One Earth Solar Farm

Draft Statement of Common Ground with the Environment Agency

EN010159/APP/8.11

August 2025

One Earth Solar Farm Ltd

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 One Earth Solar Farm Development Consent Order (the "Application") made by One Earth Solar Farm 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 DCO Application is a Nationally Significant Infrastructure Project (NSIP) for the installation, operation (including maintenance) and decommissioning of solar photovoltaic (PV) panels, Battery Energy Storage Systems (BESS) and associated grid connection infrastructure which will allow for the generation and export of electricity to the High Marnham substation (hereafter 'the Proposed Development').

1.1.3 The SoCG is being submitted to the Examining Authority as an agreed draft between both parties involved. It will be amended as the examination progresses in order to enable a final version to be submitted ot 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. Collectively, the Applicant and Environment Agency 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 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 Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance')[1].

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*

[1] Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

therefore makes best use of the lines of questioning pursued by the Examining Authority".

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 Environment Agency and the Applicant on matters relating to the 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 Environment Agency.

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 Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.

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

1.4 Terminology

1.4.1 In the table in the issues chapter of this SoCG:

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

2. Description of the Proposed Development

2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage System (BESS) with an import and export connection to the National Grid.

2.1.2 The principal components of the Proposed Development will consist of the following:

- Solar PV Modules;
- Mounting Structures;
- Power Conversion Stations (PCS);
- Battery Energy Storage Systems (BESS);
- Onsite Substations and Ancillary Buildings;
- Low Voltage Distribution Cables;
- Grid Connection Cables;
- Fencing, security and ancillary infrastructure;
- Access Tracks; and
- Green Infrastructure (GI).

3. Record of Engagement

3.1 Summary of Consultation

3.1.1 The parties have been engaged in consultation throughout the early stages of the Proposed Development. Table 01 shows a summary of key engagement that has taken place between the Applicant and the Environment Agency in relation to the Application.

Table 01 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
13.09.2023	Teams Meeting	The purpose of the meeting was to introduce the EA to the scheme, provide an overview of baseline flood conditions and the suggested approach to managing flood risk. The following key topics were discussed: • Current Flood Risk and Proposed Mitigation • Watercourse and Flood Defence Considerations • The classification of the design flood event as the 1 in 100 year plus 39% climate change scenario. • The approach to flood risk mitigation, such as panel raising. • The requirement for additional breach data to be provided by the EA. • The sequential approach taken to the development layout with fundamental infrastructure (such as BESS and Substations) being located within Flood Zone 1 areas. The key outcomes of this meeting were as follows: • A sequential approach is being taken to the development layout, with fundamental

		infrastructure being located within Flood Zone 1 areas. • Solar panels in the design flood extent will be raised so the base of the panel is a maximum of 1.8m above ground levels. With the aim of providing a 300mm freeboard. • The EA requested that a similar freeboard should be provided for the breach (residual flood event) where possible. EA to provide further breach data so that Logika could assess this. • EA were to request flood defence data from their Asset Management Team. • EA were to provide information on emergency planning for battery storage areas. In general, the approach to flood risk mitigation and development layout was agreeable to the EA however, there were further actions to address.
27.02.2024	Teams Meeting	This meeting was the first with the EA's National Infrastructure Team and the purpose was therefore to bring them up to speed on the scheme and previous discussions as well as the current position. The following key topics were discussed: • Baseline Flood Risk • Approach to Flood Risk Management and Mitigation • Consideration of Breach (Residual) Risk The key outcomes of this meeting were as follows: • In line with the approach set out in the first meeting, it is proposed that the base of the panels will be raised to a maximum of 1.8m above ground. • A 300mm freeboard for panels is provided in most areas however, there are some locations where this isn't possible and either a lesser freeboard is provided or the panels will experience some flooding.

		• Breach flooding for the 1 in 100 year plus 29% climate change event (as provided by the EA) had been assessed and Breach location 36 was considered worst case for the Site. Since the breach flood extent is greater than the design event, the areas with lesser freeboard and flooding are increased. However, this is a residual event and the probability of occurrence is low, meaning that this increased potential is considered acceptable. • EA indicated that the panel frames design will need to make consideration of impact from floating debris. In general, the approach to flood risk mitigation and development layout was agreeable to the EA however, there were further actions to address.
26.09.2024	Teams Meeting	This meeting was held following comments from the EA to the PEIR. The following key topics were discussed: • Approach to Freeboards • Land Raising • Hydraulic Modelling Queries • Water Quality The key outcomes of this meeting were as follows: • Despite the EA's response to the PEIR, given the previous discussions, the EA were happy with a 300mm freeboard and indicated that further information on areas of reduced freeboard and panel flooding will be required with the submission. • There will be no land raising within the design flood extent. • There will be a need for sme inverters to site within the design flood extent however, these will be raised on voided strcutrures to ensure no loss of storage or impacts on flows. EA indicated that this is agreeable but suggested a strict

		management plan would be required for these areas. • Agreed that methods other than hydraulic modelling could be undertaken to confirm the impact of solar panel frames within floodplain. • Assessment of pluvial vs fluvial flows within catchments for ordinary watercourse to be undertaken to confirm validity of using low risk pluvial flood extents as a proxy for fluvial design flood event. • Impacts of a breaches closer/within the order limits to be assessed. This was with particular reference to impacts on the BESS and Substation areas and it was agree that this did not need to be through formal hydraulic modelling. • Agreed that the EA would direct Logika queries on the need for WFD Assessments to be undertaken.
15.11.2024	Teams Meeting	This was a focussed discussion on the approach to modelling techniques discussed in the previous meeting. The following items were discussed: • Potential increases in flood risk (due to panel frames) • Pluvial vs Fluvial Considerations • Breach Considerations The EA agreed with the approaches set out.
16.01.2025	Teams Meeting	The purpose of this meeting was to discuss progress of the scheme and adress any outstanding comments. The following items were discussed: • Floodplain Storage Loss • Pluvial vs Fluvial Considerations • Breach Considerations

		• Maintenance Plans (post flood actions) • WFD Assessment The key outcomes of this meeting were as follows: • The EA were in agreement with the methodology for assessing potential floodplain losses, the ReFH2 assessment for pluvial vs fluvial scenarios for ordinary watercourses and breach considerations. Furthermore, the EA were in agreement that the results of these assessments were acceptable. • The EA were still reviewing the queries relating the WFD requirements.
29.02.2025	Email	Email from EA received regarding WFD Assessment. Indicated that a WFD Screening Assessment should be undertaken in the first instance and submitted with the DCO. It was stated that be reviewed and correspondence provided to set out whether further assessment is required.
03.07.2025	Teams Meeting	The following from the EA's Relevent Representation were discussed: • Submerged Panel Assessment with regards to impact on flood storage. • Voided inverter structures. • Cable Interactions with watercourse and flood defences. • Proposed maintenance and resilience measures. • Impacts on flood conveyance. The key outcomes were that further works/justifications on the above points is to be undertaken and provided to the EA for consideration.

4. Current Position

4.1 Position of the Applicant and the Environment Agency

4.1.1 The following table sets out the position of the Applicant and the Environment Agency, 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.

Table 02 – Hydrology and Hydrogeology

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
02-01	Development Layout	Applicant to set out the development such that sensitive equipment is located outside the design flood extent.	A sequential approach to the development layout has been taken with sensitive infrastructure (BESS and Substations) located outside of the design flood extent.	***Under Discussion***
02-02	Panel Raising	Applicant to provide a 300mm freeboard between the design flood level and base of panels.	Panels are to be raised such that their base is a maximum of 1.8m above ground level (although the height of panels varies subject to the depth of flooding). This provides a 300mm freeboard across the majority of the Site however, some panels do experience	***Under Discussion***

			a lesser freeboard or panel flooding.	
02-03	Voided Inverter Structures	Applicant to provide a 300mm freeboard between the design flood level and underside of any voided inverter structure. Applicant also to provide further commentary and detail on the need for voided structures.	Where inverters need to be located within the design flood extent, these will be raised up to be 300 mm above the design flood level. This is currently stated as being raised on a voided structure.	***Under Discussion***
02-04	Flood Volume Assessment	Applicant to assess the impact of the development on flood storage volumes in the design flood event. This is to consider the panel frames, the panels themselves and voided inverter structures.	Further assessments are currently being undertaken to confirm the impact from updated panel frame design, submerged panels and inverter structures.	***Under Discussion***
02-05	Structural Design of Panel Frames and Voided Inverter Structures	Applicant to provide structural design of panel frames and voided inverter structures to ensure they can withstand flooding conditions and debris impact.	Structural design is currently being undertaken to confirm the details associated with each feature listed.	

02-06	Cable Crossings beneath Main Rivers	Applicant to consider the impacts of cable crossings beneath Main Rivers and existing flood defences.	The proposed cable crossing beneath the River Trent will be undertaken using trenchless techniques and specific construction processes will be set out within the CEMP. A hydromorphology survey, river bed survey and hydrogeologcial riosk assessment to be undertaken to inform the design of the cable crossing beneath the River Trent. Surveys of the existing flood defences will be undertaken at detailed design if deemed required. Furthermore, monitoring of the flood defences can also be undertaken during construction if deemed necessary.	***Under Discussion***
02-07	Maintenance Plans	Applicant to set out outline maintenance activities that will be undertaken to ensure there is limited potential for blockages to floodplain and the development maintained adequately.	Specific maintenance required for the panel frames and inverter structures (following a flood event) will be set out at detailed design and included in the OEMP. However, likely to include the following as a minimum:	***Under Discussion***

			• Clearance of any debris collected on fences, paths, roads and between panel supports. Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures or replacement will be implemented.	
02-08	Flood Conveyance	Applicant to consider the impact on flood flow conveyance due to the submerged panels. Velocities of flooding in the design event to be reviewed in assessing this.	Impacts on conveyance of flood flows currently being assessed, taking on board the likely veolocity of flood flows in the design flood event.	***Under Discussion***
02-09	WFD Screening Assessment	WFD Screening Assessment to be prepared for review by the EA.	WFD Screening Assessment has been provided which sets out that with embedded mitigation, no further assessment is considered necessary. Comments awaited from EA.	***Under Discussion***

02-10	Firewater Containment	Applicant to ensure that potential firewater runoff from battery energy storage system compounds is contained adequately.	Fire suppression has been considered and should this occur, a penstock valve downstream of the detention basins will be automatically triggered to isolate potentially contaminated discharges and prevent discharge to surrounding watercourses. Should this occur, contaminated water would be tankered away and treated accordingly off-site. SuDS features serving the BESS and Substation areas will include an impermeable lining to prevent infiltration to underlying groundwater.	***Under Discussion***

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