Planning Inspectorate

[via Planning Inspectorate website & oneearthsolar@planninginspectorate.gov.uk]

Our ref: XA/2025/100441/02
Alt Ref: ENVPAC/1/NIT/00019
Your Ref: EN010159

Date: 14 October 2025

Dear Sir/Madam

ONE EARTH SOLAR FARM

RESPONSE TO DOCUMENTS SUBMITTED AT DEADLINE 3

Thank you for consulting us on the additional documents submitted by the applicant on the 16 September 2025. We have reviewed the submissions and have the following comments to make within appendix 1 (response to submitted documentation). We are in discussions with the applicant around the Statement of Common Ground, we have received an updated version which we will consult with the applicant and have a formal response by the next deadline.

We are also working with the applicant through an updated version of the Flood Risk Assessment, we have referenced this in our response to ExQ2 and we are expecting updates to be made to the document by the applicant.

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 James Cordell
Planning Advisor - National Infrastructure Team

Appendix 1 – Response to documents submitted at deadline 3
Appendix 2 – Environment Agency Work Package Tracker

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Appendix 1

Water Quality

EAWQ – Water Quality Monitoring		
Outline Construction Environmental Management Plan Outline Operational Environmental Management Plan Outline Decommissioning Environmental Management Plan Appendix 7.4 – Stage 1 WFD Screening Assessment	Issue:	Whilst we accept that a water quality monitoring regime has been agreed to, there are still minimal details in Table 3.5 of the CEMP, Table 3.5 of the DEMP and section 5.2 of Appendix 7.4. Furthermore, Table 3-4 of the OEMP says "No water quality monitoring is required during the operational period", however this is incorrect.
	Impact:	If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality during the construction and operation phases. There will be some monitoring during the first few months of operation to provide confirmation that there are no residual water quality impacts post-construction.
	Solution:	Amend Table 3-4 of the OEMP to acknowledge monitoring will occur during operation. We recognise that the applicant states that details of monitoring will be set out within the CEMP and DEMP post consent, therefore we will look forward to reviewing the documents and providing further comments at that stage. In the meantime, see below for what we would expect to be included in a monitoring programme. As per our REP2-094 response, we recognise that section 5.2 of the WFD Assessment says that the Water Management Plan (WMP), which will be submitted as part of the CEMP, will contain details of pre, during and post-construction water quality monitoring. Therefore, we also look forward to reviewing the WMP.
Additional comments:	We support that there is a commitment to include monitoring upstream and downstream of any proposed surface water outfalls and water crossings and look forward to further details of locations post-consent. With regard to frequency, as stated in in REP2-094, the monitoring plan will include enough monitoring samples to detect any variation as a result of seasons or weather conditions. We recommend a frequency of at least once per month, which should start at least six months prior to construction. During construction, we suggest the frequency of sampling should increase, i.e. every two weeks during the first three months of construction, and during any earthworks or concrete work. Monitoring should continue all throughout construction, and for six months after construction. If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality during the construction and initial operation phases.	

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	Site walkovers, and visual inspections of the drainage water, are also encouraged as a regular frequency to support measurements taken with probes and sample collections. Any water samples should be sent to a United Kingdom Accreditation Service (UKAS) accredited laboratory and where applicable Monitoring Certification Scheme for Equipment (MCERTs) accredited testing must be carried out. The results of laboratory analysis of water samples should be tabulated and recorded, and be able to be provided to the Environment Agency if requested, or sent automatically in the event of a pollution incident.

EAWQ – Surface Runoff		
Outline Construction Environmental Management Plan Appendix 7.2 – Flood Risk Assessment and Outline Drainage Strategy	Issue:	Table 3.5 of the CEMP still contains uncertainty over how surface runoff will be disposed of, i.e. discharged to sewers or under a Water Discharge Activity Permit. Table 4-2 of the FRA and Drainage Strategy also says that Storm water may slowly release to sewers. This is unclear given that there is going to be no foul connection to the sewers. We queried this in in REP2-094, but there doesn't appear to updates on this matter to the CEMP or Chapter 7.
	Impact:	It is hard to assess site drainage until further details are provided especially if it appears to have connectivity that is different from the foul water strategy.
	Solution:	Provide further information about which points of connections for surface drainage water are being considered (if any), and what discharge permits will be applied for.
Additional comments:		

EAWQ – Subbase and Lining in BESS and Substations		
Chapter 5 – Description of the Proposed Development Outline Operational Environmental Management Plan Appendix 7.2 – Flood Risk Assessment	Issue:	Table 4-2 of Appendix 7.2 is still titled BESS and Sub-station Sustainable Drainage Systems and contains reference to a number of features that will be permeable. The conclusion of the Drainage Strategy also still says "Additional SuDS in the form of permeable sub-base beneath the battery units will also be provided." However, this is in contradiction to section 5.4.45 of Chapter 5 and section 4.1.3 of Appendix 7.4. Furthermore, no updates on including these lining details have been seen in Chapter 7. If gravel substrates are deemed to be included in the final design, there should be provision within the

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Appendix 7.4 – Stage 1 WFD Screening Assessment Outline Battery Safety Management Plan		post-incident recovery plan that commits to removing the gravel to be cleaned and/or replaced.
	Impact:	Suitable lining and containment should be used in the BESS and Substations drainage systems to prevent any contaminants reaching groundwater or surface waters via runoff.
	Solution:	We accept that the BESS sites will be lined with an impermeable membrane to contain contaminants and note that the substations will likely be managed the same, but will await further details of this to be confirmed in the CEMP post-consent. We expect to see reference made to this without the outline management plans. As per our comments in REP2-094 in regard to Table 4-2 of Appendix 7.2, we would still ask for clarification on which SuDS will be impermeably lined when used for the BESS and Substations, and which ones will be used around the rest of the site. Details about lining type used in BESS, Substations and surrounding SuDS should be included in Chapter 7. We recognise that section 4.8.10 of the BSMP states "Post-incident hazards shall be addressed in the pre-fire planning and post-incident recovery plan, including consideration of contaminants remaining within the substrate of with the BESS compound of the fire water storage areas." Although we would take this opportunity to remind the applicant that it is our position they should be impermeably lined to prevent contamination reaching groundwater or runoff reaching surface waters, we accept that the gravel could be used provided that there is the commitment to removing the substrate for thorough cleaning/replacement. This should be included in the BSMP and post-incident recovery plan. However, as we have not yet been able to review any details of this plan yet we are unable to confirm it's details.
Additional comments:	We welcome the update in section 5.4.45 of Chapter 5 and Table 3-4 of the OEMP which says that "The Substation Compounds and Sustainable Drainage (SuDs) features serving them would include impermeable lining to prevent infiltration to the ground." This agrees with Appendix 7.4: Stage 1 Water Framework Directive Screening Assessment, section 4.1.3 says that "It is proposed that the drainage system and SuDS features servicing the BESS and Sub-station areas will be impermeably lined".	

EAWQ – Firewater Associated with BESS and Substations		
Outline Construction	Issue:	In the oOEMP, firewater is included in Table 3-11 about ground conditions but is not mentioned in Table 3-4 about the water environment. Furthermore,

Management Plan Outline Operational Environmental Management Plan Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy		neither of these tables references the Battery Safety Management Plan (BSMP).
	Impact:	Firewater and other chemicals from BESS will deteriorate water quality unless it is contained and removed sufficiently.
	Solution:	Update table 3-4 in the oOEMP to include references to firewater management and the BSMP. In the event of a fire, we request that methods and frequency of testing of contained surface runoff/ firewater be included in the final OEMP and Battery Safety Management Plan.
Additional comments:	We accept the updates made to documents to include provision for the penstock valve to be automatic and have a manual backup. We note that any polluted runoff will be contained and removed from the site for treatment, which we support. Furthermore, we support the clarification that transformers in the substation will all be bunded. We welcome the update in the Maintenance Regime section and table 4-10 in the Drainage Strategy which confirms that the Penstock valve will also have sufficient maintenance	

EAWQ – Septic Tanks		
Chapter 5 – Description of the Proposed Development Section 5.4.44	Issue:	In each of the Environmental Management Plans, it was confirmed that foul water will be tankered away to an appropriate disposal facility by a licensed waste disposal contractor. However, there is still reference to septic tanks in section 5.4.44. Furthermore, in REP2-094, we requested that any foul water strategy is included in Chapter 7: Hydrology and Hydrogeology, as currently the only information associated with this is that there will be “no direct connection to existing foul infrastructure.”, however an updated version was not submitted by the applicant at the last deadline.
	Impact:	There is a requirement to ensure that foul water treatment and disposal is adequate to minimise risk to water quality. There should be consistency across documents to ensure there is confidence in the proposed measures.
	Solution:	Section 5.4.44 needs to be updated to remove mention of possible septic tanks, but please see our response REP2-094 if you require further information on septic tank permits. Please add details to Chapter 7.

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Additional comments:	

EAWQ – WFD References		
Appendix 7.4 – Stage 1 WFD Screening Assessment	Issue:	All Environmental Management Plans for all phases (Construction, Operation and Decommissioning) and the Battery Safety Management Plan (BSMP) should be referenced in the WFD Assessment when providing details of embedded mitigation measures.
	Impact:	Currently only the CEMP is referenced in the WFD Assessment, and this makes it hard to interpret which measures are included to ensure that there are no negative impacts to the existing watercourses and waterbodies.
	Solution:	Section 4 of the WFD Assessment must be updated to reference the OEMP and the BSMP for continuity to understand all measures. Please add an additional section to the WFD Assessment titled 'Decommissioning Mitigation' which captures which measures will be implemented during decommissioning so that it can be concluded that the decommissioning will not cause or contribute to deterioration of the existing watercourses or groundwater bodies or jeopardise their potential to achieve good status. This may have similarities to the construction section but should reference the DEMP.
Additional comments:		

EAWQ – Testing Post Fire Event		
Outline Battery Safety Management Plan	Issue:	Section 5.1.5 states "There shall be no firewater runoff released to the environment before appropriate testing has been carried out". However, it is unclear what 'appropriate testing' means.
	Impact:	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.
	Solution:	Please provide details of what testing is proposed in the event of a fire. We expect that samples would be taken, when safe to do, which would be sent to a UKAS accredited laboratory for analysis by UKAS and MCERTS (where applicable) accredited methods. The water samples should be checked against the list of surface water specific substances in the surface water pollution risk assessment guide. Surface water pollution risk assessment for your environmental permit - GOV.UK

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Additional comments:	

EAWQ – Construction Mitigation		
Outline Construction Environmental Management Plan Appendix 7.4 Stage 1 WFD Screening Assessment	Comments:	We recognise that the requested amendments regarding storage of fuels, oils and chemicals, wash out water management, and concrete management have been updated in the outline CEMP and WFD Assessment. We are satisfied with the mitigation measures that are now included. We acknowledge that the exact measures to manage wash out water and concrete will be detailed in the CEMP post-consent, and we will look forward to reviewing the document and providing further comments. We accept that a site specific frac-out risk assessment will be produced and included in the CEMP prior to drilling the cable crossings. Additionally, we identify that the CEMP will also include a bentonite fluid breakout plan and an emergency spill response procedure. If the Applicant has further drafts of the CEMP and/or bentonite fluid breakout plan ready to be reviewed prior to consent, we would welcome the opportunity to evaluate further details. Table 3.5 of the DEMP says “Where these containment measures are utilised, an oil separator (interceptor), or other device to remove oil from water, may need to be installed. This will be detailed in the CEMP if required” – We wanted to clarify with the applicant if CEMP was correct, or if it should read DEMP?

EAWQ – Herbicides		
Outline Operational Environmental Management Plan Appendix 7.4 Stage 1 WFD Screening Assessment Outline Landscape and Ecology	Comments:	Table 3-4 of the OEMP says that “Should any herbicide or other spray chemical be needed in small volumes, a method statement, operating procedure or similar will be prepared prior to the work commencing”, however there is no reference to the oLEMP here. For consistency between documents, we strongly encourage a reference to be added. Section 4.1 of Appendix 7.4 says that “It is not proposed that harsh chemicals or pesticides will be utilised for vegetation management”, which we acknowledge. However, it goes on to say that “Full details of vegetation management will be outlined within the Landscape and Ecology Management Pan (LEMP), post consent”. Whilst we accept that we can

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Management Plan		review the final LEMP and provide further comments at that stage, we would like to note that no specific details are currently included in the outline LEMP. Sections 5.4.14 and 5.4.25 only say that "chemical and mechanical control" may be used to maintain a weed free strip either side of the hedgerow.

EAWQ – SuDS Maintenance		
Outline Operational Environmental Management Plan Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy	Comments:	We note that the maintenance of the SuDS features and drainage network may be appointed to third party maintenance contractor, and that some information about SuDS maintenance is included in Table 4-10 of the Drainage Strategy. We welcome updates to Table 3-4 in the OEMP which says "the OEMP will include a detailed SuDS Maintenance Schedule that sets out maintenance tasks and their frequency." We look forward to reviewing the document and providing further comments when this is finalised. We believe there is one typo in Table 3-4, where it says "The detailed schedule will be based on the principles set out in Table 4-1" we believe this should actually be Table 4-10.

EAWQ – Foul Water		
Outline Construction Environmental Management Plan	Comments:	We note that it has been confirmed that foul water will be tankered away to an appropriate disposal facility by a licensed waste disposal contractor during all phases of the development. We support this, and we would like to remind the applicant that if road transport to an offsite disposal facility is required to remove foul water, then there should be regard for this within the waste management procedures. If these procedures are already contained within other documents, then they should be referenced within the CEMP.

EAWQ – Battery Safety Management Plan		
Outline Battery Safety Management Plan	Comments:	We accept the amendments made to the Outline Battery Safety Management Plan (BSMP), however there are two typos that should be addressed. • Section 4.8.9 says "contamenentscontaminants" • Section 5.1.3 says "cab me closed maually"

Ground Water & Contaminated Land

GWCL–002 and GWCL-004 Groundwater Abstractions

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Chapter 7 Hydrology and Hydrogeology, Section 7.4.11 Chapter 8 Land and Soils, Section 8.4.38	Issue:	The Applicant has not clearly differentiated between different sources of information for identified groundwater abstractions. There is a lack of consistency in descriptions of abstractions within the Study Area.
	Impact:	Potential for private groundwater abstractions to be present which may not have been accounted for in the ES. If these are known or presumed to be used for potable water abstraction these are assigned a presumptive 50m radius SPZ1.
	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:	We note that the updated Figure 8.7 of the ES has been altered to remove two previously marked abstraction points at the former High Marnham Power Station and in the north-western part of the Draft Order Limits near Ragnall. The Applicant should confirm the rationale behind these changes for completeness. Chapter 8 has been updated to reflect changes in the Order Limits and now refers to there being no abstractions within the draft Order Limits, two abstractions within 250m of the Order Limits and three Anglian Water abstractions without positional data within the Study Area, which have been assumed to be positioned outside the Order Limits. Chapter 7 should be updated to be consistent with Chapter 8.	

GWCL–007 Contamination Watching Brief		
Chapter 8 Land and Soils Outline Construction Environmental Management Plan Table 3.10	Issue:	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.
	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:	We acknowledge that the area of High Marnham Power Station will be subject to investigation post-consent, and that the findings will be used to determine management of soil and groundwater contamination risks during construction.	

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	The purpose of the contamination watching brief would be to ensure that if contamination were unexpectedly encountered within areas not previously characterised, the Contractor would halt works locally and seek specialist advice. We acknowledge that the course of action in the event that unexpected contamination is discovered is captured in Table 3.10 of the oCECMP. This should be supported by ensuring the Principal Contractor provides a suitable briefing to earthworks personnel on recognising possible evidence of contamination and the unexpected contamination discovery protocol. 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.

GWCL–009 Retention of Buried Cables		
Appendix 7.6 Outline Decommissioning Environmental Management Plan	Issue:	Inconsistency between the DEMP and Chapters 5 and 8 of the ES relating to the proposed retention of buried cables following decommissioning.
	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:	Chapter 5 of the ES (Section 5.6.2) has been amended to state that buried cables are proposed to be retained in-situ below 0.9m following decommissioning. This is contradicted in part by Section 8.3.18 of Chapter 8 and the DEMP, which both state that the decommissioning approach for underground cables would be subject to review prior to decommissioning, in accordance with the legislation and best practice guidance at that time. The resulting assessment may conclude that retention of cabling is the least environmentally impactful method, or that removal is required. This should remain a commitment for the Proposed Development, and we recommend that the developer consider the potential future need for removal as part of the detailed design process for underground cabling. Note that Chapter 5 also does not refer to the proposed sealing and burial of cable ends, which is mentioned in Chapter 8. Buried cables should be designed and installed in accordance with industry best practice and should have a design lifespan commensurate with that of the Proposed Development. We encourage the Applicant to avoid the use of PFAS compounds in construction materials where possible, inclusive of buried cabling.	

GWCL–013 Firewater Run-off		
Outline Battery Safety Management Plan	Issue:	The Plan states in Section 4.8.7 “At the time of writing there is no clear consensus on the type or quantity of potentially harmful combustion products.

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		The data from the only BESS fire in the UK indicated that firewater run-off contamination was low" The report does not cite the source of the data, however this conclusion differs from that in a 2024 paper 'Assessment of Run-Off Waters Resulting from Lithium-Ion Battery Fire-Fighting Operations' published in March 2024, which concluded that runoff water from large-scale lithium-ion battery fire incidents could be potentially hazardous to the environment.
	Impact:	The statement could potentially be misleading, as there is (non-UK) evidence to suggest that firewater run-off contamination could pose a significant hazard to groundwater.
	Solution:	The Applicant should confirm the source of information cited in the Management Plan and acknowledge that some studies have indicated Lithium-ion battery firefighting water can contain elevated concentrations of ecotoxic contaminants.
Additional comments:	Research paper: Assessment of Run-Off Waters Resulting from Lithium-Ion Battery Fire-Fighting Operations The paper determined that lithium-ion battery firefighting run-off water was susceptible to containing elevated concentrations of several heavy metals including Ni, Mn, Co, Li and Al, in addition to hydrocarbons and sometimes undecomposed solvents used in the battery electrolyte. A second research paper (Ecotoxicity Evaluation of Fire Extinguishing Water from Large-Scale Battery and Battery Electric Vehicle Fire Tests, Environ. Sci. Technol. 2023, 57, 4821-4830) focusing on a comparison between firefighting water composition from petrol and EV vehicles found higher concentrations of Ni, Co, Li, Mn and fluoride in the lithium-ion vehicle firefighting water.	

GWCL – Sentinel Outfall Monitors at BESS		
oOEMP and Outline Battery Safety Management Plan	Comments:	We encourage the Applicant to employ 'sentinel' monitoring systems at the BESS outfall to enable early detection and management of spills and leaks entering surface water drainage system during normal operation.

Biodiversity

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.

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	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.	

EAFBG-006 Watercourse Classifications BNG		
Environmental Statement Chapter 6 Appendix 6-10 Biodiversity Net Gain Assessment	Issue:	Fledborough Beck is still classified as a ditch along with other named watercourses within the Biodiversity Net Gain Metric.
	Impact:	It cannot be demonstrated that the river elements of the site within the red line boundary have been considered.
	Solution:	Correctly identify Fledborough Beck as ‘other rivers and streams’ and reassess the BNG watercourse metric.
Additional comments:		

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EAFBG – Ditch Enhancement		
REP3-0 Response to D2 Submission R2R10	Comments:	Viability of assuming ditches can be assumed to be changed to 'good'. In order to achieve 'good condition' the created habitats will need to secure all of the stated condition criteria. Whilst it is accepted that changed management practices will benefit water quality, presumably there are ditches receiving water from offsite areas outside of the applicant's control, and therefore viability of achieving these is open to question. For example, the condition assessment mentions road run off as an issue. The applicant's response points to measure (planting aquatic vegetation) not mentioned in the oLEMP or commitments. To achieve good status, control over the water levels is required which again the applicant may not be able to control. There is no commitment to monitor/control non-native species (accept Mink) in the oLEMP or commitments. Overall, we would be more confident assuming enhancement of ditches to a moderate condition.

Water Resources

EAWR-001		
REP2-025 Chapter 7 & REP2-050 oCEMP	Issue:	The EA does not yet have confidence that there will be an available source of supply of water for the non-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

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		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). 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:		

Appendix 2

Work Package Tracker

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

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						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**	
	Flood Risk Assessment	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	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.
	Detailed Flood Modelling (Flood Risk Assessment)	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	EAFM-02 - Flood flows from areas where the panels sit below the deign flood level could

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						have an effect on flow rates which has not been quantified.
Geomophology	**Water Environment Report / WFD**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	References to the Outline Environmental Management Plans and the BSMP to be added
Groundwater Protection & Contaminated Land	**WFD Assessment**	**Working on solution**	**Working on solution**	**Working on solution**	**Working on solution**	Additional Monitoring to be added to the WFD Assessment
	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**	

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	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-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 solution**	**Working on solution**	**Working on solution**	**Working on 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

Cont/d..

						permit applications.