



Lime Down

Solar Park

Statement of Common Ground with Environment Agency

May 2026

Revision 1

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/8.6

The Infrastructure Planning (Examination Procedure) Rules 2010



List of Contents

Statement of Common Ground Signatures	1
1 Introduction	2
1.1 Purpose of this document	2
1.2 Parties to this Statement of Common Ground.....	2
1.3 Terminology.....	2
2 Record of Engagement.....	3
2.1 Summary of engagement.....	3
3 Matters Raised	7
3.2 Draft Development Consent Order.....	7
3.3 Ecology and Biodiversity	11
3.4 Hydrology, Flood Risk and Drainage.....	23
3.5 Ground Conditions	56
3.6 Other Environmental Matters	71

List of Tables

Table 2-1: Summary of engagement.....	3
Table 3-1: Draft Development Consent Order.....	7
Table 3-2: Ecology and Biodiversity	11
Table 3-3: Hydrology, Flood Risk and Drainage	23
Table 3-4: Ground Conditions	56
Table 3-5: Other Environmental Matters	71

Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and the Environment Agency.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by the Environment Agency

Name:

Position:

Date:

Signature

1 Introduction

1.1 Purpose of this document

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

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) the Environment Agency (EA).
- 1.2.2 Collectively, Lime Down Solar Park Limited and EA are referred to as 'the parties'.

1.3 Terminology

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

2 Record of Engagement

2.1 Summary of engagement

2.1.1 The parties have been engaged in consultation since October 2024. A summary of the meetings and correspondence that has taken place between the Applicant and EA is outlined in Table 1.

Table 2-1: Summary of engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
3 October 2024	Online meeting	Introduction to the Lime Down Solar Park scheme and programme. Discussion of baseline conditions for flood risk, groundwater, water quality and fisheries. Review of Environment Agency scoping opinion. Consideration of potential impacts during construction, operation and decommissioning. Discussion of groundwater flood risk, aquifers, Source Protection Zones, private water supplies and controlled waters. Discussion of water quality risks, including firewater and pollution prevention at BESS and substations. Fisheries baseline and potential effects discussed. Applicant outlined proposed assessment approach within the PEIR and ES and confirmed use of management plans to control construction phase risks.
07 October 2024	Online Microsoft Teams Meeting between Project Team, Environment Agency and Clarkson & Woods Ltd,	Meeting to provide Scheme overview in relation to Ecology and Biodiversity, and to discuss Scoping Responses provided by the Environment Agency. Key topics included Site overview and survey results to-date, potential impacts to riparian habitats and species, scope of assessment (including designated sites and species such as white-clawed crayfish, beaver and Invasive Non-Native Species (INNS)), and potential mitigation measures.
11 October 2024	Online meeting	Flood risk and hydraulic modelling meeting. Review of baseline flood risk context, including Flood Zones and surface water flood risk. Discussion of Environment Agency scoping responses relating to flood

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		risk. Discussion of Flood Risk Assessment methodology, including parcel based assessment. Proportionality of hydraulic and pluvial modelling discussed. Climate change allowances and resilience testing considered. Siting of solar PV infrastructure and electrical equipment discussed, including interaction with flood risk. Floodplain displacement from solar panel frames and foundations discussed. Watercourse crossings and cable route strategy introduced.
October 2024 to March 2025	Email correspondence	Ongoing correspondence following the October 2024 meetings. Clarification of flood risk assessment methodology, modelling scope and justification. Discussion of data sources, including Environment Agency flood mapping and hydraulic model availability. Clarification of approach to groundwater flood risk, water quality and controlled waters assessment.
29 January 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the Environment Agency for the launch of the statutory consultation.
19 March 2025	Statutory consultation response	Environment Agency issued statutory consultation comments on the PEIR Hydrology, Flood Risk and Drainage chapter. Comments covered application of the Sequential and Exception Tests, representation of Main Rivers and ordinary watercourses, use of updated flood mapping, floodplain storage and displacement, hydraulic modelling, Manning's open channel flow calculations, watercourse crossings, groundwater flood risk and water quality considerations.
22 May 2025	Online Microsoft Teams Meeting between Project Team, Environment Agency and	Meeting to discuss Scheme updates relating to Ecology and Biodiversity. Key topics included proposed survey scope with primary focus on Cable Route Corridor surveys, appropriate mitigation measures for likely impacts to riparian species and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Clarkson & Woods Ltd,	habitats (including INNS), discussion of Statutory Consultation responses received from Environment Agency, and clarification of information to be provided at ES submission.
29 May 2025	Online meeting	Detailed technical meeting on hydrology, flood risk, drainage, groundwater and water resources. Review of scheme updates and programme. Discussion of updated Flood Map for Planning and NaFRA mapping. Review of Applicant responses to Environment Agency PEIR consultation comments. Update on Flood Risk Assessment and Drainage Strategy, including hydraulic modelling, floodplain compensation methodology and provision of Manning's cross sections. Discussion of watercourse crossing strategy, including HDD and open cut crossings, and potential disapplication of environmental permitting regimes. Discussion of protective provisions, Water Resources Strategy, Water Framework Directive assessment and foul drainage strategy. Actions and next steps identified.
May to June 2025	Email correspondence	Follow up correspondence relating to actions arising from the May 2025 meeting. Provision and discussion of Environment Agency standard protective provisions. Clarification of watercourse crossings, permitting and disapplication requirements. Clarification of foul drainage arrangements and compliance with relevant regulatory requirements.
3 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the Environment Agency for the launch of the targeted consultation.
9 June 2025	Targeted consultation response	Environment Agency confirmed they had no further comments to provide.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
29 October 2025	Email / letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to the Environment Agency.
9 January 2026	Relevant Representation	The Environment Agency submitted a relevant representation to the Planning Inspectorate.
17 February 2026	Online meeting	Discussion of relevant representations provided by the Environment Agency and Applicant's responses for Drainage, Water Quality and Ground Conditions.
2 March 2026	Online meeting	Discussion of relevant representations provided by the Environment Agency and the applicant's responses for Ecology and Flood Risk.
14 April 2026	Email	The Applicant provided the Environment Agency with the initial draft SoCG for their comment.
27 April 2026	Email / modelling report	The Applicant provided the Environment Agency with a hydraulic modelling report for Gauze Brook
29 April 2026	Email	The Environment Agency provided the Applicant with their comments and requested revisions for the SoCG.
30 April 2026	Written Representation	The Environment Agency submitted a written representation to the Planning Inspectorate.
13 May 2026	Email / letter	The Environment Agency provided the Applicant with their comments on the hydraulic modelling report for Gauze Brook.

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed.

3.2 Draft Development Consent Order

Table 3-1: Draft Development Consent Order

Reference	Sub-topic	EA Position	Applicants Position	Status
3.1.1	Protective Provisions	Protective Provisions for the disapplication of Flood Risk Activity Permits under the Environmental Permitting Regulations (EPR) 2016 have not been agreed.	Protective provisions for the protection of the Environment Agency have been included at Part 7 of Schedule 15 to the Draft Development Consent Order [REP1-007] . The Applicant and the EA are under discussions about the form of the protective provisions and should any further changes to these be agreed, these will be incorporated into the updated Draft Development Consent Order [REP1-007] at the relevant subsequent deadline.	Under Discussion
3.1.2	Requirement of Flood Risk Activity Permits through the DCO	Disapplication of Legislative Provisions EA note the Applicant is seeking disapplication of the Flood Risk Activity Permit(s) from the Environment Agency under the Environmental Permitting Regulations (England and Wales) 2016 in connection with drainage outfall installation. We would need the	The Applicant will continue to engage with the EA to discuss the proposal to disapply the requirement for Flood Risk Activity Permits through the Draft Development Consent Order [REP1-007] . The Applicant and the EA are under discussions about the form of the	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>Applicant to provide details for any structures and a basic method statement for the works proposed before we can consider this request further.</p> <p>We have provided the Applicant with a copy of our standard protective provisions and would need justification for any changes before they are considered by our Legal team.</p>	<p>protective provisions and should any further changes to these be agreed, these will be incorporated into the update Draft Development Consent Order [REP1-007] at the relevant subsequent deadline.</p>	
3.1.3	Schedule 2 Requirement 13 Construction environmental management plan (CEMP)	<p>The Environment Agency are not listed as a consultee for the discharge of Requirement 13 (CEMP).</p> <p>The CEMP provides essential mitigation measures to prevent impacts from construction sites. We often encounter construction sites that have caused issues because their CEMP was either insufficient or was not adhered to. Potential monitoring requirements may not be adequate if the Environment Agency are not consulted on them.</p> <p>We request to be consulted on the CEMP to be approved under Requirement 13.</p>	<p>The Applicant has added the requirement that the relevant planning authority consult with the Environment Agency before it approves the detailed construction environmental management plan under Requirement 13. This change is shown in the Draft Development Consent Order provided at Deadline 1 [REP1-007].</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.1.4	Schedule 2 Requirement 14 Operational environmental management plan (OEMP)	<p>The Environment Agency are not listed as a consultee for the discharge of Requirement 14 (OEMP).</p> <p>The OEMP provides essential mitigation measures to prevent impacts.</p> <p>Potential monitoring requirements may not be adequate if the Environment Agency are not consulted on them.</p> <p>We request to be consulted on the OEMP to be approved under Requirement 14.</p>	<p>The Applicant has added the requirement that the relevant planning authority consult with the Environment Agency before it approves the detailed operational environmental management plan under Requirement 14. This change is shown in the Draft Development Consent Order provided at Deadline 1 [REP1-007].</p>	Under Discussion
3.1.5	Schedule 2 Requirement 17 Soil Management	<p>The Environment Agency are not listed as a consultee for the discharge of Requirement 17 Soil Management.</p> <p>Potential impacts to groundwater may not be adequately remediated and risks to groundwater from contamination may not be managed.</p> <p>We request to be consulted on the Soil Resources Management Plan to be approved under Requirement 17.</p>	<p>The Applicant will continue to engage with the EA to discuss the request to be added as a consultee on the soil resources management plan to be approved under Requirement 17. The Applicant notes that the EA is listed as a consultee in relation to the surface water drainage scheme to be approved under Requirement 11, and considers that this provides appropriate oversight of matters within the EA's remit that may affect ground conditions and soil quality.</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.1.6	Chapter 3 The Scheme Section 3.6.3	<p>It is unclear what below ground infrastructure will be left in-situ following the decommissioning phase.</p> <p>Lack of clarity over decommissioning proposals undermines the Environmental impact assessment process.</p> <p>The Applicant should clarify the piled foundations decommissioning proposals.</p>	<p>The Applicant agrees that clarity around the decommissioning of below ground infrastructure should be provided. Given that ES Volume 1, Chapter 3: The Scheme [APP-055] is not a secured document it is not proposed that any edits are provided here. Rather the Applicant has updated the Decommissioning Strategy [REP1-100] at Paragraph 2.1.3 in the Deadline 1 submissions to confirm that complete removal of piled foundations will be avoided if practicable.</p>	Under Discussion

3.3 Ecology and Biodiversity

Table 3-2: Ecology and Biodiversity

Reference	Sub-topic	EA Position	Applicants Position	Status
3.2.1	Legislation and Policy	The Environment Agency has not raised substantive comments in relation to legislation and policy considerations.	The Applicant considers that ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.2.2	Methodology	The Environment Agency has not raised substantive comments in relation to the Impact Assessment methodology.	The methodology adopted within section 9.6 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. The methodology for Impact Assessment has followed the standard approach developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) in their 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (2018)' and is considered acceptable	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
3.2.3	Baseline	The Environment Agency has not raised substantive comments in relation to the baseline conditions presented.	The baseline conditions which are detailed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and ES Volume 3, Appendices 9-1: Ecological Baseline Report [REP1-083] to 9-7: Wintering Bird Survey Report [APP-204] are representative of the baseline site conditions.	Agreed
3.2.4	Assessment Results	The Environment Agency's position is that the ecological impact on the watercourse crossings is not fully assessed and communicated – see line below for details. Also captured in Hydrology, Flood Risk and Drainage. With the exception of white clawed crayfish, aquatic invertebrates/ macrophytes have not been assessed. These may be affected by physical damage to habitats and habitat fragmentation caused by watercourse crossings. Ecological impacts upon these features have not been assessed nor requirements for mitigation confirmed. Therefore, protected species are not appropriately protected.	A new appendix to ES Volume 3, Chapter 9: Ecology and Biodiversity was submitted at Deadline 1 which provides habitat descriptions and photographs of all watercourse crossing points, as well as the construction methodology to be used at each crossing point, for clarity. ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been revised to include a separate section for Aquatic Invertebrates (excluding white clawed crayfish, which is covered in its respective section), and additional text has been included on aquatic macrophytes within existing sections relating to plants. No significant residual adverse effects are anticipated for either of these species	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		Chapter 9 Ecology and Biodiversity [APP-061] does not assess the potential attractant effect on aquatic invertebrates and macrophytes therefore are not appropriately protected.	groups, and the revised Chapter submitted at Deadline 1.	
3.2.5	Noise impacts on fish	The Environment Agency has not raised substantive comments in relation to assessment of noise impacts on fish.	An assessment of noise and vibration impacts on fish is ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] The Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [REP1-106] details mitigation measures to be implemented. The impact assessments and mitigation measures proposed are considered appropriate and proportionate.	Agreed
3.2.6	Impacts of Electromagnetic Fields (EMF) on migratory fish species	The Environment Agency has not raised substantive comments in relation to assessment of EMF impacts on migratory fish species.	The potential effects of anthropogenic EMF on ecology is an emerging and poorly researched issue, however a summary of research on this issue is provided in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] . A precautionary approach to mitigation has been taken, whereby all cables which cross suitable watercourses for migratory fish will be	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
			buried to a minimum depth of 5m, to maximise attenuation of electromagnetic fields and minimise the risk of any adverse impacts. This depth is far greater than typical installation depths and will significantly reduce the EMF, particularly magnetic (B-field), exposures. In this way, it is anticipated that the low risk of impacts on European eel, sea trout, and other species will be avoided and effects reduced to neutral and non-significant levels.	
3.2.7	Invasive Non-Native Species (INNS)	The Environment Agency has not raised substantive comments on matters relating to INNS. One consideration relating to appropriate course of action should non-native crayfish be encountered during works has been noted (refer to section 3.2.8 below).	The proposed measures set out within the Outline Ecological Protection and Mitigation Strategy [REP1-106] for identifying and managing INNS to prevent their spread and ensure legal compliance are correctly identified and considered appropriate.	Agreed
3.2.8	Mitigation	EA requests that the proposed additional mitigation for freshwater fish ensures all fish species are protected during the spawning when completing channel work. The work avoidance period should also encompass the	The Applicant will seek to either avoid open-cut trenching works on the affected watercourses during the coarse fish spawning period (15th March - 15th June inclusive), or otherwise pre-commencement survey	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		coarse fish spawning season, which runs from March 15th to June 15th (inclusive). This restriction applies in areas where coarse fish populations or spawning habitats are known to exist. However, if evidence confirms that the area is not used for spawning or that spawning fish are absent, in-channel works may proceed, provided that appropriate fish rescue measures are carried out.	work will be undertaken to establish whether the avoidance period is required for each relevant watercourse crossing point. This may comprise habitat suitability assessments to establish whether suitable spawning habitat is present at each crossing point, or fish surveys to determine whether fish which may spawn in the watercourse are present/likely absent. The cable installation methodology to be used at each of the affected crossing points, as well as any required mitigation measures for spawning/migrating fish, would be discussed and agreed with the EA/relevant consenting body post-DCO consent, prior to work commencing. An updated version of the Outline Ecological Protection and Mitigation Strategy [REP1-106] was submitted which outlines this approach at Examination Deadline 1.	
3.2.9	Outline Ecological Protection and Mitigation	The Environment Agency requests that the Outline EPMS [APP-284] paragraph 4.1.1 is updated to include beaver as they would be impacted by aquatic pollution or simplify and use	A review of the Outline Ecological Protection and Mitigation Strategy [REP1-106] has been undertaken by the Applicant, and a revised version of the document which captures all of	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
	Strategy (Outline EPMS)	<p>'riparian mammals' as a catch all rather than listing individual species.</p> <p>Paragraph 5.1.1 should include riparian mammals to list of wildlife potentially adversely impacted and include a line to say lighting will be directed away from watercourse corridors wherever possible, also the use of lighting after dusk should be minimised where possible.</p> <p>Paragraph 6.3 Biosecurity measures should mention that if signal or other non-native species of crayfish are encountered e.g. when carrying out open cut of channels, it is an offence under the Wildlife & Countryside Act to return these animals to the wild if they are removed. They should be humanely dispatched and ideally disposed of onsite (burial) rather than being taken away to prevent potentially transferring crayfish plague. There are signal crayfish in the wider catchment so biosecurity is paramount.</p>	these recommendations submitted at Deadline 1. These amendments do not alter the assessed ecological conclusions.	
3.2.10	Outline Landscape and Ecological	The Environment Agency request the Applicant to give consideration in the Outline LEMP [APP-283] to the tree	Consideration will be given to tree species favoured by beavers during the preparation of the detailed Landscape	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
	Management Plan (Outline LEMP)	species used along watercourses and rivers, particularly those preferred by beaver.	and Ecological Management Plan, which will need to substantially in accordance with the Outline Landscape and Ecological Management Plan [APP-283] secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP1-007] . The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in consultation with the EA.	
3.2.11	Biodiversity Net Gain (BNG)	<p>The Environment Agency notes that the Biodiversity trading rules have not been met in the Biodiversity Net Gain (BNG) Assessment [APP-273] and highlights the risk that even if the project has achieved net gain in all aspects, not meeting the trading rules could result in the BNG plan being rejected.</p> <p>The Environment Agency have not been able to verify the BNG calculation provided in the Biodiversity Net Gain (BNG) Assessment [APP-273] as the condition assessment data was not provided. They request the Applicant provide full BNG metric spreadsheet,</p>	<p>BNG for NSIPs is not yet mandatory, but the Applicant has sought to meet the requirements as if it were. The approach to assessing and securing BNG is detailed in the Biodiversity Net Gain Assessment Report [REP1-089].</p> <p>A full justification for the single habitat trading rule not being met is provided in paragraphs 1.11.10 - 1.11.16 of the Biodiversity Net Gain Assessment Report [REP1-089]. This relates to the loss of habitats within the 'Cropland' broad habitat type, and is considered an artefact of the Statutory Metric, given that these habitats will in reality</p>	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>condition assessment data and a means of cross referencing baseline (including condition) and post development habitat proposals with a plan. This should include details of riparian and watercourse encroachment.</p>	<p>be retained and enhanced through the Scheme. Therefore, taking into account professional judgement, the BNG assessment is considered to be compliant with trading rules.</p> <p>The full Statutory Biodiversity Metric [REP1-093] in excel format has been submitted at Deadline A and at Deadline 1</p> <p>Figures showing the baseline and proposed habitats are provided in Plates 3 - 24 at the end of the Biodiversity Net Gain Assessment Report [REP1-089]. Given the sheer number of area and linear habitat parcels present across the Sites, it was not considered proportionate to provide each condition assessment individually for submission. However, a summary of the condition assessment scores for each specific habitat, hedgerow and watercourse type is provided in Table 3: Summary of Baseline Habitats - Solar PV Sites in the Biodiversity Net Gain Assessment Report [REP1-089].</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
3.1.12	Ecological impact from watercourses crossing	<p>Due to the lack of habitat descriptions or photographs of watercourses and the reference to the use of open cut technologies on SM5 (not referenced elsewhere) in Appendix 11-1 Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report; Table 5: Watercourse Crossing [APP-210], the EA is concerned that the ecological impact of these crossings has not been fully assessed and/or communicated in Chapter 9: Ecology and Biodiversity [APP-061], regarding impacts on habitats and associated species.</p> <p>Whilst we agree with the detail set out in paragraph 9.1.47 of Chapter 9 Ecology and Biodiversity [APP-061], there remains a risk that some watercourses where an open-cut method is selected could have a significant impact on fish species—not only eels and brown/sea trout. Of particular concern are crossing reference SM3 and SM5 which are both main river and may provide suitable habitat for fish.</p>	<p>A new appendix to ES Volume 3, Chapter 9: Ecology and Biodiversity was submitted at Deadline 1 which provides habitat descriptions and photographs of all watercourse crossing points, as well as the construction methodology to be used at each crossing point, for clarity.</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been revised to include a separate section for Aquatic Invertebrates (excluding white clawed crayfish, which is covered in its respective section), and additional text has been included on aquatic macrophytes within existing sections relating to plants. No significant residual adverse effects are anticipated for either of these species groups, and the revised Chapter was submitted at Deadline 1.</p> <p>Notwithstanding, the Applicant confirms that no watercourse crossing is proposed at SM5 and this has now been removed from the watercourse crossing schedule. This does not alter the assessed flood risk, drainage or ecological conclusions. The Applicant</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>The Environment Agency requires the applicant to provide a clear plan and schedule detailing extent and nature of works directly impacting upon watercourses. Provide habitat descriptions and photographs of proposed watercourse crossings and ensure Chapter 9 Ecology and Biodiversity [APP-061 assesses the impact of these, with other documents updated as appropriate.</p> <p>This would provide confidence that the chosen crossing type is appropriate.</p>	<p>will update the relevant application documents as set out above.</p>	
3.2.13	Inconsistencies between documents	<p>It is not clear what mitigation will be proposed and secured by the DCO. The commitments register and other documents should detail all environmental commitments secured by the proposal. There are inconsistencies between Chapter 9 Ecology and Biodiversity [APP-061], the Outline EPMS [APP-284] and the Commitments Register [APP-291]. This means there is a risk protected species are not adequately managed, resulting in harm which is against legislation.</p>	<p>The Commitments Register [REP1-114] will be updated to cross refer to the relevant ecological protection and mitigation measures set out in the Outline Ecological Protection and Mitigation Strategy [REP1-106]</p> <p>The Applicant confirms that a minimum buffer of 8 m from ditches and watercourses is secured as part of the flood risk, drainage and construction controls set out in Outline Construction Environmental Management Plan [REP1-096] and assessed in ES, Volume 1, Chapter</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>The watercourse buffers quoted in Chapter 9 Ecology and Biodiversity [APP-061], the OLEMP [APP-283] and the OCEMP [APP-277] are inconsistent so the EA are not clear what buffers are being proposed, and are unable to advise on suitability.</p>	<p>11 Hydrology, Flood Risk and Drainage [REP1-017], with wider buffers applied where required to address ecological sensitivities identified through survey and assessment in ES, Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].</p> <p>Accordingly, the approach to buffers as set out at Table 5 of the Outline Landscape and Ecological Management Plan [APP-283] is as follows:</p> <ul style="list-style-type: none"> • A minimum 8 m buffer from any ditch or watercourse, applied for flood risk, drainage and construction control purposes. • A minimum 10 m buffer from ditches with evidence of water voles. • A minimum 15 m buffer from minor watercourses where ecological value or sensitivity requires an enhanced buffer. • A minimum 50 m buffer from ponds with confirmed great crested newt presence, or where presence is 	

Reference	Sub-topic	EA Position	Applicants Position	Status
			assumed on a precautionary basis due to inconclusive results.	

3.4 Hydrology, Flood Risk and Drainage

Table 3-3: Hydrology, Flood Risk and Drainage

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.1	Legislation and Policy	The Environment Agency has provided consultation comments focused on evidencing and clarity within the submitted assessment, rather than identifying policy non-compliance.	The Applicant considers that the assessment of hydrology, flood risk and drainage has been undertaken within the relevant legislative and policy framework, including NPS EN-1, the NPPF and the Flood Risk and Coastal Change PPG. The Sequential Approach has informed scheme design, with permanent and sensitive infrastructure targeted to areas of lowest flood risk where practicable. This is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] , supported by the ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and site-specific appendices (ES Volume 3, Appendices 11-2 to 11-9 [REP1-039] to [REP1-053]).	Agreed
3.3.2	Baseline Conditions	The Environment Agency has reviewed the baseline presentation and has not raised substantive objection, noting	The Applicant considers that the baseline conditions presented are representative and sufficient to inform	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
		through consultation the need to reflect updated datasets where relevant.	the assessment, including Flood Zones, surface water flood risk, mapped watercourses and the wider hydrological context. The baseline reflects that the majority of the Scheme is located within Flood Zone 1, with localised interaction with Flood Zones 2 and 3 associated primarily with named watercourses. Baseline conditions are set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and supporting documents [REP1-037] to [REP1-053] .	
3.3.3	Surface Water Flood Risk and Drainage Principles	The Environment Agency is not the statutory consultee for surface water flood risk. The Environment Agency has not reviewed the assessment for surface water flood risk as this is a LLFA responsibility. t.	The Applicant considers that surface water flood risk has been appropriately assessed using Environment Agency Risk of Flooding from Surface Water mapping and site-specific context, and that the largely permeable nature of the Scheme, together with embedded drainage controls, ensures no increase in surface water flood risk. The assessment is presented in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] and the ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
			[REP1-017] , supported by the ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and site-specific appendices (ES Volume 3, Appendices 11-2 to 11-9 [REP1-039 to REP1-053]).	
3.3.4	Assessment Methodology	The Environment Agency has advised that a proportionate approach is acceptable in principle, subject to clear justification and supporting evidence at locations where flood risk interaction is relevant.	The Applicant considers that the assessment methodology is proportionate and risk-based, reflecting the scale of the Scheme and the distribution of flood risk. The approach uses current Environment Agency datasets, parcel-specific assessment for each Solar PV Site and the Cable Route Corridor, and targeted hydraulic modelling where required, rather than blanket modelling. The methodology is described in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] , ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and site-specific appendices (ES Volume 3, Appendices 11-2 to 11-9 [REP1-039 to REP1-053]).	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.5	Hydraulic Modelling Scope	The Environment Agency has indicated that site-wide fluvial modelling is not required but expects clear justification of the modelling scope and supporting evidence at sensitive locations.	<p>The Applicant notes that this matter relates to the scope of fluvial flood risk modelling, which falls within the Environment Agency’s statutory remit, rather than surface water drainage modelling, which falls within the remit of the Lead Local Flood Authority.</p> <p>The Applicant agrees that site-wide fluvial hydraulic modelling is not required. Fluvial hydraulic modelling has been undertaken where proportionate and necessary, including for Gauze Brook at Lime Down D, to support the assessment of flood risk, floodplain interaction and resilience at sensitive locations. Proportionate alternative methods have been applied for minor watercourses and drainage features where detailed hydraulic modelling is not required.</p> <p>Supporting evidence is provided in ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP1-037], FRA Appendix 11-6: Lime Down D / BESS [REP1-047], FRA Appendix 11-8: Lime Down E2 [REP1-052] and the wider ES Volume</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].</p> <p>The Applicant provided the relevant Gauze Brook model files and updated supporting documentation to the Environment Agency for review on 14 May 2026. It is proposed that the Hydraulic Modelling Report including any comments from the EA is submitted to the Examining Authority at a future deadline.</p>	
3.3.6	Mitigation (shallow groundwater and dewatering risk)	<p>The Environment Agency is concerned that due to the limited coverage of the currently available exploratory hole records and monitoring data, there is uncertainty around the likely ranges of shallow groundwater and therefore there is inadequate mitigation against groundwater pollution and dewatering impacts for cable installation as the risks are not appropriately understood. The EA suggest groundwater observation and monitoring as part of pre-construction ground investigation</p>	<p>The Applicant notes the comment. Construction phase groundwater and dewatering risks will be managed through the detailed CEMP, substantially in accordance with the Outline Construction Environment Management Plan [REP1-096] (Outline CEMP), including appropriate control measures where groundwater is encountered and pollution prevention measures for excavations and cable installation.</p> <p>Where pre-construction ground investigation identifies shallow</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		works may be beneficial. See British Standard 5930.	<p>groundwater, or where shallow groundwater could materially affect cable installation, trench stability, dewatering requirements or controlled waters receptors, groundwater observation and monitoring will be included on a risk-based basis and with reference to BS 5930. This will inform the final temporary works, cable installation and dewatering methodology.</p> <p>Where dewatering is required, pumped water will be contained, inspected and tested where appropriate, and discharged, reused or removed from site only where lawful and suitable. Pollution prevention measures will be implemented to prevent uncontrolled discharge to ground, surface water or groundwater.</p> <p>These controls are secured through the Outline CEMP [REP1-096] and detailed CEMP. They are consistent with the groundwater and controlled waters assessment reported in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], ES Volume 1, Chapter 19:</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			Ground Conditions and Contamination [REP1-027] and the Water Framework Directive Assessment [REP1-094] . No change to the assessment conclusions is required.	
3.3.7	Mitigation (drilling fluids, breakout plan and trenchless controls)	The Environment Agency is concerned that mitigation proposal managing risks to groundwater have not been adequately addressed. The Applicant specifies two products required to facilitate the drilling process: Bore-Gel (or similar) dry, powdered bentonite, and EZ Mud (or similar) liquid polymer. No environmental risk mitigation measures are currently provided in the Method Statement and the document does not reference the Drilling Fluid Breakout Plan.	The Applicant agrees that environmental risk mitigation for trenchless techniques should be made more explicit. The relevant environmental controls have been incorporated into the secured construction management framework, rather than relying on ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183] as the securing document. The Outline CEMP [REP1-096] confirms that trenchless excavation methods, drilling fluids and additives will be assessed for environmental suitability and potential interaction with groundwater, and that appropriate mitigation will be developed through the detailed CEMP and trenchless drilling management plans. This includes drilling fluid breakout contingency procedures, surface spill	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			response measures, and, where required, Water Features Surveys and Hydrogeological Risk Assessment to inform detailed design, construction methodology and monitoring. The relevant commitments are also tracked in the Commitments Register [REP1-114] .	
3.3.8	Mitigation (OCEMP water quality measures)	<p>The Environment Agency state that the Water Quality Mitigation Measures in the <i>Outline Construction Environmental Management Plan [APP-277]</i> are insufficient and request the Applicant to incorporate more water quality mitigation measures, including the following:</p> <p>Vehicle washdown and refuelling to be carried out in designated areas, where there is no risk of pollution.</p> <p>Concrete laying to not be carried out in wet conditions.</p> <p>A foul water strategy during construction should be mentioned.</p> <p>Sediment capture methods to be used on tracks and compounds to reduce the chance of surface run-off pollution.</p>	<p>Construction phase water quality controls are secured through the Outline Construction Environment Management Plan [REP1-096] (Outline CEMP) including measures for pollution prevention and protection of ecological receptors. The Applicant agrees that the topics raised by the Environment Agency are appropriate matters to be controlled through the Outline CEMP [REP1-096]. For clarity, these matters will be made explicit within the next iteration of the CEMP and commitments, with no change to conclusions.</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		Fuels, oils, and chemicals should be on impermeable ground, and sufficiently bunded.		
3.3.9	Mitigation (Commitments Register clarifications)	<p>The Environment Agency request the following clarifications to the 7.26 <i>Commitments Register Hydrology, Flood Risk and Drainage [APP-291]</i>: More detail on the environmental controls for trenchless crossing techniques.</p> <p>Confirmation that construction compounds and stockpiles would be located as far from sensitive groundwater and ecological receptors as well as surface water receptors.</p> <p>Plant nappies also referenced where appropriate.</p>	<p>The Applicant notes the comment. The commitment in Commitments Register [REP1-114] will be updated to cross refer to the relevant pollution prevention and water quality control measures in Outline Construction Environmental Management Plan [REP1-096], which set out the environmental controls that will be applied to trenchless crossings including HDD. The relevant commitment will also be updated to confirm that the siting of construction compounds and stockpiles will take account of sensitive receptors, and to reference the use of plant nappies.</p>	Under Discussion
3.3.10	Floodplain Interaction and Displacement	<p>The Environment Agency has requested clear reporting and evidence of floodplain displacement assessment to demonstrate flood risk neutrality.</p>	<p>The Applicant notes that this matter has been addressed in the revised floodplain displacement assessments submitted at Deadline 1.</p> <p>Interaction with the floodplain has been avoided where practicable through layout design. Where limited interaction remains, the Applicant has</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>assessed displacement from the proposed solar panel supports using a deliberately conservative methodology. The assessment assumes displacement is redistributed only across the modelled flood extent within the relevant Lime Down site boundary, rather than across the wider hydraulically connected floodplain. This is precautionary, as in practice any displaced floodwater would be distributed over a substantially larger floodplain area.</p> <p>For Lime Down D, the assessment identifies a displaced volume of 11.59m³, redistributed across an on-site modelled flood extent of 222,530m². This results in a theoretical increase in flood level of approximately 0.000052mm.</p> <p>For Lime Down E2, the assessment identifies a displaced volume of 2.09m³, redistributed across an on-site flood extent of 50,735m². This results in a theoretical increase in flood level of approximately 0.000041mm.</p> <p>In both cases, the calculated increase is de minimis, several orders of</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>magnitude below the precision at which flood levels can be meaningfully defined, and would not result in any measurable change to flood levels, flood extents, flow routes or flood risk to third parties. The revised assessments also include figures showing the flood extent and displacement calculation areas for Lime Down D and Lime Down E2. The Applicant therefore considers that the assessment demonstrates flood risk neutrality and that compensatory flood storage is not necessary or proportionate.</p> <p>This is set out in FRA Appendix 11-6: Lime Down D / BESS [REP1-047], paragraphs 2.3.23 to 2.3.29 and Figure 8, FRA Appendix 11-8: Lime Down E2 [REP1-052], paragraphs 2.3.16 to 2.3.21 and Figure 8, and the wider ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-037 to REP1-054].</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.11	Climate Change and Safety for Lifetime	The Environment Agency expects development to be safe for its lifetime, including appropriate consideration of climate change.	The Applicant considers that the Scheme has been designed to be safe for its lifetime, with climate change allowances applied appropriately and sensitive infrastructure located in Flood Zone 1 where practicable or designed with suitable resilience where required. This is demonstrated in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017], ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and site-specific appendices (ES Volume 3, Appendices 11-2 to 11-9 [REP1-039 to REP1-053]).	Under Discussion
3.3.12	Watercourse Crossings and Works Near Watercourses	The Environment Agency has advised that detailed information on watercourse crossings, including locations, construction methods and mitigation measures, will be required at the appropriate stage, and has expressed a preference for trenchless techniques at sensitive crossings. The Environment Agency note the lack of habitat descriptions or photographs	The Applicant considers that effects on watercourses can be appropriately managed through a defined and proportionate crossings strategy. This prioritises avoidance where practicable, the use of trenchless techniques such as HDD for Main Rivers and other sensitive crossings, and reinstatement to pre-construction condition where open-cut techniques are required for minor watercourses.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		of watercourses and the reference to the use of open cut technologies on SM5 (not referenced elsewhere) in Appendix 11-1 <i>Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]</i> . The Environment Agency requires the Applicant to provide a clear plan and schedule detailing extent and nature of works directly impacting upon watercourses. They also require habitat descriptions and photographs of proposed watercourse crossings, to allow Chapter 9 <i>Ecology and Biodiversity [APP-061]</i> assesses the impact of these, with other documents updated as appropriate. This would provide confidence that the chosen crossing type is appropriate.	The crossings principles and environmental controls are set out within ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP1-053] and secured through the Outline Construction Environmental Management Plan [REP1-096] .	
3.3.13	WFD Assessment (GWDTEs)	The Environment Agency is concerned that the Water Framework Directive Assessment [APP-276] does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs) and notes that Harries Ground Site of Special Scientific Interest (SSSI) is present within the Study Area, situated to the immediate	The Applicant agrees that the Water Framework Directive assessment should explicitly identify and consider any candidate Groundwater Dependent Terrestrial Ecosystems (GWDTEs) within the Study Area, including whether Harries Ground SSSI could represent a GWDTE receptor and whether there is any	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		north of Lime Down E, and may be a GWDTE on the basis of its habitat designation.	plausible impact pathway from the Scheme. The Applicant will update Water Framework Directive Assessment [REP1-094] to include a proportionate review of candidate GWDTEs, including Harries Ground SSSI, and to confirm the assessment of potential impact pathways and the relevance of the Scheme's embedded pollution prevention and drainage controls.	
3.3.14	WFD Assessment (Cable Corridor wording)	The Environment Agency notes that Section 1.2.4 of the <i>Water Framework Directive Assessment [APP-276]</i> states that the Cable Corridor is subsurface infrastructure which will have a negligible impact on WFD status and has thus been excluded from assessment. It is the EA's position that is incorrect, as poor site management and interaction with contamination could lead to a degradation in WFD status.	The Applicant agrees that the Water Framework Directive assessment should not imply that the Cable Corridor is excluded from consideration simply because it is subsurface infrastructure. The Applicant will update Water Framework Directive Assessment [REP1-094] to clarify that the Cable Corridor has been assessed in relation to WFD groundwater bodies through construction phase risk pathways and embedded controls, and to amend the relevant wording in Sections 1.2.4, 5.1.3 and 5.4.2 so this is unambiguous.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.15	Water Resources, Foul Drainage and WFD	The Environment Agency has requested clarity on water resources and foul drainage proposals, which has been provided within the submitted documentation.	The Applicant considers that operational water demand and foul drainage are minimal and can be managed appropriately, and that the Scheme will not result in deterioration of Water Framework Directive status. This is addressed in the Water Framework Directive Assessment [REP1-094] and Water Resources Strategy [APP-290] , supported by construction controls in Outline Construction Environmental Management Plan [REP1-096] .	Under Discussion
3.3.16	Groundwater WFD receptors presentation	Plan 2.8 Waterbodies in a River Basin Management Plan [APP-012] shows only surface water bodies within a River Basin Management Plan. No equivalent figure showing WFD Groundwater bodies is provided and therefore sensitive groundwater receptors are not well defined. The Environment Agency notes there are multiple WFD Groundwater bodies present within the Study Area captured in the Water Framework Assessment Section 5.1 and Figure 5 [APP-276]	The Applicant notes the comment and will update the Water Framework Directive Assessment [REP1-094] and signposting within the ES to ensure WFD groundwater bodies are clearly identified as receptors and consistently presented, with no change to the assessment conclusions.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		that are not included in main Environmental Statement.		
3.3.17	Functional floodplain (Flood Zone 3b)	<p>The Environment Agency notes that some parts of the proposal, such as Solar PV Panels, are within areas of fluvial flood risk and requests the Applicant to confirm in ES Volume 3, Appendix 11-1 <i>Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]</i> whether any aspects of built development are contained within Flood Zone 3b. With respect to the construction phase of the development, stockpiles, materials, and laydown areas should be outside Flood Zone 3 where possible and must be outside of Flood Zone 3b. Whilst it is appreciated that the extent of Flood Zone 3b with regards to the development is small it is important to note that some panel areas, for example D17, D12, D13, and D14, are shown to be within the 5% (1 in 20) annual exceedance probability (AEP) flood extent on drawing 317212-ENG-DAT-02 within the Flood Risk Assessment and Drainage Strategy Lime down BESS and hence by</p>	<p>The Applicant notes the Environment Agency's comment. The updated Hydraulic Modelling Report for Lime Down D, to be submitted at a future Examination Deadline, will incorporate the Environment Agency's comments and will include the 1 in 30 year flood extents to inform the definition of the functional floodplain.</p> <p>The Applicant is also undertaking hydraulic modelling for Lime Down E2 to delineate the Flood Zone 3b extent associated with Gabriel's Well / Rodbourne Brook. The results will be reported in the supporting Hydraulic Modelling Report and reflected in the relevant FRA reporting.</p> <p>The Applicant confirms that no BESS, substations or other flood-sensitive electrical infrastructure is proposed within Flood Zone 3b. Construction compounds, stockpiles, materials and laydown areas would be located outside Flood Zone 3 where</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>extension would be within the Functional Floodplain (3.3% (1 in 30) AEP). Whilst panels will be raised in these areas it is important to ensure the FRA acknowledges this and how this relates to compliance with the second part of the Exception Test and paragraph 5.8.12 within the Overarching National Policy Statement for Energy (EN-1).</p>	<p>practicable and outside Flood Zone 3b.</p> <p>Where limited raised solar PV panel areas are shown by the updated modelling to interact with the 1 in 30 year flood extent, this will be acknowledged in the updated reporting. Solar farms are classified as Essential Infrastructure under the NPPF flood risk vulnerability classification. The updated FRA reporting will explain how any limited interaction with Flood Zone 3b satisfies the relevant policy tests, including the Exception Test, paragraph 5.8.12 of NPS EN-1, and the requirements for the development to remain safe and operational, avoid increasing flood risk elsewhere, avoid impeding flood flows and avoid net loss of floodplain storage.</p> <p>This will be addressed in the updated Hydraulic Modelling Report, FRA Appendix 11-6: Lime Down D / BESS [REP1-047], FRA Appendix 11-8: Lime Down E2 [REP1-052] and the wider ES Volume 3, Appendices 11-1 to 11-9: Flood Risk</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			Assessment and Drainage Strategy [REP1-037 to REP1-054].	
3.3.18	Fencing within areas of fluvial flood risk	The Environment Agency is concerned there is limited detail within in ES Volume 3, Appendix 11-1 <i>Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]</i> and respective flood risk assessments for Lime Down A to E on fences which may surround the development and their interaction with areas of flood risk. They are requesting the Applicant to assess proposed fencing to ensure appropriate design. The applicant should provide details on where fencing will be placed with respect to flood flow routes and extents and additional detail on mesh spacing. A larger mesh should be considered in flood risk areas to ensure blockage risk is kept to a minimum	The Applicant notes the comment. Interaction between the Scheme and Flood Zone 3 is limited to minor areas. The flood risk assessment is based on fencing in these locations being of a form that does not impede flood flows or reduce floodplain conveyance, consistent with the approach assessed in ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP1-047] and ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051] . The Applicant will include additional narrative within the relevant FRA appendices to confirm this.	Under Discussion
3.3.19	Construction phase flood risk	The Environment Agency requests the Applicant to assess the impacts the storage of materials, site compounds, temporary roads and/or crossings will have on flood risk and provide appropriate mitigation in ES Volume 3,	The Applicant notes the comment. Construction phase flood risk effects have been assessed and mitigation is set out through the construction and flood risk control framework, as reported in ES Volume 1, Chapter 11:	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>Appendix 11-1 <i>Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]</i>.</p> <p>EA would like to see locations of crossings. However, if this detail is not available till a later stage we would expect the applicant to commit to specific best practice criteria for design.</p>	<p>Hydrology, Flood Risk and Drainage [REP1-017] and secured through the Outline Construction Environmental Management Plan [REP1-096]. A shapefile of the watercourse crossing locations was provided to the EA on 23 March 2026. .</p>	
3.3.20	Freeboard allowances clarity	<p>The Environment Agency is not clear on what freeboard allowances are proposed in Section 2.11.1 of ES Volume 3, Appendix 11-2 to 11-8 <i>Flood Risk Assessment and Drainage Strategy Lime Down A to E [APP-211]</i> and are concerned that mitigation measures may be inappropriate in areas of flood risk where there are uncertainties in the design flood water level. They request a freeboard of +600 millimetres (mm) is provided above the design flood level.</p>	<p>The Applicant notes the comment and confirms that embedded mitigation applies a minimum freeboard of 600 mm above the 1% AEP plus climate change flood level, as set out in ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]. This approach is supported by hydraulic data within ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP1-047] and ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051]. The Applicant will update the relevant FRA appendices [to</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			APP-218] to confirm this freeboard approach.	
3.3.21	Gauze Brook model review request	The Environment Agency note that they have not had the opportunity to review hydraulic model files for the Gauze Brook and the assessment of flood risk for the Gauze Brook in Section 2.3.6 of ES Volume 3, Appendix 11-6: <i>Flood Risk Assessment and Drainage Strategy Lime Down D/BESS [APP-215]</i> could be inaccurate or underestimated which could lead to inappropriate mitigation.	The Applicant notes the request to review the Gauze Brook hydraulic model and has provided the hydraulic modelling report and associated model files to the Environment Agency on 14 May to support ongoing technical review. The Hydraulic Modelling Report will be submitted to the examination library at a future deadline pending the EAs review of the modelling files.	Under Discussion
3.3.22	Gauze Brook analysis extent	The Environment Agency is not clear on how the analysis extent area of 275,000m ² has been derived and are concerned that flood risk impacts could be underestimated in Section 2.3.20 of ES Volume 3, Appendix 11-6: <i>Flood Risk Assessment and Drainage Strategy Lime Down D/BESS [APP-215]</i> .	The Applicant notes the comment. The 275,000 m ² analysis extent is derived from the defined downstream floodplain boundary. The Applicant will add a figure to ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP1-047] showing the downstream floodplain extent used in the assessment for transparency.	Under Discussion
3.3.23	Solar panel support frames	The Environment Agency is concerned that the impacts of the solar panel support frames on flood flow	The Applicant notes the Environment Agency's comment. Revised reporting for Lime Down D and Lime Down E2	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
	and conveyance (Lime Down D)	conveyance is not discussed in Section 2.3.20 of ES Volume 3, Appendix 11-6: <i>Flood Risk Assessment and Drainage Strategy Lime Down D/BESS [APP-215]</i> and therefore flood risk impacts and blockage risk from the solar panel support frames could be underestimated. The applicant should confirm details regarding indicative panel leg spacing and flood flow velocities in areas where panel legs are placed as this will help in understanding potential impacts on conveyance and also blockage risk	<p>has now been submitted and includes additional clarification on the interaction between solar PV panel supports, floodplain conveyance and blockage risk.</p> <p>The assessment confirms that panel supports are discrete, widely spaced elements with a very small cumulative footprint relative to the floodplain area. The assessment uses an indicative support allowance of 10 piles per 100 m of panels, with an individual support cross-sectional area of 28.65 cm². On this basis, the submitted assessment concludes that the panel supports would not materially impede flood flow conveyance or increase blockage risk.</p> <p>The submitted material also includes the relevant flood flow information for the areas where panel supports are located within the modelled flood extent. This is reported in FRA Appendix 11-6: Lime Down D / BESS [REP1-047] and FRA Appendix 11-8: Lime Down E2 [REP1-052].</p> <p>The Applicant considers that the submitted reporting provides the</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			clarification requested by the Environment Agency and that the assessment conclusion remains unchanged.	
3.3.24	Gabriel's Well / Rodbourne Brook analysis extent	The Environment Agency is unclear on how the analysis extent area of 175,580m ² has been derived in Section 2.3.15 of ES Volume 3, Appendix 11-8 <i>Flood Risk Assessment and Drainage Strategy Lime Down E2 section [APP-217]</i> and are concerned that flood risk impacts could be underestimated. They request the Applicant to provide a map and/or additional clarity on how the surface area of 175,580m ² has been derived and clarify if this the area of the design flood extent for the Gabriels Well/Rodbourne Brook that bisects the order limits for the development.	The Applicant notes the comment. To address the request for clarity, the Applicant will include a plan within ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051] illustrating the defined floodplain extent used in the calculation and the location of the downstream control point to confirm how the area was derived.	Under Discussion
3.3.25	Solar panel support frames and conveyance (Lime Down E2)	The Environment Agency note that the impacts of the solar panel support frames on flood flow conveyance is not discussed in Section 2.3.15 of ES Volume 3, Appendix 11-8 <i>Flood Risk Assessment and Drainage Strategy</i>	The Applicant notes the Environment Agency's comment. Revised reporting for Lime Down E2 has now been submitted and includes additional clarification on the interaction between	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p><i>Lime Down E2 section [APP-217]</i> and that flood risk impacts and blockage risk from the solar panel support frames could be underestimated.</p> <p>The applicant should confirm details regarding indicative panel leg spacing and flood flow velocities in areas where panel legs are placed as this will help in understanding potential impacts on conveyance and also blockage risk</p>	<p>solar PV panel supports, floodplain conveyance and blockage risk.</p> <p>The assessment confirms that panel supports are discrete, widely spaced elements with a very small cumulative footprint relative to the floodplain area. The assessment uses an indicative support allowance of 10 piles per 100 m of panels, with an individual support cross-sectional area of 28.65 cm². On this basis, the submitted assessment concludes that the panel supports would not materially impede flood flow conveyance or increase blockage risk.</p> <p>The submitted material also includes relevant flood flow information for the areas where panel supports are located within the modelled flood extent. This is reported in FRA Appendix 11-8: Lime Down E2 [REP1-052].</p> <p>The Applicant considers that the submitted reporting provides the clarification requested by the Environment Agency and that the assessment conclusion remains unchanged.</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.26	Riparian buffers consistency	Watercourse buffers quoted are inconsistent: a 10-15m buffer is quoted in Chapter 9 whereas up to 30m for 'major watercourses' is quoted in the OLEMP and 8m watercourse buffer is proposed in the OCEMP.	The Applicant notes the comment and confirms that a minimum buffer of 8 m from ditches and watercourses is secured as part of the flood risk, drainage and construction controls set out in Outline Construction Environmental Management Plan [REP1-096] and assessed in ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051] , with wider buffers applied where required to address ecological sensitivities identified through survey and assessment in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] .	Under Discussion
3.3.27	BESS foundation interaction with sealed drainage and SPZs	The Environment Agency is unclear how the Battery Energy Storage System (BESS) foundation solution as presented in Appendix 3-1: <i>Substations and Battery Energy Storage System Description [APP-182]</i> Section 1.2.11 would interact with the proposed sealed drainage solution.	The Applicant notes the Environment Agency's comment. The Applicant is not seeking to fix the detailed BESS foundation or drainage construction detail at this stage. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017] , ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Covering Report [REP1-037] and the site-specific appendices	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>At Deadline 1, EA state that this response and the documents referenced do not answer our concern.</p> <p>The applicant proposes to site the BESS on [up to] 4m deep piled foundations (APP-182, para 1.2.11). They also propose to install an impermeable lined gravel subbase beneath the whole BESS Area to capture firewater (APP-215, para 3.9.1 & 4.2.3).</p> <p>If piled foundations penetrate through the base of the lining, we are concerned about the integrity of the impermeable lining. A Piling Risk Assessment is likely to identify this same risk, but as it is a foreseeable issue we expect the Applicant to proactively plan for it.</p> <p>Further information is required.</p>	<p>(ES Volume 3, Appendices 11-2 to 11-9 [REP1-039 to REP1-053]) set out the drainage and containment principles that the detailed design must comply with, including the requirement for the BESS drainage system to maintain its sealed, isolatable and containment function.</p> <p>The BESS containment approach is set out in the Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124]. This confirms the principle of a sealed and isolatable BESS drainage system, with lined drainage or lined drainage components where required to contain potentially contaminated runoff, including firewater, and prevent uncontrolled discharge to ground or controlled waters.</p> <p>The Applicant agrees that the interface between piled foundations and any sealed or lined drainage system is a foreseeable detailed design matter. Where piles are proposed within an area requiring containment, the detailed design will be required to demonstrate that pile penetrations,</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>structural supports and liner interfaces do not create an uncontrolled pathway through the containment layer or compromise its function. This may be achieved through engineered pile / liner interface details, local sealing, collars, sleeves, upstands, membrane interfaces, or an alternative foundation and containment arrangement where required.</p> <p>This approach is consistent with the principles of CIRIA C736, which requires containment systems to be designed on a risk basis, and with recognised geomembrane design practice, which treats sealing around structures and penetrations as a key design and quality assurance consideration. The final construction detail will be confirmed at detailed design stage, informed by the Foundation Works Risk Assessment, drainage design and construction methodology. This assessment will consider the design of any sealed drainage to be incorporated into the final design.</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
			The Applicant considers that this addresses the Environment Agency’s concern at this stage without fixing a specific foundation or drainage construction detail before detailed design. The relevant drainage principles are set out in Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] and FRA Appendix 11-6: Lime Down D / BESS [REP1-047] , and will be secured through the detailed design process, detailed CEMP and the requirement for construction controls to be prepared substantially in accordance with the Outline CEMP [REP1-096] .	
3.3.28	BESS drainage lining impermeable and firewater disposal	The Environment Agency requests that the Applicant should clearly state that the BESS Area drainage system lining must be impermeable. The disposal of firewater should be determined in consultation with the Environment Agency.	The Applicant notes the Environment Agency’s comment. The BESS drainage and containment approach is based on an impermeable, sealed and isolatable drainage system designed to retain potentially contaminated runoff, including firewater, and prevent uncontrolled discharge to ground, groundwater or surface water.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>This principle is set out in Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] and reflected in FRA Appendix 11-6: Lime Down D / BESS [REP1-047]. The detailed construction specification will be confirmed at detailed design stage, but must achieve the required impermeability, containment and isolation performance.</p> <p>The Applicant notes the Environment Agency’s comment regarding firewater disposal. Disposal of retained firewater will be determined in consultation with the Environment Agency, including any permitting requirements where applicable. Where discharge is not suitable, cannot be permitted in the required timeframe, or where retained water cannot be safely stored pending permit determination, the fallback position would be removal by tanker to an appropriately permitted facility.</p>	
3.3.29	BESS SuDS Mitigation Indices table	The Environment Agency note that the in Appendix 11-6 <i>Flood Risk Assessment and Drainage Strategy</i> -	The Applicant notes the comment. Table 4 in ES Volume 3, Appendix 11-6 Flood Risk Assessment and	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<i>Lime Down D BESS Table 4 [APP-215]</i> SuDS Mitigation Indices is blank and the degree of mitigation afforded against contaminants by the proposed gravel drainage medium is not given.	Drainage Strategy - Lime Down D BESS [REP1-047] will be populated to confirm the SuDS mitigation indices associated with the proposed drainage medium and treatment train assumptions.	
3.3.30	Firewater sampling and testing protocol	The Environment Agency also notes the following issues with the oBSMP refer to "battery liquid cooling systems with automatic safe operation" and a "Liquid cooling Thermal Management System" which may act as a source of pollution which could impact controlled waters. The Plan states that routine maintenance will be undertaken on the BESS equipment every 6-12 months depending on the risk profile of equipment. They request the Applicant to provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site. No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event and the suite of analysis of firewater may not be sufficient to fully	The Applicant notes the Environment Agency's comment. The Outline Battery Safety Management Plan [REP1-110] has been updated at Deadline 1 to confirm that any contained firewater, suppression water or potentially contaminated water retained within the BESS drainage system would be sampled and tested before any discharge or off-site removal at Paragraphs 5.3.3 and 5.5.12. Sampling and analysis would be undertaken by an appropriately accredited laboratory. The testing suite would be defined by the incident scenario, the materials involved, and the potential contaminants present, including contaminants associated with BESS equipment, suppression water, liquid cooling systems and any fire residues. The results would be	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>characterise the risks posed to controlled waters.</p>	<p>reviewed before any disposal route is agreed.</p> <p>Any disposal of retained water would be determined in consultation with the Environment Agency, including any permitting requirements where applicable. Where discharge is not suitable, cannot be permitted in the required timeframe, or retained water cannot be safely stored pending permit determination, the fallback position would be removal by tanker to an appropriately permitted facility.</p> <p>Inspection and maintenance requirements for the BESS, including liquid cooling systems and key containment controls, will be confirmed in the final Battery Safety Management Plan in accordance with the final BESS technology, manufacturer's requirements and detailed design. The containment and isolation principles are set out in the Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124] and FRA Appendix 11-6: Lime Down D / BESS [REP1-047].</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
3.3.31	Emergency Response Plan notifications	The Emergency Response Plan (ERP) should identify the importance of notifying downstream river/groundwater abstractors should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority.	The Applicant agrees. The Applicant will update Outline Battery Safety Management Plan [REP1-110] to ensure the Emergency Response Plan explicitly includes priority notification and escalation where an incident could affect surface water or groundwater, including notification of the Environment Agency and, where applicable, downstream receptors such as abstractors.	Under Discussion
3.3.32	BESS construction phasing and commissioning	The Environment Agency notes that the BESS would be constructed in two distinct phases, with civil works and the balance of non-BESS plant and equipment commenced initially, with the BESS equipment delivered to be installed at "a suitable point" and requests that the Applicant confirm in Section 4.2.1 of the oBSMP [APP-286] that the initial phase would include all drainage and firewater containment infrastructure, and that the battery storage infrastructure would not be delivered to site before all firewater	The Applicant will update the Outline Battery Safety Management Plan [REP1-110] to confirm that the initial phase will include all drainage and firewater containment infrastructure and that battery storage infrastructure will not be delivered to site before containment arrangements are installed and commissioned.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>containment arrangements are installed and commissioned.</p> <p>EA believe that battery storage methods need to be clearer i.e. retained inside the unit if damaged/end of life before replacement. Need to be clear how they will be treated prior to removal offsite.</p>		
3.3.33	Substation drainage strategies	<p>The Environment Agency request the Applicant to provide Drainage Strategies for the proposed 400kV and 132kV Substations and to confirm what the proposed drainage solution for Substation structures will be, and how spills and leaks and firewater from plant containing hazardous and polluting substances will be managed.</p>	<p>Drainage principles for the proposed 400 kV and 132 kV substations are already established for the Scheme and include a sealed, isolatable drainage approach. This approach is also considered in the WFD assessment, including groundwater bodies as receptors (Water Framework Directive Assessment [REP1-094]). The Applicant will update ES Volume 3 Appendices 11-2 to 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down A to E2 and Cable Connection Corridor [APP-211 to APP-218] to explicitly set out the substation drainage strategy. The assessment conclusions in ES Volume 1, Chapter 11: Hydrology,</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			Flood Risk and Drainage [REP1-017] remain unchanged.	
3.3.34	WFD hydromorphology terminology update	Hydromorphological Supporting Elements "Supports Good". A recent change in terminology from "Supports Good" to "Not High" has been made to the Hydromorphological Supporting Elements/Regime.	The Applicant notes the comment and will update the terminology in Table 2 to reflect the current Environment Agency classification, replacing "Supports Good" with "Not High" where relevant in Water Framework Directive Assessment [REP1-094] .	Under Discussion

3.5 Ground Conditions

Table 3-4: Ground Conditions

Reference	Sub-topic	EA Position	Applicants Position	Status
3.4.1	Legislation and Policy	The Environment Agency provided no comments on the legislation and policy applied for the ground conditions assessment.	The Applicant considers that Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027] of the ES has identified and appropriately considered all applicable legislation and policy.	Agreed
3.4.2	Methodology	The Environment Agency notes that although raised at PEIR stage and included in Table 19-3 in the ES, Volume 1, Chapter 3: Ground Conditions [APP-071] there has been no assessment of the thermal implications of cables on sensitive groundwater receptors.	Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027] of the ES and relevant technical assessments was be reviewed and updated prior to Deadline 1 to consider the thermal implications on sensitive groundwater receptors.	Under Discussion
3.4.3	Baseline	The Environment Agency raised concerns that some potential sources of contamination were not adequately considered in the baseline. They also indicated an opinion that not all sensitive water resources were fully considered in the baseline.	The baseline conditions which are detailed in Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027] of the ES was reviewed and updated if required prior to Deadline 1 to ensure that all potential	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		The baseline assessments were reviewed and adjusted in the Environmental Statement.	contaminant sources are captured and appropriately assessed.	
3.4.4	Assessment Results	<p>The Environment Agency have raised concerns around the assessment of risk to sensitive groundwater; particularly in relation to the use of horizontal drilling techniques where they intersect with underlying Principal Aquifer.</p> <p>The assessments were reviewed and adjusted in the Environmental Statement.</p>	<p>The Cable Route Avoidance Areas - Preliminary Geotechnical Risk Register [REP1-129] was submitted at Deadline 1 to provide further information relating to risks posed to sensitive groundwater resources in areas where horizontal drilling is planned.</p>	Under Discussion
3.4.5	Assessment Results	<p>The Environment Agency states that Application has not presented an assessment of the implications of Monks Park Mine on cable installation, ground stability and HDD works and therefore there remains uncertainty regarding risks posed to controlled waters from the mine.</p> <p>EA request the Applicant to confirm if the reference to “Additional ground investigation will be deployed to</p>	<p>The Cable Route Corridor Mining Risk - Technical Memorandum [REP1-130] was submitted at Deadline 1 to describe the ground investigation regime proposed for this part of the site, considering both potential contamination and geohazards associated with the mine. As per Volume 3, Appendix 19-11 Mining Risk Assessment [APP-257] no HDD</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		confirm the presence of any unrecorded mine workings, shafts, etc which are within the cable alignment in Cable Route Corridor Southwest” in section 19.12.3 of ES Volume 1, Chapter 19: Ground Conditions [APP-071] is additional to the works station in section 19.10.2. They request the Applicant to provide confirmation of the proposed purpose, scope and extent of ground investigations.	is planned in the vicinity of the Monks Park Mine.	
3.4.6	Assessment Results	<p>The Environment Agency states that the Applicant has not appropriately assessed groundwater risks and has underestimated the risks to groundwater by stating that soil contamination would not pose a risk during the operational phase.</p> <p>They request that in addition to geotechnical characterisation, intrusive investigations should also target any areas of potential historic contamination identified in the Preliminary Risk Assessment. They also request the Applicant to have a</p>	Ground investigation is secured via the Outline Construction Environmental Management Plan (Outline CEMP) [REP1-096] and will be conducted prior to the construction phase to inform the design and investigate any residual risks to sensitive groundwater resources and other receptors. In addition, the requirement for a Discovery and Inspection Strategy to be prepared prior to the construction phase is also secured via the Outline CEMP [REP1-096] .	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		Discovery and Inspection Strategy in place for excavation activities during the operational phase.		
3.4.7	Mitigation / Management Plans	<p>The Environment Agency is unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development and are concerned significant sources of contamination may not be investigated and assessed ahead of the construction phase. This may not align with Paragraph 189 of the National Planning Policy Framework.</p> <p>The Environment Agency notes that the Applicant states in Section 1.9.2 of Appendix 3-2 Cable Route Construction Method Statement [APP-183] “Should any contaminated spoil be identified during construction, this would be transported off site to a licenced waste facility for treatment”, however the statement is not in line with the Discovery and Inspection Strategy.</p>	<p>Ground investigation is secured via Section 3 of Outline Construction Environmental Management Plan (CEMP) [REP1-096]. This will be undertaken to confirm the conceptual site model used in the assessments outlined in Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027], investigate previously identified sources and ensure that potential risks to receptors are fully understood and, where necessary, appropriately mitigated.</p> <p>Any contamination not identified through ground investigation will be addressed via a Discovery and Inspection Strategy, to be prepared prior to the construction phase which is secured via the Outline CEMP [REP1-096].</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>They request the Applicant to demonstrate a proactive approach to identifying and managing potential sources of contamination, with the use of a Discovery and Inspection Strategy to be employed for unexpected contamination where encountered outside such areas.</p> <p>Discussion of the proposed ground investigation in oCEMP Table 13 has no reference to the Conceptual Site Model. It does not clearly state an intention to target all previously identified potential sources of contamination. Further updates are required.</p> <p>The applicant has not proposed to update Section 1.9.2 of Appendix 3-2 Cable Route Construction Method Statement [APP-183] which is not in line with the Discovery and Inspection Strategy. Keeping this text unchanged may cause confusion and lead to inappropriate actions if contamination is identified in spoil.</p>	<p>Further to this, the ground investigation secured via Table 13 in the Outline CEMP [REP1-096] will be updated to align with the Conceptual Site Model presented in ES Volume 1, Chapter 19: Ground Conditions [REP1-027] at Deadline 2.</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
3.4.8	Impacts of piling	The Environment Agency is concerned the current piling proposals, to depths extending to a maximum depth of 12m below ground level, increase the risk for the introduction new contaminant migration pathways and/or between hydraulically separate groundwater bodies.	<p>The BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128] was submitted at Deadline 1 to provide further information relating to possible risks posed by interactions between planned foundations and sensitive groundwater.</p> <p>A full Piling Risk Assessment, in line with appropriate guidance on assessing risks from foundation design, is secured via the Outline Construction Environmental Management Plan [REP1-096] and will be supported by ground investigation to be undertaken prior to the construction phase.</p>	Under Discussion
3.4.9	Preliminary Risk Assessments	The Environment Agency states that the Contamination risks have not been adequality assessed and is concerned that there are no Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas, although these were provided at PEIR stage.	All assessments contained within Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027] and associated appendices will be reviewed and, where necessary, adjustments will be made to ensure that risks to receptors are appropriately assessed.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		The PRA concludes that subsurface migration of contamination within the Secondary A aquifer from the off-site vehicle repair garage lies outside the scope of assessment. It is the EA's position that the migration of contamination subsurface within the Secondary A aquifer should not be considered outside the scope of assessment.	All relevant areas of the order limits are assessed within the Preliminary Risk Assessments in Volume 3, Appendices 19-1 to 19-8 [APP247 – APP254] . Some rationalisation of study area boundaries was undertaken between PEIR and ES. Again, this will be reviewed to ensure that all relevant information is captured.	
3.4.10	RAF airfield at Hullavington	The Environment Agency notes that Appendix 19-5 Lime Down E Desk Study [APP-251] does not reference the former RAF airfield at Hullavington. Although this lies outside the 250m study area this is situated up topographic gradient from Lime Down E within the Proposed Development site and overlies the same Cornbrash Formation bedrock (Secondary A aquifer) which underlies that part of the site. Although unlikely, it cannot be fully discounted that mobile contamination associated with the airfield could be impacting the site.	As RAF Hullavington is outside of the study area for Volume 1: Chapter 19 Ground Conditions & Contamination [REP1-027] , it was not considered as part of the Preliminary Risk Assessments. However, given the points raised by the Environment Agency in consultation, it will be reconsidered in revision to Volume 3, Appendix 19-5 Lime Down E Desk Study [REP1-073] and associated assessments will be updated as necessary.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.4.11	Commitments Register Ground Conditions and Contamination	<p>The Environment Agency notes that the Applicant states “Where unexpected contamination is encountered, a hydrological risk assessment would be undertaken. If necessary, material would be removed in line with the Discovery and Inspection Strategy”, however it is not clear whether this is intended to refer to a hydrological risk assessment (i.e. relating to surface water) or a hydrogeological risk assessment (i.e. relating to groundwater). Removal may not be the best option for management of unexpected contamination.</p> <p>The Environment Agency notes that the Applicant states “Ground investigation would be deployed within the Cable Corridor Southwest to identify the presence of any unrecorded mine workings, shafts etc.”</p> <p>The Preliminary Risk Assessments recommend ground investigation in several locations across the Proposed Development area, not just the</p>	<p>The applicant notes that this is a spelling error and will be amended to “hydrogeological risk assessment”.</p> <p>Any contamination not identified through ground investigation will be addressed via a Discovery and Inspection Strategy, to be prepared prior to the construction phase which is secured via the Outline Construction Environmental Management Plan (CEMP) [REP1-096]. This will outline appropriate measures to deal with contamination encountered during the construction phase. These measures could include removal of impacted material or in situ or ex situ methods of remediation in order to retain material on site.</p> <p>Ground investigation is secured via Section 3 of Outline CEMP [REP1-096] and will be undertaken across the entire extent of the site.</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>proposed substations and Southern Cable Corridor. This commitment should be updated to reflect all proposed intrusive site characterisation.</p> <p>EA believe the commitment to the Ground Investigation in the oCEMP is too vague. The oCEMP does not confirm the GI “will be undertaken across the entire extent of the site”.</p>	<p>Further to this, the Outline CEMP [REP1-096] will be updated ahead of Deadline 2 to clarify that ground investigation will be undertaken across the full extent of the scheme prior to the start of the construction phase.</p>	
3.4.12	Soil infiltration testing	<p>The Applicant states that the upper geology present on the Proposed Development site is heavily weathered and cohesive. Ground conditions have not been verified through intrusive investigation and updates to the Preliminary Risk Assessments presented as supporting documentation. No infiltration testing has been carried out to date.</p> <p>The majority of the site overlies geological strata designated as Secondary A aquifer. The majority of which has groundwater Source</p>	<p>The Applicant agrees with the assertion that the geology and the water resource value of the area are important considerations. Pre-construction ground investigation has been secured via the Outline Construction Environmental Management Plan [REP1-096] to ensure that ground conditions are understood prior to the start of construction. In addition, the applicant has committed to undertaking Foundation Works Risk Assessment for BESS and substation structures. Where ground investigation indicates</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>Protection Zone status, either confined or unconfined.</p> <p>In the absence of confirmation from ground investigation on the site, the Applicant should take a precautionary approach regarding the likelihood of the presence of extensive weathered cohesive deposits. Throughout the anticipated extent of construction activities such as piling, foundation construction, trenching and HDD.</p>	<p>that trenching or HDD may interact with the geological strata designated as a Secondary A aquifer, additional risk assessment will be undertaken and if required, appropriate mitigation put in place.</p>	
3.4.13	Walkover surveys	<p>EA believe there is inconsistencies in the walkover surveys carried out.</p> <p>Lack of clarity about what surveys have been carried out, and which areas are covered. Visual and olfactory evidence of contamination and contamination sources may be missed.</p> <p>The Applicant should ensure that it is clear which areas have been subject to walkover survey and on which dates.</p>	<p>All sections of the study area have been covered by walkover surveys. The walkovers were carried out over a number of separate deployments due to constraints around access arrangements. Walkovers were carried out on 1 and 2 May, 28 May and 28 July 2025.</p> <p>The Applicant acknowledges that ES Volume 3, Appendix 19-6 Cable Corridor Northwest Desk Study [REP1-075] and ES Volume 3, Appendix 19-7 Cable Corridor Central Desk Study [REP1-075]</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			reference the incorrect section of the study area in the description of the site walkover. This is an error in the text and will be amended.	
3.4.14	Maps and data searches	EA believe that maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites (we previously raised this in our PEIR response). The PRA for Lime Down A (Annex 19-1), Lime Down B (Annex 19-2) and Lime Down E (Annex 19-5) do not clearly differentiate the PRA target Study Area boundary from the overall Study Area. The PRA study areas are also not clearly delineated in Table 2 for any of the PRA reports. The appended environmental setting reports state distances to 'offsite' features relative to the defined search polygon for that report. Therefore, applying those reports to a smaller land parcel makes it difficult to establish distances to on/offsite features relative to those land parcels unless they've	The Applicant acknowledges the change in boundaries and that this impacts the distances stated in Annexes to ES Volume 3, Appendix 19-1 Lime Down A Desk Study [REP1-065], Appendix 19-2 Lime Down B Desk Study [REP1-067] and Appendix 19-5 Lime Down Desk Study [REP1-073] . Distances referenced in the Appendices themselves have been updated to reflect the amended boundaries, therefore these can be relied upon in reviewing those documents.	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>been manually measured and updated by the Applicant in their PRA report.</p> <p>Any distances quoted in the report cannot be relied upon as they are not given in relation to the LD A and LD B site boundaries. This makes it difficult for us to cross check the conclusions of the report.</p> <p>Clearly identify the limits of each PRA Study Area and ensure that the PRA accurately represents the distances from the Study Area boundary to key features.</p>		
3.4.15	Discovery and Inspection Strategy	<p>The EA believe the PRA reports do not refer to the proposed Discovery and Inspection Strategy.</p> <p>Contamination may not be appropriately managed.</p> <p>Investigate potentially contaminated areas as identified in the Preliminary Risk Assessments, and follow the Discovery and Inspection Strategy</p>	<p>The Applicant notes that the Discovery and Inspection Strategy is referenced in both the Preliminary Risk Assessment and Recommendation sections of the desk study PRAs [REP1-065 to REP1-075]. It is also referenced in both ES Volume 1, Chapter 19: Ground Conditions [REP1-027] and in the Outline Construction Environmental Management Plan [REP1-096].</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		during all phases of the Proposed Development.		
3.4.16	Supporting information	<p>EA believe that a supporting information source is needed to prove risks from regulated activities are not likely to be acceptable with respect to the site development</p> <p>Potentially significant sources of contamination may be incorrectly discounted.</p> <p>Provide suitable justification for selecting the distances beyond which off-site contamination sources would not be significant.</p>	<p>The Applicant believes that the preliminary risk assessment has sufficiently considered off-site risks. There is no standard distance to which off-site risks should be assessed within the Environmental Impact Assessment process, but 250m is the minimum radius for Source Protection Zone 2 in The Environment Agency's approach to groundwater protection guidance document. In the absence of a defined radius for such assessments, this distance was adopted as a reasonably conservative approach. Migration of contaminants via groundwater pathways is the most likely to be present for off-site sources impacted the proposed scheme.</p> <p>In addition to this, there are no recent pollution incidents associated with these regulated activities. The most recent was from September 2005, approximately 170m to the east of Lime</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
			Down A, which resulted in no impacts to water and only minor impacts to soils. In the absence of any evidence of pollution associated with regulated activities, the Applicant feels the assessments made and the study boundaries are appropriately conservative.	
3.4.17	Use of poly fluoroalkyl substances (PFAS) based materials	<p>There is no clear confirmation that per- and poly fluoroalkyl substances (PFAS) based materials will not be present in above and below ground cabling.</p> <p>Potential for PFAS to be present associated with non-construction material aspects of the Proposed Development. Resulting in contamination.</p> <p>Address other aspects of the Proposed Development where the use of PFAS compounds may occur.</p>	Should any materials be used in the construction of the scheme that cannot be confirmed to be PFAS-free, this will be considered in both the Discovery & Inspection Strategies (as secured in the Outline CEMP [REP1-096]) applied to those phases and any investigations required during decommissioning, which will be applied according to “Best Available Technique” principles at the time of decommissioning, as per the Outline Decommissioning Strategy [APP-279] .	
3.4.18	Assessment results (groundwater abstractions)	The Environment Agency is concerned that the information on licenced groundwater abstractions relative to the Proposed Development does not	The Applicant notes the Environment Agency's comment regarding licensed groundwater abstractions. The Applicant will undertake a final	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>match their records and the impacts on groundwater abstractions within potential influencing distance of the site has not been appropriately assessed. They request the Applicant to reassess the presence of, and risks to, groundwater abstractions which may be impacted by the proposal.</p>	<p>reconciliation of licensed abstractions within an agreed study buffer of the Order Limits using the most recent Environment Agency abstraction licensing dataset and will provide a proportionate screening of abstractions within potential influence distance. The Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [REP1-106] was updated at Deadline 1 with this clarification.</p>	

3.6 Other Environmental Matters

Table 3-5: Other Environmental Matters

Reference	Sub-topic	EA Position	Applicants Position	Status
3.5.1	Outline Decommissioning Strategy	<p>The Environment Agency is concerned that the Applicant has given no clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan in 7.14 Outline Decommissioning Strategy [APP-279] and therefore management of environmental risks during the decommissioning phase may not be sufficient. They request the Applicant to confirm the development of a standalone Decommissioning Environmental Management Plan, or that the outline and detailed Decommissioning Strategies will set out and secure environmental risk management equivalent to those secured during the construction and operational phases in the oCEMP and oOEMP.</p> <p>EA believe APP-279 should still be updated to ensure consistency with oCEMP and oOEMP.</p>	<p>An Outline Decommissioning Strategy [REP1-100] has been prepared which secures the environmental mitigation for the decommissioning stage. The Outline Decommissioning Strategy [REP1-100] will be developed into a Detailed Decommissioning Strategy post consent as secured by Requirement 21 the Draft Development Consent Order [REP1-007].</p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
3.5.2	Outline Site Waste Management Plan	<p>The Environment Agency is concerned that the Outline Site Waste Management Plan [APP-281] does not include that waste will be assessed in accordance with Waste Technical Guidance WM3 which could lead to the potential misclassification/misdisposal of waste. They request the Applicant includes confirmation that an appropriate waste assessment will be carried out in accordance with WM3 before the waste leaves site.</p> <p>Rather than a reference to WM3, EA Believe it would be preferable to see additional detail and assurance that waste generated will be fully assessed and classified in accordance with WM3 technical guidance including sampling where appropriate. A sampling plan should be generated for each set of sampling taking place. The samples should be analysed at a UKAS accredited laboratory with a waste classification report completed by a suitably qualified person to determine the waste as hazardous or non-</p>	<p>The Outline Site Waste Management Plan [REP1-102] Paragraph 1.2.6 sets out duty of care and the requirement to provide an accurate description of the waste when it is transferred to another person. For clarity a reference to WM3 was added at Deadline 1 to section Outline Site Waste Management Plan [REP1-102].</p>	

Reference	Sub-topic	EA Position	Applicants Position	Status
		hazardous received before the waste leaves site.		
3.5.3	Outline Battery Safety Management Plan (oBSMP) – management of defective end-of-life batteries	<p>Outline protocols for the management of defective end-of-life batteries is provided in Section 4.3.18 and 4.3.19 of the outline Battery Safety Management Plan, which states that such batteries will be “placed in an approved protective container prior to being transported from the defective unit to a dedicated safe location for inspection by an authorised manufacturer’s representative”. The Environment Agency requests the Applicant to provide details of storage and management proposals for damaged, faulty and end-of-life batteries, including management of associated fire propagation and pollutant spill/leak controls.</p> <p>There is no specific mention of pollutant spill or leak controls. Risks to the environment should also be discussed. We note that the “approved protective container” may provide the necessary controls, but it isn’t explicitly clear. We are not clear who is</p>	<p>As outlined in the Outline Battery Safety Management Plan [REP1-110] <i>"a Battery Safety Management Plan (BSMP) will be implemented throughout the scheme to ensure the safe design, production, use, transportation, storage, and disposal of batteries. This approach will minimise risks associated with batteries while complying with relevant standards"</i>.</p> <p>An Outline BSMP [REP1-110] has been prepared as part of the Application which sets out the mitigation measures to be secured via Requirement 6 ('Battery Safety Management') of the Draft Development Consent Order [REP1-007]. The Outline BSMP [REP1-110] sets out under the 'End of life/disposal' heading from Paragraph 4.3.15 to Paragraph 4.3.18.</p> <p><i>"In the event of a defective battery module or cell being identified, the defective module shall be immediately</i></p>	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>expected to approve the suitability of any container used.</p> <p>The protocol outlined does not cover leakages or other pollutant release from battery modules or cells.</p>	<p><i>placed out of service and be electrically disconnected from the system. A specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors. Specific protocols for storage and removal will fully align with the supplier's maintenance, decommissioning, and warranty stipulations."</i></p> <p><i>Once a defective module is safely discharged or removed in accordance with the specific risk assessment, it shall be stored in an approved protective container suitable for the safe storage of BESS battery components prior to being transported from the defective unit to a dedicated safe location for inspection by an authorised manufacturer's representative.</i></p> <p><i>All components replaced during the defects notification and warranty period will be taken back and recycled"</i></p>	
3.5.4	Outline Battery Safety	The Environment Agency notes that section 4.1.30 of the oBSEMP [APP-	The Outline Battery Safety Management Plan [REP1-110]	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
	Management Plan (oBSMP) – fire safety	286] states that the battery system and transformers serving the BESS will be automatically electrically isolated upon detection of a fire within the BESS enclosure and requests the Applicant to confirm that manual isolation of these systems will also be available in such a situation should the automatic systems fail for any reason.	section 4.1.30 stipulates that isolation capability is both "remote and local" NFPA 855 and NFCC guidance specify that E-stop system capability must be automatic and manual. The Applicant confirms that "local" capability allows for manual isolation of systems and is required under NFPA, UL, and IEC standards for BESS and associated equipment.	
3.5.5	Outline Battery Safety Management Plan (oBSMP) – Emergency Response Plan	The Environment Agency requests the Applicant to ensure the Emergency Response Plan (ERP) to identify the importance of notifying downstream river/groundwater abstractors should impacts to surface water and/or groundwater occur, to ensure that EA incident response personnel are made aware of this as a priority. All relevant incident response parties should be made aware of the ERP and provided with immediate access to it.	The Applicant agrees and will update Outline Battery Safety Management Plan [REP1-110] to ensure the Emergency Response Plan drafted at detailed design when the BESS system is selected, explicitly includes priority notification and escalation where an incident could affect surface water or groundwater, including notification of the Environment Agency and, where applicable, downstream receptors such as abstractors. The Applicant will also confirm that relevant incident response parties will be made aware of the ERP and have immediate access to it.	Agreed

Reference	Sub-topic	EA Position	Applicants Position	Status
3.5.6	Commitments Register - Piling Risk Assessment	The Environment Agency request the Applicant to include the application of a Piling Risk Assessment in the Hydrology, Flood Risk and Drainage and Ground Conditions and Contamination section in relation to the foundation designs for the Solar PV Panels as these may introduce new migration pathways for surface and near surface contamination.	<p>The Applicant confirms that a risk-based approach to ground and groundwater protection is embedded within ES Chapter 11 Hydrology, Flood Risk and Drainage [REP1-017], ES Chapter 19 Ground Conditions and Contamination [REP1-027] and secured through the Outline Construction Environmental Management Plan [REP1-096] and Outline Soil Resource Management Plan [APP-550].</p> <p>In response to the Environment Agency's request, the Applicant confirms that a Piling Risk Assessment will be undertaken where required, in accordance with Environment Agency guidance, where foundation design has the potential to create pollutant migration pathways or interact with groundwater receptors. This will be secured through the detailed CEMP and final construction methodologies.</p>	Agreed
3.5.7	Commitments Register – Spill response plan	The Environment Agency notes that Appendix 3-2 Cable Route Construction Method Statement Section 1.8.2 identifies proposed	The Applicant confirms that these matters are addressed through the existing mitigation framework secured via ES Chapter 11 Hydrology, Flood	Under Discussion

Reference	Sub-topic	EA Position	Applicants Position	Status
		<p>products to be used as drilling fluids, which the Safety Data Sheets indicate can pose a hazard to the water environment. The commitment should confirm that the risks posed by drilling fluids will be assessed and managed in the trenchless drilling management plans.</p> <p>They request the Applicant to provide a spill response plan in the detailed CEMP to manage spillage containment and cleanup at surface outside the context of fluid breakout during drilling activities. This should also reference the preparation of a Water Features Survey and Hydrogeological Risk Assessment at proposed surface water crossings and beneath Groundwater Dependent Terrestrial Ecosystems, and for Hydrogeological Risk Assessment where HDD or other trenchless methods are anticipated to be in contact with groundwater within Primary or Secondary A aquifers.</p>	<p>Risk and Drainage [REP1-017], the Outline Construction Environmental Management Plan [REP1-096] and the Cable Route Construction Method Statement (Appendix 3-2) [REP1-037].</p> <p>In response to the Environment Agency's request, the Applicant confirms the following:</p> <ul style="list-style-type: none"> • Trenchless crossing management plans, including HDD method statements, will include assessment and management of drilling fluid risks, including identification of sensitive receptors, control measures, monitoring and contingency procedures. • A site-wide Spill Response Plan will be secured through the detailed CEMP, covering all construction activities and including procedures for storage, handling, containment and clean-up of potential spills, not limited to HDD breakout scenarios. • Water Features Surveys and Hydrogeological Risk Assessments will be undertaken where required, 	

Reference	Sub-topic	EA Position	Applicants Position	Status
			<p>including at surface water crossings, beneath Groundwater Dependent Terrestrial Ecosystems, and where trenchless techniques may interact with groundwater within Principal or Secondary A aquifers.</p> <p>These measures reflect a proportionate, risk-based approach consistent with Environment Agency guidance and established construction best practice.</p>	