Rosefield Solar Farm

Draft Statement of Common Ground – Environment Agency (Clean)

EN010158/APP/5.15.4
Revision 4
Deadline 4
June 2026
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] [REP1-005]**, 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.
31 March 2026	Teams meeting	Discussion related to the Statement of Common Ground and Deadline 1 updated documents.
10 April 2026	Email	Issued draft of SoCG to the EA for their comment on the Applicant's responses to their comments following the meeting on the 31 March 2026.
17 April 2026	Email	Received the EA's comments on the Applicants responses.
20 April 2026	Teams meeting	Discussion on remaining comment queries.
20 April 2026	Email	Issued draft of SoCG for EA approval for submission at Deadline 2.
18 May 2026	Teams meeting	Discussion on remaining comments left under discussion including floor risk, PFAS and batteries.
19 May 2026	Email	Confirmation that the Applicant's responses to the majority of matters under discussion are acceptable subject to Deadline 3 updates.
10 June 2026	Email	Correspondence on the EA's position on remaining outstanding matters under discussion following submission of Deadline 3 updates.
19 June 2026	Email	Correspondence with the EA confirming that the updated wording around PFAS in Ref. 4.5 is acceptable subject to the revised documents being submitted into the examination.
22 June 2026	Email	Correspondence with the EA confirming wording around Ref. 1.3. The EA also provided their Deadline 4 response for the Applicant's consideration.

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]** [REP1-005] 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	**Agreed**

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.	modules and would be located outside 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. Solar PV panels located in areas of surface water flooding in Field B1 will be designed to have a minimum 600mm freeboard. Section 4.2.1 and 4.2.2 of the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** has been updated at Deadline 2 to reflect this.	
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**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
1.3	**Relevant Representation (EA04, EA05)**	**Flood Risk**	At the detailed design stage, the Applicant needs to consult the EA on the results of the modelling to agree whether a CFS scheme is needed and how this should be designed. At present the Outline CEMP appears to imply that the EA would just be consulted on the CFS design (if needed), but we would need to see the decision making/ modelling at the detailed design stage as well to establish whether the rationale to include/not include CFS based on offsite impacts is valid. Additionally, the Applicant needs to provide CFS before construction of solar PV panels within the design flood extent can begin – not just Flood Zone 3b. We would need this to be secured by Requirement in the DCO. We are currently drafting a Requirement internally and will provide this as soon as possible.	No permanent or temporary flood sensitive infrastructure including stockpiles, construction compounds or 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 proposed Solar PV development comprises widely spaced support columns. Further modelling will be undertaken at detailed design to determine if the detailed design of the Proposed Development would increase flood risk outside of the Order Limits. If there is an increase to flood risk outside of the Order Limits, floodplain compensation will be provided to ensure that there is no increase in flood risk outside of the Order Limits. Given the minor nature of the losses this is likely to be provided through localised groundworks with details provided at detailed design stage. This is secured in the **Outline CEMP [EN010158/APP/7.2.3]**.	**Under Discussion** **Medium**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			Please note that if the Applicant is proposing to use swales as part of the CFS scheme, these would need to be sized appropriately such that they can accommodate runoff from the pluvial design event too. CFS cannot be in Flood Zone 3.	Table 3.9 of the **Outline CEMP [EN010158/APP/7.2.5]** has been updated at Deadline 4 to state that the Environment Agency will be engaged with throughout the detailed design stage in regards to floodplain compensation. In addition, the wording around the location of floodplain compensation has been amended for clarity. The Applicant does not believe a Requirement for the DCO is required.	
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 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	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 Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]**). 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	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			maximum scenario (upper fluvial climate change). The EA would appreciate confirmation on what the growth factor (GF) between the 100-year and 1000-year peak flow rates is to allow determination if it is a suitable proxy for the credible maximum scenario.	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 appropriate mitigation is proposed. Further clarification is provided in Section 3.2.18 and Table 3.2 of the **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** which has been updated at Deadline 2.	
1.5	**Relevant Representation**	**Flood modelling – use of proxy**	Use of proxy for fluvial flood risk and pluvial flood risk could	In the absence of detailed hydraulic models for minor Ordinary Watercourses in the vicinity of the Site,	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA08, EA09)		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.	the Risk of Flooding from Surface Water (RoFSW) (Figure 3.4 of **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]**) 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/6.4.3]** has been updated at Deadline 2 to include detailed fluvial and pluvial hydraulic models, along with sensitivity testing, to define site-specific flood extents and mitigation where appropriate. **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.4]** has been updated at Deadline 3 to include additional mapping and text showing the comparison between the different	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				mapping to justify why RoFSW is a good proxy to use.	
1.6	**Relevant Representation (EA03)**	**Flood Impacts to third parties**	The Applicant's response to the EA's concern that 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, has been accepted.	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]** [REP01-042] has been amended at Deadline 1 for clarification.	**Agreed**
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. The EA would need more specificity on the fencing proposed (e.g., drawing/image, dimensions, etc). We note that the fencing is perpendicular to the flow direction within some areas of the functional floodplain. Please can the applicant clarify: • The type of fencing that will be used such that flow will not be impeded.	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]** [REP1-034], which do not create a solid barrier and therefore would not obstruct overland flow or flood conveyance. **ES Volume 4, Appendix 16.1: Flood Risk Assessment [EN010158/APP/6.4.3]** has been updated at Deadline 2 to consolidate all information on fencing that has been used to inform the Applicant's	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			• How the risk of blockage will be managed.	assessment. At this stage, information on the fencing is indicative, specific information will be provided at detailed design stage. The **Outline CEMP [EN010158/APP/7.2.3]**, has also been updated at Deadline 2 to include the following: "Fencing installed around the solar development will be standard deer fencing which will be similar to high-tensile, galvanised steel wire that is commonly used for agricultural use. As an indicative, the wire will either be a standard wire netting as used in forestry or have a smaller mesh at the bottom, close to the ground at around 75mmx75mm. The mesh can be larger higher up the fence. Post distance will be around 3-5m as is common for stability with a maximum of 10m. Posts may be closer together when gate or tensioners are required. Further detail on fencing will be provided at detailed design stage." This aligns with the Forestry Commission Guidance on mesh sizing for Muntjac, which are present on-site.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3],** and **Outline DEMP [EN010158/APP/7.4.3]** have been updated at Deadline 2 to provide guidance on how the risk of blockage will be managed.	
1.8	**Relevant Representation (EA15)**	**Foot and mouth burial sites**	The Applicant's response and subsequent updates to document in relation to the EA's concern that foot and mouth burial sites are not mentioned in APP-119 Appendix 11.1 Preliminary Risk Assessment (Part 1) and that no further information or specific mitigation is given in APP-138 oCEMP, APP-139 oOEMP and APP-076 Commitments Register (ref.219) despite being mentioned, is satisfactory.	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/7.2.3]** to detail actions that should be taken in the event of encountering such features. Further details will be provided in the **Outline CEMP [EN010158/APP/7.2.3]** submitted at Deadline 1.	**Agreed**
1.9	**Relevant Representation**	**Penstock**	Table 16.10 says there will be "penstock system at the BESS" and the text added to oBSMP [REP1-	Outfalls from the BESS drainage system would have automatic and manual isolation systems to ensure that any	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	(EA36)		092 / -093] paragraph 6.6.7 to 6.6.9 setting out further information is satisfactory. We note that section 6.5.2 of the Outline Drainage Strategy [REP1-097] and Table 3.5 of the OEMP [REP1-081] have not been updated to include the word 'manual' in reference to the option of being able to close the penstock.	firewater runoff is captured for analysis prior to disposal as detailed in the **Outline Battery Safety Management Plan [EN010158/APP/7.9.3]**. 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. The **Outline OEMP [EN010158/APP/7.3.4]** and **Outline Drainage Strategy [EN010158/APP/7.11.4]** has been updated at Deadline 3 to state that the isolated system will be automated with a manual backup.	
1.10	**Relevant Representation (EA36)**	**Drainage design**	We believe that since section 1.3.1 of the Outline Drainage Strategy [REP1-097] states that drainage during construction and decommissioning phases sits outside the scope of this document,	The **Outline CEMP [EN010158/APP/7.2.3]** states 'A temporary drainage strategy would be implemented during construction works to control runoff rates and sediment mobilisation.' Further information has	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			further updates are required in the oCEMP and oDEMP. Currently there is no mention of Sustainable Drainage Systems (SuDs). Consequently, the maintenance of these SuDS during these phases is unsecured. Drainage associated with the Rosefield Substation is still under discussion. There are no updates to section 7.6 of the Outline Drainage Strategy [REP1-097] which explain how drainage would be stopped in the event of a pollution incident or fire at the substation. We welcome further discussion on the additions to section 6.6.16 of the oBSMP [REP1-093] as it should be clarified that even if drainage solutions change, it will follow the same principles already agreed, such as no direct discharge to surface waters or groundwater.	been added at Deadline 2 to supplement this. The **Outline DEMP [EN010158/APP/7.4.3]** has been updated to reflect potential options around drainage. Further information on drainage during decommissioning will be provided at detailed design. The **Outline Drainage Strategy [EN010158/APP/7.11.3]** has been updated at Deadline 2 to include clarity on the drainage associated with Rosefield Substation. This includes the provision for pollution control and emergency drainage isolation measures (such as automated and/or manual penstock valves or equivalent) to enable containment, testing and controlled management of runoff in the event of a transformer oil release or fire-fighting activities. Clarification that if drainage solutions change, the same principles will be followed, has been added into Section 6.6.16 of the **Outline BSMP [EN010158/APP/7.9.3]** at Deadline 2.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			When silt and aggregate are removed, the operator must ensure the integrity of the impermeable lining is not compromised.	The **Outline OEMP [EN010158/APP/7.3.3]** has been updated to include a commitment to undertake inspections of the impermeable lining to ensure they are not compromised following removal of silt and aggregate from the storage tanks. If damage is identified, repairs will be undertaken.	
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 further Correspondence**	**Geomorphology**	Geomorphology concerns have been addressed in the WFD Waterbodies Stage 1 Screening Assessment [REP 1-071] and Chapter 3, Section 3.5.16 commits to an open span bridge for the AIL crossing, removing the option for a culvert. Chapter 7 [REP 1-037] should be updated to take account of the impact of the AIL bridge, and the Outline CEMP should be updated in line with the updated LEMP [REP1-087] .	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] [REP1-034]**. This bridge will be designed to maintain existing watercourse function and flood conveyance while minimising environmental and hydraulic impacts. The **Outline CEMP [EN010158/APP/7.2.3]** will secure measures to manage sediment control, pollution prevention, and working methods in proximity to the watercourse, therefore there would be	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				no impacts on biodiversity (aquatics) during the construction, operation and decommissioning phase. Impacts associated with altering the course of watercourses are not considered applicable to the Stage 1 Screening Assessment (see **ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4.3]**). Table 7.4 of **ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3]** has been updated at Deadline 2 to include the impact of the clear span AIL bridge. The **Outline CEMP [EN010158/APP/7.2.3]** has been updated to align with the **Outline LEMP [EN010158/APP/7.5.3]** with reference to the clear span bridge in Section 2.17.	
2.3	**Relevant Representation (EA42) and**	**Foul water**	In our Relevant Representations, we raised awareness that Table 5.2 in APP-133 of the WFD Screening Assessment did not identify all	**ES Volume 4, Appendix 16.2: WFD Waterbodies Stage 1 Screening Assessment [EN010158/APP/6.4.3]** has been updated to reflect all three	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
	further Correspondence		impacts. The Applicant has updated this to include impacts from foul water at Deadline 1. However, by specifying the operational phase, it leaves uncertainty associated with the construction and decommissioning phase. Furthermore, the two options proposed exclude a third option included in section 7.8 of the Outline Drainage Strategy [REP1-097]. Documents should be consistent and ensure that all project phases are accounted for.	options that are set out in the **Outline Drainage Strategy [EN010158/APP/7.11.3]**	
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	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/7.4.3]**). It is not anticipated that the cables that are left in situ below 1m buried underground would cause any	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			reviewing further information at the detailed design stage.	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, 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/7.2.3]**, to include installation of cables covers, tiles or	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				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. 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.	As outlined in the **Outline Drainage Strategy [EN010158/APP/7.11.3]**, there are three options for foul drainage strategy during the operational phase for permanent works, Option 1 – 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	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				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 (EA14 and EA18)**	Contamination data	Information from Envirocheck data search, paragraph 11.5.23 (was 11.5.22), has been updated and is now acceptable. Chapter 11 [REP1-038 / -039] paragraph 11.5.34 has been added to provide information about wells. The applicant has not found records that these are associated with potable water abstraction but speculates they may be used for agricultural processes.	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** Section 11.5.22 was updated, and submitted at Deadline 1. **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** will be updated at Deadline 1 to make reference to existing wells. The **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]** have been updated at Deadline 2 to commit to further investigation of the identified	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			The oCEMP, oOEMP and oDEMP do not appear to have specific information about identifying and avoiding wells, other that with reference to refuelling. Given the presence of three wells of unknown status within the order limits, we consider it would be valuable to include specific reference to ensure workers do not overlook their presence.	wells and appropriate mitigation to be included in the detailed management plans.	
3.4	**Relevant Representation (EA19)**	Operational assessment	The Applicant's response to the EA's concern on potential risks from fuel and chemical management or firewater drainage during operation 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 OEMP [REP1-081] should be updated to state in Table 3.8 "The measures outlined in Table 3.5 in relation to groundwater will also be	**ES Volume 2 Chapter 16: Water [EN010158/APP/6.2.2] [REP01-042]** was updated at Deadline 1 to include mitigation. 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/7.3.3]**. Fire water drainage during operation is considered in the **Outline Battery Safety Management Plan [EN010158/APP/7.9.3].**	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			adhered to in order to protect surface water quality.".	Table 3.8 of the **Outline OEMP [EN010158/APP/7.3.3]** has been updated to relate to the mitigation measures related to groundwater at Deadline 2.	
3.5	**Relevant Representation (EA17)**	GWDTE	EA satisfied that the details about Finemere Wood SSSI as a Groundwater Dependent Terrestrial Ecosystem have been adequately detailed in Chapter 11 [REP1-038 / -039] paragraphs 11.10.5 and 11.10.6.	Further detail on the assessment of the Finemere Wood SSSI were added into **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** [**REP1-038**] and submitted at Deadline 1.	**Agreed**
Water quality and waste management					
4.1	**Relevant Representation (EA21 and EA31)**	**Water quality**	Construction/decommissioning activities have the potential to result in the release of chemicals, concrete washout and silt laden runoff which could be conveyed via overland flow or local drainage features into nearby watercourses. We acknowledge the updates to the oCEMP [REP1-079] and oDEMP [REP1-083]. However, in the oDEMP [REP1-083], the Applicant needs to update	The Proposed Development includes embedded mitigation measures to reduce these risks, for example construction compounds would be 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/7.2.3]** and **Outline**	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			paragraph 2.11.4 to include reference to the Outline Drainage Strategy. Additionally, Table 3.6 Potential impact column should be updated in line with the oCEMP [REP1-079] and oOEMP [REP1-081] to reflect that it also includes contamination of surface water. The Applicant has also responded to EA21, EA31 and EA32 under Ref 6.4 – see further EA comments under this reference.	**DEMP [EN010158/APP/7.4.3]** and further detail was added at Deadline 1. The **Outline DEMP [EN010158/APP/7.4.3]** has been updated at Deadline 2 to include reference to the **Outline Drainage Strategy [EN010158/APP/7.11.3]** and to include 'surface water' into the 'Potential Impact' column.	
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. The Applicant's response in updating section 7.8 of the Outline	Relevant detail is contained in **ES Volume 2, Chapter 16: Water [EN010158/APP/6.2.2] [REP01-042]**, and, **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** and further detail was 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	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			Drainage Strategy [REP1-097] resolves the EA's concerns for foul water. The Applicant should note that it can take several months to obtain the necessary permit to release uncontaminated captured firewater to the local drainage network. Storage of the water and feasibility of continued safe operation of the BESS during this time should be considered. We recommend that the Outline Drainage Strategy [REP1-097] is updated to acknowledge that a water discharge activity permit may be required.	water network, as foul water generated in these areas would be transported off-site for disposal. The **Outline BSMP [EN010158/APP/7.9.3]** has been updated at Deadline 2 to include reference to acknowledge that a water discharge activity permit may be required to discharge uncontaminated firewater.	
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	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	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			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 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.	potential pollutant linkages as set out in **ES Volume 4, Appendix 11.1: Preliminary Risk Assessment [EN010158/APP/6.4.2]** [REP1-066] [APP-120] [APP-121] [APP-122] [APP-123] however this would not have any implications to the conclusions of the assessments detailed in **ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2]** [REP1-038].	
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	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				requirements of Buckinghamshire Council, and the Environment Agency, where appropriate, and as secured by the **Outline CEMP [EN010158/APP/7.2.3]**), at the point at which the Proposed Development construction works commence.	
4.5	**Relevant Representation (EA27)**	**PFAS**	We do not agree with the response to EA27, the wording in the outline OEMP Table 3.5 or outline CEMP Table 3.6. We believe that this does not sufficiently mitigate the risks from PFAS at present. Alternative wording such as 'only using PFAS containing products where no suitable alternative is available' should be used instead of 'would seek to minimise the level of PFAS in the final equipment selection'. Similar wording has been utilised for other comparable NSIPs. Appendix 3 – HDD Fluid Breakout plan does not contain any reference to the avoidance of	**ES Volume 2, Chapter 11: Land and Groundwater [EN010158/APP/6.2.2] [REP1-038]** and **ES Volume 2 Chapter 16: Water [EN010158/APP/6.2.3]** were updated at Deadline 1 to include consideration of PFAS. 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	**Under Discussion** **Low**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			PFAS within drilling fluid. Similar wording to what we have requested above for cable, panels and firefighting equipment would be suitable to address this. In addition, the HDD Fluid Breakout plan 3.2.3 should identify the relevant statutory authorities.	equipment is used for the Proposed Development. The **Outline CEMP [EN010158/APP/7.2.5]**, **Appendix 3** of the **Outline CEMP [EN010158/APP/7.2.5]**, and the **Outline OEMP [EN010158/APP/7.3.5]** have been updated at Deadline 4 to include the following: 'The Applicant shall prioritize the procurement and installation of cables and construction materials that are free of PFAS. The use of PFAS-containing materials (including fluoropolymers such as PTFE, PFA, and PVDF) will be considered where PFAS-free alternatives are not technically feasible, do not meet required safety and performance standards, or are not commercially available at a reasonable cost. The Applicant will request from contractors a justification for any necessary use of PFAS-containing components.' As the Applicant is not able to commit to the wording suggested by the Environment Agency. In relation to **Appendix 3: HDD Fluid Breakout plan**, Section 3.3.3 has been	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				updated to identify the relevant statutory consultees.	
4.6	**Relevant Representation (EA36) and Response to Draft 1 of this SoCG issued at Deadline 1.**	**Firewater testing**	Testing is important to provide information around the quality of water that has been contained after a fire and will ascertain if it contains any contaminants and what level of risk to the water environment the contained firewater has. We expect that samples would be taken, when safe to do, which would be sent to an UKAS accredited laboratory; MCERTS accredited methods should be used where applicable. The water samples should be checked against the list of surface water specific substances in the surface water pollution risk assessment guide.	The **Outline BSMP [EN010158/APP/7.9.3]** has been updated at Deadline 2 to state that samples would be sent to an UKAS accredited laboratory and that MCERTS accredited methods will be used where applicable, and that the water samples will be checked against the list of surface water specific substances in the surface water pollution risk assessment guide.	**Agreed**
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.	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**	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			Commitment to clear span bridge is welcomed. We request comments on potential biodiversity impacts of this structure in construction and operation phases in the biodiversity chapter. Currently Chapter 7 does not appear to have been updated to include a commitment for the design of the bridge to include longitudinal connectivity for flora and fauna along the riparian corridor. Until the impact is assessed it cannot be fully verified that proposed mitigations are acceptable. As well as the relatively high-level aquatic ecology 2023 survey, consideration of desk study data is recommended to inform assessment and check for notable species which could be present.	**Development Description [EN010158/APP/6.1.2] [REP1-034]** and **Draft Development Consent Order (DCO) [EN010158/APP/3.1.4]** were 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. The **Outline CEMP [EN010158/APP/7.2.3]** will be updated at Deadline 1 to include further measures for the protection of fish and aquatic invertebrates. The **Outline LEMP [EN010158/APP/7.6.3]** was 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. The **Outline CEMP [EN010158/APP/7.2.3]** will be updated at Deadline 2 for consistency.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.3] will be updated at Deadline 2 to include the impact of the clear span AIL bridge.	
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 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	**ES Volume 4, Appendix 7.17: Biodiversity Net Gain Assessment [EN010158/APP/6.4.2] [REP1-060]** was 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
			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.		
5.3	**Relevant Representation (EA25) and further email correspondence**	INNS	The EA can confirm that the updates to the Outline CEMP, OEMP, DEMP and LEMP, and Chapter 7 have been updated to confirm understanding of presence of INNS on site and include further detail regarding biosecurity measures to be implemented and that a pre-construction INNS walkover survey will be undertaken.	**ES Volume 2, Chapter 7: Biodiversity [EN010158/APP/6.2.2]** was 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/7.2.3]** was updated at Deadline 1 to state that a pre-construction INNS walkover survey will be undertaken. The **Outline CEMP [EN010158/APP/7.2.3]** contains a commitment to produce an Invasive Non Native species (INNS) biosecurity protocol and the final scope of this will	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				be presented in the detailed Construction Environmental Management Plan. Likewise the **Outline LEMP [EN010158/APP/7.6.3]** 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	The EA considered the further detail given in the oBSMP [REP1-092 / -093] paragraphs 6.6.7 to 6.6.9 about outline proposals for BESS firewater management and drainage design appear acceptable. The proposal is presented as one option to be agreed in principle. If other options are chosen later, we will need to entirely revisit this response. Either way, we expect to see confirmation during detailed design and be consulted further post-consent. We do note that section 6.1.4 of the Outline Drainage Strategy	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/7.9.3]** and other relevant outline management plans have been updated to provide further detail and ensure consistency. The **Outline BSMP [EN010158/APP/7.9.3]** and **Outline Drainage Strategy [EN010158/APP/7.11.3]** set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. More detail is contained within the **Outline BSMP**	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			[REP1-097] says that 'BESS area may also require the installation of an impermeable membrane', however we wish to reiterate that the BESS area will need to be impermeable. Section 6.3.3 of the oBSMP [REP1-092 / -093] describes the Emergency Response Plan (ERP). We request that there is an addition which states "The Environment Agency would be alerted in the event of a fire at the BESS location, in relationship to support responding to flood warnings and pollution events." Furthermore, the ERP should identify the importance of notifying any downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority.	**[EN010158/APP/7.9.3]**. This approach ensures that environmental protection is maintained under both normal and emergency conditions. The measures within the **Outline OEMP [EN010158/APP/7.3.3]** and **Outline DEMP [EN010158/APP/7.4.3]**, alongside the **Outline BSMP [EN010158/APP/7.9.3]** 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/7.4.3]** was updated at Deadline 1 to confirm the process of how BESS site protection for firewater segregation will be handled during decommissioning. Section 6.1.4 of the **Outline BSMP [EN010158/APP/7.9.3]** has been updated at Deadline 2 to include the additional information requested around the Emergency Response Plan.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			The EA is satisfied with the addition made to oDEMP [REP1-082 / -083] Table 3.6 around ongoing protection of the BESS site during decommissioning.	Section 6.1.4 of the **Outline DS [EN010158/APP/7.11.3]** has updated the wording at Deadline 2 to state "The BESS area will incorporate appropriate containment measures across the areas where batteries are concentrated to ensure a sealed and isolatable system that prevents any pathway for contamination of groundwater during a fire event, with the final specification of materials and configuration to be confirmed at detailed design stage (**Outline BSMP [EN010158/APP/7.9.3]**)".	
6.2	**Relevant Representation (EA34)**	Transformer	The EA are satisfied with the updates to the oCEMP [REP1-079], oOEMP [REP1-081] and oDEMP [REP1-083] around the management of firewater and surface water runoff associated with the transformers to include bunding.	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/7.11.3]**, which includes containment around transformers (perimeter bunds and impermeable base under each of the transformers), provision of a separate oily drainage	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
				infrastructure with oil interceptors, emergency shut-off systems and monitoring provision. This further detail was included in the updated **Outline Drainage Strategy [EN010158/APP/7.11.3]** and other related Outline management plans and submitted at Deadline 1.	
6.3	**Relevant Representation (EA16 and EA20)**	Gas and groundwater monitoring	Any groundwater monitoring should be agreed in consultation with the EA as well as Buckinghamshire Council. We are satisfied that the applicant agrees to carry out further site investigation works and look forward to discussing the scope in due course.	It is noted that a complete ground investigation has yet to be undertaken. The scope of work for the full 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).	**Agreed**
6.4	**Relevant Representation (EA28)**	Water Quality Monitoring	We note oCEMP [REP1-078 / -079] Table 3.9 has been updated to confirm the proposed 12-month monitoring regime. However, in the OCEMP there is no reference to pre-construction	The **Outline CEMP [EN010158/APP/7.2.3]** has been updated at Deadline 2 to state that a water monitoring regime will be implemented 6 months pre-construction, during the construction phase, and 12	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			monitoring to establish a baseline, or for water quality monitoring throughout construction phase. No such update to water quality monitoring has been made in the oDEMP [REP1-082 / -083]. Although, we are named in Requirements 11, 12 and 15 associated with the CEMP, OEMP and DEMP, and therefore the details for these updates can be confirmed in due course it would be preferable to see them in the management plans at this stage.	months post-construction with further detail to be provided at detailed design stage in agreement with the EA. The **Outline OEMP [EN010158/APP/7.3.3]** already states the commitment to undertake a 12 month post-construction (i.e. within the operation phase) water quality monitoring regime and therefore is not required to be updated. The **Outline DEMP [EN010158/APP/7.4.3]** has been updated at Deadline 2 to confirm that a water quality monitoring regime will occur during the decommissioning phase with further detail to be provided at detailed design stage in agreement with the EA.	
6.5	**Relevant Representation and further engagement**	Mitigation	The EA would like assurances that the measures listed out in Relevant Representative EA23, EA30, EA32, EA37, and EA39 will be included in the Outline CEMP, Outline OEMP, Outline DEMP, Outline BSMP. For completeness, we have some further comments for specific matters covered under these EA	The **Outline BSMP [EN010158/APP/7.9.3]**, **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3],** and **Outline DEMP [EN010158/APP/7.4.3]** were updated to provide further detail and to address these matters (including in response to EA32 and 37) at Deadline 1.	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			issues, which are not addressed elsewhere in this SoCG. EA23, EA37 and EA39: the applicant has added reference to the relevant waste battery regulation in the oCEMP Appendix 1 (outline Site Waste Management Plan (oSWMP)). We would like further information on how and where damaged or end-of-life batteries will be stored prior to removal or, as a minimum, a commitment to confirm this during detail design. We expect specific controls for these to be included in any detailed plans, to be agreed with the EA prior to implementation. We understand that, while the oSWMP is appended to the oCEMP, the detailed SWMP will also cover the operational phase. EA30 (water quality mitigation): Table 3.9 in both the oCEMP [REP1-079] and oDEMP [REP1-083] have been updated to	EA23, EA37 and EA39: the **Outline CEMP [EN010158/APP/7.2.4] Appendix 1, Outline SWMP,** has been updated at Deadline 3 to provide further information on how and where damaged batteries will be stored prior to removal. EA30: Table 3.8 in the **Outline OEMP [EN010158/APP/7.3.3]** has been updated at Deadline 2 to refer back to Table 3.5. Section 9.1.2 of the **Outline DS [EN010158/APP/7.11.3]** has been updated to remove reference to PPG3, and replaced with Oil storage regulations for businesses. EA32: Table 3.9 of the **Outline CEMP [EN010158/APP/7.2.3]** has been updated at Deadline 2 to reference back to Table 3.2.	

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			reference Table 3.6. However, Table 3.8 in the oOEMP [REP1-081] still needs to be updated to refer back to Table 3.5. The Applicant should be aware, that section 9.1.2 references PPG3 for oil separators. This was withdrawn on 14 December 2015. The Applicant should instead use a) Oil storage regulations for businesses Oil storage regulations for businesses - GOV.UK and b) Pollution Prevention guidance Pollution prevention for businesses - GOV.UK EA32 (concrete and water quality): Whilst updates to Table 3.6 in the oCEMP [REP1-079] are acknowledged, Table 3.2 should also be referenced back to, to ensure that all concrete management measures which protect biodiversity are consistent to protect surface water too. We		

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			also recommend that the concrete washout areas are bunded.		
6.5	**Relevant Representation and further engagement**	Mitigation	The EA would like assurances that the measures listed out in Relevant Representative EA21, EA22, EA31, EA33, EA38, EA40, and EA41 will be included in the Outline CEMP, Outline OEMP, Outline DEMP, Outline BSMP. EA21: We are satisfied with the various additions and deletions that have been made in response to our comments. EA22 (HDD fluid breakout): reference added to oCEMP Table 3.6, and detail given as Appendix 3 of oCEMP. This is acceptable for this stage in the DCO process. We look forward to seeing detailed plans prior to any HDD works being carried out. The Applicant should also ensure that in due course, distances of at	The **Outline BSMP [EN010158/APP/7.9.3]**, **Outline CEMP [EN010158/APP/7.2.3], Outline OEMP [EN010158/APP/7.3.3],** and **Outline DEMP [EN010158/APP/7.4.3]** were updated to provide further detail and to address these matters (including in response to EA21) at Deadline 1.	**Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			least 10m between watercourses and entry/exit pits are guaranteed. EA31 (wheel washing): Table 3.6 in the oCEMP [REP1-079], Table 3.5 in the oOEMP [REP1-081] and Table 3.6 in the oDEMP [REP1-083] have been updated so concerns about wheel washing are resolved. EA33 (BESS fire water contamination): oOEMP and oDEMP updated as requested. EA38, EA40, and EA41: see our response to Ref. 1.9 and Ref. 6.1.		
Draft DCO					
7.1	**Relevant Representation (EA01)**	Requirement 9	The EA are satisfied that they are now listed as a consultee on Requirement 9 (Drainage).	The Applicant updated the **Draft Development Consent Order (DCO) [EN010158/APP/3.1.3]** at Deadline 1 to add the EA as a consultee to Requirement 9.	**Agreed**
7.2	**Email correspondence**	Wording	Following discussion with the Applicant's legal team, we maintain our position on this matter.	This is standard drafting required to provide flexibility for the discharge	**Not Agreed**

Ref	Source	Description of Matter	EA Comment	Applicant's Response	Status
			The use of 'substantially' in DCO requirements undermines the enforceability of proposals and/ or may erode the environmental protections put in place. The overarching management plans provide a large scope for the detail to come later, and the Rochdale envelope applies – thus flexibility is built into the process. To resolve this matter, the words 'substantially' need to be removed from the requirements identified. We note the removal of reference to disapplication of flood risk activity permits in the draft DCO [REP1-009] submitted at Deadline 1, as requested.	process. The Applicant does not propose any changes.	

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/5.15.4
Planning Inspectorate Scheme Ref: EN010158