

Green Hill Solar Farm

EN010170

Statement of Common Ground: Environment Agency

Prepared by: Lanpro Services

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Infrastructure Planning (Examination Procedure) Rules 2010



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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 2

Statement of Common Ground: Environment Agency

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Green Hill Solar Farm Development Consent Order (the Application) made by Green Hill Solar Farm Ltd (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate's website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process, of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Green Hill Solar Farm Ltd. as the Applicant and (2) the Environment Agency (EA).
- 1.2.2 Collectively, Green Hill Solar Farm Ltd. and the Environment Agency are referred to as 'the parties'.

1.3 Terminology and Referencing

- 1.3.1 In the Tables in Section 3 of this SoCG below:
- "Agreed" indicates where the issue has been resolved;
 - "Not Agreed" indicates a final position; and
 - "Under discussion" indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.4 Topic Referencing for All Matters

- 1.4.1 All matters agreed, under discussion and not agreed have been given unique references which relate to the topic matter. The referencing system is defined as follows:

Table 1.1: Topic Referencing

Topic	Unique Identifying Code
Ecology and Biodiversity	EB-XX
Hydrology Flood Risk and Drainage	HYD-XX
Ground Conditions and Contamination	GCC-XX



2 Record of Engagement

2.1 Summary of Consultation

- 2.1.1 The parties have been engaged in consultation since March 2024.
- 2.1.2 A non-statutory consultation took place in March to May 2024. The statutory consultation process took place between 7th November and 19th December 2024.
- 2.1.3 The Applicant and the Environment Agency have engaged extensively throughout the pre-application and Environmental Impact Assessment (EIA) stages of the Proposed Development. The key engagement has included statutory consultation responses, technical discussions on flood risk modelling and drainage design, and provision of supporting information to inform the Environment Agency's review.
- 2.1.4 The main focus of discussions has related to:
- The hydrology, flood risk and drainage assessments set out in Environmental Statement (ES) Chapter 10 **[REP1-023]** and the Flood Risk Assessment (FRA) Covering Report **[REP1-053]** and Annexes **[APP-098 to APP-108, REP1-055 and REP1-057]**.
 - The scope and methodology of the Water Framework Directive (WFD) Assessment **[REP1-155]**.
 - The approach to climate change allowances in the FRA and drainage strategy.
 - Provision of rainfall hyetograph data and ReFH2 calculations to support verification of the 2D direct rainfall model.
 - The design of bunded drainage and pollution prevention measures for Battery Energy Storage System (BESS) areas.
 - Measures to manage residual flood risk, including emergency response procedures.
 - Construction phase flood risk management.
 - Consideration of impacts upon fish species, especially migratory fish species and impacts associated with trenching and Horizontal Directional Drilling around watercourses.
 - Consideration of impacts upon aquatic invertebrates.
- 2.1.5 Consideration of the risks associated with historical landfill areas in proximity to the site, including their potential to cause contamination and impact controlled waters. A summary of the meetings and correspondence that has taken place between Green Hill Solar Farm Ltd and statutory consultees in relation to the Application is outlined in **Table 2.1** below.

**Table 2.1: Record of Engagement**

Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
March–May 2024	Email correspondence (non statutory consultation)	Applicant requested EA Product 4, 5 and 6 data and sought early agreement on baseline information needs for the FRA and WFD screening, including available hydraulic models, historic flood records and climate allowance parameters.	EA acknowledged the requests and confirmed data availability to support preparation of the assessments.
November–December 2024	Statutory consultation response (Section 42)	Environment Agency provided detailed comments on ES Chapter 10, the FRA, and the WFD screening assessment, including recommendations on model verification, drainage design and pollution prevention measures.	Comments and recommendations to take forward.
December 2024–January 2025	Email correspondence	EA requested provision of rainfall hyetograph data, ReFH2 calculations and model logs to support verification of the hydraulic modelling approach.	See below.
January 2025	Statutory consultation response (Section 42)	Environment Agency provided detailed comments on fisheries legislation; mitigation measures for activities which may impact fish (such as trenching of watercourses); potential impacts on aquatic invertebrates; and characterisation of watercourses.	Comments and recommendations to take forward.
January 2025	Statutory consultation response (Section 42)	Ground Conditions and Contamination: Environment Agency requested the assessment of landfill risk to controlled waters, queried the requirement	Comments actioned within GH6.2.22 Environmental Statement Chapter 22 Ground Conditions and



Date	Form of Correspondence	Key Topics Discussed	Key Outcomes
		of cable leak protection and requested further details regarding Source Protection Zones (SPZs) and aquifers as potential receptors.	Contamination [APP-059].
January–March 2025	Email correspondence and file submission	Applicant provided model logs, rainfall hyetograph files and ReFH2 outputs. Updated mapping datasets were submitted reflecting NaFRA2 (January 2025) and revised RoFSW outputs.	EA acknowledged receipt and confirmed the information would inform their review.
April–May 2025	Email correspondence	Ongoing review of hydraulic modelling and drainage design. EA raised clarifications on residual risk measures, construction phase arrangements and pollution prevention measures for BESS areas.	N/A
June–July 2025	Email correspondence and SoCG preparation	Parties discussed the structure of the SoCG, confirmed the topics for inclusion.	Parties agreed to record current positions pending final review.
1 st October 2025	Teams meeting	Issue raised in EA Relevant Representation [RR-1224] regarding avoidance of the coarse fish spawning period for open-cut trenching of watercourses during cable route installation.	Applicant committed to avoidance period of October – June 15 th for relevant works, or completion of habitat suitability survey work pre-commencement to establish whether spawning fish are likely present/absent. This commitment is secured in the Outline Ecological Protection Mitigation and Strategy Revision A [REP1-141].



- 2.1.6 It is agreed that this is an accurate record of the key meetings and consultation undertaken between Green Hill Solar Farm Ltd and the Environment Agency in relation to the issues addressed in this SoCG.



3 Matters of Discussion

3.1 Overview

3.1.1 **Table 3.1** to **Table 3.3** below detail by topic the matters agreed, under discussion, or not agreed with the Environment Agency at the point of this document being published.

3.2 Ecology and Biodiversity

Table 3.1: Ecology and Biodiversity

	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
EB-01	Legislation	<u>EA Statutory Consultation Feedback</u> 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. This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered. Both pieces of legislation should be listed as relevant in the biodiversity chapter of the ES and submitted as part of the DCO.	This legislation has been considered and referenced in the Environmental Statement Chapter 9 Ecology and Biodiversity [REP1-033].	The Applicant is waiting for the EA comments.	Agreed
EB-02	Mitigation for fish species	<u>EA Statutory Consultation Feedback</u> Fish surveys or fish habitat surveys have not been included as part of	An approach is set out whereby either open-cut trenching or trenchless techniques, such as HDD, will be used for cable	The Applicant is waiting for the EA comments.	Matter Under Discussion



Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
	<p>the baseline data collection. Certain construction activities may have a negative impact on notable fish populations. Particularly where open cut trenching is proposed for cable crossing of waterbodies. A qualitative fish habitat assessment (coupled with the desk-based study) should be completed where cable crossings are proposed. This will inform necessary mitigation measures. Where quantitative fish surveys have not been completed, the precautionary approach should be taken and assumed that fish species present within the catchment will be present if habitat is suitable.</p> <p>Mitigation measures should be stringent to control pollution and fine sediment runoff into waterbodies. Where open trench crossings are proposed, it is assumed that waterbodies that will be flumed, or coffer dammed and thus require over-pumping. It may be necessary for a fish rescue and relocation to take place and for key spawning and migration periods to be avoided. Mitigation should be included within the Outline CEMP and submitted</p>	<p>crossing points. The final approach may be revised based on qualitative assessments to be completed pre-construction and outlined in the Outline Ecological Protection and Mitigation Strategy (OEPMS) [REP1-140]. Appropriate mitigation for fish species will be implemented in the event of open-cut trenching. This is considered appropriate and proportionate.</p>		



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
		with the DCO application. Any over-pumping should ensure that screens are fitted on inlets and outlets of pumps and that they are compliant with the Eels (England and Wales) Regulations 2009.			
EB-03	Noise impacts on fish	<p><u>EA Statutory Consultation Feedback:</u></p> <p>Impacts on fish from noise associated with vibration created by HDD has not been included. Sensitive fish species associated with the River Nene could be disturbed during construction and decommissioning activities. The EIA should include an assessment on the risk of fish populations within the River Nene and other main watercourses being impacted by noise from HDD during construction. Mitigation and management of any impacts should be detailed in the Outline CEMP. Standard mitigation would be to avoid this activity during sensitive fish migration and spawning times, or drilling to a depth where any significant noise becomes negligible to fish.</p> <p>Noisy construction activities such as HDD under watercourses may</p>	The Environmental Statement Chapter 9 Ecology and Biodiversity [REP1-033] assesses the likely impacts of noise and vibration on fish. The Outline Ecological Protection and Mitigation Strategy (OEPMS) [REP1-140] details mitigation measures to be implemented. The impact assessments and mitigation measures proposed are considered appropriate and proportionate.	The Applicant is waiting for the EA comments.	Matter Under Discussion



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
		disturb fish during key periods of migration and spawning. In extreme cases, noise may kill fish. According to our records, the River Nene contains European eel (Section 41 priority species NERC), brook lamprey (<i>Lampetra planeri</i>) (Annex II Habitats Directive), bullhead (<i>Cottus gobio</i>) (Annex II Habitats Directive), spine loach (<i>Cobitis taena</i>) (Section 41 priority species NERC and Annex II Habitats Directive) and brown/sea trout (<i>Salmo trutta</i>) (Section 41 priority species NERC). It maybe that appropriate mitigation to avoid impacts on fish would be a sufficient buffer zone from water courses and/or noisy construction activities avoiding key periods of migratory and fish spawning.			
EB-04	Consultation	<u>EA Statutory Consultation Feedback:</u> Table 9.1: Summary of Consultation and Responses doesn't include the Environment Agency.	Consultation with the EA is shown in Table 9.2 of the Environmental Statement Chapter 9 Ecology and Biodiversity [REP1-033].	The Applicant is waiting for the EA comments.	Agreed
EB-05	Impacts on aquatic invertebrates	<u>EA Statutory Consultation Feedback:</u> Solar farms that have wetland habitats on site or are near wetland habitats should implement mitigation	Studies on this matter are inconclusive, although there is some evidence to suggest that polarotactic invertebrates may	The Applicant is waiting for the EA comments.	Matter Under Discussion



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
		to prevent adverse impacts on aquatic invertebrates. Many species of aquatic invertebrates mistake the polarised light reflected from solar panels for open water, leading them to try and lay eggs on panels, which ultimately fail. Low-cost mitigation measures can be taken that do not impact on energy generation, such as including a pattern of roughened or painted glass or a horizontal light blocking grid so that they are no longer attractive to aquatic invertebrates.	be attracted to panels, which reflect polarised light. Wetland habitats were of limited extent within the Survey Area, meaning there is limited suitable habitats for aquatic invertebrates and a notable population is considered unlikely to be present. Moreover, buffers to boundary habitats of elevated importance for aquatic invertebrates, such as the Grendon Brook, are substantial (at least 30m). Therefore, no significant adverse effects on aquatic invertebrates through polarised light are anticipated.		
EB-06	Watercourse assessment	<u>EA Statutory Consultation Feedback:</u> Watercourses present in some array areas (e.g. A, A1, B, C, D, & E) have been dismissed as agricultural drains, however, some appear to be spring fed natural watercourses and not artificial field drains. Lack of consideration of natural spring fed watercourses in array areas could result in morphological and ecological harm to headwater	Relevant datasets have been consulted to determine the status of watercourses across the sites, supported by ground-truthing field surveys. Evaluation of these features and enhancement measures are detailed in the Environmental Statement Chapter 9 Ecology and Biodiversity [REP1-033]	The Applicant is waiting for the EA comments.	Matter Under Discussion



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
		streams. Ensure that natural spring fed watercourses are correctly identified, in the proposed MoRPH surveys and BNG assessment as “other rivers and streams”, rather than “ditches”. Minor works to improve these watercourses could result in significant uplift for the project.	which are considered appropriate and proportionate.		
EB-07	Impacts of Electromagnetic Fields (EMF) on migratory fish species	EA released a Position Statement entitled ‘Impact of Electromagnetic Fields on Freshwater Fish in Inland Waters’, stating that ‘in the absence of conclusive evidence of no impact, we adopt the precautionary principle and require that appropriate measures are put in place by the developer, so that no detectable EMFs result from the installation of underground cables within the wetted area of an inland waterbody’.	The potential effects of anthropogenic EMF on ecology is an emerging and poorly researched issue, however a summary of research on this issue is provided in Environmental Statement Chapter 9 Ecology and Biodiversity [REP1-033] (paragraphs 9.9.249 – 9.9-250). A precautionary approach to mitigation has been taken, whereby all cables which cross the River Nene will be buried to a minimum depth of 5m, to maximise attenuation of electromagnetic fields and minimise the risk of any adverse impacts. This depth is far greater than typical installation depths and will significantly reduce the EMF,	The Applicant is waiting for the EA comments.	Matter Under Discussion



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
			particularly magnetic (B-field), exposures. In this way, it is anticipated that the low risk of impacts on sea trout (and other species) will be avoided and effects reduced to neutral and non-significant levels.		
EB-08	Avoidance of coarse fish spawning period where open-cut trenching is used at watercourse crossing points	EA raised in their Relevant Representation that the period of avoidance for open-cut trenching at watercourse crossing points should be extended to June 16 th (avoidance period was previously October – May inclusive) to protect spawning coarse fish which may be present.	<p>This comment was discussed in a meeting between the Applicant and the Environment Agency on 01/10/2025.</p> <p>The Applicant notes this comment, and, as agreed, will seek to either avoid open-cut trenching works on the affected watercourses during the coarse fish spawning period (15th March - 15th June inclusive), or otherwise pre-commencement survey work will be undertaken to establish whether the avoidance period is required for each relevant watercourse crossing point. This may comprise habitat suitability assessments to establish whether suitable spawning habitat is present at each crossing point, or fish surveys to determine whether fish which</p>	The Applicant is waiting for the EA comments.	Matter Under Discussion



	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
			<p>may spawn in the watercourse are present/likely absent.</p> <p>The Environment Agency confirmed during the meeting that features characterised as wet ditches can be scoped out of this timing restriction, as this only applies to permanently wet watercourses with a flow.</p> <p>The cable installation methodology to be used at each of the affected crossing points, as well as any required mitigation measures for spawning/migrating fish, would be discussed and agreed with the EA/relevant consenting body post-DCO consent, prior to work commencing. An updated version of the Outline Ecological Protection and Mitigation Strategy CONFIDENTIAL [REP1-140] has been submitted at Deadline 1 which outlines this approach.</p>		



3.3 Hydrology, Flood Risk and Drainage

3.3.1 Below are the matters that have been identified through consultation, grouped into Matters Agreed and Matters Under Discussion.

Table 3.2: Hydrology, Flood Risk and Drainage

	Matter	Details of Matters for Discussion	Applicant Position	Consultee Position	Status
HYD-01	Water Framework Directive (WFD)	The Environment Agency required confirmation that the scope and methodology of the Water Framework Directive (WFD) assessment were appropriate, including consideration of hydromorphology, water quality and pollution risk, in line with WFD objectives.	The WFD Assessment [APP-566] sets out an appraisal of potential impacts on relevant waterbodies. It follows a source-pathway-receptor approach and confirms that the Proposed Development will not lead to deterioration in status or prevent achievement of Good Ecological Potential. The assessment draws on baseline data also presented in the Water Resources Assessment [APP-563] , Environmental Statement Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] , and ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] .	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-02	Design	The Environment Agency required that the design incorporate appropriate embedded measures to prevent contamination of surface water features, particularly from the BESS, substation and other infrastructure,	Embedded pollution prevention measures include bunded drainage systems, self-actuating shut-off valves for the BESS, and firewater containment. These are detailed in Environmental Statement Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] , ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] , and Annex J [REP1-053] and are secured through the Outline Construction Environmental Management Plan [REP1-140] and DCO Requirement 11 in the Draft Development Consent	The Applicant is waiting for the EA comments.	Matter Under Discussion



		consistent with the scope of ES Chapter 10.	Order [REP1-008] . Groundwater contamination risk is considered separately under ES Chapter 11: Ground Conditions [APP-059] .		
HYD-03	Surface Water Flooding	The Applicant was required to assess the risk of surface water flooding using current Environment Agency datasets and an approach aligned with national guidance.	Surface water flood risk was assessed using the NaFRA2 dataset (January 2025) and Risk of Flooding from Surface Water (RoFSW) mapping. This approach is consistent with EA guidance and is documented in Environmental Statement Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] and the ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] . The modelling confirms the site is at low risk from surface water flooding.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-04	Drainage Strategy	The Environment Agency required the drainage strategy to apply appropriate climate change uplifts in accordance with the latest allowances to demonstrate resilience of SuDS and flood mitigation.	The Environment Agency required the drainage strategy to apply appropriate climate change uplifts in accordance with the latest EA guidance to demonstrate resilience of SuDS and flood mitigation. The drainage design uses the EA upper peak rainfall allowance for the Anglian Nene catchment, applying a 40% uplift to peak rainfall intensity for the critical events, as set out in ES Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] and the ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] . This provides the basis for the site-specific drainage design in the supporting annexes.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-05	Surface Water Management	The Environment Agency required the Applicant to identify and characterise all relevant on-site and off-site watercourses and	All relevant watercourses and field drains were identified using a combination of site walkovers, LiDAR, and topographic survey data. These are described in Environmental Statement Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] and documented across the ES Appendix 10.1	The Applicant is waiting for the EA comments.	Matter Under Discussion



		ditches to inform the FRA and surface water management.	to 10.8 [REP1-053 to APP-108] . This information informed the surface water drainage strategy and identification of flow paths.		
HYD-06	Fluvial Flood Modelling	Whether the baseline hydraulic modelling for Grendon Brook and the River Nene, including use of 1D ISIS models and application of +45% climate change allowance, is appropriate and consistent with EA modelling standards.	Fluvial flood risk to the BESS has been assessed using the updated Environment Agency Middle Nene and Grendon Brook Flood Modeller models together with a 2D TUFLOW direct rainfall model of the Field Drain. The Hydraulic Modelling Report submitted at Deadline 2 sets out the model geometry, hydrology, climate change allowances and sensitivity testing. The Middle Nene and Grendon Brook models simulate the 1 percent and 0.1 percent AEP events with +13 percent and +36 percent uplifts, using updated LiDAR and targeted checks on roughness, flows and bed levels. The Field Drain model applies ReFH2 rainfall with 25 percent and 35 percent uplifts paired to the river flow allowances. Results confirm the BESS remains flood free from the River Nene, that only narrow low lying margins adjacent to Grendon Brook flood in higher order events, and that fluvial risk from the Field Drain is negligible. A merged depth grid identifies the worst case across all models and confirms the BESS platform meets the less than one metre flood depth resilience criterion in ES Appendix 10.11 BESS FRA [REP1-057] with no increase in flood risk elsewhere.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-07	Rainfall Hyetographs	Whether rainfall hyetograph data and associated ReFH2 calculations used in the 2D surface water	Surface water modelling of the Field Drain was undertaken in TUFLOW using direct rainfall derived from ReFH2. The Hydraulic Modelling Report submitted at Deadline 2 sets out the catchment descriptors, storm profiles and hyetographs used	The Applicant is waiting for the EA comments.	Matter Under Discussion



		modelling are accurate and aligned with EA requirements.	for the 3.3 percent, 1 percent and 0.1 percent AEP events, with 25 percent and 35 percent rainfall uplifts applied in line with current Environment Agency allowances. Hydrological checks and sensitivity testing were completed for rainfall rate, downstream boundary and roughness. The approach is consistent with ReFH2 guidance and appropriate for a small responsive catchment and provides a robust basis for assessing surface water exceedance alongside the wider FRA in ES Appendix 10.1 [REP1-053] and the BESS assessment in ES Appendix 10.11 [REP1-057] .		
HYD-08	Residual Risk and Emergency Response	Adequacy of the Applicant's assessment of residual flood risk and emergency response planning, particularly in relation to overtopping events or blocked drainage scenarios.	Residual flood risk has been assessed using the updated Middle Nene, Grendon Brook and Field Drain models documented in the Hydraulic Modelling Report [EX2/GH8.2.2] submitted at Deadline 2, together with the BESS assessment in ES Appendix 10.11 [REP1-057] and the wider FRA in ES Appendix 10.1 [REP1-053] . Sensitivity testing has been undertaken to represent overtopping, blockage and reduced capacity scenarios, including variations in flows, roughness, bed levels, rainfall rate, downstream boundary conditions and culvert dimensions. The merged depth grid confirms the BESS platform remains within the less than one metre flood depth resilience threshold under all sensitivity scenarios. Operational resilience, emergency access, drainage shut-off controls and response procedures are secured through the OCEMP [REP1-131] and OEMP [REP1-133] . Residual risks are therefore well understood and can be safely managed	The Applicant is waiting for the EA comments.	Matter Under Discussion



			through embedded design and operational measures.		
HYD-09	Drainage Strategy and BESS Containment	Whether the drainage design adequately protects BESS infrastructure from flooding and prevents discharge of contaminants.	The BESS will use an impermeable and isolated drainage system that provides a sealed containment arrangement during an incident, consistent with the commitments in the BESS FRA in ES Appendix 10.11 [REP1-057] , the wider FRA in ES Appendix 10.1 [REP1-053] , and the Outline Battery Storage Safety Management Plan [REP1-143] . The solution will follow the performance-based requirements set out in the ES and OBSSMP, which focus on impermeability, isolation of the BESS area during a fire event, and controlled release after testing. The final approach will be confirmed at detailed design, but will deliver an impermeable lined system with isolation valves and no routine connection to the wider drainage network. ES Chapter 22 Ground Conditions and Contamination [APP-059] confirms low sensitivity receptors. On this basis, the drainage strategy will protect the BESS infrastructure from flooding and will prevent the discharge of contaminants to surface or groundwater. Together, these confirm the risk of discharge to surface or groundwater is negligible.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-10	Construction Phase Flood Risk	Whether construction phase flood risks have been adequately assessed and mitigated, including surface water and fluvial risk to	Construction phase flood risk has been assessed in the FRA in ES Appendix 10.1 [REP1-053] and ES Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] , supported by the findings of the Hydraulic Modelling Report submitted at Deadline 2. The identified construction compounds and laydown areas avoid Flood Zone 3 where	The Applicant is waiting for the EA comments.	Matter Under Discussion



		compounds and laydown areas.	practicable and are located outside the main areas of fluvial and surface water hazard. Where temporary works fall within areas of surface water accumulation, risk will be managed through good practice measures secured in the OCEMP [REP1-131] , including temporary drainage control, exceedance routing, material storage protocols and contingency arrangements for high flows. ES Chapter 22 Ground Conditions and Contamination [APP-059] confirms low sensitivity receptors and that pollution risks are controllable with standard site management. On this basis, construction phase flood risks have been adequately assessed and can be safely managed.		
HYD-11	Groundwater Flood Risk	Adequacy of the assessment of groundwater flood risk, particularly in low-lying areas adjacent to watercourses or with shallow groundwater tables.	Groundwater flood risk has been assessed in the FRA in ES Appendix 10.1 [REP1-053] and ES Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023] , supported by BGS mapping and site level information. Although parts of the site overlie the Blisworth Limestone Principal Aquifer, groundwater levels are generally deep and no evidence of groundwater emergence or perched groundwater risk has been identified across the Order Limits. No receptors dependent on shallow groundwater were recorded. ES Chapter 22 Ground Conditions and Contamination [APP-059] confirms the absence of significant groundwater constraints and identifies a low risk profile. On this basis, groundwater flood risk is assessed as low and does not require mitigation beyond standard design practice.	The Applicant is waiting for the EA comments.	Matter Under Discussion



HYD-12	Watercourse Crossing Design and Permitting	Whether the approach to watercourse crossing design and environmental permitting is sufficiently developed and in line with EA expectations.	All permanent and temporary watercourse crossings have been assessed, with HDD adopted where feasible to avoid instream works. Crossing locations are selected to minimise hydraulic or ecological impact, with entry/exit points located outside the floodplain. All works will be subject to Environmental Permitting Regulations and will require Flood Risk Activity Permits where relevant. Engagement with the Environment Agency on detailed design and permitting is ongoing. The design approach is consistent with CIRIA C793 and EA good practice.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-13	Floodplain Storage and Compensation	Whether the potential loss of functional floodplain has been appropriately assessed and level-for-level compensation secured if necessary.	Encroachment into Flood Zone 3 has been minimised through iterative design. Any unavoidable encroachment is limited in area and depth and has been assessed for impact on floodplain storage using the hydraulic model. These are reported in ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053]. Where applicable, level-for-level compensatory storage will be provided in hydraulically connected areas, secured through detailed design. The development will not reduce floodplain function or increase flood risk elsewhere.	The Applicant is waiting for the EA comments.	Matter Under Discussion
HYD-14	Pollution Control in Sensitive Catchments	Whether pollution control measures are adequate in locations designated as Drinking Water Groundwater Safeguard Zones.	The layout avoids locating infiltration SuDS within Drinking Water Safeguard Zones. In these areas, surface water will be collected via lined drainage systems and discharged only where appropriate risk assessments support this. Infrastructure such as the BESS and substation are located on impermeable surfacing within contained areas. No discharges to ground are proposed in sensitive	The Applicant is waiting for the EA comments.	Matter Under Discussion



			zones. These measures are documented in ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] and confirmed in ES Chapter 22 Ground Conditions and Contamination [APP-059] which reports no contaminant linkages or risks to groundwater quality.		
HYD-15	Overland Flow Route Preservation	Whether natural overland flow routes have been preserved and not obstructed by the development layout.	Overland flow routes were identified using a combination of LiDAR, topographic survey and national surface water mapping datasets. These were preserved during layout design by maintaining development offsets and incorporating open drainage corridors. SuDS features are aligned to natural drainage pathways to avoid obstruction. This is detailed in ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053] and has informed siting of all infrastructure zones.	The Applicant is waiting for the EA comments.	Matter Under Discussion



4 Signatories

4.1 Overview

4.1.1 The above SoCG is agreed between Green Hill Solar Farm Ltd. (the Applicant) and the Environment Agency, as specified below.

4.1.2 Duly authorised for and on behalf of **Green Hill Solar Farm Ltd.**

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of the Environment Agency.

Name:	
Job Title:	
Date:	
Signature:	