Planning Inspectorate

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Our ref: XA/2025/100441/01
Alt Ref: ENVPAC/1/NIT/00019
Your Ref: EN010159

Date: 16 September 2025

Dear Sir/Madam

ONE EARTH SOLAR FARM

RESPONSE TO DOCUMENTS SUBMITTED AT DEADLINE 2

Thank you for consulting us on the additional documents submitted by the applicant on the 21 August 2025, we have reviewed the submissions and have the following comments to make within appendix 1 (response to submitted documentation). We are however still waiting for a Statement of Common Ground (SoCG) which covers all topics within our remit. We are satisfied with the SoCG which has been submitted, however as stated this only includes flood risk and water quality. We are in discussions with the applicant and are expecting a revised version.

Please also see a list of key issues as highlighted below in our Work Package Tracker, Appendix 2, we are in regular consultation with the applicant to work through these issues.

We trust this advice is useful.

Yours sincerely

Mr [redacted]
Planning Advisor - National Infrastructure Team

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Appendix 1 – Response to documents submitted at deadline 2
Appendix 2 – Environment Agency Work Package Tracker

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Appendix 1

Flood Risk

EAFR-001 Submerged Panels		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Section 3.1.1	Issue:	Within the updated FRA the applicant has undertaken an assessment of the volume of floodplain capacity which may be removed due to panel legs and panels which become submerged. The applicant has taken a conservative approach in calculating this volume and the impacts this may have on flood depths. The results show an increase of 2.3mm to the west and a 4.1mm increase to the east. The applicant has not provided details as to the impact the submerged panels may have on flow routes and or impediment of flow.
	Impact:	The displacement of flood water may affect offsite risk due to the impediment caused by solar panels.
	Solution:	The applicant should undertake an assessment of the affect the submerged panels may have on flow routes or the applicant should remove panels which become submerged in the design event, this may be by remove of panels or adjustment of design to ensure all panels are above the design event.
Additional comments:		

EAFR-002 – Voided Structures		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Section 3.1.1	Issue:	It is proposed to use voids under inverter stations within the design flood event to mitigate for the increased footprint within the floodplain. Voids should be a last resort option for mitigation once all other options have been exhausted. This is due to the risk of blockages within voids not allowing the free flow of water and reducing floodplain storage capacity.
	Impact:	This may cause increases in offsite flood risk.
	Solution:	The applicant should assess other options of mitigation for the built footprint within the design event and provide commentary as to why it is necessary to use voids as floodplain compensation. Voided structures should be a last resort when designing floodplain mitigation.
Additional comments:		

EAFR-003 – Construction Phase		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage	Issue:	Within the OEMP the applicant has proposed where possible placing all construction compounds and material storage outside of the floodplain. However, due to the vast floodplain on site this may not be possible. The applicant has not provided detail of

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Strategy Section 3.1.1		mitigation measures which may need to be put in place if construction compounds and/or materials need to be with in the floodplain onsite.
	Impact:	This may lead to increased flood risk during the construction phase.
	Solution:	The applicant needs to provide details of mitigation measures that will be implemented if storage in the floodplain through the construction phase is necessary. Additionally, the applicant needs to ensure sufficient distance is implemented between defences on site and any storage of materials to ensure no impact on onsite embankments.
Additional comments:		

EAFR-004 – Proposed Crossings		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Section 3.1.1	Issue:	The applicant has not provided evidence the development will not have adverse impacts on the stability of flood defences on site. Specifically, the applicant has not assessed the interaction between the cable crossing below the River Trent and the embankment foundations along the River Trent.
	Impact:	This may lead to adverse impacts on watercourses and/or flood defences.
	Solution:	The applicant needs to provide more detail of how the cable crossing may interact with the embankments and the mitigation measure which will be implemented to ensure embankments will not be adversely affected.
Additional comments:		

EAFR-004 – Crossings		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Section 3.1.1	Issue:	This section notes that bridging over watercourses to facilitate access may be required. Where this is the case openings will be sized accordingly to ensure there would be no constraint to flows.
	Impact:	Crossings could be designed inaccurately if appropriate methods are not used to determine their size.
	Solution:	Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. Careful consideration will need to be given to how the design flood level will be determined for any proposed crossings. Typically, this would be determined by

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		undertaking localised hydraulic modelling or referring to existing detailed hydraulic modelling data (where available).
Additional comments:		

EAFR-004 – Crossings		
Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Table 3.9	Issue:	These sections present calculations regarding the loss of storage due to submerged solar panels and describe how this is considered acceptable. Solar PV panels could deflect flood flows and increase flood risk elsewhere.
	Impact:	The impact of flood risk because of the development could be underestimated particularly in areas where the solar panels themselves are submerged.
	Solution:	Please model the impact of submerged solar panels on flood risk and produce and include water level and extent difference mapping in the Flood Risk Assessment. If submerged solar panels result in an increase in flood risk this should be addressed following the principles of avoidance, mitigation, and compensation.
Additional comments:	Table 3.9 shows the volume of storage lost due to partially submerged solar PV panels. Section 5 of the Flood Risk Assessment concludes that only a small number of panels are affected by flooding, which is stated as being considered acceptable. Following a meeting with the applicant on 11th September 2025, flood flow velocities near the submerged panels were reviewed using the Tidal Trent hydraulic model (Jacobs, 2023). While this provided useful insights, a full assessment of flood risk impact requires testing within the hydraulic model itself. The recommended approach is to represent the inundated panel areas using layered flow constriction polygons (2d_lfcsh layers) in the 2D TUFLOW model, applying a high blockage percentage to simulate flow obstruction. Justification should be provided for any chosen blockage values, and conservative assumptions are advised where uncertainties exist. Alternatively, a simpler but more conservative method involves modelling the panels as complete flow barriers using elevation (z) shapes in TUFLOW. This assumes no flow beneath the panels and may overstate their impact. Both methods offer objective ways to assess flood risk impacts from submerged panels, reducing reliance on subjective interpretation. Once modelling is complete, depth and extent difference mapping should be included in the Flood Risk Assessment, along with a description of the modelling approach, assumptions, and limitations. If the panels are found to increase flood risk, the avoid–mitigate–compensate hierarchy should be followed to ensure this is addressed. Further guidance is available in the Environment Agency's online resource: Using modelling for flood risk assessments - GOV.UK	

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Groundwater & Contaminated Land

EAGWCL-001 & EAGWCL-007		
3.1 Draft DCO, Requirement 21 (2)	Issue:	Requirement 21 (2) of the Draft DCO states the following: • *(2) If, during the carrying out of the authorised development in the area for site investigation* [described as the area around the High Marnham power station as shown on the hatched blue on the land and soils constraints plan included in the preliminary risk assessment at appendix 8.2 to chapter 8 of the Environmental Statement], *contamination not previously identified is found to be present within such area(s), no further development (unless otherwise agreed in writing with the relevant planning authority) must be carried out on the area(s) on which the contamination has been found until a remediation strategy detailing how such contamination must be dealt with has been submitted to and approved by the relevant planning authority.*
	Impact:	If contamination not previously identified is encountered in other areas of the Proposed Development outside the 'area for site investigation' this would not be subject to the same controls, which could result in detrimental impacts to controlled waters.
	Solution:	We recommend that Requirement 21 (2) is rephrased to incorporate all parts of the Proposed Development, not just that of the area for site investigation.
Additional comments:		

EAGWCL-002		
Volume 2 Chapter 7: Section 7.4.11, Section 8.4.37 6.21 Appendix 8.2 Preliminary Risk Assessment – Part 1: Table 9	Issue:	The EIA report discusses designated superficial and bedrock aquifer designations, groundwater Source Protection Zones (SPZs) and known groundwater abstractions. No reference is made to any private groundwater abstractions (if present) within the study area although some abstractions not licensed by the Environment Agency are presented and discussed. Where groundwater abstractions are discussed, it is unclear what information sources have been used.
	Impact:	Potential for private groundwater abstractions to be present which may not have been accounted for in the EIA. If these are known or presumed to be used for potable water abstraction these are assigned a presumptive 50m radius SPZ1.

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	Solution:	The Applicant should confirm the information sources used to determine the presence and details of groundwater abstractions, both private and public, within the Study Area.
Additional comments:		

EAGWCL-002		
Volume 2 Chapter 7: Section 7.4.11, Section 8.4.37 6.21 Appendix 8.2 Preliminary Risk Assessment – Part 1: Table 9	Issue:	The EIA report identifies three groundwater SPZs within the study area near Dunham Bridge in Section 7.4.11; however, in Section 8.4.37 the report states that there are no groundwater SPZs within the study area. Furthermore, the appended Phase 1 Desk Study states in Table 9 that there are five SPZs associated with groundwater abstraction close to the River Trent, with the closest of the Zone 1 Inner Zones being partly inside the site boundary, despite this using the same site boundary as the EIA report and the related Figure 2: Land and Constraints Plan showing these zones outside the Order Limits.
	Impact:	Lack of consistency in baseline information for the Proposed Development.
	Solution:	The Applicant should ensure all described SPZ and abstractions accurately reflect the study area and account for both Environment Agency licensed groundwater abstractions and private groundwater abstractions registered with the Local Authorities.
Additional comments:	The Applicant identifies three groundwater SPZs within the northern part of the Order Limits, near Dunham Bridge. These were assumed by the Applicant to be associated with five Anglian Water groundwater abstractions, which our records confirm. As Section 8.4.37 states, the Order Limits boundary has been amended with the result that the identified SPZs no longer fall within the Order Limits or 250m study area search buffer. Chapter 7 does not appear to have been updated to reflect this. The report also refers to an apparently active groundwater abstraction point within the Order Limits, located at High Marnham Power Station, used for industrial processing. Our records do not indicate the presence of an active abstraction license at this location. Table 9 of the Preliminary Risk Assessment states the following: *"There are 16 active licences for groundwater abstractions located on-site and within 1km of the site boundary. The majority of these are used in agricultural (for spray irrigation), with some associated with potable water supplies (operated by Anglian Water), several for private domestic use and one for industrial processing. A full list of abstractions is provided in Appendix D."* No information source is provided for the listed abstractions either in Table 9 or Appendix D of the Preliminary Risk Assessment. These are assigned individual Envirocheck reference IDs, however no	

	corresponding Envirocheck report appears to have been provided. Several of the groundwater abstractions listed in the Appendix are not shown in our records are not currently licensed by the Environment Agency. Furthermore, the list of abstractions in Appendix D includes 14 groundwater abstractions not 16 as stated in Table 9.

EAGWCL		
Volume 2 Chapter 7: Section 7.4.36 Sensitive Receptors	Issue:	The chapter does not identify groundwater (aquifers, abstractions, Source Protection Zones and Groundwater Dependent Terrestrial Ecosystems) as a potential receptor in Chapter 7 despite referencing potential sources of groundwater contamination and proposed groundwater mitigation measures including impermeable surfacing. These receptors are not considered within the impact assessment presented in Chapter 7 and are absent from Table 7.4: Summary of Significant Effects.
	Impact:	Potential for readers of the EIA to conclude that impacts to groundwater quality could not occur from the development.
	Solution:	Although groundwater is considered as a potential receptor in Chapter 8 this should also be identified and assessed as a receptor in Chapter 7, or if preferred the reader should be directed to discussion of groundwater quality impacts in Chapter 8.
Additional comments:	Section 7.4.11 references Volume 2, Chapter 8: Land and Soils regarding groundwater baseline conditions but does not further direct the reader to this section regarding impacts to these receptors.	

EAGWCL-011 Firefighting Water		
6.2.1 Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Table 4-1 Surface Water Drainage Hierarchy Appendix 5.9 Outline Design Parameters	Issue:	Table 4.1 of the report states the following, apparently regarding the substation and BESS areas: *The provision of unlined features (i.e. permeable sub-base and attenuation features) to encourage some natural infiltration has been considered, however potential contamination from fire water runoff will need to be contained which could limit where this is possible. This would be assessed further at detailed design.* It is unclear how firefighting water containment and unlined features could both be incorporated into the BESS and substation drainage design – notably commitment C41 in the Commitments register states: *"Furthermore, the proposed BESS facilities and SuDS features will be lined to prevent the potential for contaminated fire water to infiltrate to the ground."*

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		Minimal information on proposed BESS drainage design is provided in the Work No. 2 section of the Outline Design Parameters appendix.
	Impact:	Potential for uncontrolled release of firefighting water into Secondary aquifer in the event of a BESS fire if unlined features are adopted.
	Solution:	The Applicant should clarify their statement on provision of unlined features. BESS drainage design commitments should also be captured in the Outline Design Parameters.
Additional comments:	Both the Eastern and Western BESS compounds are proposed to be established on Secondary aquifers: • Western BESS: Alluvium (Secondary A) and Mercia Mudstone Group (Secondary B) • Eastern BESS: Mercia Mudstone Group (Secondary B) Table 4-2 identifies that detention basins are proposed at each BESS compound and page 46 of the Flood Risk Assessment and Drainage Strategy outlines that these have been sized to provide sufficient storage to attenuate a 1 in 10-year event plus 228m3 of firewater without need for discharge, and that a penstock valve would be automatically triggered to prevent discharge of contaminated firefighting water.	

EAGWCL – WFD Assessment		
Volume 3 Appendix 7.4 Water Framework Directive Screening Assessment	Issue:	The WFD assessment does not state that a hydrogeological risk assessment would be produced for river/watercourse crossings prior to detailed design.
	Impact:	Risks posed by trenchless crossings may not be adequately assessed.
	Solution:	The River Trent trenchless crossing should be supported by a Hydrogeological Risk Assessment, which should include the site-specific hydraulic fracture risk assessment referenced in the same section.
Additional comments:	Table 3.5 of the outline Construction Environmental Management Plan states “A hydrogeological risk assessment will be produced for river/watercourse crossings prior to detailed design and suggest this is secured through requirement.” Section 5.1.7 of the WFD Assessment states that the launch and receiving pits for trenchless crossing at the River Trent will be a minimum 10m from the watercourse edge. This should be updated to 16m to be consistent with the updated CEMP.	

EAGWCL – oCEMP		
6.2.1 Volume 3 Appendix 7.6	Issue:	The Outline Construction Environmental Management Plan does not commit to the provision

Outline Construction Environmental Management Plan		of a contamination watching brief in areas of potential soil and groundwater contamination.
	Impact:	Potential for sources of existing contamination to be encountered during construction works without adequate measures in place to manage risks to controlled waters.
	Solution:	The Applicant should include a clear commitment to a land and groundwater contamination watching brief during earthworks and confirm that works would be locally halted if unexpected contamination sources are encountered, until the source is adequately investigated and remediation proposals agreed with the Local Authority and Environment Agency.
Additional comments:	Table 3.10 outline proposed mitigation and enhancement measures for controlling risks from waste generation, land contamination, airborne contamination and groundwater contamination. The listed measures do not include a watching brief for sources of contamination in areas where the potential for historic contamination has been identified, such as the former High Marnham Power Station and associated infrastructure and landfilling areas, potentially infilled historic ponds and mineral extraction pits, former railway land, farm developments and historic oil wells. Although Table 3.10 includes a statement that development would be locally halted should unidentified contamination be encountered, for consistency and clarity this should also be stated in the relevant part of Table 3.5.	

EAGWCL – oCEMP		
6.2.1 Volume 3 Appendix 7.6 Outline Construction Environmental Management Plan	Issue:	The Outline Construction Environmental Management Plan does not commit to the provision of a contamination watching brief in areas of potential soil and groundwater contamination.
	Impact:	Potential for sources of existing contamination to be encountered during construction works without adequate measures in place to manage risks to controlled waters.
	Solution:	The Applicant should include a clear commitment to a land and groundwater contamination watching brief during earthworks and confirm that works would be locally halted if unexpected contamination sources are encountered, until the source is adequately investigated and remediation proposals agreed with the Local Authority and Environment Agency.
Additional comments:	Table 3.10 outline proposed mitigation and enhancement measures for controlling risks from waste generation, land contamination, airborne contamination and groundwater contamination. The listed measures do not include a watching brief for sources of contamination in areas where the potential for historic contamination has been identified, such as the former High Marnham Power Station and associated infrastructure and landfilling areas, potentially infilled historic ponds and mineral extraction pits, former railway land, farm developments and historic oil wells.	

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	Although Table 3.10 includes a statement that development would be locally halted should unidentified contamination be encountered, for consistency and clarity this should also be stated in the relevant part of Table 3.5.

EAGWCL – oDEMP		
6.2.1 Volume 3 Appendix 7.6 Outline Decommissioning Environmental Management Plan	Issue:	Proposal to retain underground cabling in-situ below ploughing depth.
	Impact:	Potential for cables left in-situ to act as a source of groundwater contamination.
	Solution:	The Applicant should demonstrate that cables left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters.
Additional comments:		

EAGWCL – oDEMP		
6.2.1 Volume 3 Appendix 7.6 Outline Decommissioning Environmental Management Plan	Issue:	Table 3.17 does not currently indicate that works would be halted locally pending investigation and remediation if unidentified sources of contamination are discovered.
	Impact:	Potential for sources of existing contamination to be encountered during construction works without adequate measures in place to manage risks to controlled waters.
	Solution:	The Applicant should include a clear commitment to a land and groundwater contamination watching brief during decommissioning earthworks and confirm that works would be locally halted if unexpected contamination sources are encountered, until the source is adequately investigated and remediation proposals agreed with the Local Authority and Environment Agency.
Additional comments:	Section 1.1.7 identifies that the method of buried connection cable decommissioning will be established at the time of decommissioning, which would comprise either leaving cables in-situ or the removal of cables by pulling through from an extraction point. The Applicant should consider total cable removal at the design stage, as this may have design and construction implications. Even sealed and left in-situ, buried cables would degrade over time and release contaminants into the soil environment. Table 3.17 outlines proposed mitigation and enhancement measures for controlling risks from waste generation, land contamination, airborne contamination and groundwater contamination. The listed measures do not include a watching brief for sources of contamination.	

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	The outline discovery protocol included in the table states the following: *"Should any potentially contaminated ground, including isolated 'hotspots' of contamination and/or potential deposits of asbestos containing materials (ACM), be encountered, the contractor would be required to investigate the areas and assess the need for containment or disposal of the material. The contractor would also be required to assess whether any additional health and safety measures are required."*

EAGWCL oOEMP		
Volume 3 Appendix 7.5 Outline Operational Environmental Management Plan	Comments:	In Table 3-11: Ground Conditions, the measures for managing firewater at the BESS compound should reference to the preparation of a Battery Safety Management Plan. We encourage the Applicant employs 'sentinel' monitoring systems to enable early detection and management of spills and leaks entering surface water drainage system during normal operation.

EAGWCL oOEMP		
Volume 3 Appendix 7.5 Outline Operational Environmental Management Plan	Comments:	Section 2.10 outlines water supply proposals for the operation and maintenance phase of the scheme. This does not reference the water supply for firefighting at BESS compounds (described in Section 4.4 of the Outline Battery Safety Management Plan as comprising four 120,000 litre static tanks at each of the two BESS sites). This should be referenced in the OCEMP.

EAGWCL WFD Screening Assessment		
Volume 3 Appendix 7.4 Water Framework Directive Screening Assessment	Comments:	Summary table 3-1 incorrectly states that the 2019 Quantitative Status Element of the Lower Trent Erewash – Secondary Combined Water Body (waterbody ID GB40402G990300) is Poor. This Status Element, and the overall Water Body Status, are Good. This should be corrected, however does not materially affect the assessment. Impacts to the WFD Groundwater Body from the construction and operation phases have been Screened Out of further assessment based on adherence to the mitigation measures which are to be set out in the OCEMP and OOEMP.

Biodiversity

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EAFBG-001 Fish Species		
Environmental Statement Chapter 6 Section 6.2	Issue:	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this fish specific legislation has not been considered.
	Impact:	This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered.
	Solution:	Both pieces of legislation should be listed as relevant in the biodiversity chapter of the ES and submitted as part of the DCO.
Additional comments:	Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4. Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	

EAFBG-001 Fish Species		
Environmental Statement Chapter 6 Section 6.10.4 – 6.1.10	Issue:	The ES has only assessed river lamprey and sea lamprey.
	Impact:	There are records in the River Trent of populations of Atlantic salmon (*Salmo salar*), brown/sea trout (*Salmo trutta*), European eel (*Anguilla anguilla*) and notable coarse fish, including barbel (*Barbus barbus).* By not including all fish in the baseline, impact-pathways may cause damage to fish or habitat
	Solution:	Include all fish species present in the River Trent in the EIA
Additional comments:	Atlantic salmon are an Annex II species of the Habitats Directive. Brown/sea trout are listed as a S41 Priority Species of the NERC (Natural Environment and Rural Communities) Act. European eel are listed as critically endangered on the IUCN Red List of Threatened Species, they are also listed as a species of principal importance under Section 41 of the Natural Environment and Rural communities (NERC) Act 2006. They are also protected under The Eels (England and Wales) Regulations 2009. Barbel are an Annex V species of the Habitats Directive. Note that EMF impacts on additional fish species is detailed in Appendix 2.4: Electromagnetic Fields Impact Report.	

Water Resources

EAWR-001		
	Issue:	The EA does not yet have confidence that there will be an available source of supply of water for the non-

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REP2-025 Chapter 7 & REP2-050 oCEMP		potable demands of the construction phase of the project. 7.6.27 states that wherever possible, water is to be sourced from non-potable sources (this could include using the existing abstraction licences from the River Trent) or private supplies to reduce the pressure on demand from the water company. Details of these abstractions as regards their current use and ownership is not specified. The oCEMP states only that if at detailed design, it is confirmed that potable water demand at the construction or operational stage is in excess of 20m3/day, then a Water Resource Assessment will be produced in consultation within Anglian Water.
	Impact:	7.6.30 and 31 state that the nature of effect to public water supply during construction is considered to be minor adverse and therefore is deemed not significant, and that based on the protective measures implemented by Anglian Water (i.e. declining requests in preference of protecting existing supply and the environment), the magnitude of impact is considered to be negligible. Whilst we agree with this in terms of the projects impact on receptors, the implications of water not being available to the construction phase of the scheme itself is not considered adequately.
	Solution:	If the water company is unable to provide supply for non-potable construction water use, alternative sources of supply need to explored. This is the purpose of the Water resources assessment and should ideally have been considered at pre application. We recommend that this assessment is undertaken and appraises options for alternative sources of supply for non-potable water demands available to the project to include: • Clarifying the construction activities which require a water supply (dust suppression; HDD etc) • Further information on existing abstractions identified (are they owned by the landowner or developer or is a trade required? Do existing licences already have restrictive conditions?); • Likelihood of new abstraction being required if trades are not possible. • Appraisal of the catchment abstraction licensing strategy to evaluate potential licence restrictions and mitigation required (e.g. temporary winter storage for summer use).

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		Exact volumes of water are not essential to this assessment. If existing licences are to be made use of, they will require formal changes to reflect their additional use. Evaluating this now can identify any future obstacles and mitigations which may influence detailed design.
Additional comments:		

Subject	Topics	Assessment	Impact	Solution	Agreed requirement/ or updated assessment	Note:
Ecology and Biodiversity	**Biodiversity Net Gain**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFBG-004 - Lack of detail on the creation and management of habitats though BNG processes. EAFBG-005 - Lacking detail in the BNG map in addition no BNG metric calculator is supplied. EAFBG-006 - Clarity needed on the watercourses included within the metric, some may be missed/classified as ditches. EAFBG-007 - Use of culvert as habitat type in post development scenario is not appropriate.
	Decommissioning Management Plan (DMP)	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFBG-012 - Post decommissioning plan needs putting in place to ensure left in situ cables don't have an adverse effect on water quality.

	Ecological Assessment	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFBG-001 - Fish species missing from EIA, only river lamprey and sea lamprey have been assessed. EAFBG-002 - Protected fish species have not been included within Table 3-1 Extended Habitat Survey. EAFBG-003 - No fish species are included within the desk study (appendix 6.2). EAFBG-008 - Construction phase effects on mammals has not been identified. EAFBG-009 water vole populations/locations need to be considered when undertaking crossings. EAFBG-010 - a biosecurity plan should be developed including an INNS monitoring and eradication plan is developed. EAFBG-011 - Water vole survey was undertaken outside of optimal survey season

	Water Environment Report / WFD	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFBG-012 - Watercourse sensitivity not identified correctly. EAFBG-011 - Impacts on WFD waterbodies through the use of culverts
	Flood Risk Assessment	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFR-001 - panels indicated to be submerged by 600mm, assessment needed for the panels which will not remain operational, justification needed EAFR-002 - Proposals of voids under inverter stations which could cause increases in offsite flood risk, justification needed and maintenance plan. EAFR-003 - Construction phase impacts have not been identified. EAFR-004 - Details of proposed crossings (above and below ground) have not been provided, impacts on water course and flood defences need to be identified. EAFR-005 - Maintenance

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						plans for debris clearance and upkeep of panel legs have not been provided.
	Detailed Flood Modelling (Flood Risk Assessment)	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFM-01 - proposed bridges must sit above the design flood level EAFM-02 - Flood flows from areas where the panels sit below the deign flood level could have an effect on flow rates which has not been quantified. EAFM-03 - Grid references for the catchments where the ReFH2 peak flows were calculated need to be included.
Geomorphology	**Water Environment Report / WFD**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	
Groundwater Protection	**WFD Assessment**	**Working on**	**Working on**	**Working on**	**Working on solution**	

& Contaminated Land		**solution**	**solution**	**solution**		
	Decommissioning Management Plan (DMP)	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	
	Hydrogeology Sensitivities	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAGWCL-003 - Greater clarity needed on WFD classification/magnitude of impacts. EAGWCL-006 - SPZs presumed to not be connected to the underlying Superficial Secondary A aquifers. EAGWCL-011 - Firefighting water containment and unlined features associated with the BESS could cause contamination to aquifer EAGWCL-008 - no commitment has been made to the production of a hydrogeological risk assessment for watercourse crossings. EAGWCL-012 - Automatic penstock valve not specified to ensure firefighting water does not discharge into surface water drainage. EAGWCL-013 - Uncited source

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						of data supporting statement associated with fire runoff water.
	Surface water and Groundwater abstractions, pollutions incidents and discharge consents Report	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAGWCL-002 - No reference to private groundwater abstractions has been made and it is unclear what information sources have been used to identify the discussed groundwater abstractions. EAGWCL004 - Figure 8.7 shows additional groundwater abstraction point which may not be considered.

	Contaminated Land	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAGWCL-001 - Requirement 21 (2) of Draft DCO, incorporation of all parts of the proposed development to be included not just the area for site investigation. EAGWCL-007 - No commitment made to mitigate the risk of unexpected contamination being discovered. EAGWCL-010 - Drilling fluid breakout plan has not been included. EAGWCL-009 - potential for cables left in situ to cause contamination to groundwater.
	Piling Risk Assessment	**Not Agreed**	**Not Agreed**	**Not Agreed**	**Not Agreed**	EAGWCL-005 - no commitment to producing a Foundation Works Risk Assessment (this could be completed through the oCEMP)
Surface Water Quality	**Battery Safety Management Plan (BSMP)**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EASW-001 - Post Fire Event Management
	Decommissioning Management Plan (DMP)	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	
	Modelling	**Working on**	**Working on**	**Working on**	**Working on solution**	

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		solution	**solution**	**solution**		
Water Resources	**Water Supply Strategy**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAWR-001 - Recommendation of a water resources strategy to ensure demands can be met.
	Water Resources Assessment	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAWR-001 - Anglian Water asks for a Water Resources Assessment to be completed to understand water demands.
Permitting	**Consents Strategy**	**Not Agreed**	**Not Agreed**	**Not Agreed**	**Not Agreed**	EAGCC-01 - Delays to the delivery of the scheme where consents and agreements are insufficiently comprehensive, to ensure the EA can effectively deal with permit applications.