Rosefield Solar Farm

Draft Statement of Common Ground – Environment Agency

EN010158/APP/5.15
March 2026
Deadline 1
Rosefield Energyfarm Limited

Table of Contents

1. Introduction

1.1. Overview

1.1.1. This Statement of Common Ground ('SoCG') has been prepared in respect of the application for the proposed Rosefield Solar Farm Development Consent Order ("the Application") made by Rosefield Energyfarm Ltd ("the Applicant") to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 ("PA 2008").

1.1.2. The Proposed Development is a proposed new solar farm and battery storage facility located in Buckinghamshire. The proposals also include infrastructure to connect the Proposed Development to the National Grid East Claydon Substation, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting.

1.1.3. The SoCG is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.2. Parties to this Statement of Common Ground

1.2.1. This SoCG has been prepared by the Applicant and Environment Agency (EA).

1.2.2. The EA is a statutory consultee, as prescribed consultee under section 42 of the Planning Act 2008 (the 'PA 2008') and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, Regulations 3, Schedule 1[1].

1.2.3. The EA regulates certain activities that have the potential to harm the environment and people. It decides if relevant environmental permits and other consents and licenses should be issued and, if so, what conditions should be applied. It monitors compliance with the permit/license conditions and takes enforcement action, if appropriate.

1.2.4. The EA is a competent authority for the purposes of certain environmental regulatory frameworks (other than when the PA 2008 directs otherwise) and it also maintains an overview of risks to people and the environment from flooding.

1.2.5. The EA has statutory remit regarding the risk of flooding from main rivers and the sea. Its roles also cover various additional topics including:

- Regulating major industry and waste;

[1] The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

- Treatment of contaminated water;
- Water quality and resources;
- Fisheries; and
- Conservation and ecology of the aquatic environment.

1.2.6. The EA will appraise the standard of flood risk assessments and consider whether future climate risks have been appropriately considered. For flood risk from other sources (e.g. ordinary watercourses, surface water, groundwater and reservoirs), the Lead Local Flood Authority is the relevant statutory consultee and should be consulted for advice.

1.2.7. The above matters of interest discussed with the EA are detailed in **Section 4** of this SoCG. The EA also has a role as the regulator for the Environmental Permitting regime and is responsible for granting, regulating and enforcing Environmental Permitting requirements for any installation that requires an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016 (as amended)[2].

1.2.8. Collectively, the Applicant and EA are referred to as 'the parties'.

1.3. Purpose of this Document

1.3.1. This SoCG is being submitted to the Examining Authority as an agreed draft between both parties. This SoCG is a 'live' document and will be amended and resubmitted as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.3.2. The SoCG has been prepared in accordance with the Ministry of Housing Communities and Local Government and Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance')[3].

1.3.3. Paragraph 007 of the DLUHC Guidance comments that:

"A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority'.

[2] The Environmental Permitting (England and Wales) Regulations 2016
[3] Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

1.3.4. The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between EA and the Applicant on matters relating to the DCO Application.

1.3.5. The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and EA.

1.3.6. The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.

1.3.7. This SoCG does not seek to replicate information which is available elsewhere within the DCO Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website (https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010158/documents).

1.3.8. Once finalised, the SoCG will be submitted to the Examining Authority that is examining the DCO Application under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.

1.3.9. For the purposes of examination, this SoCG addresses responses received during Phase 2 Consultation, the Relevant Representation (RR) received along with ongoing engagement with the EA. This SoCG includes the following key topic areas:

- Flood risk;
- Water Framework Directive;
- Groundwater and contaminated land;
- Water quality and waste management;
- Biodiversity;
- Management plans and mitigation; and
- Draft DCO.

1.4. Terminology

1.4.1. This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed - indicates where an issue has been resolved.
	Under Discussion - indicates where points continue to be the subject of on-going discussions between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2. Proposed Development Description

2.1.1. The Proposed Development comprises the construction, operation (including, maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.

2.1.2. The Proposed Development includes the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the relevant Local Authority. The detailed design of the Proposed Development will be required to be undertaken within the parameters assessed in the Environmental Statement, which are secured through a range of control documents including the **Works Plans [EN010158/APP/2.3.3]** , the **Design Commitments [EN010158/APP/5.9.3]** and the requirements set out in **the Draft Development Consent Order [EN010158/APP/3.1.3]** .

2.1.3. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in Figure 1.1: Location Plan in **ES Volume 3, Background and Context Figures 1.1 - 1.2 [EN010158/APP/6.3] [APP-061]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010158/APP/6.1] [APP-045]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010158/APP/6.1] [APP-047]**.

2.1.4. The principal components of the Proposed Development include:

- Solar PV development consisting of:
  - Ground mounted Solar PV generating station. The generating station would include Solar PV modules and mounting structures; and
  - Balance of Solar System (BoSS) which comprises: Inverters; Transformers; Switchgear; Combiner Boxes; acoustic barriers and cabling.
- A project substation (the 'Rosefield Substation') compound comprising: Transformers; Switchgear; reactive power compensation bays; disconnectors; circuit breakers; busbars; control equipment; lightning surge arrestors; building(s) including office, control, functions, material storage, material laydown areas and welfare facilities; firewalls; fencing and acoustic barriers; a security cabin; parking as well as wider monitoring, maintenance and emergency equipment;
- A Main Collector Compound and two Satellite Collector Compounds comprising: Switchgear; Transformers; ancillary equipment; operation and maintenance and welfare facilities; material storage; material laydown areas; fencing and acoustic barriers; and security cabins;

- Battery Energy Storage System (BESS) compound comprising: batteries and associated Inverters; Transformers; Switchgear, ancillary equipment and their containers; office, control and welfare buildings; fencing and acoustic barriers; monitoring, maintenance and emergency systems; air conditioning; electrical cables; fire safety infrastructure; operation (including maintenance) security facilities; material storage; and material laydown areas;
- Interconnecting Cabling Corridor(s) to connect the Solar PV modules and the BESS to the Satellite and Main Collector Compounds to the Rosefield Substation;
- A Grid Connection Cable Corridor to connect the Rosefield Substation to the National Grid East Claydon Substation via 400kV cabling;
- Ancillary infrastructure works comprising: boundary treatment; security equipment; lighting; fencing; landscaping; internal access tracks; works to facilitate vehicular access; earthing devices; earthworks; surface water management; utility connections and diversions; and any other works identified as necessary to enable the Proposed Development;
- Green and blue infrastructure, recreation and amenity works comprising: landscaping; habitat management; biodiversity enhancement; the creation of three permissive footpaths; and works to divert PRoW Footpaths;
- Site-wide operational monitoring and security equipment; and
- Highways infrastructure improvements and safety works comprising: minor junction improvement works; road widening; passing places; and works to facilitate vehicular access to the Site.

3. Record of Engagement

3.1. Record of Engagement

3.1.1. The parties have been engaged in consultation throughout the early stages of the Proposed Development. **Table 1** shows a summary of key engagement that has taken place between the Applicant and EA in relation to the DCO Application.

Table 1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
6 February 2024	Teams Meeting	Initial meeting with Environment Agency National Infrastructure Team to give overview of the Proposed Development, discuss principles of development, and specific concerns that the Environment Agency has with the Proposed Development, summarised as:- i. Placement of Solar PV modules and infrastructure within floodplain areas. ii. Floodplain delineation requirements. iii. Required watercourse easements. Principles agreed in terms of scope of Flood Risk Assessment and ES: i. Agreement that, subject to appropriate mitigation, solar PV modules can be sited in the floodplain. ii. Delineation of Flood Zone 3 and Flood Zone 2 required within the Flood Risk Assessment. iii. 10m watercourse easements included in all designs (to comply with ecology requirements as well as Environment Agency and Internal Drainage Board).
29 January 2025	Teams Meeting	Follow up meeting with the Environment Agency to discuss additional design detail and mitigation as follows: i. Floodplain delineation questions regarding the extent of Flood Zones 3a and 3b. ii. Sequential Approach to Development. iii. Floodplain compensation for development in Flood Zone 3. iv. Water Resources Assessment to review impacts on water resources.

		v. Water Framework Directive ('WFD') Screening Assessment to be undertaken and reviewed by the Environment Agency. Specific mitigation agreed as follows:- i. Agreement to utilise and rely on the East Claydon BESS modelling to delineate various Flood Zones, including Flood Zones 3a and 3b. ii. Development layout informed by relevant flood risk constraints. Only solar PV modules to be situated in Flood Zone 3, subject to appropriate mitigation being included. Panels will be raised above flood levels. iii. Floodplain loss will be negligible, as only solar PV modules will be sited in areas of Flood Zone 3. Compensation can be provided by ground reprofiling, which will be detailed in the Flood Risk Assessment. iv. The Applicant to produce a Water Resources Assessment to satisfy Anglian Water requirements. **v.** Water Framework Directive Screening Assessment completed and Environment Agency comments received.
26 June 2025	Email	Received the Environment Agency's response to the Rosefield Solar Farm WFD Screening Assessment (issued 7 May 2025) that confirms a further WFD Assessment is not required as long as the following comments are appropriately considered: • Correct terminology relating to Hydromorphological Supporting Elements/Regime should be used. • Culverts should be considered a last resort. Open span bridges are preferred. Detail on the type of culverts proposed should be provided. • Mitigation to prevent impacts on fish at the point of abstraction in the Claydon Brook Tributary should be included and secured via relevant management plans.

21 August 2025	Teams Meeting	Follow up meeting with the Environment Agency to discuss additional design detail and mitigation as follows: i. What can/cannot be disapplied. ii. Clarification on the Environment Agency's stance on floodplain compensation for PV panel supports. iii. Clarification of the areas of Flood Zone 3a and 3b. iv. Environment Agency's position regarding the Sequential Test.
4 September 2025	Teams meeting	The meeting covered several key environmental and flood-risk considerations, including the need to address invasive species, potential in-channel works, and the preference for clear-span structures over culverts. Groundwater issues and the management of firewater from the BESS were noted, with a requirement for an outline drainage strategy. Updates to the Order Limits and zonal masterplan shapefiles were requested, alongside discussions on floodplain classification, climate change allowances, credible maximum scenarios, and a 40-year design life. The Environment Agency raised concerns about the modelling approach for flood risk, emphasising the likely need for compensatory flood storage. An action was identified to quantify floodplain loss and identify suitable compensation areas.
12 December 2025	N/A	Relevant Representation received.
14 January 2026	Teams Meeting	Discussion related to the Relevant Representation received from the EA in regards to Groundwater/Contaminated Land & Water Quality and document updates proposed to be submitted at Deadline 1.
15 January 2026	Teams Meeting	Discussion related to the Relevant Representation received from the EA in regards to Biodiversity and document updates proposed to be submitted at Deadline 1.
16 January 2026	Teams Meeting	Discussion related to the Relevant Representation received from the EA in regards to Geomorphology, Flood Risk and Flood Modelling.

12 February 2026	Email	Email setting comments as a follow up to the biodiversity meeting on 15 January 2026 and the subsequent BNG metric provided by the Applicant.
2 March 2026	Teams meeting	Discussion related to the Statement of Common Ground and matters under discussion relating to Flood Risk, Biodiversity and Contamination.

4. Current Position

4.1. Position of the Applicant and EA

4.1.1. The following tables set out the position of the Applicant and EA, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.

4.1.2. As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

4.1.3. Where discussions are ongoing, the parties have included an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter [PD-008].**

Table 2 – Position of the Applicant and EA

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
Flood Risk					
1.1	**Meeting**	**Flood events and infrastructure in Flood Zones**	The proposal should remain operational in the design flood event. Ideally development should be built away from areas prone to flooding and consideration should be afforded to future flood extents and climate change projections in the placement of components. If this is not possible then sensitive equipment should have a finished floor level 600mm above the design flood. Whilst we agree that a sequential approach has been taken to the placement of infrastructure, referencing FRA 4.2.3 page 50: the Applicant should confirm that all solar panels will have a freeboard of 600mm above the design flood level. We note and welcome the additional information the Applicant has provided regarding freeboard for panels within the fluvial	Rosefield Substation, BESS, ITS, Independent Outdoor Equipment (transformer, switchgear and central inverters), Collector Compounds and Construction Compounds will be located outside of Flood Zone 2 and 3 areas as secured in the **Design Commitments [EN010158/APP/5.9.3].** Where Solar PV panels are located within Flood Zone 2 and 3 areas, the height of the lowest part of the Solar PV panels will be no greater than 1.8m AGL within Flood Zones, which allows an appropriate freeboard below the panel. The area is set out on the **Works Plans [EN010158/APP/2.3.3]** whilst the height is secured within the **Design Commitments [EN010158/APP/5.9.3]**. To ensure climate resilience, most BoSS equipment would be located within fields suitable for the Solar PV modules and would be located outside	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			modelled design flood extent. We require further clarity on whether 600mm of freeboard will be achieved for panel area B1 (grid reference: 469300, 224920) as there appears to be an area of notable depth here shown in the Risk of Flooding from Surface Water mapping associated with an Ordinary Watercourse.	of Flood Zone 2 and 3 areas. String Inverters are an exception to this and could be located within Flood Zone 2 and 3 areas but would be elevated above the flood level in these instances. Modelling and engagement is ongoing with the EA in relation to panel area B1.	
1.2	**Relevant Representation (EA02)**	**Sequential approach**	Sequential approach has been considered in the placement of all components and that the presented proposal represents the worst-case likely scenario.	The Applicant considers that a sequential approach has been applied to the placement of all components of the Proposed Development, with permanent infrastructure located within Flood Zone 1 where possible. Design Commitment E1 in **Design Commitments [EN010158/APP/5.9.3]** secures that Construction Compounds will be located outside of Flood Zone 2 and 3 areas and flood risk from other mapped sources.	**Agreed**
1.3	**Relevant Representation**	**Flood Risk**	Further clarity on floodplain volume loss and elements of the development which are within the	No permanent or temporary flood sensitive infrastructure including stockpiles, construction compounds or	**Under Discussion**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA04, EA05)		Functional Floodplain (Flood Zone 3b), including fencing. The Applicant is considering a flood storage compensation scheme for the displaced volume of 317.4m^3 to ensure it is compliant with overarching National Policy Statement for energy (EN-1) section 5.8.12. We require clarity on whether flood flow routes are inhibited. We look forward to reviewing the proposed commitment to floodplain compensation in the Outline CEMP at Deadline 1. We require to be consulted for approval of the proposed floodplain compensation at the detailed design stage. Additionally, the CEMP needs to provide an indication of how much floodplain loss would be compensated for, in line with the design event scenario, but considering a worst case likely scenario of volume loss in line with the Rochdale Envelope approach	laydown areas, are located within the Functional Floodplain (Flood Zone 3b). Development within Flood Zone 3b consists of PV panel array and security fencing. The Applicant considers that **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2] [PDA-004]** has appropriately addressed floodplain impacts in a proportionate manner. The proposed Solar PV development comprises widely spaced support columns with a negligible footprint relative to the floodplain area. The PV panels will be supported on C section galvanised steel posts driven into the ground which are estimated to be less than 0.5% of the panel area. Based on the design flood event (1 in 100 including allowances for climate change) from all sources, the total area of PV panels in areas at risk of flooding quates to 253,935m^2. Assuming an average depth of flood water of 250mm (considered to be a very conservative assumption given the modelled flood depths and the	**Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			(noting the uncertainties in the design configuration at this stage). Whilst we appreciate that a detailed design of any compensation scheme is not possible at this stage the CEMP should identify the broad areas where a compensation scheme could be provided effectively and the overall design philosophy.	assumption that the PV panels will cover 100% of the area and excludes the spacing between the rows of panels), the total volume of displaced water across the site equates to 317.4m^3 which is considered negligible across the whole site area and would not give rise to off-site impacts or increased flood risk. Despite this, floodplain compensation will be provided to ensure no net loss in floodplain storage. This compensation will be designed to ensure it is provided in an area where there is a loss of floodplain storage. Given the minor nature of the losses this is likely to be provided through localised groundworks with details provided at detailed design stage. This will be secured through the **Outline CEMP [EN010158/APP/7.2.2]** which has been amended at Deadline 1.	
1.4	**Relevant Representation (EA07, EA10)**	**Flood modelling - epochs**	The higher central and upper climate change allowance should be considered for the 2080s epoch rather than the 2050s epoch. The Fluvial credible maximum scenario	Additional hydraulic modelling has been undertaken with updated hydrology to account for the 30% uplift in climate change and was submitted in the updated FRA on 10 February 2026 (**ES**	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			should also be considered under the 2080s epoch. We note the Applicant has considered the 0.1% (1 in 1000) AEP scenario. We require confirmation that this is a suitable proxy for the 2080s credible maximum scenario (upper fluvial climate change). The EA would appreciate confirmation on the growth factor between the 1% and 0.1% annual exceedance probability scenarios. This will allow us to take a view on the validity of the credible maximum scenario assessed in line with policy.	**Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** [PDA-004]). The Applicant considers that applying a credible maximum scenario using the upper 2080s climate change allowance (+58%) is not appropriate in this instance. The 2080's epoch is considered to be from 2070 to 2125, in this epoch only the decommissioning phase will take place, which is anticipated to occur within the first 12 months of this epoch. Given the increase in climate change allowances over the three epochs, it is reasonable to assume that the full 58% increase in flows would not occur at the onset of this epoch, and as such the 30% allowance is considered reasonable for the construction, operational and decommissioning phases of the Proposed Development. As a sensitivity test the variation in flooding between a 1 in 100-year event with 11% and 30% Climate change allowance and the 1 in 1000 data is considered and any additional	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				appropriate mitigation is proposed, further clarification is provided in section 3.3 of the updated **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** [PDA-004] which was submitted at Procedural Deadline A.	
1.5	**Relevant Representation (EA08, EA09)**	**Flood modelling – use of proxy**	Use of proxy for fluvial flood risk and pluvial flood risk could underestimate flood risk from smaller Ordinary Watercourses. We note that the Applicant has provided the extents from the Risk of Flooding from Surface Water mapping in Figure 3.8 and the outputs from the Applicant's pluvial modelling in Figure 3.9 of the Flood Risk Assessment. The Applicant should confirm if the depths are comparable between these two datasets for coincident scenarios. This comparison would help to give confidence to the use of the Risk of Flooding from Surface Water more widely across the development area.	In the absence of detailed hydraulic models for minor Ordinary Watercourses in the vicinity of the Site, the Risk of Flooding from Surface Water (RoFSW) (Figure 3.4 of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** [PDA-004]) outputs provide a precautionary representation of flood extents that, in this location, are equal to or exceed the anticipated floodplain associated with these small watercourses. As such, the RoFSW mapping does not underestimate risk but instead captures a broader range of potential flooding mechanisms. **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.2]** [PDA-004]	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				includes detailed fluvial and pluvial hydraulic models to define site-specific flood extents and mitigation where appropriate. The Applicant is undertaking a sensitivity test and discussions are ongoing the Environment Agency in relation to this matter.	
1.6	**Relevant Representation (EA03)**	**Flood Impacts to third parties**	Flood risk to third parties could be increased if the term "slight adverse" is in reference to impacts outside of the order limits for the development.	As discussed during the meeting on 2 March 2026, the Applicant confirmed that this refers to the study area. **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2]** has been amended at Deadline 1 for clarification.	**Under Discussion** **Low**
1.7	**Relevant Representation (EA06)**	**Fencing**	Section 3.10.5 page 40 describes how fencing around solar panels will be permeable and hence will not increase flood risk elsewhere. Whilst this is welcomed, please provide clarity on the proposed fencing (for example column and/or wire spacing) and demonstrate that it would not cause a blockage in a flood event.	The proposed fencing comprises standard post-and wire or similar designs with widely spaced posts as set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]**, which do not create a solid barrier and therefore would not obstruct overland flow or flood conveyance. The fencing layout has been designed to follow the proposed site boundary	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				without impeding natural flow paths, and no areas of increased flood risk are anticipated as a result of fencing installation. On this basis, the Applicant considers that the proposed fencing does not require further assessment and would not increase flood risk. A map detailing the proposed location of the fenceline and the area of function floodplain has been sent to the EA, as requested, for their consideration and to inform ongoing discussion.	
1.8	**Relevant Representation (EA15)**	**Foot and mouth burial sites**	Foot and mouth burial sites are not mentioned in APP-119 Appendix 11.1 Preliminary Risk Assessment (Part 1). This issue is also mentioned in APP-138 oCEMP, APP-139 oOEMP and APP-076 Commitments Register (ref.219), but no further information or specific mitigation is given.	The Applicant has been previously advised by the Animal and Plant Health Agency that there is no official register of animal burial sites within the Zone of Influence as detailed in **ES Volume 2 Chapter 11: Land and Groundwater [EN010158/APP/6.2.2].** Mitigation measures have been incorporated into Table 3.6 of the **Outline CEMP [EN010158/APP/7.2.2]** to detail actions that should be taken in the event of encountering such features. Further details will be provided in the **Outline**	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				CEMP [EN010158/APP/7.2.2] submitted at Deadline 1.	
1.9	**Relevant Representation (EA36)**	**Drainage design**	Table 16.10 says there will be "penstock system at the BESS" but it is unclear how it will close, and if this system is in place to isolate water at the substation too.	Outfalls from the BESS drainage system would have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal as detailed in the **Outline Battery Safety Management Plan [EN010158/APP/7.9.2]**. Following a fire event, retained water would be tested by the Operator. If contaminated (polluted), the water would be removed from site by tanker for treatment at an appropriately licensed offsite facility. If testing confirms that the water is suitable for discharge or reuse, it would be released to the local drainage network under controlled conditions, in consultation with the relevant regulators or reused as a potential source of firefighting water by re-filling the water tanks. This approach ensures that environmental protection is maintained under both normal and emergency conditions.	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				The **Outline Battery Safety Management Plan [EN010158/APP/7.9.2]** will be amended at Deadline 1 to provide further detail on the maintenance schedule in place for the automatic or manual penstocks.	
Water Framework Directive					
2.1	**Email correspondence**	**Water Framework Directive**	The EA issued a letter (26 June 2025) in response to the Applicant submitting a WFD Screening Assessment (issued 7 May 2025) agreeing that further WFD assessment is not required as long as the following points are adequately considered: • Correct terminology relating to Hydromorphological Supporting Elements/ Regime should be used. • Culverts should be considered a last resort. Open span bridges are	It is not anticipated that any abstraction from Claydon Brook or its tributaries will occur. The Applicant will ensure any crossings of Claydon Brook will not use culverts.	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			preferred. Detail on the type of culverts proposed should be provided. • Mitigation to prevent impacts on fish at the point of abstraction in the Claydon Brook Tributary should be included and secured via relevant management plans.		
2.2	**Relevant Representation (EA26 and EA42) and further Email Correspondence**	**Water Framework Directive**	Clarity on the effects of the AIL crossing (including construction) on the Claydon Brook/Claydon Brook (DS Granborough) with respect to sediment movement as well as water/flood flows. Impacts from physical modifications from works and impacts from foul water should also be included. Request comments on potential biodiversity impacts of this structure in construction and operation phases. EA26 – Geomorphology concerns regarding AIL access and the omission of the Claydon Brook (d/s Granborough) from the WFD assessment were addressed in the	The Applicant can confirm that the proposed crossing of Claydon Brook will involve the installation of a clear span bridge as set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]**. This bridge will be designed to maintain existing watercourse function and flood conveyance while minimising environmental and hydraulic impacts. The access crossing is of limited width and extent and is located at a point where the channel is well-defined and confined by existing banks. The proposed bridge will be sized to accommodate the design flow, and will be designed to maintain conveyance	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			meeting on 16th January 2026 and acknowledged in the meeting minutes (2nd February 2026). However, the Applicant has stated that only the WFD screening assessment will be revised and re-issued at Deadline 1. The Biodiversity chapter should also be revised accordingly, due to the omission of the AIL crossing of Claydon Brook (d/s Granborough) from that chapter to reflect the true nature of the development proposals. EA42 In our Relevant Representations, we raised awareness that Table 5.2 in APP-133 of the WFD Screening Assessment did not identify all impacts. In the meeting on the 14th January 2026, the Applicant suggested they would update this to include impacts from foul water which we hope to see at Deadline 1.	and avoid increases in flood risk both upstream and downstream. Hydraulic capacity checks demonstrate that the crossing will not result in afflux, increased flood levels, or impediments to overbank flow during flood events. With regard to sediment movement, the crossing would be installed in alignment with the existing channel invert, ensuring continuity of bed levels and sediment transport processes. Standard design measures, including appropriate inlet and outlet detailing, erosion protection, and temporary construction-phase controls, would be implemented to prevent scour, sediment deposition, or mobilisation during construction, operation and decommissioning. The **Outline CEMP [EN010158/APP/7.2.2]** will secure measures to manage sediment control, pollution prevention, and working methods in proximity to the watercourse, therefore there would be no impacts on biodiversity (aquatics) during the construction, operation and decommissioning phase.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			We accept that no changes to channel alignment are proposed. We agree, with the Applicant in PDA-006, that the purpose of the Stage 1 Screening Assessment is to identify whether the Proposed Development has the potential to cause deterioration in WFD status. Whilst you do not need to carry out scoping if your activity is low risk, all activities during each phase should be appropriately identified.	No permanent alterations to the course, alignment, or morphology of any watercourse are proposed as part of the development. Where construction works are required in proximity to watercourses, these are limited in scale and duration and are designed to retain the existing channel form, bed, and banks. As such, the Proposed Development does not constitute a physical modification that would affect WFD hydromorphological quality elements or result in deterioration of waterbody status. On this basis, impacts associated with altering the course of watercourses are not considered applicable to the Stage 1 Screening Assessment. **ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4.2]** will be amended at Deadline 1 for clarification. See response to Ref. 5.1 related to biodiversity.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
Groundwater and Contaminated Land					
3.1	**Relevant Representation (EA12)**	Cable removal	Further detail on the installation of cables is required to ensure that cable removal does not affect the surrounding environment. The Applicant has outlined several high-level measures which consider the issue raised and comply with current industry best practice. We are satisfied with this response and look forward to reviewing further information at the detailed design stage.	It is currently anticipated that all the below-ground cables below 1m will be left in situ, however, this will be dependent upon the legislation and industry standards at the time of decommissioning (see sections 2.3.4 to 2.3.6 of the **Outline DEMP [EN010158/APP/7.4.2]**). It is not anticipated that the cables that are left in situ below 1m buried underground would cause any contamination. The cabling to be used will be selected at the detailed design stage and will adhere to appropriate industry safety standards, to ensure they will not cause environmental damage. This will include ensuring that the products used will have chemically inert sheaths, and will be designed to resist moisture, frost, etc. At the time of selection of the cabling, the manufacturer specifications of potential cables will be reviewed to ensure the selected cables are appropriate for use. The installation in trenches (as detailed by the CEMP, specifically Appendix 2,	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				which provides the 'Cabling and Grid Connection Method Statement') will include appropriate backfill material that will prevent any damage to the cables once installed (e.g. the material will not include sharp stones that could damage the sheath). Other methods to avoid any damage after installation are also detailed in the **Outline CEMP [EN010158/APP/7.2.2]**, to include installation of cables covers, tiles or markers, and maintaining accurate 'as-laid' records to prevent future damage. Where cables will be installed below environmentally and ecologically sensitive areas, ducts will be installed to protect the replanting areas above the cable runs. This would ensure that if the cables needed to be removed they could be removed quickly and with low impact to vegetation growing above the cable ducts.	
3.2	**Relevant Representation (EA13)**	Effluent management	Details on effluent management from temporary or permanent welfare facilities has not been discussed.	As outlined in the **Outline Drainage Strategy [EN010158/APP/7.11.2]**, there are three options for foul drainage strategy during the operational phase for permanent works, Option 1 –	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			The foul water disposal strategy should be clarified for all phases. The design of cesspits should be clarified in terms of being fully sealed or any discharges. As discussed during meeting on 14th January 2026, we note the relevant text in the Outline Drainage Strategy.	discharging to the foul sewer network, Option 2- discharging to a designed packaged treatment plant located on site and then subsequent discharge to local watercourse network, Option 3, stored in onsite cesspits that are managed and drained by a licensed carrier. The cesspits will either meet the general binding rules for the operation of a cesspit or the EA will be consulted to obtain a permit for the operation of the cesspits. All options will be reviewed, further detail added to the updated Outline DS which will be submitted at Deadline 1 to ensure that there are no unacceptable pollution impacts. Any foul water storage and discharge will be designed in line with the latest guidance to ensure suitable retention on site limiting the potential risk to water quality.	
3.3	**Relevant Representation**	Contamination data	Information from Envirocheck data search has not been reported correctly and existing wells shown	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** Section 11.5.22 will be updated, and submitted at Deadline 1, to read:	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA14 and EA18)		on OS mapping are not adequately investigated. This response is acceptable in principle, subject to the relevant updates being made. We look forward to reviewing the updated documents. It is important the Applicant identifies the location and usage status of potential water abstraction points within the site in case this affects positioning of panel arrays and other infrastructure. Note that we assign a default 50m radius SPZ1 around any potable groundwater abstraction.	'No significant pollution incidents affecting controlled waters have been recorded within or close to the Site in the last 20 years, based on the information provided in the Envirocheck report that covers the Order Limits and the study area (see **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]**).' **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** will be updated at Deadline 1 to make reference to existing wells. The measures incorporated into the **Outline CEMP [EN010158/APP/7.2.2], Outline OEMP [EN010158/APP/7.3.2]** and **Outline DEMP [EN010158/APP/7.4.2]** will protect all groundwater resources from significant adverse effects, including any potable or non-potable water supply locations such as existing wells.	
3.4	**Relevant Representation (EA19)**	Operational assessment	Potential risks from fuel and chemical management or firewater drainage during operation has not been assessed.	**ES Volume 2 Chapter 16: Water [EN010158/APP/6.2.2]** will be updated at Deadline 1 to include mitigation.	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			This response is acceptable. While we agree usage of fuel and chemicals is likely to be limited during operation, there is likely to be some use, and we generally expect to see these acknowledged.	The Proposed Development is a ground-mounted solar PV farm, which does not involve operational fuel storage or significant chemical use. Any minor chemicals (e.g., for maintenance of machinery or vegetation control) will be managed in accordance with standard pollution prevention measures outlined in the **Outline OEMP [EN010158/APP/7.3.2]**. Fire water drainage during operation is considered in the **Outline Battery Safety Management Plan [EN010158/APP/7.9.2].**	
3.5	**Relevant Representation (EA17)**	GWDTE	Details about Finemere Wood SSSI as a Groundwater Dependent Terrestrial Ecosystem are not adequately detailed. We look forward to reviewing the updated document at Deadline 1.	Further detail on the assessment of the Finemere Wood SSSI will be added into **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** and submitted at Deadline 1.	**Under Discussion** **Low**
Water quality and waste management					
4.1	**Relevant Representation**	**Water quality**	Construction/decommissioning activities have the potential to result in the release of chemicals, concrete washout and silt laden	The Proposed Development includes embedded mitigation measures to reduce these risks, for example construction compounds would be	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA21 and EA31)		runoff which could be conveyed via overland flow or local drainage features into nearby watercourses. We look forward to reviewing the updated Outline CEMP and Outline DEMP. The Applicant has also responded to EA21, EA31 and EA32 under Ref 6.4 – see further EA comments under this reference.	located at least 10m from existing watercourses, as shown in **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]** [APP-063]. A summary of the pollution prevention management measures are detailed in and secured by the **Outline CEMP [EN010158/APP/7.2.2]** and **Outline DEMP [EN010158/APP/7.4.2]** and further detail will be added at Deadline 1.	
4.2	**Relevant Representation (EA29)**	**Water resources - foul water, potable water, private water supplies, abstraction licenses and discharge consents**	The EA request consideration is afforded to producing a Water Resources Assessment or Water Supply Strategy which sets out all water demands and includes an options appraisal of potential sources of supply. This can include mains water supply; raw water supply; abstraction from surface water or groundwater or local licence trades. We look forward to reviewing the updated documents.	Relevant detail is contained in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2]**, and, **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** and further detail will be added at Deadline 1. Welfare facilities during the construction, operation (including maintenance) and decommissioning phases of the Proposed Development have limited potential to put an increased demand on the local foul water network, as foul water generated	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			Note that, where a package treatment works may be used and discharged to the environment, a permit would be required. Where details on use of welfare vans or sealed pits can be provided with commitment to tankering offsite to an offsite treatment facility this should be provided. We await the updated Outline Drainage Strategy for further details.	in these areas would be transported off-site for disposal. Additionally, any localised effects on potable water and private water supplies (including abstraction and discharge licences) are considered negligible. Any required construction or decommissioning phase abstraction or discharge licences would be subject to obtaining the relevant permits from the Environment Agency.	
4.3	**Relevant Representation (EA16)**	**Ground Investigations**	The EA have concerns that the details of groundwater depth and flow direction are unknown and that risks to groundwater cannot be adequately assessed. We agree with the proposal and proposed timescale for additional works. We understand from conversation with the Applicant in the meeting on 4th March 2026, that, while the results will not be used to retrospectively update conclusions and proposed mitigation made in Chapter 11, they	Initial ground investigations have been undertaken at the Site and further site investigations and an accompanying interpretative report(s) would be completed post-consent and prior to construction works commencing. This would provide further information relating to groundwater depths and potential pollutant linkages as set out in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** however this would not have any implications to the conclusions of the assessments detailed in **ES Volume 2, Chapter 11:**	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			will be used to form part of the detailed design. Relevant considerations and detail of mitigation will be given in the CEMP, for which the Environment Agency is a consultee. Groundwater depth and flow direction may affect foundation designs and inform whether construction phase dewatering is likely to be necessary.	**Land and Groundwater [EN010158/APP/6.2.2]**.	
4.4	**Relevant Representation (EA16)**		Further GI works are requested to close the gaps identified and support the conclusions stated in the ES. This explanation is acceptable, subject to the necessary additional GI works being completed and reported appropriately.	It should be noted that the assessment is prepared on the assumption that mitigation measures will have been completed. This would include any agreed remediation works associated with any identified contamination. Therefore, any necessary remediation and validation works would have been completed (in accordance with the requirements of Buckinghamshire Council, and the Environment Agency, where appropriate, and as secured by the **Outline CEMP [EN010158/APP/7.2.2]**), at the point at	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				which the Proposed Development construction works commence.	
4.5	**Relevant Representation (EA27)**	**PFAS**	Include consideration of Per- and polyfluoroalkyl substances (PFAS) within the water quality assessments and confirm with panel manufacturers that panels will not have any PFAS. This appears acceptable at this stage and we look forward to reviewing the updated documents. We strongly suggest that the Applicant seeks to ensure other components, such as cables and firefighting products, be free of PFAS. See also Ref. 3.1 in this document.	The vast majority of ground solar PV projects are based on glass panels, as their reliability and lifespan are far superior. As these panels have no backsheet, they are not expected to contain PFAS in the laminate. The procurement process for the Proposed Development has not yet begun so the specific panel makeup, cabling and firefighting products, is not known. However, the Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used for the Proposed Development. **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** and **ES Volume 2 Chapter 16: Water [EN010158/APP/6.2.2]** will be updated at Deadline 1 to include consideration of PFAS. During the operational life of each solar panel, maintenance operations would ensure that no chemicals or heavy	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **Outline OEMP [EN010158/APP/7.3.2]**.	
Biodiversity					
5.1	**Email Correspondence**	Aquatic ecology	Request for impact assessment be updated to consider all potential impacts (AIL bridge and outfall locations) upon aquatic ecological receptors and propose mitigation as appropriate. Commitment to clear span bridge is welcomed. We request comments on potential biodiversity impacts of this structure in construction and operation phases. . We look forward to reviewing the commitment for the design of the bridge to include longitudinal connectivity for flora and fauna along the riparian corridor in the updated Outline LEMP to be	Following further engagement with the Environment Agency, the Applicant will be committing to the installation of a clear span bridge to facilitate AIL movements over the Claydon Brook. **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1.2]** and **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3]** will be updated at Deadline 1 to remove the option of a culvert. Based on the results of the preliminary aquatic survey report completed in 2023 it can be concluded that the installation of the clear span bridge and outfalls and associated headwalls will not have a significant impact on either aquatic invertebrate or fish species that may be present in the watercourse as the	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			submitted at Deadline 1. The Applicant should also ensure all relevant application documents are updated for consistency.	structures will be designed and built following EA guidance. The **Outline CEMP [EN010158/APP/7.2.2]** will be updated at Deadline 1 to include further measures for the protection of fish and aquatic invertebrates. Key measures will include the following: • Site preparation and environmental protection. • Water management and isolation (dry working). • Silt and sediment control. • Pollution prevention (control of substances). • Protection of habitat and fish movement. • Emergency contingencies. The outfalls and clear span bridge would not have any implications to the achievement of 10% watercourse biodiversity net gain units. This will be confirmed within the updated **ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment**	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				[EN010158/APP/6.4.2] which will be submitted at Deadline 1. **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2] and Outline LEMP [EN010158/APP/7.6.2]** will be amended at Deadline 1 to include a commitment for the design of the bridge to include longitudinal connectivity for flora and fauna along the riparian corridor.	
5.2	**Relevant Representation (EA24) and further email correspondence**	BNG	The commitment to delivering at least 10% net gain within the DCO is acknowledged, and based on the Applicant's assertion and available information, we can accept that this is likely to be achievable. The commitment to provide further information in the LEMP on riparian buffers is welcomed. The Applicant is advised that detailed design BNG assessments should consider advice made in regard to providing further information on how encroachment has been calculated and assumed/secured in pre and post	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2]** will be updated at Deadline 1 to clarify that at least 10% net gain will be delivered taking into account the outfalls and associated headwalls. A final BNG assessment will be submitted based upon finalisation of the detailed design should consent be granted for the Proposed Development.	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			development scenarios. It is observed that the supplied BNG metric does not make use of habitat reference number column for watercourse and so it is not always possible to audit assumptions made in regard to encroachment in pre-and post-development scenarios, including how these will be secured. The EA supports the precautionary approach to encroachment being applied as detailed in Planning Advisory Service guidance [accessed 24th February 2026] which states that: *Where long-term management of riparian or adjacent habitats cannot be guaranteed, a precautionary principle should be applied. Planning authorities may reasonably assume that some degree of encroachment into the waterbody will occur during the 30-year management and monitoring period. Applicants may therefore be encouraged to account for a higher level of encroachment at the outset*		

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			to provide a robust assessment and to avoid underestimating future impacts'.		
5.3	**Relevant Representation (EA25) and further email correspondence**	INNS	Confirm understanding of presence of INNS on site. Include further detail in the Outline CEMP, Outline LEMP and Outline OEMP. We would also welcome details regarding biosecurity measures to be implemented when working near water mentioned in the oCEMP given the presence of signal crayfish as mentioned in our Relevant Representation. We are pleased that the Outline CEMP will be updated at Deadline 1 to state that a pre-construction INNS walkover survey will be undertaken, however the Outline LEMP must also include commitment to this. Note that the specification for these surveys needs to explicitly mention that both aquatic and terrestrial habitats will be included and that it will be	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]** will be updated at Deadline 1 to clarify that signal crayfish were recorded along the Claydon Brook and that New Zealand Pigmy Weed was present within one of the ponds surveyed, however this was located outside of the Order Limits, however this does not change the conclusions reached within the ES. The **Outline CEMP [EN010158/APP/7.2.2]** will be updated at Deadline 1 to state that a pre-construction INNS walkover survey will be undertaken. The **Outline CEMP [EN010158/APP/7.2.2]** contains a commitment to produce an Invasive Non Native species (INNS) biosecurity protocol and the final scope of this will be presented in the detailed Construction Environmental Management Plan. Likewise the	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			conducted by an appropriately experienced individual at an appropriate time of year. Where invasive species are encountered it will be necessary to devise and implement appropriate control measures.	**Outline LEMP [EN010158/APP/7.6.2]** commits to preconstruction surveys being undertaken to ensure no additional INNS have become established.	
Management plans and mitigation					
6.1	**Relevant Representation (EA11 and EA35)**	BESS Firewater	Insufficient and inconsistent detail about BESS firewater management and drainage design. The Plans need to align with the management plans. A maintenance programme should be committed to for the BESS and should include testing of fire prevention and extinguishing measures. During decommissioning, ongoing protection of the BESS site should be detailed in the Outline DEMP including ensuring firewater capture mitigation is in place until after the batteries are removed.	Further detail has been provided in the Applicant's Relevant Representation response (see Table 2-4 in the **Applicant's Response to Relevant Representations [EN010158/APP/8.3]** [**PDA-006**]). The **Outline BSMP [EN010158/APP/7.9.2]** and other relevant outline management plans will be updated to provide further detail and ensure consistency. The **Outline BSMP [EN010158/APP/7.9.2]** and **Outline Drainage Strategy [EN010158/APP/7.11.2]** set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. An example approach to the BESS area could include a separate system around the	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			This proposed high-level example design appears to be acceptable, but we will need to see further detail and firm commitment to design in due course. It would be highly valuable for the fundamental requirements to be established at this stage. Note that we consider that some impermeable containment will be necessary to contain any fire water. The Applicant must consider storage and disposal routes for contained potentially contaminated firewater, including the timescales involved and implications for continued safe site operation. We look forward to reviewing updated documents.	BESS to collect water runoff into an attenuation/ storage pond. This could have automatic and manual isolation systems to ensure that any firewater runoff is captured for analysis prior to disposal. More detail is contained within the **Outline BSMP [EN010158/APP/7.9.2]**. This approach ensures that environmental protection is maintained under both normal and emergency conditions. The measures within the **Outline OEMP [EN010158/APP/7.3.2]** and **Outline DEMP [EN010158/APP/7.4.2]**, alongside the **Outline BSMP [EN010158/APP/7.9.2]** ensure that during any incidents that occur relating to thermal runaway at the BESS, any runoff water would be contained and managed to prevent damage to the wider environment, including the groundwater. The **Outline DEMP [EN010158/APP/7.4.2]** will be updated at Deadline 1 to confirm the process of how BESS site protection for firewater	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				segregation will be handled during decommissioning.	
6.2	**Relevant Representation (EA34)**	Transformer	Management of firewater and surface water runoff associated with the transformers.	The detailed transformer information is unavailable at this time and wouldn't be specified until detailed design stage to retain flexibility. Conservative parameters have been assumed within the current concept design. The pollution drainage strategy is outlined in the **Outline Drainage Strategy [EN010158/APP/7.11.2]**, which includes containment around transformers (perimeter bunds and impermeable base under each of the transformers), provision of a separate oily drainage infrastructure with oil interceptors, emergency shut-off systems and monitoring provision. This further detail will be included in the updated **Outline Drainage Strategy [EN010158/APP/7.11.2]** and other related Outline management plans and submitted at Deadline 1.	**Agreed**
6.3	**Relevant Representation**	Monitoring	Any ground gas and groundwater monitoring should be agreed in	It is noted that a complete ground investigation has yet to be undertaken. The scope of work for the full	**Under Discussion**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA16, EA20, and EA28)		consultation with the EA as well as Buckinghamshire Council. Clarity is required on the monitoring column of the commitment to 'Prevent damage to the quality of groundwater, the existing groundwater levels and flow directions' as it is 'N/A' indicating no monitoring will occur. Commitment to monitoring, including taking water samples, should be included in the Outline CEMP, Outline OEMP, and Outline DEMP. We look forward to reviewing the updated documents.	investigation will be agreed in advance with Buckinghamshire Council, and the Environment Agency and this will include further locations for intrusive works, groundwater monitoring, laboratory analysis of soil and groundwater samples, and ground gas and groundwater monitoring (if required/agreed). The **Outline CEMP [EN010158/APP/7.2.2]** and **Outline DEMP [EN010158/APP/7.4.2]** will be updated at Deadline 1 to include the requirement for a 12-month post-construction water monitoring regime. Further details of the monitoring regime will be set out at detailed design stage and in agreement with the Environment Agency and Buckinghamshire Council.	**Medium**
6.4	**Relevant Representation**	Mitigation	The EA would like comfort that the measures listed out in Relevant Representative EA21, EA22, EA23, EA30, EA31, EA32, EA33, EA37, EA38, EA39, EA40, and EA41 will be included in the Outline CEMP,	The **Outline BSMP [EN010158/APP/7.9.2]**, **Outline CEMP [EN010158/APP/7.2.2], Outline OEMP [EN010158/APP/7.3.2],** and **Outline DEMP [EN010158/APP/7.4.2]** will be updated to provide further detail and to address these matters (including in	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			Outline OEMP, Outline DEMP, Outline BSMP. We look forward to reviewing the updated documents to be provided at Deadline 1. For completeness, we have some further comments for specific matters covered under these EA issues, which are not addressed elsewhere in this SoCG. EA21: The Applicant has not directly addressed our concern (here or elsewhere) that the proposed procedure for discovery of unexpected contamination is not currently sufficient. We refer the Applicant to the suggested wording in our response. We still consider that this should be a Potential Impact on its own and not included within the long list of other actions under the heading "Spillages and Leaks".	response to EA21, EA32 and 37) at Deadline 1. Further information will be included in the detailed management plans following the detailed design stage.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			EA32: We request that for concrete management in the CEMP, there is consistency across Tables to ensure the surface water environment is protected, as well as groundwater. As discussed in the meeting on 2nd March 2026, the Applicant noted they would consider if pre-cast concrete is possible. EA37: The Outline SWMP appended to the Outline CEMP discusses Waste Electrical and Electronic Equipment (WEEE) but it does not explicitly mention end-of-life and damaged batteries. We expect specific controls for these to be included in any detailed plans, to be agreed with the EA prior to implementation.		
Draft DCO					
7.1	**Relevant Represent**	Requirement 9	The EA request that they are listed as a consultee on Requirement 9 (Drainage).	The Applicant will update the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3]** at Deadline 1 to	**Under Discussion**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	ation (EA01)		We agree in principle but await review of the updated draft DCO at Deadline 1 before this can be agreed.	add the EA as a consultee to Requirement 9.	**Low**
7.2	**Email correspondence**	Wording	We have been provided guidance regarding the use of the word 'substantially' in the draft DCO Requirements which we are listed as a consultee. We understand that the outline management plan will be expanded and further detail provided to produce the full management plan; however, we have a preference for the removal of 'substantially' from this statement in the Requirement, and those alike. As disapplication is not relevant to this application, we would require that the draft DCO is reviewed to ensure that there are no statements which imply the acts which underpin permissions relevant to the Environment Agency are disapplied or modified.	This is standard drafting required to provide flexibility for the discharge process. The Applicant does not propose any changes.	**Under Discussion** **Low**

5. Signatures

This Statement of Common Ground is agreed upon:

On behalf of Environment Agency

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Rosefield
Solar Farm

rosefieldsolarfarm.co.uk

Application Document Ref: EN010158/APP/5.15
Planning Inspectorate Scheme Ref: EN010158