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Environment Agency

Examining Authority
via PINS portal 'Have your say'

Our ref: [redacted]
Your ref: EN010168
Interested Party ref: [redacted]
Date: 21 May 2026

Dear Examining Authority,

Lime Down Solar Park – Development Consent Order (DCO) Application

Environment Agency Examination Deadline 2 Response: Comments on documents submitted at Deadline 1

This letter constitutes the Environment Agency's Deadline 2 Response to the above mentioned DCO application.

A list of the submissions made by the Applicant at Deadline 1 which we have reviewed is presented in Appendix 1. Our updated comments and position on the issues raised in our Relevant Representation response following review of the submissions is presented in Appendix 2.

I trust this information is of use.

Yours faithfully,

[redacted]
Planning Specialist
National Infrastructure Team
Email: NITeam@environment-agency.gov.uk

Appendix 1: List of Deadline 1 submissions reviewed by the Environment Agency

- REP1-008 3.1 Draft Development Consent Order (Rev 2)
- REP1-016 6.1 ES Volume 1 Chapter 9 Ecology (Rev 2)
- REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)
- REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)
- REP1-082 6.3 ES Volume 3 Appendix 3-1 Substations and Battery Energy Storage System Description (Rev 2)
- REP1-038 6.3 ES Volume 3 Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2)
- REP1-040 6.3 ES Volume 3 Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A
- REP1-042 6.3 ES Volume 3 Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2)
- REP1-044 Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1
- REP1-046 6.3 ES Volume 3 Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2)
- REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)
- REP1-050 Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1
- REP1-052 6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2)
- REP1-054 6.3 ES Volume 3 Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2)
- REP1-066 6.3 ES Volume 3 Appendix 19-1 Lime Down A Desk Study (Rev 2)
- REP1-068 6.3ES Volume 3 Appendix 19-2 Lime Down B Desk Study (Rev 2)
- REP1-070 6.3 ES Volume 3 Appendix 19-3 Lime Down C Desk Study (Rev 2)
- REP-072 6.3ES Volume 3 Appendix 19-4 Lime Down D Desk Study (Rev 2)
- REP-074 6.3 ES Volume 3 Appendix 19-5 Lime Down E Desk Study (Rev 2)
- REP-076 6.3 ES Volume 3 Appendix 19-6 Cable Corridor Northwest Desk Study (Rev 2)
- REP1-078 6.3ES Volume 3 Appendix 19-7 Cable Corridor Central Desk Study (Rev 2)
- REP1-080 6.3 ES Volume 3 Appendix 19-8 Cable Corridor Southwest Desk Study (Rev 2)

- REP1-095 7.11Water Framework Directive Assessment (Rev 2)
- REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2)
- REP1-099 7.13 Outline Operational Environmental Management Plan (Rev 2)
- REP1-101 7.14 Outline Decommissioning Strategy (Rev 2)
- REP1-106 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2)
- REP1-111 7.21 Outline Battery Safety Management Plan (Rev 2)
- REP1-115 7.26 Commitments Register (Rev 2)
- REP1-124 9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System
- REP1-125 9.9 Firewater Containment and Drainage Strategy- Lime Down Substation
- REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule
- REP1-128 9.12 BESS and Substation - Preliminary Geotechnical Risk Register
- REP1-129 9.13 Cable Route Avoidance Areas- Preliminary Geotechnical Risk Register
- REP1-130 9.14 Cable Route Corridor Mining Risk- Technical Memorandum

Appendix 2: Environment Agency (EA) position on issues raised in our Relevant Representation response following Deadline 1 submissions

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
EA001-EA-011s summarise the issues below	See below	See below	NA
EA-012	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Disapplying Flood Risk Activity Permits	**Under Discussion** We are discussing the request to disapply Flood Risk Activity Permits with the applicant.
EA-013	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 13 Construction environmental management plan (CEMP)	**Under Discussion**- document has not been updated to include the Environment Agency as a consultee.
EA-014	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 14 Operational environmental management plan (OEMP)	**Under Discussion**- document has not been updated to include the Environment Agency as a consultee.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	**Agreed** for the Environment Agency not to be a consultee.
EA-016	Fisheries	Fish species protection	**Agreed** REP1-106 **7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2)** The additional text in paragraph 6.4.1 now addresses Relevant Rep EA-016.
EA-017	Fisheries,	Watercourse	**Agreed**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
	Biodiversity and Geomorphology	Crossings	REP1-126 **9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule** has been provided. We defer to the LLFA for comments on the ordinary watercourses, but note it would be preferable for some micro-siting of the open-cut trench to avoid the bankside vegetation in the OW3 crossing.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	**Agree** REP1-106 **7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2)** has been updated.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	**Agree** REP1-016 **6.1 ES Volume 1 Chapter 9 Ecology (Rev 2)** has been updated.
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	**Agree** REP1-016 **6.1 ES Volume 1 Chapter 9 Ecology (Rev 2)** has been updated.
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	**Under Discussion** We note the differences in watercourse buffers but would prefer to see at least a 10 metre buffer. There is a discrepancy in watercourse buffer distances where staff are to wash plant and vehicles as a biosecurity measures. Table 5 (oCEMP) states the minimum buffer is 10m whereas Section 15.3.1 (oEPMS) states the minimum buffer is 15m. There is inconsistency in REP1-018 **6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** Table 11-2 says "Following consultation with the Environment Agency, a precautionary 10 m stand-off will be applied", however section 11.9.2 on page 42 still says "Eight metre buffers

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			from infrastructure will be established around watercourses". Additionally, APP-283 Outline Landscape and Environmental Management Plan (OLEMP) has not been updated.
EA-022	Water Framework Directive	Groundwater Bodies	**Under Discussion** Resolved in principle. PDA-009 EA-022: a plan will be produced, but this has not yet been supplied. We have not identified where proportionate signposting has been added to Chapter 11. We will be able to resolve this when we have seen the plan and proportionate signposting.
EA-023	Groundwater and Contaminated Land	Piling	**Under Discussion** This has not been answered in REP1-028 **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)**. In 19.11.4, 19.11.6 and 19.11.7 the applicant refers to preliminary risk summary "EN010168/EXAM/9.X". This has not been supplied, and we have no further information so we cannot comment if it is likely to be sufficient for us to resolve this issue.
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	**Under Discussion** An update to Chapter 3 has not been supplied and we are not aware of an answer to this elsewhere. In the oCEMP the applicant commits to produce a piling risk assessment (Table 5) or foundation works risk assessment (Table 13), but these are only proposed for the substation and not the BESS. The applicant confirms in PDA-009 that "Where foundations are penetrative, the final design will ensure that the containment system remains effective and continuous". However, we have not seen anything which explains how that will be achieved or commits to

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			achieving it.
EA-025	Groundwater and Contaminated Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	**Agree** with explanation given in PDA-009 EA-025. Where hydrants are to be used, the applicant must obtain agreement from the local water supplier. Where tanks are to be used, the applicant will need to ensure a suitable supplier is sought and that refilling of tanks can be done if the water is used. Tanks and hydrants must be maintained to ensure operability.
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	**Agree REP1-101 7.14 Outline Decommissioning Strategy (Rev 2)** paragraph 2.1.3 has been updated to clarify the proposal for foundations at decommissioning. This is acceptable in principle. However, the applicant must ensure that reinforced concrete caps, bentonite slurry, and any other products used are certified as causing no harm to the environment. Best practice guidance at the time of decommissioning should be followed. This may require total removal of the foundations and cables, or other remediation of the land.
EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	**Under Discussion** **REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** **REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** Chapter 11 Table 11-1 ID 3.5.4 has not been updated. Chapter 11 Section 11.10, Appendix 11-1 and Chapter 19, which are referenced in ID 3.5.4, do not appear to have been updated with any relevant information. Discussion of requirements around dewatering in the oCEMP have not been updated. However, ground investigation works are committed to in **the REP1-**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			097 **7.12Outline Construction Environmental Management Plan (Rev 2).** Completion of this, and subsequent detailed assessment of conditions, should be sufficient to resolve the issue. For completeness, we would like to see relevant chapters or supporting documents updated as relevant with additional information.
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	**Agree** PDA-009 EA-028 response, and REP1-018 **6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** , Table 11-1, ID 3.5.11 states PFAS will not be used unless no other option is available.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	**Under Discussion** An update to Appendix 19-10 has not been supplied. However, upon receipt and review of the added information we are likely to be able to resolve this.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	**Under Discussion** The applicant has confirmed in REP1-028 **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** Table 19-6, that "Cables will be selected in order to minimise thermal loss considering available guidance from the EA." In February 2026 we sent additional guidance on thermal impacts to the applicant as requested. This set out our expected approach to considering thermal impacts, including conditions for when further desk-based assessment will be required. The applicant does not appear to have referenced or otherwise considered this guidance. The applicant has not provided commentary on whether all conditions can be discounted, and, if not, the outcomes of

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			the assessment. The proposed mitigation is too vague to give us reassurance that thermal impacts on groundwater receptors has been appropriately mitigated.
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	**Agree** **REP1-111 7.21 Outline Battery Safety Management Plan (Rev 2)** 5.5.8 confirms manual override as a secondary control.
EA-032	Groundwater and Contaminated Land	Ground conditions	**Under Discussion** The applicant's response is acceptable, providing that the ground investigation scope is sufficient for the scale of the scheme and anticipated ground conditions. A period of groundwater monitoring, in accordance with relevant British Standard guidance for site investigations, is strongly recommended.
EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	**Agree** The narrative given in PDA-009 EA-033 is sufficient to reassure us the applicant has considered this appropriately.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	**Under Discussion** We note some changes made to the relevant documents, but some inconsistencies remain. For example, in Table 4 of both Appendix 19-1 and Appendix 19-4, it still states that a site walkover was carried out by Delta Simons on 31 January 2024. However, Section 1.2.16 of both appendices states that "A site walkover of Lime Down A was carried out between 1st and 2nd May 2025."

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			We acknowledge that there may have been multiple site walkovers, but this is not explained in the text or PDA-009 EA-034. This is a minor issue, and we do not expect it to affect the outcomes of the assessments, but it remains unresolved.
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	**Under Discussion** REP1-028 **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** Paragraph 19.11.12 has not been updated. We have not identified the relevant update in the REP1-099 **7.13 Outline Operational Environmental Management Plan (Rev 2)**. We request the applicant directs us to where the relevant changes have been made, or this will remain unresolved. In the REP1-115 **7.26 Commitments Register (Rev 2)**, the applicant still only commits to a discovery and inspection strategy as construction and decommissioning.
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	**Under Discussion** We have noted confirmation in REP1-028 **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** and the REP1-097 **7.12 Outline Construction Environmental Management Plan (Rev 2)** that a ground investigation will be completed. However, an outline scope and limitations of this in the submitted documents is still not clearly set out. We note the clarification of the scope in PDA-009 EA-036. This appears acceptable in principle, and we will resolve this issue. However, the applicant should be aware that if we are not satisfied with the scope, methodology and interpretation of the investigation results, we may request further works pre-

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			commencement before we can agree that risks to controlled waters have been adequately assessed and mitigation is appropriate.
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not been provided.	**Agree** We note the updates made to REP1-111 **7.21 Outline Battery Safety Management Plan (Rev 2)** 4.3.16 and 4.3.17. This outline methodology appears acceptable. Note that if there is a damaged battery which might be causing harm to the environment then we expect there to be a control which prevents it causing further harm while the risk assessment is undertaken. We note clarification of the wording in chapters 3 and 20, and that these will not be updated at this time.
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	**Under Discussion** As we previously stated, it would be beneficial for the cable route construction method statement to reference the breakout contingency procedure, or explicitly direct readers to review it in the oCEMP. We don't feel this is clearly presented in the current reference to the oCEMP and use of method statements (Appendix 3-2 paragraph 1.5.5).
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas.	**Under Discussion** In PDA-009 EA-039 the applicant states: "Further clarity has been added to the Preliminary Risk Assessments to explain the coverage of the interconnecting cable corridors". We have not identified where this is given. For example, the map and site description in Table 2 of each report still do not clearly explain the coverage of the study area.
EA-040	Groundwater and Contaminat	Maps and data searches in	**Under Discussion** See response to EA-039. We have noted some changes to the reports, but

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
	ed Land	appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	these do not appear to resolve this issue.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	**Agree** We felt that specific reference to the discovery and inspection strategy for risks to controlled waters would be valuable in the discussion of the PRAs. We are aware of the proposed discovery and inspection strategy, which is secured in the oCEMP, and will resolve this issue.
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	**Agree** The updates do not directly answer our query, but we are satisfied that this potential source is not of significant concern.
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	**Agree** We are satisfied that a pre-commencement ground investigation is secured in the REP1-097 **7.12 Outline Construction Environmental Management Plan (Rev 2)** (Table 13). However, we note that our comments in Additional Narrative have not been directly addressed in the response. See also our comments on other issues regarding the scope of this work.
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	**Agree** The applicant has not provided any supporting information, and we consider that hydrogeological risks can extend beyond 250m. However, given other discussions and mitigation addressed elsewhere, we are satisfied that this issue can be resolved.
EA-045	Groundwater and	Monks Park Mine	**Under Discussion** We have reviewed the

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
	Contaminated Land		**REP1-130 9.14 Cable Route Corridor Mining Risk- Technical Memorandum** We note in section 6.2.4 there is a commitment to obtain geoenvironmental samples to be analysed for a range of relevant contaminants of potential concern. We support this proposal. Other discussion of contamination or the potential risk to controlled waters is not addressed, and we have identified no relevant updates to Chapter 19 or Appendix 19-8 which specifically address this issue. The potential for treatment and ground stabilisation of mine workings is discussed as Section 7. If mine workings requiring stabilisation are flooded and mine water is not pumped dry, the introduction of stabilisation materials could be construed as discharge direct to groundwater for which there would be need for risk assessment. This may need a permit. Many cement-based grouts contain PFA, and some may be prohibited. If displacing groundwater in tunnels, grout may have high barium content. Any pumping may require a permit for abstraction and discharge after treatment. Pumping may also cause localised subsidence in some cases.
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	**Under Discussion** We have reviewed REP1-125 **9.9 Firewater Containment and Drainage Strategy- Lime Down Substation** and this has provided some clarity. Many elements will need to be agreed during detailed design in due course. In paragraph 2.4.4 it states "[the oOEMP] confirms that retained firewater will be subject to inspection, testing and

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			controlled disposal." We have not identified this information in the oOEMP, so this is not resolved. The fate of retained water is discussed in paragraph 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the applicant proposes to release captured water to the environment, a relevant discharge permit should be obtained from the Environment Agency. It can take approximately 4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time.
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration of the need for sealed drainage.	**Agree** The requested information is now clearly presented in REP1-111 **7.21 Outline Battery Safety Management Plan (Rev 2)** paragraph 5.5.8 and REP1-048 **6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)** paragraph 3.5.8.
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	**Under Discussion** Partially resolved. The table has been updated in REP1-048 **6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)**, however it states there will be no shut-off valve or isolation system. In Appendix 11-6 paragraphs 1.9.4, 3.2.2 and elsewhere, and oBSMP paragraph 5.5.8, the applicant confirms that the BESS drainage arrangement will have isolation valves. While the

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			isolation system might not be in use during normal operation, we expect an acknowledgement in this table that one will be present.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	**Under Discussion** It appears some of the solar PV panel supports are within areas of functional floodplain within Lime Down D and Lime Down E2. In revision 2 (May 2026) of the updated Flood Risk Assessment and Drainage Strategy the applicant describes how the panelled areas are not expected to give rise to a material loss of floodplain storage or material obstruction of flood flow routes. This seems reasonable based on the volumetric calculations and associated level estimates provided for Lime Down D and Lime Down E2. We note that the applicant has undertaken further modelling for Lime Down E2 and will delineate Flood Zone 3b based on this modelling. We await this information before taking a final view on this matter.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	**Under Discussion** Section 2.3.15 page 17 within the updated REP1-048 **6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)** notes that any fencing within areas of flood interaction will be permeable to both water and debris passage and will not impede flood flow routes. This is welcomed although we would ask that more specificity is provided. Please can the applicant provide details on the type of fencing that will be used in terms of mesh spacing and how blockage risk will be managed. Mesh spacing should be as wide as possible to reduce blockage risk. There should be a commitment within the Operational

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			Environmental Management Plan to ensure any debris is removed from fencing following floods.
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	**Under Discussion** The applicant needs to undertake additional assessment of the impact the construction phase may have on the floodplain capacity and flow routes. Additionally, additional mitigation commitments may needed. For example, there should be no storing of materials and/or construction compounds within flood zone 3b and where practicable outside of the 1 in 100 year extent.
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	**Under Discussion** Within the updated Flood Risk Assessment and Drainage Strategy REP1-048 **6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)** and REP1-052 **6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2)**(May 2026) paragraph 2.3.8 notes that electrical infrastructure including inverter, transformers, and substation, will either be located outside of modelled flood extents or raised above a minimum freeboard of 0.6 metres above the design flood level. This is welcomed, however, there doesn't appear to be a value assigned to the freeboard applied above the design flood level for the solar PV panels. For Lime Down E, paragraph 2.3.13 states that these will be above the design flood level with an appropriate freeboard allowance. Paragraph 2.3.13 within the Flood Risk Assessment for Lime Down D/BESS states that for both fixed and tracker

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			panels all sensitive electrical equipment mounted on the Solar PV Panels will be elevated so that there is not less than 0.6 metres of freeboard above the design flood level. For clarity, the applicant should confirm what the freeboard will be to the lowest leading edge of the respective solar panels. The applicant should make a commitment to ensure there is a 0.6 metre freeboard above the design flood level for the solar panels themselves. If a freeboard of less than 0.6 metres is being adopted for the Solar PV panels, then the applicant should provide clear justification as to why this is reasonable and clarify what the minimum freeboard will be.
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	**Under Discussion** The applicant has now provided the model files and we are reviewing them.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m2 has been derived.	**Agreed.** The applicant has addressed this within updated REP1-048 **6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)**. The applicant has provided a map which shows the analysis extent in figure 8 of the updated Flood Risk Assessment. The analysis extent is calculated as being 222,530m2. As part of this review this extent/map was georeferenced and the area checked. This confirms an analysis extent of 222,530m2 for the area of panels that intersect the flood extent. The estimated level change of 0.00052mm based on the volume lost and area of inundation has been calculated correctly.

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	**Under Discussion** Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and are currently reviewing them. This will help us to form a view on flood flow conveyance impacts
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of 175,580m2 has been derived.	**Agreed** The applicant has addressed this within REP1-052 **6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2)**. The applicant has provided a map which shows the analysis extent in figure 8 of the updated Flood Risk Assessment. The analysis extent is calculated as being 50,735m2. This is reduced from the previous analysis extent of 175,500m2. As part of this review this extent/map was georeferenced and the area checked. This confirms an analysis extent of 50,735m2 for the area of panels that intersect the flood extent. The estimated level change of 0.000041mm based on the volume lost and area of

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			inundation has been calculated correctly.
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	**Under Discussion** Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and are currently reviewing them. This will help us to form a view on flood flow conveyance impacts
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	**Agreed** We note that we will be a consultee on requirement 20 Decommissioning and restoration; where the detailed strategy will be assessed.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	**Under Discussion** PDA-009 EA-059. The applicant states Table 5 of the REP1-097 **7.12Outline Construction Environmental**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			Management Plan (Rev 2) will be updated to reference the discovery and inspection strategy. We have not identified this addition to the table. The updated Appendix 3-2 Cable Route Construction Method Statement has not been supplied so we cannot comment on changes made therein.
EA-060	Biodiversity Net Gain	Trading Rules	**Agree** with applicant's response PDA-009 EA-060
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has not been provided.	**Agree-** no comments on document provided at Deadline A.
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	**Agree**- with applicant's response PDA-009 EA-062.
EA-063	Water Framework Directive Assessment	Change the description from "Supports Good" to "Not High" and possibly add an explanation.	**Agree REP1-095 7.11 Water Framework Directive Assessment (Rev 2)** has been updated.
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	**Agree** The **REP1-095 7.11Water Framework Directive Assessment (Rev 2)** has been updated to include GWDTEs (paragraphs 5.1.7 to 5.1.10 and Table 7). The applicant must ensure that any dewatering, if required, does not impact the GWDTE.
EA-065	Water	Subsurface	**Agree**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
	Framework Directive Assessment	infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	The relevant sections have been updated and provide suitable assessment and mitigation.
EA-066	Outline Battery Safety Management Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.	**Agree** We acknowledged that the final design of the system has not yet been decided. We look forward to reviewing pollution control protocols prior to finalisation of the BSMP under requirement 6 Battery safety management.
EA-067	Outline Battery Safety Management Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site.	**Agree** We acknowledged that the final design of the system has not yet been decided. We look forward to reviewing the maintenance protocols prior to finalisation of the BSMP under requirement 6 Battery safety management.
EA-068	Outline Battery Safety Management Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated	**Agree** We have reviewed the REP1-124 **9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System** supplied at Deadline 1, with consideration to other documents previously submitted. Information

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
		firewater captured at the BESS in a fire event.	relevant to this issue is given in paragraphs 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the applicant proposes to release captured water to the environment, a relevant discharge permit should be obtained from the Environment Agency. It can take approximately 4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time. In 3.5.2 it states there is an intention to "not rely on long-duration passive storage" of retained water. It is not clear how this will be achieved while any testing and permit application is completed. See also our response to PDA-009 EA-046.
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	**Agree** PDA-009 EA-069. The response is acceptable. See also PDA-009 EA-047.
EA-070	Outline Construction Environmental Management Plan	Water Quality Mitigation Measures are insufficient	**Under Discussion** Water Quality Mitigation Measures associated with Vehicle washdown, concrete laying, foul water strategy and drilling fluid have been resolved due to updates to: **REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2); REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2) REP1-101 7.14 Outline**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			Decommissioning Strategy (Rev 2). However, **REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2)** Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage. There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding capacity, but also be covered to reduce contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary. Oil separators could also be used.
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	**Agree** **REP1-103 7.16 Outline Site Waste Management Plan (Rev 2)** Paragraph 1.2.6 considered to be acceptable.
Informatives/ advice to applicant			
EA-072	Permitting	Permitting Informative	**Agreed**
EA-073	Flood Risk Assessment	Compensatory flood storage	**Under Discussion** Whilst we recognise it is uncertain at this stage if it isn't feasible to sequentially locate the substation within Lime Down C1 outside of the mapped surface water flow route an assessment of the impact is required to ensure flood risk isn't increased elsewhere and if it is appropriate mitigation (compensatory storage) needs to be put in place to ensure the development satisfies paragraph 5.8.12 within the overarching National Policy Statement for Energy. Therefore, if “where feasible" is

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
			included there would need to be acknowledgement that further assessment and potentially compensatory storage may be required.
EA-074	Outline Landscape and Ecological Management	Herbicide use	**Under Discussion**- the Outline Landscape and Ecological Management has not been updated.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	**Agreed REP1-106 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2)** has been updated.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly recommended.	**Agreed** The strategies have been submitted, and we have given comment elsewhere. NOTE: the applicant states here that "ES Volume 1, Chapter 3 The Scheme [APP-055] will be updated to signpost to the standalone drainage strategy report(s)". Elsewhere in PDA-009, the applicant has stated that Chapter 3 will not be resubmitted at this time (for example, see EA-037 and EA-079). When the chapter is reissued, all changes discussed in PDA-009 should be included.
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	**Agreed** The explanation given in PDA-009 EA-077 is acceptable.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	**Agree** **REP-074 6.3 ES Volume 3 Appendix 19-5 Lime Down E Desk Study (Rev 2)** has been updated with relevant commentary.

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
EA-079	outline Battery Safety Management Plan	Battery replacements	**Agree** The explanation given in PDA-009 EA-079 is acceptable.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	**Agree** See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.
EA-081	Decomissioning	Decomissioning of cables	**Agree** The explanation given in PDA-009 EA-081 is acceptable.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	**Agree** See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	**Agree**
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	**Agree** The explanation given in PDA-009 EA-084 is acceptable.
EA-085	Battery Safety Management Plan	Emergency Response Plan	**Agree** REP1-111 **7.21 Outline Battery Safety Management Plan (Rev 2)** paragraph 5.4.1 addresses this.
EA-086	Foundation Design	Piling Risk Assessment references	**Agree** The explanation given in PDA-009 EA-086 is acceptable.
EA-087	Commitmen	Horizontal	**Agree**

EA RR ID Ref in PDA-009	Issue	Topic (s)	EA Position at Deadline 2
	ts Register	Directional Drilling	**REP1-115 7.26 Commitments Register (Rev 2)** has been amended.
EA-088	Commitments Register	Siting of construction compounds and stockpiles	**Agree** **REP1-115 7.26 Commitments Register (Rev 2)** has been amended.
EA-089	Commitments Register	Plant maintenance	**Agree** **REP1-115 7.26 Commitments Register (Rev 2)** has been amended.
EA-090	Commitments Register	Breakout contingency procedures	**Agree** **REP1-115 7.26 Commitments Register (Rev 2)** has been amended.
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	**Agree**- see EA-028
EA-092	Commitments Register	BESS and substation drainage infrastructure	**Agree** **REP1-115 7.26 Commitments Register (Rev 2)** has been amended.
EA-093	Commitments Register	Hydrological risk assessment	**Agree** See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.