

The Drovers Solar Farm

Statement of Common Ground (SoCG) with Environment Agency (Clean)

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1 Introduction

1.1 Overview

- 1.1.0 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the DCO Application) for The Drovers Solar Farm (the Scheme) made by The Drovers Solar Farm Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008.
- 1.1.1 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.
- 1.1.2 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties, and where agreement has not yet been reached.
- 1.1.3 This document has been updated at Deadline 3 to reflect ongoing discussions. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.4]** for the list of current versions of documents.

1.2 Parties to this Statement of Common Ground

- 1.2.0 This SoCG has been prepared by the Applicant and the Environment Agency (EA).
- 1.2.1 Collectively, the Applicant and EA are referred to as ‘the parties.’

1.3 Purpose of this Document

- 1.3.0 This SoCG is a ‘live’ document and will be amended as the examination progresses, including as more information becomes available and as a result of ongoing discussions between the Applicant and the EA, in order to enable a final version to be submitted to the ExA.
- 1.3.1 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.



1.4 Terminology

1.4.0 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in Section 4 has been outlined below.

Cell	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of ongoing discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
	Not Agreed – indicates a position where both parties have reached a final position that a matter cannot be agreed between them.



2 The Scheme

2.1 Scheme Description

- 2.1.0 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 2.1.1 The **Location Plan** [\[APP-007\]](#) shows the Order limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').



3 Record of Engagement

3.1 Summary of Engagement

- 3.1.0 The parties have been engaged in consultation since December 2024.
- 3.1.1 A non-statutory consultation took place between 17 September and 1 October 2024. The statutory consultation process took place between 21 May and 9 July 2025.
- 3.1.2 The Applicant and EA have engaged extensively throughout the pre-application and Environmental Impact Assessment stages of the Scheme. The key engagement has included discussions on protecting groundwater and chalk rivers, BESS firewater, and piling impacts.
- 3.1.3 Table 3.1 shows a summary of key engagement that has taken place between the Applicant and EA in relation to the Application.

Table 3.1 – Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
05/12/2024	Written responses to EIA Scoping	Key topics discussed: • Drinking Water Protected Areas within the Core Study Area • Methodology for assessing magnitude of water quality impacts (WFD status) • Risks of pollution to the River Nar (including ephemeral / dry valleys)



		• Sensitivity of chalk stream habitats (River Nar SSSI) • Sediment control, runoff, and pollution prevention during construction • Surface water and contaminated runoff management at BESS and substations • Firefighting water containment at BESS • Sewage management during construction and operation • Surface water abstraction constraints Key outcomes: • Drinking Water Protected Areas were formally included as sensitive receptors in the Water Resources assessment. • WFD status change retained as an indicator of impact magnitude, with clarification that no WFD deterioration would be acceptable. • Additional embedded mitigation secured through: ○ outline Construction Environmental Management Plan (oCEMP) [APP/7.6.1] ○ Flood Risk Assessment (FRA) • Commitment to: ○ Dedicated contaminated water containment tanks with penstocks at BESS and substations
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		○ Enhanced sediment and runoff control measures ○ SuDS designed to 1% AEP + 40% climate change • EA concerns were addressed and incorporated into ES Chapter 12: Water Resources [APP-061] and ES Appendix 12.2: Flood Risk Assessment [AS-053].
07/07 2025	Written responses to PEIR	Key topics discussed: • Groundwater Source Protection Zones (SPZ 1 and SPZ 2) • Vulnerability of the Chalk Principal Aquifer • Location and design of BESS, Customer Substation and National Grid Substation • Foundation depths and piling impacts on groundwater • Adequacy of groundwater baseline data and monitoring • Firewater and contaminated runoff risks at BESS • Infiltration SuDS acceptability in SPZs • Private water abstractions and potable supplies • Land contamination risks (marl pits, historic land use) • Decommissioning risks (cables left in situ) • Adequacy of impact magnitude and significance matrices



			Key outcomes: • Siting of BESS and substations revised to avoid SPZ 1, demonstrated in ES Chapter 12: Water Resources [APP-061] figures. • Confirmation that Work Nos. 2–4 are outside SPZ1 and sited preferentially where lower permeability deposits exist. • ES Appendix 12.2: Flood Risk Assessment [AS-053] updated to: ○ Include sealed drainage systems and dedicated contaminated water storage ○ Provide headroom for combined fire and flood events ○ Include 2D direct rainfall modelling and hydraulic reporting • Clarification and amendment of: ○ Piling depths (up to 4 m for PV, up to 12 m for BESS/substations) ○ Impact assessment methodology and significance matrices • Addition of commitments to: ○ Foundation Works Risk Assessment ○ Breakout fluid containment for HDD ○ Unexpected contamination protocols
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		EA objections were addressed through design changes, strengthened mitigation and DCO-secured requirements, allowing progression of the application.
July 2025	Email request for Environmental Information	The Applicant requested up to date records of licenced groundwater abstraction data. The EA provided records of licenced groundwater abstractions within the WSSA in August 2025.
September 2025	Teams meeting	Key topics discussed: - To discuss the assessment of groundwater and commitments in the oCEMP [APP/7.6.1] Key outcomes: - Meeting feedback directly informed revisions to: - Water Resources assessment oCEMP [APP/7.6.1] commitments - FRA design principles
March 2026	Email request from the Applicant for Environmental Information	The Applicant requested the following: - Groundwater monitoring data - Abstraction and licensing records - Geological and Hydrogeological information



		• Additional Monitoring datasets • North East Anglian Chalk (NEAC) Model outputs
23/04/2026	Teams Meeting – Applicant and Environment Agency	Key topics discussed: • NEAC outputs including groundwater levels, flow directions Key outcomes: • NEAC groundwater levels are less conservative than Applicant's groundwater assessment • NEAC Model outputs can be used to inform the assessment of groundwater
May-July 2026	Disapplication correspondence and meeting (18 06 2026) email	Key topics discussed: • Work no.11 is considered by Applicant as area needing a FRAP, and thereby seeking disapplication and protective provisions with DCO. • Environment Agency state works associated with floodplain of Ordinary Watercourse, and thereby don't need a FRAP. • Environment Agency advise that we require upfront detail for disapplication of FRAPs Key outcomes: Environment Agency shared standard wording 07 July 2026.
June 2026	Written Relevant Representation	See EA issues EA01 – EA51 in tables below.



			Key Outcomes: • Issues are primarily matters of clarity, assurance and detail, with risks considered manageable and capable of resolution through updated ES material and secured DCO controls rather than fundamental objection.
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- 3.1.4 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Applicant and the EA in relation to the issues addressed in this SoCG.

4 Matters of Discussion

4.1 Overview

- 4.1.0 The following tables detail, by topic, the matters agreed, under discussion, or not agreed between the Applicant and the EA at the point of this document being published.
- 4.1.1 Where discussions are ongoing, the parties will include an indication of the likelihood that disagreement will remain by the end of the examination in accordance with the **Rule 6 letter** [\[PD-006\]](#).



Table 4.1 – Water, Flood Risk & Drainage

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
1-1	EA01	Source Protection Zone	Figure 12.5: Source Protection Zone [APP-119] Issue: Figure 12.5 is not easily interpreted due to shading not being used to define Source Protection Zone (SPZ) extents. Impact: Unclear to the reader how the draft Order Limits, Battery Energy Storage System (BESS) sites, substation sites and SPZs intersect. Solution: Update Figure 12.5 to use shading to clearly define SPZ extents. Additional Comments:	ES Figure 12.5: Source Protection Zone [APP/6.3.1] was intended to show what infrastructure is located within SPZ 1 and 2; however, to aid the Environment Agency's interpretation, this Figure has been updated at a Deadline 3.	Low
1-2	EA02	Drinking Water Protected Area	Figure 12.12 Drinking Water Protected Area [APP-126] Issue: Figure 12.12 shows the extents of a designated Drinking Water Protected Area in the context of the site, but there are no figures showing other drinking water protection designations. Impact: The reader is unable to see how the Drinking Water Surface Water Safeguard	It is noted that ES Figure 12.12: Drinking Water Protected Area [APP-126] does not show other drinking water protection designations and this Figure has been updated at Deadline 3 ES Figure 12.12: Drinking Water Protection Designations [APP/6.3.1].	Low



			Zone lies across the entire draft Order Limits area, and how a Drinking Water Groundwater Safeguard Zone lies across the south-western part of the site. Solution: Provide figures showing other drinking water protection designations in the context of the draft Order Limits. Additional Comments:		
1-3	EA03	3D Representation of Groundwater	Figure 12.7 3D Representation of Groundwater [APP-121] Figure 12.8 Minimum Static Groundwater Level Depths within CSA [APP-122] Figure 12.9 Maximum Static Groundwater Level Depths within CSA [APP-123] Issue: Figure 12.7 is poorly executed. Impact: Figure 12.7 is difficult to interpret which limits its value. It is difficult to distinguish the site topography, relative elevation of groundwater, extents of the hydrogeological model, viewpoint orientation and relation to the study site. Groundwater elevation appears to be a single plane uninfluenced by surface elevation in the context of the model. Solution: Revise Figure 12.7 to provide additional views of the modelled area, with clearer indication of view orientation and	To aid the Environment Agency's interpretation of ES Figure 12.7: 3D Representation of Groundwater [APP/6.3.1], the following changes have been made at Deadline 3. • Addition of orientation labels or description • Elevation shading to show mAOD values for the maximum groundwater elevation surface and foundation extent surface; and • Figures and text refer to groundwater elevation (mAOD) rather than groundwater level to increase clarity between absolute elevation and depth below ground.	Low



			contouring of the groundwater surface, if applicable. Additional Comments: It is unclear whether the 3D model output is identical to the 2D minimum or maximum groundwater depth model data shown in Figure 12.8 or 12.9 respectively, or if it represents a separate dataset.		
1-4	EA04	Groundwater Flow Direction	Figure 12.7 3D Representation of Groundwater [APP-121] Figure 12.8 Minimum Static Groundwater Level Depths within CSA [APP-122] Figure 12.9 Maximum Static Groundwater Level Depths within CSA [APP-123] Figure 12.10 Groundwater Flow Patterns [APP-124] Figure 12.11 Private Water Supplies Locations [APP-125] Figure 12.12 Drinking Water Protected Area [APP-126] Figure 12.13 Work No.2 Piling Locations within CSA for Maximum Groundwater Level [APP-127] Figure 12.14 Work. No 3 Piling Locations within CSA for Maximum Groundwater Level [APP-128]	The Environment Agency's comment on groundwater flow is noted. The Environment Agency's NEAC model outputs and BGS 1976 hydrogeological map indicate a regional westward flow component towards the Marham abstraction. The north-northeast flow vectors shown in Figures 12.7 to 12.16 to ES Chapter 12: Water Resources [APP-061] are therefore more likely to represent localised topographic influences near the River Nar valley margin than the regional groundwater flow regime within the Chalk Principal Aquifer. The groundwater surfaces present in ES Figures 12.7 to 12.16 to ES Chapter 12: Water Resources [APP-061] are intended to illustrate relative groundwater depth beneath proposed infrastructure locations and identify where piling or foundations may interact with perched or shallow groundwater. This would highlight zones	Medium



		Figure 12.15 Work No. 4 Piling Locations within CSA for Maximum Groundwater Level [APP-129] Figure 12.16 Maximum Foundation Extents for Minimum Groundwater Level [APP-130] Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.6.9, 12.6.37 and 12.6.38 Issue: Estimated groundwater flow direction across most of the draft Order Limits area is indicated to be toward the north-east, north or northwest, approximately following local topography. Impact: Groundwater flow direction as indicated in Figures 12.7 to 12.16 may be inaccurate. Solution: Claims such as that made in Sections 12.6.37 and 12.6.38 regarding potential groundwater interception should be revised and new evidence, preferably across multiple lines, sought to support them. Intrusive investigation to measures groundwater level with empirical evidence is highly recommended. Additional Comments: The majority of the draft Order Limits area is shown to be underlain directly by Chalk Principal aquifer, and according to Chapter 12 Section 12.6.9, trial trenching activities in the vicinity of the proposed BESS and substation sites did not	where interception risk across the Work Nos. 1 to 4 during construction could occur. They were not intended to be used as a regional groundwater flow model. Paragraphs 12.6.37 and 12.6.38 of ES Chapter 12: Water Resources [APP/6.2.2] have been updated at Deadline 2 to remove any implied statements of groundwater flow direction across the Order limits and present the Applicant's findings are local-scale interpretations. Reference to the Environment Agency's NEAC model and BGS hydrogeological mapping in regard to regional groundwater flow will be made to consolidate the conceptual groundwater model of the Scheme. Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] commits to installing boreholes within the Order limits to monitor groundwater levels prior to construction to ensure that construction activities such as HDD and foundations do not occur when groundwater levels are high enough to interact with the activity. The Applicant has requested the Environment Agency's NEAC model and this will be used to further refine groundwater elevations within the Order limits at a subsequent Deadline, noting that <i>"the Applicant's estimations are within a similar</i>	
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		encounter superficial deposits. The draft Order Limits area lies within Zone 1 and Zone 2 of a groundwater SPZ for a potable water abstraction at Marham, located to the west of the draft Order Limits area. This indicates that groundwater within the Principal aquifer in this area is anticipated to migrate toward the abstraction point to some degree. A review of the 1976 British Geological Society (BGS) Hydrogeological Map of Northern East Anglia (British Geological Survey (BGS) large image viewer IIPMooViewer 2.0) indicates that the potentiometric groundwater upper surface within the Chalk principal aquifer in the vicinity of the site is locally northward toward the River Nar valley but more generally toward the west in the direction of the Marham public water supply abstraction. This is shown in the BGS map as ranging from approximately 30m Above Ordnance Datum (AOD) in the east to approximately 15m AOD in the west. The model outputs produced by the Applicant can be compared to the outputs for various hydrological scenarios available from the Environment Agency's North East Anglian Chalk (NEAC) model, a bespoke groundwater model using MODFLOW 5 which covers most of East Anglia.	<i>range of values for most of the Study Area". As such, the Applicant does not anticipate the outcome of ES Chapter 12: Water Resources [APP-061] to change.</i>	
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			The outputs for a wet month Scenario (March 2001 – corresponding to the Applicant's 'worst-case' data usage of highest recorded levels) show very different groundwater contours and resultant flow directions compared with those produced by the Applicant. Flow in the Chalk is east-to-west in the NEAC model data, rather than south-to-north using the Applicant's techniques derived from individual boreholes nearby. Northwards flow is present locally near the left bank of the Nar, but this reflects the topography close to the Nar intercepting the westerly flowing groundwater. If modelling will be used in the future, the Applicant is advised to consider groundwater flow on a more regional level rather than overfitting a model to a low number of interpolated datapoints. They may also choose to request model runs done on the Environment Agency's NEAC model which can run scenarios designed and paid for by the Applicant. Although the Applicant's estimations are within a similar range of values for most of the Study Area, the figures provided from their modelling should not be accepted as an accurate representation of subsurface groundwater elevation or flow direction.		
1-5	EA12	Flood Risk - BESS	We are satisfied and consider this issue resolved. We were concerned that there was	The Scheme has Work Nos. and does not have a detailed design at this stage. A	Agreed



			insufficient flood mitigation provided for BESS units. In the 8.4 Applicant's Response to Relevant Representations [REP1-067], it is stated that the Flood Risk Assessment (FRA) includes a commitment to produce a drainage design based on the detailed site design, post DCO, based on the 1 in 100 year rainfall event + 40% climate change allowance. If localised flood depths cannot be managed by the drainage strategy, then BESS units will be appropriately raised to 300 mm above the modelled flood level. We find this acceptable.	detailed drainage plan will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as detailed within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [APP-170]. If localised flood depths cannot be managed via the drainage strategy, ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3] has been updated at deadline 2 to confirm that BESS units will be appropriately raised to 300 mm above the modelled flood level. It should be noted that the 2D pluvial modelling represents flow pathways and flood depths using baseline topography. Groundworks / enabling works for Work Nos. 2 to 4 are likely to level the area to remove topographical hollows, meaning the baseline flooding scenario is unlikely to be representative of the post-development scenario. As the Scheme does not have a detailed design at this stage, there is a commitment in ES Appendix 12.2: Flood Risk Assessment [AS-053] to have a formal drainage system for the BESS and Customer Substation designed to the 1% AEP + 40% climate change allowance, with no flooding of the drainage system built into the design, as per National Standards. As such, the	
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				current pluvial ponding would enter the drainage system, rather than flow across or pond on the surface of Work Nos. 2 to 4. The Environment Agency have agreed that this principle is acceptable in their Statement of Common Ground on the Great North Road Solar and Biodiversity Park, where the BESS area was modelled to have pluvial depths greater than for the Scheme (see EA025 of the EA's SoCG for Great North Road).	
1-6	EA14	Private Water Supplies	We are satisfied and consider this issue resolved. The groundwater elevation records which have been provided to date appear to represent groundwater within the underlying Chalk Principal aquifer. The potential for some of the identified abstractions to draw from the Superficial Secondary A aquifers, which are locally present along the River Nar, cannot be discounted. However, we acknowledge that the elements of the Proposed Development which could pose the highest risk to water quality within the Superficial deposits – i.e. the BESS, Substation and trenchless drilling activities – are located away from areas in which Superficial deposits are recorded in BGS mapping. Provided the Applicant ensures that post-consent groundwater investigation, and monitoring, establishes the groundwater hydraulic head and flow direction within the Chalk Principal aquifer within the Order Limits, we concur that dipping of private	As outlined in paragraph 12.6.48 of ES Chapter 12: Water Resources [APP-061] , private water supplies in proximity to the Scheme abstract groundwater, as indicated by council records, and as such the levels derived from the triangulated groundwater elevation model is suitable to determine groundwater abstraction depths. As outlined in paragraph 12.8.107 of ES Chapter 12: Water Resources [APP-061] , effects on the groundwater resource from the Scheme of which private water supplies draw, as a result of embedded mitigation outlined in the oCEMP [APP/7.6.1] , is negligible. As such, it is not necessary to undertake dipping of PWS.	Agreed



			groundwater abstraction boreholes is not required		
1-7	EA16	Abstraction Licence	We are satisfied and consider this issue resolved. We were concerned that the possibility of identified licensed abstraction (6/33/58/*G/0248) being in use had been ruled out, and this could therefore result in an incorrect assessment of impacts to all receptors. We note the comments in 8.4 Applicant's Response to Relevant Representations [REP1-067]. As post-consent groundwater monitoring will be followed by hydrogeological risk assessment for foundation works, we are therefore consent to resolve this issue. If conditions are found to differ substantially from the interpolated model to the extent effects to this abstraction could occur, these would be required to be duly assessed.	Paragraph 12.8.123 of ES Chapter 12: Water Resources [APP-061] states that <i>"Whilst the property is derelict and uninhabited, the licence is still extant and therefore requires assessment. Triangulation/interpolation of hydrometric monitoring data available on Hydrology Data Explorer, which shows a maximal groundwater level of 25.2m BGL"</i> . As such, the Applicant considers that abstraction licence 6/33/58/*G/0248 has been assessed appropriately.	Agreed
1-8	EA18	Groundwater Levels	We cannot resolve this issue. We were concerned that there was a lack of clarity regarding where groundwater levels have been recorded as artesian or sub-artesian, and it is not readily apparent how the recorded borehole groundwater level and interpolated groundwater levels reported in Table 12.8 [APP-061] relate to ground level. The Applicant stated in the 8.4 Applicant's	Tables 12.7 and 12.8 in ES Chapter 12: Water Resources [APP/6.2.2] has been updated at a Deadline 2 for depth relative to groundwater within boreholes to include depth to groundwater, ground elevations, and artesian indicators. An Environmental Information Request has been submitted to the	Low



			Response to Relevant Representations [REP1-067] that Tables 12.7 and 12.8 in ES Chapter 12: Water Resources [APP061] would be updated deadline 1. We cannot locate a revised Water Resources chapter on the examination library	Environment Agency to verify whether further groundwater monitoring locations exist within the wider study area to ensure the dataset reflects all reasonably available information. The conceptual model conceptual model has been updated at a Deadline 2. Regarding the statement that the “<i>presence of multiple springs and standing water bodies within the draft Order limits area suggests that artesian and/or sub-artesian conditions could be encountered during construction works</i>”, no springs were encountered during either the Hydrology or Ecology walkovers, and this is reflected in ES Figure 7.2: Habitats and Ecological Features [APP-110] and ES Figure 12.1: Ephemeral Ditches [APP-115].	
1-9	EA20	Boreholes	We recommend that the Applicant ensures that ground investigation addresses potential for karst features to be encountered within areas proposed for HDD, piling and infiltration drainage, and suitable mitigation to be developed as required.	It is noted that there are minor discrepancies in recording of borehole groundwater depths within Section 12.6.50 of ES Chapter 12: Water Resources [APP-061]. These have been checked and updated for deadline 2 (ES Chapter 12: Water Resources [APP/6.2.2]). However, the borehole records were used to verify the groundwater surface developed through groundwater monitoring station data and an update of	Low



				these borehole groundwater depths will not change the groundwater elevation surface.	
1-10	EA32	Drainage System	We are satisfied and consider this issue resolved. We were concerned that it was unclear how the surface water drainage infrastructure at the BESS, Customer Substation, National Grid Substation and infiltration basin would be managed at decommissioning stage. The Applicant has confirmed in 8.4 Applicant's Response to Relevant Representations [REP1-067] that the any infrastructure that is to remain in place after the lifetime of the Scheme will retain the drainage features which serve it.	As detailed within paragraph 12.4.16 of ES Appendix 12.2: Flood Risk Assessment [AS-053], any infrastructure that is to remain in place after the lifetime of the Scheme will retain the drainage features which serve it. The Scheme has Work Nos. and does not have a detailed design at this stage. However, the Applicant notes that Requirement 11 of Schedule 2 of the draft DCO [APP/3.1.1] states that “<i>no part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority</i>”.	Agreed
1-11	Appendix B - Informatives	Water Supply and Demands	Chapter 12 [APP-061] includes a good appraisal of water demands and potential sources of supply and provides reasonable confidence that a water supply can be found practically and sustainably. <i>With regards to HDD drilling</i> Table 12.17 in Chapter 12 [APP-061] states that the maximum total water demand for HDD drilling is given as 25.1 m³ /day. If HDD	The Applicant welcomes the Environment Agency's assessment of ES Chapter 12: Water Resources [APP-061]. With regard to the Environment Agency's comment in relation to licensing, the Applicant will engage with the EA to discuss the requirement for abstractions, following the granting of the DCO (if consented).	



			drilling uses an abstraction as a source of supply this may not be exempt from licensing as the maximum water demand is above the de minimus amount exempting an abstraction from licensing. The Applicant should ensure early engagement with the Environment Agency if there is a likely need for an abstraction licence. The Abstraction Licensing Strategy for North West Norfolk is available here: North West Norfolk Abstraction Licensing Strategy - GOV.UK.		
1-12	Appendix B - Informatives	Abstraction Licence	<i>With regards to the use of the landowners (existing) abstraction licence</i> The Applicant should be familiar with the licence intended to be used and understand what changes are required to make it suitable for purposes not already listed on the licence. If as suggested in Section 12.6.54 of Chapter 12 [APP-061], the licence intended to be used is 6/33/58/*G/0248, the Applicant should note the low quantities available on the licence (7000m³ at 24m³/day) respective to the quantities specified in the appraisal of construction water demands. Particularly if this water is continued to be used for the purpose of Livestock watering stated in the previous 2023 renewal determination.	The Applicant confirms that it is fully aware of the scope and limitations of abstraction licence *6/33/58/G/0248, including that it is currently authorised for livestock watering only and is restricted to 7,000 m³ per annum (24 m³/day) as confirmed by the 2023 renewal determination. The Applicant understands that use of the licence for construction purposes not currently authorised would require a formal licence variation, including amendment of the authorised purpose and, if necessary, abstraction quantities, to be agreed with the Environment Agency in advance. The Applicant also acknowledges that the licensed volumes are materially lower than the peak construction water demands identified in the construction water appraisal and therefore does not rely on this licence as the primary source of construction water, particularly where abstraction for	



				livestock watering continues. Construction water demand will be met through alternative lawful supplies and demand management, with any abstraction remaining strictly within licence limits unless and until an approved variation is secured. On this basis, the Applicant is satisfied that the licensing constraints are fully understood and that there is no risk of unauthorised abstraction or environmental harm.	
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Table 4.2 – Design

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
2-1	EA05	Maximum Foundation Extents	Figure 12.13 Work No.2 Piling Locations within CSA for Maximum Groundwater Level [APP-127] Figure 12.14 Work. No 3 Piling Locations within CSA for Maximum Groundwater Level [APP-128] Figure 12.15 Work No. 4 Piling Locations within CSA for Maximum Groundwater Level [APP-129] Figure 12.16 Maximum Foundation Extents for Minimum Groundwater Level [APP-130] Issue: Figures 12.13 to 12.16 do not clearly show the orientation of each 3D model view,	Figures 12.13 to 12.16 of ES Chapter 12: Water Resources [APP-061] were used to illustrate the maximum groundwater elevation surface across the Core Study Area and identify where proposed foundation depths could theoretically intercept shallow groundwater under worst-case conditions. The figures also demonstrate at a concept level where piling may be required depending on foundation design. The following changes have been made at Deadline 3 to aid the EA's interpretation: Addition of orientation labels or description	Medium



			and the elevation of the maximum extent of foundations is not given. Impact: Difficulty in interpreting figures. Solution: Revise figures to more clearly define the area represented in the drawings, including view orientation, and the maximum foundations extent should be shaded to show elevation values. The model should be updated to inform detailed foundation design, based on site specific survey and monitoring data. Additional Comments: Use of inconsistent terminology may also result in confusion. Figures 12.13 to 12.15 are titled to show the anticipated extent of piling in comparison with the maximum groundwater level. In the context of the data presented, the maximum groundwater level in mAOD represents the shallowest extent and therefore worst-case condition for groundwater. For clarity the report should preferably refer to groundwater 'elevation' (in mAOD) as is represented within the figures rather than 'level', which could be misinterpreted as relative to ground level rather than Ordnance Datum. Figure 12.16 shows the minimum (i.e. deepest) groundwater elevation (i.e. best case) in relation to anticipated piling depth. Although this is useful information, this could potentially be misinterpreted by the reader as presenting a combined overview of the	- Elevation shading to show mAOD values for the maximum groundwater elevation surface and foundation extent surface - Highlight areas where foundations intersect or exceed groundwater elevation surfaces; and - Figures and text refer to groundwater elevation (mAOD) rather than groundwater level to increase clarity between absolute elevation and depth below ground. The Applicant agrees that the conceptual model present is not the final tool for foundation design, but rather to provide a screening-level assessment of groundwater conditions and to identify areas needing piled or shallow foundations and will be aligned with EA regional groundwater understanding (NEAC model). The Design Principles, Parameters Commitments [APP/5.8.3] have been updated at deadline 2 to commit to foundations not directly interacting with groundwater.	
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			information provided in Figures 12.13 to 12.15.		
2-2	EA38	Storage of Waste Batteries	We cannot resolve this issue. We were concerned that there was an absence of mitigation measures relating to the storage of waste batteries. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067]: "End-of life or damaged BESS units are to be electrically disconnected from the system when identified as being required. When disconnecting damaged or defective units, a specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Damaged or defective units will be inspected and placed in an approved protective container prior to being transported from Site, to ensure against any risk of contaminants entering ground- or surface water. End-of life batteries awaiting regular replacement will be stored in situ. This is considered most appropriate due to existing contamination bunding and surface-water runoff protections associated with the BESS enclosure. Batteries that are removed from the BESS are not stored at the Site; they are returned to the battery manufacturer for repair/ refurbishment. As such a fire watch is not required at the site." The 7.14 outline Battery Safety Management Plan [APP-194], nor the 7.8.1 outline Operational	An outline Battery Safety Management Plan (oBSMP) [APP-194] has been prepared as part of the DCO Application which sets out the mitigation measures to be secured via Requirement 6 of the draft DCO [APP/3.1.1]. End-of life or damaged BESS units are to be electrically disconnected from the system when identified as being required. When disconnecting damaged or defective units, a specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Damaged or defective units will be inspected and placed in an approved protective container prior to being transported from Site, to ensure against any risk of contaminants entering ground- or surface water. End-of-life batteries awaiting regular replacement will be stored in situ. This is considered most appropriate due to existing contamination bunding and surface-water runoff protections associated with the BESS enclosure. Batteries that are removed from the BESS are not stored at the Site; they are returned to the battery manufacturer for repair/ refurbishment. As such a fire watch is not required at the site.	Low



			Environmental Management Plan (Tracked) [REP1-055] do not refer to the above mitigation measures. The outline Battery Safety Management Plan (oBSMP) should be updated to confirm the management of damaged or end-of-life batteries.	Under current UK legislation, end-of-life BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling. As such, any potential for contamination will be managed by transport offsite to one of these approved facilities. The outline Decommissioning Strategy (oDS) [APP/7.10.1] provides for decommissioned infrastructure to be managed in accordance with the applicable legislation relating to waste and recycling that is in force at that time, and is secured by Requirement 20 of Schedule 2 to the draft DCO [APP/3.1.1]. As requested by the Environment Agency in EA40 above, the oCEMP [APP/7.6.1] has been updated at Deadline 1 to commit to installing 'sentinel' monitoring systems for the drainage system serving Work Nos. 2 – 4 and therefore any leakage from damaged batteries being stored on Site will be detected and not released to the wider hydrological environment.	
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Table 4.3 – Impact on existing apparatus / infrastructure



Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
3-1	EA06	Avoidance of Pipelines	We cannot resolve this issue. We were concerned that figure 16.1 [APP-131] did not show the approximate routes of the former Ministry of Defence (MoD) oil pipeline or Exolum pipeline which traverse the draft Order Limits. The Applicant has stated in the in the 8.4 Applicant's Response to Relevant Representations [REP1-067] that a revised figure had been submitted at deadline 1. We cannot locate this revised figure on the examination library. Please clarify which document the amendment has been included within.	A figure showing the underground pipelines will be produced at Deadline 3, ES Figure 16.1: Utilities Plan [APP/6.3.1] . Paragraph 12.7.7 of ES Chapter 12: Water Resources [APP-061] states that pipelines will be located using techniques such as CAT scanning or hand digging, therefore limiting the potential to introduce contaminants to groundwater.	Low

Table 4.4 – Planning Policy

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
4-1	EA07	Environmental Legislation	We are satisfied and consider this issue resolved. We were concerned over Omission of Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 in Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP-147], Section 7.2. We have reviewed	The Applicant notes this comment and confirms that ES Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4.1] has been updated at Deadline 1 to include the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework	Agreed



			the 6.4.1 ES Appendix 7.1 Consultation and Legislation, Planning Policy and Guidance (Tracked) [REP1-045], and note that the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 have been included.	Directive) (England and Wales) Regulations 2017.	
4-2	EA39	Fire Suppressant Chemicals	We are satisfied and consider this issue resolved. We were concerned that if fire suppressant systems contain polluting or hazardous chemicals, these could potentially impact groundwater quality if discharged to ground. In consideration of the Applicant's efforts to include drainage features for containing fire water, we are content to resolve this issue. Additional advice We recommend that the Applicant includes an assessment of the pollution potential of chemical fire suppressants, when carrying out options appraisal at detailed design stage.	Internal Fire Suppression System details will only be known once this infrastructure is selected. It should be noted that most commercially available Suppression media for BESS are PFAS free. The oBSMP [APP-194] will be updated once this information becomes available.	Agreed

Table 4.5 – Ecology and Biodiversity



Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
5-1	EA08	Watercourse Buffers	We are satisfied and consider this issue resolved. We were concerned that there were Insufficient buffer zones around watercourses. We have reviewed the 6.2.1 Chapter 7 Ecology and Biodiversity (Tracked) [REP1035] and 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051], and are content with the updating of the buffer size to 10m around watercourses, and 15m for temporary construction compound screening. Further Advice We recommend that table 2 of the outline CEMP is also updated to include the mitigation measures for temporary construction compound screening. .	The Applicant takes note of this inconsistency. Table 7-10 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] has been updated at Deadline 1 to state 10m buffer zones around ditches. The 10 m buffer zones for all above ground development will apply from watercourse or ditch bank tops and this will be stated within ES Chapter 7: Ecology and Biodiversity [APP/6.2.1]. Table 5-2 of ES Chapter 5: The Scheme [APP/6.1.2] will be updated at Deadline 1 to commit to a 10 m buffer of watercourses. It is not anticipated that construction compounds will be located within 15m of a watercourse. The oCEMP [APP/7.6.1] has been updated to commit temporary construction compounds within 15m of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse.	Agreed
5-2	EA09	Otter & Water Vole	We are satisfied and consider this issue resolved.	As clearly set out within ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] (see paragraphs 7.8.54, 7.8.55, 7.8.99, 7.8.100, 7.8.157, 7.8.158), the Site does not contain any suitable watercourses or	Agreed



			We were concerned that there were inconsistencies in monitoring requirements for otter and water vole. We acknowledge the note in the 8.4 Applicant's Response to Relevant Representations [REP1-067] which draws attention to the lack of connected drains and watercourses within the Site. We accept that this would reasonably suggest that the species will be absent within the site. We note that table 2 in the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] states that a precautionary update may be undertaken prior to the commencement of construction; these would be completed as appropriate to reconfirm the status of protected species identified, to inform mitigation requirements and support protected species license applications. We are therefore content to resolve this issue	connected waterbodies that could support Otter or Water Vole and accordingly, it has been concluded that these species are absent from the Site and adjacent areas and will not be adversely affected. Accordingly, no populations are present that could be subject to monitoring and therefore Table 7-12 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] remains accurate and appropriate in this regard. Measures set out within the oCEMP [APP/7.6.1] in relation to Otter and Water Vole (Table 2) refer to further update surveys that may be required in order to reflect the passage of time and confirm that any such position has not changed prior to commencement of construction activities (in regard to these species representing a precautionary measure outside of any ES requirement, likely to confirm that suitable habitat remains absent) rather than any specific monitoring requirement. Accordingly, Table 7-12 of ES Chapter 7: Ecology and Biodiversity [APP/6.2.1] and the oCEMP [APP/7.6.1] are entirely consistent and it is not proposed to update Table 7-12 at this stage.	
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5-3	EA10	Invasive Non-Native Species	We cannot resolve this issue at this time. We note that the 7.11.1 outline Landscape and Ecological Management Plan (Tracked) [REP1-061] and 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] have been updated to include specific reference to secure a detailed Invasive Species Management Plan (to include specific reference to Variegated Yellow Archangel and Three Cornered Garlic) within the detailed Landscape and Ecological Management Plan. We request that section 7.8.46 (or 7.9) of 6.2.1 Chapter 7 Ecology and Biodiversity (Tracked) [REP1-035] is updated to better reflect the changed ambitions of the INNS management, namely that the INNS management plan will seek to eradicate species within the Site (as mentioned in section 7.3.130 of the landscape environment management plan). Section 7.8.46 currently still reads that the species in the buffer areas will remain undisturbed.	The Applicant confirms that reference to management of Invasive Non-native Species within ES Chapter 7: Ecology and Biodiversity [APP/6.2.2] will be updated at Deadline 3 to confirm that the INNS Management Plan will seek to eradicate the named Invasive species within the site.	Low
5-4	EA15	Chalk Rivers	Environmental Statement Chapter 12: Water Resources [APP-061], Table 12.3 Issue: Table 12.3 assigns the receiving surface waterbody (River Nar) a 'medium' sensitivity, failing to recognise that the River	The Applicant refers to its response above to EA14 on this matter.	Low



		Nar and several of its tributary watercourses are defined as Priority Habitat Chalk Rivers. Impact: The sensitivity of the receiving surface waterbody has been underestimated. Solution: Update Table 12.3 to assign the receiving surface waterbody 'high' sensitivity. Additional Comments: Table 12.3 justifies the assigned 'medium' sensitivity on the following basis: "the receiving waterbody (River Nar) in which the Scheme is located has a WFD Overall Water Body Class of "Moderate", Ecological classification of "Moderate" and a Chemical classification of "Good" (excluding uPBTs)". However, Table 12.3 does not note that the River Nar and several of its tributary watercourses are defined as Priority Habitat Chalk Rivers (Chalk Rivers (England) Natural England Open Data Geoportal). This was previously raised in our response at PEIR stage (Our ref: XA/2025/100395/01-L01) and is acknowledged in Section 12.6.88. Chalk streams are one of the rarest freshwater bodies on Earth, and approximately 85% of them are found in England (https://engageenvironmentagency.uk.engagementhq.com/chalk-streams). In accordance with the Catchment Based		
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			Approach the Environment Agency is committed to protecting and promoting the restoration of these waterbodies (CaBA CSRG IMP PLAN FINAL 25.11.22. V2).		
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Table 4.6 – Waste Management

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
6-1	EA11	Waste Classification	We cannot resolve this issue at this time. We were concerned that there was a lack of detail regarding outline measures for Duty of Care to ensure waste is described and classified correctly by the waste producer or holder, throughout all phases. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that the following documents have been updated to make specific reference to WM3: 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1051]	The Applicant notes this comment and confirms that the outline Construction Environmental Management Plan [APP/7.6.3], outline Operational Environmental Management Plan [APP/7.8.3], and outline Decommissioning Strategy [APP/7.10.2] have been updated for Deadline 2 to make specific reference to WM3, to ensure all waste is appropriately classified before a suitable route for recovery or disposal can be identified.	Low



			• 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1055] • 7.10.1 outline Decommissioning Strategy (Tracked) [REP1-059] We cannot find any reference to WM3 in the above documents. Therefore, we cannot resolve this issue.		
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Table 4.7 - Approach to EIA

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
7-1	EA13	Sensitivity Criteria for Receptors	Environmental Statement Chapter 12: Water Resources [APP-061], Tables 12.2 and 12.3 Issue: Water Framework Directive (WFD) status has been used to characterise receptor sensitivity. This is inappropriate, and as a result of this Table 12.2 assigns 'medium' sensitivity to Groundwater Dependent Terrestrial Ecosystems (GWDTEs), Sites of Special Scientific Interest (SSSI) and private groundwater abstractions for potable use.	The determination of sensitivity criteria for these receptors is well-precedented and has been developed in consultation with regulatory bodies. It should be noted that the sensitivity criteria outlined in ES Chapter 12: Water Resources [APP-061] is analogous with those used for the Mallard Pass, Cleve Hill, Byers Gill and Great North Road solar DCOs. As the River Nar and its tributaries are defined as Priority Habitat Chalk Rivers, this waterbody should be identified as a high sensitivity receptor. The reclassification of this receptor has been undertaken at Deadline 2.	Low



		Impact: The sensitivity of the above receptors has been underestimated. Solution: Reassess the sensitivity of these receptors. This may result in changes to the determined impact significance to these receptors detailed in Table 12.3. See 'additional comments' for further information. Additional Comments: Private groundwater abstractions for potable use or food production are afforded a default 50m radius SPZ1, which is a classification stated in the same table to be High sensitivity. More information on SPZs is provided here: Groundwater source protection zones (SPZs) - GOV.UK. We consider the assignment of 'medium' sensitivity to abstractions for potable use or food production purposes to be inappropriate. However, we acknowledge that for the site in question groundwater resources are already assessed as High sensitivity due to the presence of local SPZ1 and that this has no material impact on the outcome of the assessment. In the absence of 'very high' and 'high' categories to differentiate between we consider that SSSI and GWDTE receptors, where present, should be assigned High sensitivity.	In accordance with Table 12.3 of ES Chapter 12: Water Resources [APP-061], no change to the output of determined impact significance on watercourses will occur. Sensitivity for SSSI designations has been reassessed at Deadline 2. As noted by the EA, the resource being utilised by abstractions has been assigned high sensitivity and therefore private water supplies utilising groundwater, by default, have been assessed accordingly.	
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			It is explicit in the characterisation that the use of 'poor' waterbody status to designate waterbodies as low sensitivity is incorrect. We consider WFD waterbodies of 'poor' status to be of high priority to prevent further deterioration, and do not consider them to be 'low sensitivity' receptors. The Applicant should consider the use of aquifer typology (Principal, Secondary etc.) as a method of designating relative sensitivity to groundwater bodies.		
7-2	EA17	WFD Groundwater Bodies	ID: EA17 (WFD Groundwater Bodies) Environmental Statement Appendix 12.3: Water Framework Directive Assessment [APP-171] Environmental Statement Chapter 12: Water Resources [APP-061], Section 12.5.5 Issue: Table 12.6 fails to consider all WFD Groundwater bodies within the Hydrology Study Area as defined in Figure 12.3 Impact: Risk of impacting WFD Groundwater bodies if they are not considered within the assessment. Solution: Include all WFD Groundwater bodies within the Hydrology Study Area in the assessment. This includes the Cam and Ely Ouse Chalk WFD Groundwater Body (water body ID GB40501G400500)	It is noted that the Cam and Ely Ouse Chalk WFD Groundwater Body has not been included within the wider study area assessment. For completeness, Table 12.6 of ES Chapter 12: Water Resources [APP-061] has been updated to ensure reference to the WFD Groundwater body underlying the Site at Deadline 2. ES Chapter 12: Water Resources [APP/6.2.2] has been updated to include both Groundwater bodies underlying the Site at Deadline 3. However, as noted by the Environment Agency, the outcome of the assessment will not change.	Low



			which is located within 2km south-east of the draft Order Limits. Additional Comments: The Wider Study Area for hydrology and hydrogeology is defined as 5km from the order limits in Section 12.5.5 of Chapter 12. We do not expect the inclusion of the Cam and Ely Ouse Chalk WFD Groundwater Body in the assessment to result in any changes to the outcome, but do expect all WFD bodies within the Study Area to be considered. Table 12.6 in Chapter 12 also has an error in the header of the right-hand column. It refers to a surface water WFD body, not the WFD Groundwater body underlying the site.		
7-3	EA19	Accuracy of Hydrogeological Model	We are satisfied and consider this issue resolved. We were concerned that the accuracy of the hydrogeological model was unclear. The Applicant has confirmed in the 8.4 Applicant's Response to Relevant Representations [REP1-067] a commitment to installing boreholes within Order Limits to monitor groundwater levels prior to construction. This ensures that construction activities such as Horizontal Directional Drilling (HDD) and foundation works do not occur when groundwater levels are high enough to interact with	It is noted that the current conceptual model relies on a limited number of groundwater monitoring locations, situated largely outside the Order limits. It is acknowledged that the current model has not yet integrated regional controls including regional interpretation shown in the NEAC groundwater model and potentiometric surfaces shown in the BGS Hydrogeological Map (1976). Following an Environmental Information Request, the conceptual model has been updated at Deadline 2. It will integrate outputs from the NEAC groundwater model, particularly for the wet-month scenario to ensure the	Agreed



			them. Furthermore it allows the data to be used to refine the hydrogeological conceptual model.	conceptual understanding aligns with regional flow patterns. It should however be noted that the conceptual model was intended as a screening-level assessment with the purpose of identifying whether shallow groundwater poses a risk to foundations, trenchless installation or local construction processes, and was not intended to represent a definitive or high-resolution groundwater flow model. Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] and Table 4.8 of the oCEMP [APP/7.6.1] commits to installing boreholes within the Order limits to monitor groundwater levels prior to construction to ensure that construction activities, such as HDD and foundations, do not occur when groundwater levels are high enough to interact with the activity, and the data could be used to refine the hydrogeological model.	
7-4		Embedded Operation Phase Mitigation	The Embedded Operation Phase Mitigation of Chapter 12 [APP-061] does not mention the outline OEMP, outline BSMP or a Drainage Strategy. These are all essential documents that contain mitigation measures which will help protect the water environment, therefore Chapter 12 should be updated to reflect this.	Reference has been made in ES Chapter 12: Water Resources [APP-061] to the oOEMP [APP/7.8.1] and oBSMP [APP-194] at Deadline 2. The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy that will serve Work Nos. 2 – 4 will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4	



				of ES Appendix 12.2: Flood Risk Assessment [AS-053] .	
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Table 4.8 - Construction

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
8-1	EA21	Trenchless Installation Methods	We cannot resolve this issue. We were concerned that Section 12.7.7 [APP-061] excludes some key mitigation measures related to the hydrological environment. We requested inclusion of the following measures: • Hydrogeological Impact Assessment (HIA) for all trenchless crossings due to the sensitivity of watercourses and Principal aquifer, including Water Features Survey for all surface water bodies • Development of drilling fluid breakout plans for all trenchless crossings • Clarify the launch/receptor pit working area distance from watercourses The Applicant stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that they updated the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] to specify a hydrogeological risk assessment and drilling fluid breakout plans for HDD drilling activities. However,	The oCEMP [APP/7.6.3] and Design Principles and Parameters [APP/5.8.3] have been updated at Deadline 3 to also to commit to undertaking a Hydrogeological Impact Assessment for all trenchless crossings.	Low



			the commitment to undertake a hydrogeological risk assessment is only explicitly stated in relation to foundations and piling – it is not stated for HDD breakout risk for trenchless crossings. To resolve this issue, we require all trenchless crossings to also commit to hydrogeological risk assessments. Commitments should be provided in the outline Construction Environmental Management Plan (Tracked) [REP1-051] and the 5.8.1 Design Principles, Parameters and Commitments (Tracked) [REP1017].		
8-2	EA22	Shallow Groundwater	We are satisfied and consider this issue resolved. We were concerned that that groundwater levels may be higher than anticipated, rendering the approach set out in section 12.8.23 [APP-061] impossible. The 5.8.1 Design Principles, Parameters and Commitments (Tracked) [REP1-017] states that “An alternative construction methodology to HDD, such as open cut, will be selected if groundwater conditions require it.” We are therefore content to resolve this issue	Paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061] states that HDD works would not take place if groundwater levels were within 15m BGL based on pre-construction monitoring boreholes. This measure was intended as a precautionary safeguard until additional site-specific groundwater level data becomes available. An alternative construction methodology will be selected if groundwater conditions require it, and the Design Principles, Parameters and Commitments [APP/5.8.1] has been updated at Deadline 1 to reflect this.	Agreed



				The oCEMP [APP/7.6.1] commits to groundwater borehole monitoring within the Order limits and will be decommissioned in accordance with best practice at the time.	
8-3	EA23	Interaction with Groundwater	Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.15, 12.8.19 and 12.8.20 Issue: Groundwater elevations within the draft Order Limits area are anticipated to be below the maximum extent of foundation structures, excluding potential minimal overlap with the maximum likely pile depth at the BESS and Substation sites. Impact: Potential for depth to groundwater to be underestimated, and potential for groundwater to be encountered within solar photovoltaic (PV) Array Mounting Structure pile depth and a greater than anticipated proportion of the maximum BESS and Substation sites. There is a risk of encountering artesian conditions. Solution: The Applicant should conduct intrusive investigations across the PV Array areas including groundwater monitoring to confirm the presence and characteristics of groundwater. Additional Comments: The report concludes that there is limited potential for the installation of Mounting Structures for the Solar PV Arrays to impact groundwater,	It is noted that the current conceptual model relies on a limited number of groundwater monitoring location, situated largely outside the Order limits. It is acknowledged that the current model has not yet integrated regional controls including regional interpretation shown in the NEAC groundwater model and potentiometric surfaces shown in the BGS Hydrogeological Map (1976). Following an Environmental Information Request, the conceptual model has been updated at a deadline 2 to reflect the Environment Agency's levels, if more conservative than that of the Applicant. It will integrate outputs from the NEAC groundwater model, particularly for the wet-month scenario to ensure the conceptual understanding aligns with regional flow patterns. An Environmental Information Request has also been submitted to verify whether further groundwater monitoring locations exist within the wider study area to ensure the dataset reflects all reasonably available information. Following an Environmental Information Request, the conceptual model has been updated at Deadline 2.	Medium



			as this has been modelled to have a maximal depth to between 4.0 and 40 mbgl. This is currently supported by very limited intrusive data. The report concludes that the maximum depth of piled foundations at the BESS, Customer Substation and National Grid Substation sites could marginally interact with groundwater based on triangulation of regional borehole level data. This is not supported by suitable groundwater level data from the draft Order Limits area. We note that Section 12.8.20 confirms that the required piling depth will be considered in the context of the highest groundwater level, additional measures are to be implemented. Groundwater monitoring should be undertaken over a sufficient period to be representative of seasonal variation including worst-case groundwater levels and thus should include monitoring for at least six months including the winter period.	The oCEMP [APP/7.6.1] commits to groundwater borehole monitoring within the Order limits. This monitoring data will be used to replace or refine interpolated groundwater surfaces presented within ES Chapter 12: Water Resources [APP-061] and used to confirm whether PV arrays or foundation zones may interact with groundwater which will determine whether specific mitigation measures are needed. ES Chapter 12: Water Resources [APP-061] has been updated at Deadline 2 to confirm that the depth of PV array piles and foundation design for the BESS and substations will be reassessed against the refined highest groundwater elevation dataset and the Design Principles, Parameters and Commitments [APP/5.8.1] has been updated at Deadline 1 to reflect this. Paragraph 12.8.20 of ES Chapter 12: Water Resources [APP-061] commits to pile depth being designed to maximum groundwater elevation. If groundwater proves shallower than currently inferred, mitigation measures will be applied. If artesian pressures are identified locally, works will be designed or sequenced to ensure no groundwater breakthrough or loss of control during piling.	
8-4	EA24	Foundation Works Risk Assessment	We cannot resolve this issue. We were concerned that the FRA [APP-170] stated that a Foundation Works Risk Assessment	The Applicant confirms that the oCEMP [APP/7.6.3] has been updated at Deadline 3 to explicitly state that the final choice of	Low



			would only be required if piling goes deeper than the highest recorded groundwater level. In the 8.4 Applicant's Response to Relevant Representations [REP1-067] it is stated that "the oCEMP [APP/7.6.1] has been updated to state that the final choice of foundations for Work Nos. 2 to 4 will not indirectly interact with the underlying aquifer". We have been unable to located this statement within the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051].	foundations for Work Nos. 2 to 4 will not indirectly interact with the underlying aquifer	
8-5	EA25	Construction Mitigation Measures	We are satisfied and consider this issue resolved. We were concerned about the lack of detail regarding the construction mitigation measures for HDD, BESS and the substation. The 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1051] has been updated to confirm the mitigation measures that will be undertaken. We find this acceptable.	Mitigation measures are secured within Table 7 of the oCEMP [APP/7.6.1] and has been updated at Deadline 1 to confirm that a Foundation Works Risk Assessment, HIAs and drilling fluid breakout plans will be undertaken for foundations at the Scheme based on groundwater monitoring levels of boreholes to be installed within the Order limits. As outlined within paragraph 12.8.23 of ES Chapter 12: Water Resources [APP-061], groundwater monitoring will occur prior to the commencement of the construction phase to ensure that HDD does not have the potential to interact directly with groundwater.	Agreed



8-6	EA26	Drilling Fluid Breakout Plan	We are satisfied and consider this issue resolved. We were concerned that Tables 6 and 17 [APP-186] stated that no monitoring was required for drilling fluid seepage during borehole operations. The 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1051] has been updated to: • explicitly state that a Drilling Fluid Breakout Plan will be included in the detailed Construction Environmental Management Plan, to be submitted prior to the construction phase (table 7). • state that monitoring activities, a Foundation Works Risk Assessment, HIAs and drilling fluid breakout plans will occur to reduce the risk of breakout during drilling (tables 6 and 18).	Table 7 of the oCEMP [APP/7.6.1] states that monitoring activities will occur to reduce the risk of breakout during drilling. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to explicitly state that a Drilling Fluid Breakout Plan will be included in the detailed Construction Environmental Management Plan to be submitted prior to the construction phase. Tables 6 and 17 of the oCEMP [APP/7.6.1] has also been updated at Deadline 1 to state that monitoring activities, a Foundation Works Risk Assessment, HIAs and drilling fluid breakout plans will occur to reduce the risk of breakout during drilling.	Agreed
8-7	EA27	Hydrogeological Impact Assessment	We cannot resolve this issue. We were concerned that the definition provided in table 6 [APP-186] was vague in regards to the trenchless crossing techniques and mitigation measures to avoid impacts to groundwater may not be sufficient. The Applicant stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] "The Applicant refers to its response to EA23 above." However the reference number column, and our relevant	The Applicant confirms that tables 6, 7, and 17 of the oCEMP [7.6.3] has been updated at Deadline 3 to include reference to the production of a HIA for trenchless works.	Low



			representation ID does not match up in this document. It is therefore unclear what they are referring to. Regardless, we note that tables 6, 7 and 17 of the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] have not been updated to refer to the production of a HIA for trenchless works.		
8-8	EA28	Spills and Leaks	We are satisfied and consider this issue resolved. We were concerned that mitigation measures to prevent spills and leaks from construction compounds were not well defined. Spillages of fuel or drilling fluid are not mentioned in the outline CEMP. We requested that the Applicant provides details of mitigation measures, to prevent fugitive emissions from temporary construction and decommissioning compounds from impacting controlled waters. Specifically section 5.4.50 [APP-054] should clarify whether sheltered means fully covered (i.e. no rain access), and if any storage will utilise double-skinned tanks. The Applicant has updated the 8.4 Applicant's Response to Relevant Representations [REP1-067] and 6.1.2 ES Chapter 5 The Scheme (Tracked) [REP1033] to make reference to the above requests.	As outlined in Table 18 of the oCEMP [APP/7.6.1], machinery will be regularly maintained to minimise the potential for fuel or oil leaks and spillages to occur. All maintenance will be conducted over drip trays or suitably absorbent spill pads to minimise the potential for groundwater and surface water pollution. All machinery will be equipped with drip pans to contain minor fuel spillage or equipment leakages. It is also stated that temporary construction compounds will be sited outside Source Protection Zone 1 where possible to reduce likelihood of groundwater contamination further. Paragraph 5.4.36 of ES Chapter 5: The Scheme [APP/6.1.2] has been updated at Deadline 1 to reference fugitive emissions from temporary Construction Compound(s). Paragraph 5.4.50 will clarify whether sheltered means	Agreed



				fully covered (i.e. no rain access), and if any storage will utilise double-skinned tanks. Mitigation measures at Construction Compounds within the oCEMP [APP/7.6.1] has been made reference to.	
8-9	EA40	Spacing of BESS	We are satisfied and consider this issue resolved. We were concerned that there was a risk that firefighting methods may not be able to prevent propagation of fire along rows of BESS containers. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that BESS separation distances are defined by the UL9540A Large Scale Burn Test. We are therefore content to resolve this issue.	The BESS separation distances are defined by the UL9540A Large Scale Burn Test, and the BESS original equipment manufacturer will determine from the results the minimum space required to avoid onward propagation via radiated heat / flames. The spacing of the BESS will be in accordance with the guidance provided by the BESS original equipment manufacturer. The spacing is therefore sufficiently protective of groundwater quality.	Agreed
8-10	EA41	Thermal Effects of Buried Cables	We cannot resolve this issue. We were concerned regarding the omission of buried cables from potential contaminant sources in the Operational Phase Conceptual Site Hydrogeological Model. We require more information to be able to concur with the Applicant's conclusion in 8.4 Applicant's Response to Relevant Representations [REP1-067], that the potential for thermal discharge from buried HV cables is low. Please view the following advice, and consider the Desk-based risk assessment section: Following the 2023	The Applicant maintains that the potential for thermal effects on groundwater is low. The Scheme is substantially compliant with the exemptions listed in the EA's <i>Closed loop ground source heating and cooling systems: exemption conditions</i> guidance, specifically: The buried cable system would be a fully sealed system and would not discharge pollutants to the environment during operation.	Medium



		amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. Discharge of heat to water should be a material consideration for developments involving emissions of heat e.g., buried electrical cables, particularly NSIPs or large-scale infrastructure developments. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent further increase/ deterioration of the groundwater quality. The Environment Agency is currently developing guidance about heat as a pollutant to groundwater and to date has published a regulatory position statement, guidance on the exemptions, and a permitting regime for open and closed loop ground source heating a cooling systems (GSHCs). The guidance will draw upon the Environment Agency's Chief Scientist's Group published report for Ground Source Heating and Cooling (GSHC) systems. This report examines the potential for ground source heating and cooling systems to change the temperature in the	• The Scheme has been designed to avoid surface water or groundwater pollution, as measures to protect the water environment during construction are secured through the oCEMP [APP/7.6.3] and the commitment to a FWRA. • The cable route is not located within 50m of a well. Spring or borehole used for domestic or food production purposes. • ES Figure 7.1: Ecological Designations [APP-109] shows the CSA is not located within any protected ecological sites or ancient woodland that could be affected by localised thermal changes. • As outlined in ES Chapter 12: Water Resources [APP/6.2.2] designations are approximately 1 km from Work No.s which could have cabling and will therefore not be affected by thermal emissions. • The cable route is not located adjacent to a septic tank, cesspit or associated infiltration system. • Measures to prevent pollution of groundwater during decommissioning are secured through the outline Decommissioning Strategy [APP/7.10.2].	
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			ground and identifies receptors that could be impacted. Permitting implications Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of DEFRA's Environmental permitting: Core guidance. However, we take a proportionate and pragmatic approach in our application of the principles of the Environmental Permitting Regulations. Requiring a permit would feel disproportionate for many activities at or near the ground surface. Accountability to comply with extant environmental legislation lies with the developer and the landowner. They should consider the thermal implications of developments which emit heat such as buried electricity cables, and the potential risks to the water environment via a desk-based assessment, as a minimum. Desk-based risk assessment Currently, the main driver for the prevention of heat pollution is to protect surface water ecology, protected sites and ancient woodlands. Heat should also not impact quality or quantity of water in existing groundwater or surface water abstractions. In the first instance the developer should ensure that where practicable the proposed cabling: • is fully sealed, • does not discharge pollutants other than transfer heat to the environment,	It should be noted that the majority of cabling will be installed to a depth of 1.2m to 2m, as outlined in Table 3-1 - Work No 1 of Design Principles, Parameters and Commitments [APP/5.8.3] and as such has very limited potential to transfer heat to groundwater. The very western section of the Order Limits is located within Source Protection Zone 1, as shown on Figure 12-5: Source Protection Zones submitted at Deadline 3. Maximum groundwater elevations in this section of the Order Limits are 25-30m below ground level. As such, there is 10-15m headroom between the maximum cable depth for HDD and groundwater, meaning there is negligible potential for heat to be transferred from cables. Where groundwater elevations in the wider Order Limits have the potential to be within 15m of the ground surface, the interaction with HDD / cables is a very small proportion of the North West Norfolk Chalk Water Body which has an approximate area of 36,631.4ha. The considerable size of the overall groundwater body area means that a substantial volume of groundwater will be moving through the body at any given time. As shown on the flow pathway outputs of the Environment Agency's NEAC groundwater model, the chalk aquifer is characterised by	
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			• does not cause pollution of surface water or groundwater, • is not within a groundwater source protection zone 1 (SPZ1) that's used to supply water for domestic or food production purposes, • is not within 50m of a well, spring or borehole used to supply water for domestic or food production purposes, • installation does not mobilise any contaminants present in the subsurface to the extent that the pollution of groundwater occurs, • is not adjacent to a septic tank or cesspit, including the infiltration system Desk based assessments at the planning stage should scope in heat from electricity cables. The GSHC exemption criteria and resources referenced in this document could help assess the risk. For example: either by de-risking, if all criteria are met or further assess the risk, where the criteria are not met and mitigate the risk, where required. In other words, sections of the cabling route that meet all of these criteria, and where the developer is satisfied that the cables will not cause harm via discharge of heat and heat pollution, can be scoped out from requiring further risk assessment. You do not need to complete any further assessments or apply for a permit if your cabling route meets all the exemption conditions. If cabling sections require further assessment following application of these exemptions, a conceptual site model	continual groundwater movement and significant groundwater storage. Consequently, any localised heat transfer to groundwater would be subject to rapid dilution, dispersal and thermal dissipation within the wider groundwater body. Any temperature increases would therefore be highly localised, temporary and indistinguishable from normal natural temperature variations within the subsurface environment. As such, the effects of dilution and heat dissipation on any localised groundwater that interacts with the buried cables will be substantial and the risks relating to groundwater temperature changes are considered to be very low, especially at the abstraction point (Marham) approximately 6.5km south east of the Scheme. The Applicant, therefore, maintains that the conclusions presented within the Applicant's Response to Relevant Representations [REP1-067], remain robust and that buried cable thermal emissions do not represent a significant environmental effect requiring further assessment or mitigation.	
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			(drawing) should be produced. We ask for the model to demonstrate the proposed installation depth, anticipated depth to groundwater, and specification of the cable installation, including thermal insulation measures. An understanding of the expected normal and maximum operating temperature of the cables, and the depth of any nearby abstraction boreholes will be useful in determining risk. In those rare instances where we are concerned that there are risks which require ongoing control or management, you may require a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016.		
8-11	EA42	Missing Legislation	Flood Risk Assessment [APP-170], Section 12.4.1 Outline Construction Environmental Management Plan [APP-186], Tables 7 and 18 Issue: Omission of include The Environment Agency's approach to groundwater protection and National standards for sustainable drainage systems (SuDS) - GOV.UK from the list of guidance and legislation provided in Section 12.4.1 of the FRA.	Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3] has been updated at a Deadline 2 to include the addition of the EA's approach to groundwater protection and National standards for SuDS to the list of guidance and legislation. The drainage design for all electrical infrastructure compounds will ensure that hazardous or polluting liquids have limited potential to infiltrate into the ground. The spent fire suppression tank will be lined and have a penstock, as is secured through the oBSMP [APP-194].	Low



			Impact: Risk of the BESS, Customer Substation and National Grid Substation drainage designs not being designed in accordance with all relevant guidance. Solution: Include The Environment Agency's approach to groundwater protection and National standards for sustainable drainage systems (SuDS) - GOV.UK in Section 12.4.1 and confirm the outline drainage proposals have been designed in accordance. Additional Comments: The Environmental Pollution Act 1995 states "<i>It is an offence to cause or knowingly permit the discharge of poisonous, noxious or polluting matter into relevant waters or into any underground strata</i>". The design of Substation and BESS drainage systems must ensure that spills and leaks from plant and equipment do not result in hazardous or polluting substances discharging to groundwater. Although it is suggested that the BESS Units would be mounted on concrete foundations, it is possible that compacted gravel may also be used. It is unclear if the Applicant is committing to fully sealed drainage. The Applicant should ensure that if compacted gravel is used, an impermeable lining is present underneath so that the BESS drainage is fully sealed.	The Scheme has Work Nos. and does not have a detailed design at this stage. A detailed drainage strategy that will serve Work Nos. 2 – 4 will be provided once the detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), as secured within Section 12.4 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. If concrete foundations are used, these will form the sealed surface. If compacted gravel is used as the surface, an impermeable membrane / liner will be installed so that the drainage system beneath the BESS is fully sealed and no infiltration to the ground is possible. Any spills, leaks, or firewater runoff is captured and managed through a contained drainage system and cannot reach the Principal Aquifer. This is secured through section 12.4.42 of ES Appendix 12.2: Flood Risk Assessment [AS-053]. The detailed drainage strategy that will be provided once detailed design of the Scheme has been progressed and finalised, following the issue of the DCO (if consented), will provide further details of how the proposed SuDS will treat pollutants. Paragraph 12.4.27 of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that SuDS features including semi permeable roads and infiltration basin will be sufficient to effectively mitigate any suspended solids, metals and	
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			This should be updated in Chapter 12 and the BSMP. Tables 7 and 18 both state that “SuDS will treat runoff, which can reduce sediment and pollutant volumes in runoff before discharging back into natural drainage network”. Further details of how the proposed SuDS will treat pollutants should be provided.	hydrocarbons. The detailed design of the SuDS network for the Scheme will be provided to the EA (for permitting) and LLFA, following granting of the DCO, as outlined in paragraph 12.4.33 of ES Appendix 12.2: Flood Risk Assessment [AS-053].	
8-12	EA43	Use of Concrete	We are satisfied and consider this issue resolved. We were concerned that the 7.6 outline Construction Environmental Management [APP-186] did not contain sufficient mitigation measures to protect water quality from the use of concrete. Table 7 of the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] has been updated to: • commit to identifying within the detailed CEMP all areas where concrete works are proposed, whether cast in situ or pre-cast and delivered, • state that should in-situ concrete pouring be required, construction works would be minimised during heavy precipitation events, and carried out during dry months where practicable. We find this acceptable.	Table 7 of the oCEMP [APP/7.6.1] secures mitigation measures to protect the hydrological environment during the use of concrete. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to: • Identify all areas where concrete works are proposed • Specify whether any of these will be cast in-situ or pre-cast and delivered; and • For in-situ concrete pours, suggest timing, weather conditions, and runoff control. These construction works should be minimised during heavy precipitation events and carried out during dry months where practicable.	Agreed
8-13	EA44	Wheel Washing Facilities	We are satisfied and consider this issue resolved.	Table 7 of the oCEMP [APP/7.6.1] states that the wheel wash facility will work on a closed	Agreed



			We were concerned there was a lack of clarity for the containment and disposal of any water from wheel washing facilities. Table 3.7 of the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] has been updated to state that water from the wheel wash is to be collected and tankered off site to a licensed waste carrier. We find this acceptable	cycle, which limits the potential for 8 contained releases of pollutants to the hydrological environment. The oCEMP [APP/7.6.1] has been updated at Deadline 1 to outline how water from the wheel wash will be disposed of, if dry wheel wash facilities are not used, which is likely to involve a sump and an impermeable lined designated area for such activities. The sump will act to capture sediment. Given the absence of watercourses within Work Nos. 1 to 4, which includes Site entrances, it is highly unlikely that wheel washes will discharge to a watercourse.	
8-14	EA45	Water Quality Monitoring	We cannot resolve this issue. We were concerned that there was insufficient detail provided regarding monitoring for increased sediment in surface water runoff and chemical pollution. We note the Applicant's response in 8.4 Applicant's Response to Relevant Representations [REP1-067]. We require commitments stating the following: • monitoring locations must be specified as upstream and downstream of any discharge outfalls and crossings, • frequency should be at least monthly, starting at least 6-months before construction, occurring throughout construction and into operation. We require these commitments to ensure that there is a pre-construction baseline to	Regarding monitoring locations, as outlined in ES Chapter 12: Water Resources, the watercourses within Work Area which require construction activities are not hydrologically connected to the wider surface water environment i.e. are blind ditches without outfalls or confluences. As such, the Table 7 Water Resources of the oCEMP [APP/7.6.3] commits the Scheme to monitoring at locations on the principal watercourses downstream of the Scheme infrastructure and upstream of other non-natural influences and the locations and parameters will be agreed with the EA prior to establishing the hydrochemical baseline. This is appropriate as the mechanism of hydrological linkage is likely to be throughflow	Low



			compare post-construction motoring results with. This is the same approach adopted by Great North Road Solar and Biodiversity Park, and East Park Energy.	(subsurface) rather than via watercourse transfer. Regarding sampling frequency, Table 7 Water Resources of the oCEMP [APP/7.6.3] already commits to monitoring twice per month for at least six months prior to the construction phase and, as such, does not require updating.	
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Table 4.9 - Land contamination

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
9-1	EA29	Unexpected Contamination	We are satisfied and consider this issue resolved. We were concerned that the stated mitigation measures do not include a watching brief for unexpected contamination or a discovery strategy. The 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1051], 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1055] and 7.10.1 outline Decommissioning Strategy (Tracked) [REP1-059] have all been updated sufficiently to include a watching brief for unexpected contamination or a discovery strategy.	The oCEMP [APP/7.6.1] , oOEMP [APP/7.8.1] , and oDS [APP/7.10.1] have all been updated at Deadline 1 to include the provision of a watching brief for unexpected contamination and a Discovery Strategy to be employed where contamination is encountered. During this update, the oDS [APP/7.10.1] has had the page numbers updated as presented on page iv.	Agreed



9-2	EA30	Contaminated Soils	We are satisfied and consider this issue resolved. We were concerned that the outline Soil Management Plan does not address management of contaminated soils if encountered. We are confident that measures listed under Table 17 in the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] will ensure that soil management measures will address contaminated soils if encountered.	The Applicant notes and agrees with this comment. This matter will be addressed in the detailed Soil Management Plan that is to be produced before the commencement of the construction phase, as a requirement under the DCO.	Agreed
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Table 4.10 – Decommissioning

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
10-1	EA31	Removal of Buried Cables	We cannot resolve this issue. We were concerned that decommissioning proposals did not determine whether buried cabling would be removed, or detail the mitigation measures to minimise their potential to act as a contamination source if retained. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067], that "all below-ground cabling will be left in situ". We note that the table 7 in 7.10.1 outline Decommissioning Strategy	The outline Decommissioning Strategy [REP1-058] was updated at Deadline 1 to specify that all below ground infrastructure, including cabling, would be removed up to a depth of 1.2m to allow for the continued agricultural use of the land, as part of the decommissioning phase. Below this depth, all below-ground cabling will be left in situ, as this would allow for the cultivation of land after the Scheme has been decommissioned. This approach minimises soil disturbance by avoiding unnecessary	Low



			(Tracked) [REP1-059] has been updated to state that: • “methods for cutting and sealing cables during the decommissioning phase will be in accordance with industry best practices at the time.” • “where cables are buried under watercourses, ditches, roads and potentially sensitive vegetation, it is anticipated that the BPEO will be to leave the cable ducting (or the whole cables, if separate ducting is not used) in situ.” We require the environmental risk assessment and selection of Best Practicable Environmental Option (BPEO) to also consider total or partial cable removal. We encourage the Applicant to consider the practicability of future cable removal at the design stage.	handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Scheme. This is principally in accordance with the approach taken at the recently approved Springwell DCO. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The oDS [APP/7.10.1] was updated at Deadline 1 to commit to specifying the technique to cut and seal cables prior to the decommissioning phase, based on best practice at the time. It is considered proportionate for an environmental risk assessment and selection of Best Practicable Environmental Option (BPEO) to be undertaken to inform the detailed DS, in advance of the commencement of the decommissioning works. The decommissioning works are not expected to commence until after the 60-year operational phase of the Scheme, at which point the BPEO may be substantially different to that of today, and would likely	
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				require undertaking as part of the detailed DS regardless. disruption	
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Table 4.11 - BESS / Fire Safety

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
11-1	EA33	BESS Mitigation Measures	We cannot resolve this issue. We were concerned that the outline Construction Environmental Management Plan (CEMP) [APP-186] did not clearly state that the BESS units would only be installed once the mitigation measures are in place. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that there will be site design safety elements in place prior to the BESS being installed. We request a commitment in the outline CEMP stating that the minimum components of the site fire safety systems will be identified in the CEMP. These components must be in place and confirmed as operational before installation of the BESS, including drainage infrastructure	The Applicant notes this comment and has updated the oCEMP [APP/7.6.3] to state that the minimum components of the site fire safety systems will be identified in the CEMP and that these components must be in place and confirmed as operational before installation of the BESS, including drainage infrastructure (including a penstock), firefighting water supply, and access roads to ensure these measures are secured.	Low



			(including a penstock), firefighting water supply, and access roads to ensure these measures are secured		
11-2	EA34	Penstock Valve	Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.144 and 12.8.147 Environmental Statement Appendix 12.2: Flood Risk Assessment [APP-170], Sections 12.4.18, 12.4.41 and 12.4.42 Outline Operational Environmental Management Plan [APP-188], Table 3-7 Outline Battery Safety Management Plan [APP-194], Table 6.1 Item 12 Issue: It is unclear as to whether the automated penstock valve at the BESS, Customer Substation and National Grid Substation Sustainable Drainage Systems (SuDS)/contaminated water tank would have backup manual operation. Impact: Risk of direct release of potentially contaminated firefighting water into the environment if the automatic penstock valve fails during an incident and there is no backup manual operation. Solution: The Applicant should confirm that the penstock valve will also have backup manual operation, and that the valve will be subject to a programme of regular inspection	As confirmed within ES Appendix 12.2: Flood Risk Assessment [AS-053], the penstock valve on the contaminated water tank will automatically shut off in the event of a fire suppression event and closed until testing of the contaminated water has taken place. The oOEMP [APP/7.8.1] commits to the testing of the penstocks on a regular basis and repairs undertaken promptly if required. In the event that the penstock automated system fails, there will be an option to manually close the penstock valve and that the valve will be subject to a programme of regular inspection and maintenance. This will be detailed within ES Appendix 12.2: Flood Risk Assessment [[APP/6.4.3] as updated at a deadline 2.	Low



			and maintenance. This should be consistently referenced across the ES submission documents. The Applicant should update Chapter 12, the FRA and the outline BSMP to clarify the trigger for penstock automatically closing. Additional Comments: We note that Table 3-7 of the outline OEMP commits to regular testing of penstocks and for repairs to be undertaken promptly if required. This is essential to ensure the penstock remains in good condition to always close promptly when required.		
11-3	EA35	Removal of Captured Firefighting Water	We cannot resolve this issue, however we recognize that progress has been made towards its resolution. We were concerned that there were insufficient arrangements to ensure that the removal of captured firefighting water would not pose a risk of environmental pollution. We acknowledge the update to section 2.14.3 of the 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1-055]. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that further updates will be made at a future deadline.	The Applicant commits to locating BESS infrastructure at least 300 mm above the modelled design flood level where required, which is secured within Design Principles, Parameters and Commitments [APP/5.8.3]. ES Appendix 12.2: Flood Risk Assessment [APP/6.4.2] has been updated at Deadline 2 to explicitly address BESS fire scenarios under flood conditions, including the behaviour of contaminated firewater, interaction with floodwater and confirmation that containment and isolation systems remain effective during such events. These measures are secured through the updated ES Appendix 12.2: Flood Risk Assessment [APP/6.4.3] and the relevant DCO Requirement and that captured fire suppressant will be tankered offsite to a	Low



				licensed facility, rather than be tested and released to the wider hydrological environment. This approach is consistent with that of the Great North Road Solar and Biodiversity Park DCO.	
11-4	EA36	Underground Contaminated Water Tanks	Environmental Statement Chapter 12: Water Resources [APP-061], Sections 12.8.143 and 12.8.147 Issue: Spent firefighting water is proposed to be contained within a dedicated underground contaminated water tank(s), sized to contain 228m³ of spent fire suppressant plus a 1% Annual Exceedance Probability (AEP) event. Similar arrangements are proposed for the Customer Substation and National Grid Substation. Impact: This may result in the underground storage of hazardous substances within a Principal aquifer within SPZ2 which may not be compliant with Position Statement D2 of The Environment Agency's approach to groundwater protection. Solution: The Applicant should justify why the storage must be underground and commit to engineering and management standards to ensure there are no leaks from this infrastructure. This equally applies to the closed drainage system for the Customer Substation and National Grid Substation.	ES Appendix 12.2: Flood Risk Assessment [AS-053] outlines that a closed system should be utilised to contain spent firewater in the event of a battery or substation fire, in accordance with best practice, and the use of tanks is a typical approach on sites which include BESS. ES Appendix 12.2: Flood Risk Assessment [AS-053] has been updated at future Deadline 2 to confirm that, should there be space following the detailed design of the Scheme, then aboveground, impermeably lined detention basins will be favoured over belowground structures. Additionally, there will be a commitment that the containment area will be fully cleaned prior to any shut-off valves being re-opened. Section 12.4 (paragraphs 12.4.40) of ES Appendix 12.2: Flood Risk Assessment [AS-053] states that the SuDS structures serving the BESS compound will be sized to accommodate the 1% AEP +40% CC and an additional 228m³, and this will be sufficient	Low



		Additional Comments: Position Statement D2 of The Environment Agency's approach to groundwater protection states: <i>The Environment Agency will normally object to new and increased underground* storage of hazardous substances in SPZ1. The Environment Agency will agree to such storage in principal and secondary aquifers outside SPZ1 only if there is evidence of overriding reasons why the:</i> <i>• activity cannot take place within unproductive strata</i> <i>• storage must be underground (for example public safety), in which case it is expected that the risks are appropriately mitigated</i> <i>For all storage of pollutants underground (hazardous substances and non-hazardous pollutants), the Environment Agency expects operators to adopt appropriate engineering standards and have effective management systems in place. These should take into account the nature and volume of the materials stored and the sensitivity of groundwater, including the location with respect to SPZs. * Underground storage constitutes storage whereby the tank is not wholly visible on a permanent basis and is not wholly accessible from ground level. Any tank that is partially set in the ground in a secondary containment and is totally</i>	for storing the full fire suppressant volume during an extreme rainfall event.	
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			<i>accessible and wholly visible will be considered to be an above ground tank.</i> Although under normal circumstances the proposed firewater storage tank(s) would not contain hazardous substances, the potential for these to be present in firewater following a BESS fire cannot be fully discounted. The Applicant should therefore satisfactorily demonstrate why a firewater storage solution cannot instead be implemented above ground. The storage tank(s) should be suitably engineered to ensure secure containment over the lifetime of the Proposed Development and should include secondary containment such as double-skinned construction. The Applicant should also ensure that the containment area is sized to be able to hold all firefighting water, during a storm event, and factor in climate change. The Applicant should confirm that the containment area will be fully cleaned prior to any shut-off valves being re-opened.		
11-5	EA37	Spills and Leaks – BESS and Substation Drainage Systems	We cannot resolve this issue, however we recognize that progress has been made towards its resolution. We were concerned that there was an absence of measures to identify and manage the risk of pollution during normal operation of the BESS and	The Applicant confirms that the FRA ES Appendix 12.2: Flood Risk Assessment [APP/6.4.2] was updated at Deadline 2 to confirm that drainage system outfalls, such as installing 'sentinel' monitoring systems, will quickly identify if pollutants are found to	Low



			Substation sites, when surface water runoff would directly infiltrate into groundwater and surface waterbodies. We acknowledge the update to the 7.6.1 outline Construction Environmental Management Plan (Tracked) [REP1-051] to confirm that drainage system outfalls, such as installing 'sentinel' monitoring systems, will quickly identify if pollutants are found to be entering the drainage system and enable remedial action. The Applicant has stated in 8.4 Applicant's Response to Relevant Representations [REP1-067] that updated to the FRA will be made at a future deadline.	be entering the drainage system and enable remedial action.	
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Table 4.12 - Draft DCO

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
12-1		EA Response Provision	As a named consultee on the discharge of several Requirements, we request that the provision of at least 15 working days (21 calendar days) to respond to the discharge authority is reflected in the draft Development Consent Order (APP-018). Specifically, this should be addressed within Schedule 16 procedure for discharge of requirement, Further information and consultation, 3.(3). Ensuring this timeframe	The Applicant notes that the wording and timeframes proposed in paragraph 3(3) of Schedule 14 of the Draft DCO [APP/3.1.3] are preceded in the Longfield Solar Farm Order 2023 and the Tillbridge Solar Order 2025, and therefore the Applicant does not propose to depart from this precedent by amending the wording as proposed.	Medium



		will give us sufficient opportunity to thoroughly review any discharge of requirement applications and provide considered feedback. Furthermore, this is in-keeping with the statutory 21-day response time for town and country planning applications. Therefore, we would request that the wording for 3.(3) is amended to: “If the provision governing or requiring the application specifies that consultation with a requirement consultee is required, the relevant planning authority must notify the requirement consultee within 10 working days of the receipt of the application that an application has been received. Thereafter the requirement consultee has 15 working days from the receipt of the notification in which to submit any representations relating to the application to the relevant planning authority. The relevant planning authority must notify the undertaker in writing specifying any further information the relevant planning authority considers necessary of that is has been requested by the requirement consultee within 10 working days of the receipt of such a request from the requirement consultee and or in any event within 25 working days of the receipt of the application (or such other period as is agreed		
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			in writing between the undertaker and the relevant planning authority)”		
12-2	EA46	Environment Agency Protective Provisions	We cannot resolve this issue. Protective provisions are included in the 3.1.1 draft Development Consent Order (Tracked) [REP1-005] (Part 5). In correspondence with the Applicant (dated 21 May 2026), we identified that they wish to disapply Flood Risk Activity Permits (FRAPs). As the site does not lie in the flood plain of a main river, we do not believe FRAPs would be necessary, and therefore, neither is disapplication. We do not consent under Section 150 of the Planning Act 2008 to the removal of consent requirements. We request the removal of the protective provisions for the Environment Agency in the draft Development Consent Order.	The Applicant has been in discussions with the Environment Agency in relation to this matter. It is the Applicant’s position that, whilst the majority of the Order Limits are located within Flood Zone 1, there is a minor section of Work No. 11: Mitigation and Enhancement Area, associated with Skylark plots, which is located in Flood Zones 2 and 3. As such, activities could be carried out on the floodplain of a main river, more than 8 metres from the river bank, such as stockpiling in this area. Therefore, in accordance with the Government’s guidance entitled ‘Flood risk activities: environmental permits’, such activities could require a FRAP. The inclusion of disapplication therefore serves as a contingency to avoid unnecessary consenting duplication, rather than reflecting a substantive need for FRAP consent across the Scheme. In accordance with this approach, the Applicant updated the protective provisions for the benefit of the Environment Agency in Part 5 of Schedule 15 of the Draft DCO at Deadline 1 to mirror the Environment Agency’s preferred wording.	Medium



12-3	EA47	Requirement Wording	We cannot resolve this issue We were concerned over the use of the word “substantially” on numerous requirements in the 3.1 draft Development Consent Order [APP-018], as its inclusion would render those requirements imprecise and unenforceable. This is against government policy (National Planning Policy Framework (NPPF)) and the six tests cited in Paragraph 57 of the NPPF. We do not agree with the Applicant’s response stated in 8.4 Applicant’s Response to Relevant Representations [REP1-067].	The Applicant does not have anything further to add to its response contained in the Applicant’s Response to Relevant Representations [REP1-067] on this matter. The Applicant does not agree with the assertion that the word “substantially” results in a requirement being unenforceable and imprecise, nor is this wording against Government policy. This phrasing, for detailed management plans to be substantially in accordance with outline management plans, is extremely well-precedented across made DCOs (i.e. statutory instruments) from all industries, including all made solar DCOs. The Applicant, therefore, does not propose to depart from standard practice in this regard.	High
12-4	EA48	Permitted Preliminary Works	We cannot resolve this issue. We were concerned that the definition of “permitted preliminary works” includes ‘(d) remedial work in respect of any contamination or other adverse ground conditions’, while the definition of “commence” excludes activities defined as “permitted preliminary works”, i.e. it does not include ‘remedial work in respect of any contamination or adverse ground conditions’. Therefore, the CEMP secured via Requirement 13, only requires submission of a detailed CEMP prior to commencement.	As set out in the Applicant’s Response to Local Impact Reports [REP2-027], the Applicant has submitted a permitted preliminary works environmental management plan at Deadline 3. This sets out the methodology to be used for any permitted preliminary works, and the Applicant welcomes comments from Interested Parties on this plan. In anticipation of this plan, the Applicant updated Requirement 13 in Schedule 2 of the Draft DCO [APP/3.1.3] at Deadline 2 to require that the permitted preliminary works	Medium



		This means that remediation of the site could take place without the CEMP being approved or in place and therefore without the controls and mitigation commitments offered by the CEMP. We do not agree with the Applicant's response stated in 8.4 Applicant's Response to Relevant Representations [REP1-067]. We raised similar concerns for Frodsham Solar Project and Great North Road Solar and Biodiversity Park. For Frodsham Solar Project, the respective Applicant was able to resolve our concerns by clarifying in their 8.17 SoCG Environment Agency P04 [REP7-029] that: "Requirement 12(4) of Schedule 2 of the draft DCO (PD2-005) identifies that 'commence' includes any permitted preliminary works comprising above ground site preparation for temporary facilities for the use of contractors and site clearance (including vegetation removal and demolition of existing buildings and structures) and remedial work in respect of any contamination or other adverse ground conditions where this relates to Work no. 6C. As such a CEMP for these phases of work is required prior to them being undertaken" For Great North Road Solar and Biodiversity Park, the 3.1G Draft Development Consent Order (Tracked) - Rev 8 [REP6-006] stated for its CEMP requirement: "All permitted preliminary works must be carried out in	are carried out in accordance with the permitted preliminary works environmental management plan.	
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			accordance with the outline construction environmental management plan.” In both instances, any permitted preliminary works were covered by contamination mitigation commitments included in the respective CEMPs		
12-5	EA49	Requirement 13 – Construction Environmental Management Plan	We are satisfied and consider this issue resolved. We were concerned that we were not listed to be consulted on the 13. Construction environmental management plan. We have reviewed the 3.1.1 draft Development Consent Order (Tracked) [REP1005], and can confirm we have been listed to be consulted on the requirement.	The Applicant agrees with the Environment Agency’s request and has updated the draft DCO [APP/3.1.1] to reflect this.	Agreed
12-6	EA50	Requirement 14 – Operational Environmental Management Plan	We are satisfied and consider this issue resolved. We were concerned that we were not listed to be consulted on the 14. Operational environmental management plan. We have reviewed the 3.1.1 draft Development Consent Order (Tracked) [REP1-005], and can confirm we have been listed to be consulted on the requirement.	The Applicant agrees with the Environment Agency’s request and has updated the draft DCO [APP/3.1.1] to reflect this.	Agreed
12-7	EA51	Dedicated Contaminated Water Tanks	We are satisfied and consider this issue resolved. We were concerned that the commitment “to include dedicated	ES Appendix 12.2: Flood Risk Assessment [AS-053] states as follows: <i>“12.4.38 Based on recommendations in NFPA 855 Standard for the Installation of</i>	Agreed



			contaminated water tank(s) in a closed system for the BESS and substations sized to accommodate 228m³ plus the 1% AEP event. This is secured through a requirement of the draft DCO” wasn’t specifically mentioned in the draft DCO. The Applicant has now updated the 5.8.1 Design Principles, Parameters and Commitments (Tracked) [REP1-017] and 7.8.1 outline Operational Environmental Management Plan (Tracked) [REP1-055] to refer to the capacity of the contaminated water tanks.	<i>Stationary Energy Storage Systems and NFCC – Grid Scale Battery Energy Storage System planning – Guidance for FRS, a burn time of 2 hours and a requirement of 1,900l/min of fire suppression water has been used to calculate the volume of fire suppressant water required to be stored onsite in the event of a container fire.</i> <i>12.4.39 This equates to 228m³ of storage.</i> <i>12.4.40 The SuDS structures serving the BESS compound will be sized to accommodate the 1% AEP +40% CC and an additional 228m³, and this will be sufficient for storing the full fire suppressant volume during an extreme rainfall event.”</i> The figure of 228m³ is, as stated, based on current guidance – the relevant text in the FRA will be updated at Deadline 1 to reflect the fact that this figure is subject to change based on guidance at the time of detailed design of the Scheme. Further, the Applicant notes that the Design Principles, Parameters and Commitments [APP/5.8.1] commit, for the Customer Substation (Table 3-3) and the National Grid Substation (Table 3-4), that the related compounds will be served by a SuDS network designed to the 1% AEP event plus 40% climate change allowance. The Applicant acknowledges that a corresponding commitment is not in place for the BESS and has therefore updated this document	
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				(specifically Table 3-2) at Deadline 1 to include a commitment to storing the 1% AEP event plus an appropriate volume for firefighting water, based on guidance at the time of the detailed design of the Scheme. As such, the Applicant considers that the relevant commitment is appropriately secured.	
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Table 4.13 - Traffic and Transport

Reference	EA Issue Reference	Topic	Consultee's Position	Applicant's Position	Status
13-1	Appendix B - Informatives	Tankering Water	Given the initial estimates of volumes calculated, estimates of Heavy Goods Vehicles (HGV) numbers required should be factored into traffic management plans to ensure local authorities are satisfied with the increases this would mean to HGVs on local road networks. Given the heavy reliance on this source of supply, it is important that this does not pose a blocker pre-commencement.	The total anticipated water demand over the construction phase is set out within Table 12.18 (Total water demand for construction phase) of ES Chapter 12: Water Resources [APP-061] . Total HGV requirements for water tankering has been updated to be included within ES Chapter 9: Transport and Access [APP/6.2.1] and the outline CTMP [APP/7.7.1] .	



5 ENVIRONMENT AGENCY WORK PACKAGE TRACKER

Subject	Work package	Scope	Method and Assumptions	Results of Assessment (i.e Impact)	Mitigation / Enhancements Agreed	Requirement	RR ID
Ecology	Biodiversity Net Gain Strategy						
	Ecological Assessment						EA10
	Water Environment Regulations Compliance						
Water Resources	Water Supply Strategy						
Flood Risk	Flood Risk Assessment						EA42, EA46
	Hydraulic Model						
Surface Water Quality	Outline Construction Environmental Management Plan					13	EA33, EA45
	Outline Operational Environmental Management Plan					14	EA34, EA37
	Outline Decommissioning Strategy						
	Outline Battery Safety Management Plan						EA33, EA34
	Water Environment Regulations Compliance						EA15



Subject	Work package	Scope	Method and Assumptions	Results of Assessment (i.e Impact)	Mitigation / Enhancements Agreed	Requirement	RR ID
Groundwater Protection	Outline Construction Environmental Management Plan					13	EA21, EA24, EA27, EA33, EA48
	Outline Operational Environmental Management Plan					14	EA34, EA35, EA36, EA37, EA41
	Outline Decommissioning Strategy						EA31
	Outline Battery Safety Management Plan						EA33, EA34, EA35, EA38
	Water Environment Regulations Compliance						EA13, EA17
	Hydrogeological Model and Assessment of Impacts						EA03, EA04, EA05, EA13, EA15, EA18, EA20, EA23
Waste	Waste Management Strategy						EA11, EA38



THE DROVES
SOLAR FARM