One Earth Solar Farm

Draft Statement of Common Ground with the Environment Agency

EN010159/APP/8.11.3

November 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.
16.06.2025	Email	The Applicant requested information held by the Environment Agency relating to private water abstraction locations in response to consultation comments that the original dataset may not have been complete. Response awaited from the Environment Agency.
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.
25.07.2025	Email	Dataset received from East Midlands Enquiries team, providing recorded private licensed water abstractions.

16.09.2025	Teams Meeting	Meeting to discuss the EA “Flood Gate” as referred to by local residents. EA confirmed that they do not own or operate any flood gates in the vicinity of North Clifton but have indicated that there are two culverts where the Sewer Dyke discharges to the River Trent which include flap valves on their outfalls. It was also confirmed by the Applicant that they were intending to proceed with a develpoment design in which no panels would be submerged. It was noted that this would be achieved via amendments to the panel angle or removal of the bottom row of panels, in line with the outline design parameters. The EA indicated that this was a positive step forward and that this will address their concerns on impacts to flood flows. The EA also indicated that they were not concerned with the impacts that the panel columns would have on flood flows.
26.09.2025	Teams Meeting	Meeting to discuss the updates undertaken to the FRA prior to submitting a draft version to the EA for review. This included confirmation that no panels will be submerged in the design flood event and inclusion of the Flood Risk Mitigation Requirement as a securing method for items that need to be assessed further at detailed design. Key meeting outcomes were that the EA requested the following: – The variance in flood depth/level between the design flood event and maximum credible event be assessed. – Although the EA previously indicated that hydraulic modelling would not be required, they have now requested that the Tidal Trent (2023) hydraulic model be rerun with layered flow constriction polygons with a blockage percentage applied to represent the columns for the panel mounting structures and assess the potential impacts of this on flood risk. This was requested in addition to the flood storage assessment already undertaken and requested by the EA.

		Applicant agreed to review the above items and revert back to the EA to discuss. It was agreed that the EA would review the draft documents submitted and provide comments prior to Deadline 4.
08.10.25	Teams Meeting	Meeting to discuss outstanding points within the Statement of Common Ground.
03.11.25	Teams Meeting	Meeting to discuss progress on outstanding points within the Statement of Common Ground.

4. Current Position

4.1 Position of the Applicant and the Environment Agency

4.1.1 The following tables set 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	Flood Risk Requirement	Applicant to provide a Flood Risk Requirement setting out the securing mechanism for reconfirming flood risk mitigation measures at detailed design.	Wording for Flood Risk Mitigation Requirement 22 has been set out within a draft of the Flood Risk Assessment (FRA). This wording is being reviewed by the EA, who will provide comments/amendments.	**Under Discussion**
02-02	Development Layout	Applicant to set out the development such that sensitive equipment is located	A sequential approach to the development layout has been taken with sensitive infrastructure (BESS and Substations) located outside of the design flood extent.	**Agreed**

		outside the design flood extent.		
02-03	Panel Raising	Applicant to provide a 300mm freeboard between the design flood level and base of panels wherever possible.	It is proposed that a minimum of 300mm freeboard be provided across the majority of the Site by raising the bottom of panel heights. There are however, some localised positions where panels do experience a lesser freeboard. As a minimum, the base of the panels will be raised as required to ensure that the panels do not become submerged. This is achieved by adjusting the panel angle (within the 10 – 25 degree as set out within the outline design parameters) or by removing the bottom row of panels. By taking the above approach, it is confirmed that during the design flood event, the panels will not be submerged at any location within the Proposed Development, thereby ensuring the panels themselves will not impact flood flows or storage capacity. The EA have confirmed this matter is agreed following review of an updated draft of the FRA. The updated FRA will be submitted at Deadline 5.	**Agreed**

02-04	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 to be 300 mm above the design flood level (which includes for the underside of any structural beams if needed). At this stage, given the uncertainty of inverter locations and as a worst case, it is suggested that the inverters be raised on voided structures, that allow the flow and storage of floodwater beneath, thereby having a negligible impact on flood flows and storage capacity. However, once the inverter locations are known at detailed design, options for land raising rather than voided structures will be reviewed and provided where feasible. This is an item that will be confirmed at detailed design and assessed as part of Flood Risk Mitigation Requirement 22. This confirmation / review of the design is also allowed for within the relevant outline design parameters for the inverters.	**Under Discussion**

02-05	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 and voided inverter structures.	Conservative assessments of impact on flood volumes in the design flood event have been undertaken and confirm the following potential increases in flood depths: • + 2.2mm to the west of the River Trent. • + 3.5mm to the east of the River Trent. These increases are less than the 5mm tolerance that the EA indicated would be acceptable. Based on this flood volume assessment, the impact on fluvial flood risk is therefore considered to be negligible. The flood volume assessment will be reviewed and reassessed at detailed design as part of Flood Risk Mitigation Requirement 22, to ensure the Proposed Development does not impact storage capacity to a greater extent than is outlined within the current FRA (2.2mm to the west of the River Trent, and 3.5mm to the east of the River Trent). The EA have confirmed this matter is agreed following review of an updated draft of the FRA. The updated FRA will be submitted at Deadline 5.	**Agreed**

02-06	Resilient Design of Panel Frames and Voided Inverter Structures	Applicant to provide resilient design of panel frames and voided inverter structures to ensure they can withstand flooding conditions and debris impact.	To support the flood storage assessment, a structural assessment to determine a typical design of the panel mounting structures and inverter voided structures (within the design flood extent) has been undertaken, which takes into account the likely velocity of flood flows and conservative potential debris impact. Based on initial structural assessments, it is anticipated that clear spans of 2.4m along the width of the inverter and 6m along its length can be provided between columns. These are considered to be significant spans which should allow the free flow of water with limited risk of blockages, whilst also allowing for maintenance and clean up operations following a flood event. The panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. These included inspection of panel supports and fences to ensure structural integrity, remediation measures or replacement implemented if any issues are observed.	**Under Discussion**

			At detailed design however, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. As set out in 02-05, the flood volume assessment will be reassessed at detailed design as part of Flood Risk Mitigation Requirement 22 and will include for updated structural information.	
02-07	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 hydrogeological risk 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.	**Agreed**

02-08	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: • 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.	**Agreed**
02-09	Flood Conveyance	Applicant to consider the impact on flood flow conveyance due to panel mounting structures (i.e. supports).	The EAs additional request for hydraulic modelling is under review.	**Under Discussion**
02-10	WFD Screening Assessment	WFD Screening Assessment to be prepared for review by the EA.	An updated WFD Screening Assessment was provided at Deadline 4 which sets out that with embedded mitigation, no further assessment is considered necessary. This SoCG entry will be updated accordingly when the EA confirm agreement.	**Under Discussion**

02-11	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. A meeting between the Applicant and Environment Agency has taken place and the relevant Application documents are being updated for deadline 5 and this SoCG entry will be updated accordingly.	**Under Discussion**
02-11	Construction and Decommissioning	Applicant to set out outline flood risk mitigation and surface water runoff management measures that will be utilised during construction and decommissioning.	Measures have been outlined within the oCEMP and oDEMP to ensure that temporary changes in flood risk, surface water drainage and potential impacts to water quality are managed and mitigated for appropriately.	**Under Discussion**

Table 03 – Ecology and biodiversity

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
03-01	Adequacy of habitat survey information	EA raises concerns around the adequacy of habitat surveys.	The Phase 1 survey / UK Habitats Classification, Habitats Condition Assessment and Hedgerow Survey provide sufficient information for a robust Ecological Impact Assessment and Biodiversity Net Gain Assessment. Consideration of watercourses / wet ditches is underpinned by consideration from a certified MoRPH surveyor and a fish specialist. The provision of embedded measure C36 (Table 6.6 of Chapter 6 Biodiversity [REP1-023]) gives confidence that the detailed design and finalised BNG calculations will be accurate. Further detail can be found in Appendix 6.3 Extended Habitat Survey [REP1-032] , Appendix 6.10 Biodiversity Net Gain Assessment [REP1-040] and Appendix 6.11 Fish Habitat Baseline[REP1-042]	**Under Discussion**

03-02	Adequacy of protected mammal surveys (otter and water vole)	EA raises concerns around the adequacy of protected mammal surveys. Content that REP3-009 has committed to updating the riparian mammal surveys and therefore in agreement.	The otter and water vole survey described in Appendix 6.7 Badger, Otter and Water Vole Baseline [APP-090] provides sufficient information on otters and water vole distribution to undertake a robust assessment of the effects of the proposed development on these species. This is in light of the mitigation measures integrated within the project design. It is noted that the timing of surveys for water vole were appropriate in line with prevailing weather conditions and the Water Vole Mitigation Handbook. Further detail can be found in Appendix 6.7 Badger, Otter and Water Vole Baseline [APP-090], Chapter 6 Biodiversity [REP1-035]) and in the Applicant's response to Relevant Representations [REP1-075].	**Agreed**
03-03	Adequacy of assessment on fish	Fish species missing from EIA, only river lamprey and sea lamprey have been assessed.	Information on fish was added to Chapter 6 Biodiversity [REP1-023] as requested by the Environment Agency and a fish habitat survey completed in 2025 at crossing points of permanently wet ditches and the River Trent (Appendix 6.11 Fish Habitat Baseline [REP1-042]).	**Under Discussion**

			The mitigation integrated within the design including use of trenchless crossings, clear span bridges and stand-offs to ditches / watercourse other than at crossings. No significant effects on fish due to the construction, operation or decommissioning of the project were predicted.	
03-04	Adequacy of assessment of sea and river lamprey associated with the Humber Estuary SAC and Ramsar site	The Environment Agency are now satisfied with the approach taken for the assessment of sea and rive lamprey.	Information on lamprey was provided at application and further added to at Deadline 1 in Chapter 6 Biodiversity [REP1-023]. A fish habitat survey completed in 2025 at crossing points of permanently wet ditches and the River Trent was also provided (Appendix 6.11 Fish Habitat Baseline [REP1-042]). The mitigation integrated within the design including use of trenchless crossings (including minimum depth requirements), clear span bridges and stand-offs to ditches / watercourse other than at crossings are appropriate for negating potential effects of the Proposed Development. Due to general low level of available information on the effects of EMF on lamprey a 5 year monitoring programme has been committed to in line with those agreed with the Environment	**Agreed**

			Agency and Natural England for other Development Consent Order projects with transmission cables crossing the River Trent. With this commitment in place it is appropriate to conclude that there is no adverse effect on the integrity of the Humber Estuary SAC and Ramsar site.	

Table 04 – Land and Soils

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
04-01	Unexpected Contamination Sources	Potential for sources of existing contamination to be encountered during construction works without adequate measures in place to manage risks to controlled waters.	Based on the available baseline information on the potential contamination history of the Order Limits, and on the fact that information will be made available subsequent to intrusive investigation work in the area of the former High Marnham Power Station, the Applicant noted that the provision of a watching brief in respect of unexpected contamination was not considerednecessary for the Proposed Development. The Applicant had interpreted a 'watching brief' to require full-time supervision. Subsequent discussions with the Environment Agency has indicated that the following approach would be suitable to cover this request: The contamination watching brief for the Proposed Development would not necessitate a full-time presence of a suitably qualified and experienced land contamination specialist during ground works in areas where the potential for contamination is assessed as low.	**Under Discussion**

			This could instead be managed by a briefing to groundworks personnel to maintain vigilance for visual and olfactory signs of contamination, particularly in areas of historical mineral extraction, and the application of the discovery protocol as outlined and secured via the DCO in Table 3.10 of the oCEMP, Table 3.11 of the oOEMP and Table 3.17 of the oDEMP'. The Applicant has added text to Table 3.5 and Table 3.10 of the oCEMP, Table 3.11 of the oOEMP and Table 3.17 of the oDEMP to ensure that groundworkers are briefed as detailed above. The other requirements (to apply discovery protocols) were already incorporated in the oCEMP, oOEMP and oDEMP, as detailed in the above paragraph.	
04-02	Piling	Potential for the construction of non-piled foundation structures in areas where soil/groundwater contamination are present to introduce new migration pathways if insufficiently managed.	The concern of the Environment Agency that the potential for foundation excavation to result in mobilisation of existing contamination is noted, as is their indication that this is already addressed in other aspects of contamination control outlined in the OCEMP [REP2-049]. The Applicant understands the importance of ensuring that existing contamination is not	**Agreed**

			allowed to cause any adverse effects to the sensitive receptors, and this is robustly dealt with by the measures that are already outlined in the OCEMP, including the measures for dealing with unexpected contamination, and the requirement for a piling risk assessment. Further discussion with the Environment Agency has indicated that the committed mitigation measures outlined in the Applicant's SoCG statement and embedded in the oCEMP are acceptable and that the Environment Agency's request for the preparation of Foundation Works Risk Assessments over and above the committed Piling Risk Assessments can be withdrawn. This is on the basis that no deep foundation works other than piling are required for the construction of the Proposed Development and that excavations for non-piled foundation structures and buried service installation would be subject to the mitigation and the watching brief for unexpected contamination as referenced in Ref 04-01. This issue has therefore been agreed, given that the Applicant has now committed to the provision of a watching brief as defined in section 04-01.	

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