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Examining Authority
Sent via email:
limedown@planninginspectorate.gov.uk

Our ref: OR-0005267/01
Your ref: EN010168
Interested Party ref: [REDACTED]
Date: 15 June 2026

Dear Examining Authority,

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

Environment Agency Examination Deadline 3 Response: Comments on documents submitted at Deadline 2 and Examining Authority’s First Written Questions

This letter constitutes the Environment Agency’s Deadline 3 Response to the above mentioned DCO application.

Our responses to the Examining Authority’s First Written Questions are in Appendix 1. Our updated comments and position on the issues raised in our Relevant Representation/ Written Representation responses following review of the submissions is presented in Appendix 2.

I trust this information is of use.

Yours faithfully,

[REDACTED]
[REDACTED]
National Infrastructure Team
Email: NITeam@environment-agency.gov.uk

Appendix 1: Responses to Examining Authority's First Written Questions

ExQ1	Question to:	Question:	Environment Agency Response
CA1.21	Statutory Undertakers	<p>Planning Act 2008</p> <p>If you have not already done so in a relevant representation (RR) or written representation (WR) to date, please set out your position with regards to the tests under s127 and s138 of the Planning Act 2008, as applicable to your respective interests.</p>	<p>We have now agreed in principle to the applicant's request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule and subject to the inclusion of our standard protective provisions in the Development Consent Order.</p> <p>We note there are some amendments to our standard protective provisions in the draft Development Consent Order REP1-008 EN010168-001285-3.1 Draft Development Consent Order (Rev 2) Tracked.pdf</p> <p>Our standard protective provisions have been robustly reviewed and they are fit for purpose. Therefore, we do not agree to the proposed changes.</p>

ExQ1	Question to:	Question:	Environment Agency Response
EB1.2	The Applicant Natural England The Environment Agency	<p>Mitigation Hierarchy – CRC</p> <p>ES Chapter 9 [REP1-015] sets out the approach to survey work undertaken in the CRC. The role of the Ecological Clerk of Works (ECoW) is set out in the outline Ecological Protection and Mitigation Strategy (oEPMS) [REP1-106] in terms of construction of both solar PV sites and the CRC.</p> <p>Given the lack of survey work it is not clear what options would be available to the ECoW to re-route the cable route to avoid protected habitats and species.</p> <p><u>The applicant:</u></p> <p>You are asked to set out how, without specific species and habitat surveys, the construction of the cable route would follow the mitigation hierarchy at set out in NPS EN-1. Specifically, you are asked to demonstrate how the cable route would avoid sensitive habitats and species, as opposed to just mitigate any harms.</p> <p><u>Natural England and the Environment Agency:</u></p> <p>Do either of you have any comment to make on the applicant's approach.</p>	<p>We have reviewed ES Chapter 9 and the approach outlined by the applicant, with regards to the species and habitats surveyed within the Cable Route Corridor (CRC) within our remit.</p> <p>The applicant appears to have extrapolated the results from the otter and water vole solar PV sites surveys across the CRC “on account of the similarity of ditch and watercourse networks across the local landscape”. The applicant states they have conducted spot checks on watercourses within the CRC to check for field signs of both species.</p> <p>It would be beneficial if the applicant could clarify if the spot check surveys followed standard survey protocol, as outlined by Chartered Institute of Ecology and Environmental Management (CIEEM) and best practice guidelines. This is essential to sufficiently investigate the presence/absence of otters and water voles at the planned watercourse crossings within the CRC, and determine the need for mitigation (e.g. European Protected Species licence).</p> <p>The applicant has conducted an Extended UK Habitat Classification survey and a Modular River Physical (MoRPh) survey of the watercourses within the CRC, which is standard practice to determine the type and condition of watercourses present. Therefore, the applicant had conducted appropriate habitat surveys on watercourse and ditch habitat within the CRC.</p>

<p>FHW 1.4</p>	<p>The Environment Agency The Applicant</p>	<p>Flood Risk Assessment – Flood Zone 3b and Floodplain Impacts. The LLFA considers in Wiltshire Council’s LIR [REP1-137] that Flood Zone 3b needs to be defined for effective planning, design and operation of site. The applicant explains in its D2 submission [REP2-045] and response to the LIR [REP2-038] that detailed hydraulic modelling for the Gauze Brook and the Unnamed river has been undertaken at Lime Down D, and that at Lime Down E2 further hydraulic modelling is being progressed in relation to Gabriel’s Well to define local flood behaviour, including Flood Zone 3b where relevant. We understand that the details of the modelling are currently with the Environment Agency (EA) for review. <u>The Environment Agency:</u> 1) The EA is asked to explain if there are any concerns regarding the parameters and outputs of the modelling done so far and the modelling being progressed by</p>	<p>Lime Down D Modelling We have undertaken a detailed review of the applicant’s hydraulic modelling of the Gauze Brook which passes through the Lime Down D site. We have raised the following comments on the hydraulic modelling for Lime Down D. Firstly, the applicant should simulate the 3.3% (1 in 30) annual exceedance probability (AEP) scenario event (also referred to as the 1 in 30-year event). This is for the purposes of helping to better define the extent of the functional floodplain (Flood Zone 3b) along the Gauze Brook. Secondly, we have asked the applicant to provide more detail on how the design flood flows which are applied to the hydraulic model have been calculated. There is limited detail within the model report as it stands, and we have requested further information so that we can check the flows to ensure that they are of the right magnitude and have been derived using appropriate methods and data. Finally, we have raised two specific technical points on the model build itself with regards to riverbank elevation representation in the model and the representation of South Wales Main Line culvert. In both cases there are some discrepancies or areas of uncertainty where we have asked the applicant to provide further details and information so that we can have confidence in the model representation. Our understanding is that the applicant is currently in the process of addressing our comments and we expect to see an updated hydraulic model and associated reporting in due course. We will review this to check if our comments have been addressed.</p>
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ExQ1	Question to:	Question:	Environment Agency Response
		<p>the applicant for Lime Down D and E2.</p> <p>2) The EA is asked to explain if the information submitted by SLD, specifically in document [REP1-176] could support an extension to Flood Zone 3b in Lime Down D and if so, to which fields.</p> <p><u>The Applicant:</u></p> <p>3) The applicant is asked to confirm the freeboard allowances requested by the EA in their document [REP2-049]</p>	<p>Lime Down E2 Modelling</p> <p>With respect to Lime Down E2, we have yet to receive the modelling for this site. We understand the applicant will be sending this to us for review shortly. We will review the modelling and provide comment on its suitability in due course.</p> <p>Sites A, B, C, and E1</p> <p>More widely, sites A, B, C, and E1 are almost entirely within Flood Zone 1. The Flood Map for Planning generally only covers watercourses with a catchment area of greater than three square kilometres. There are several smaller Ordinary Watercourses and drainage ditches which cross these sites which have no associated Flood Zone mapping due to the small size of their respective catchments.</p> <p>In these locations, the applicant has used the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping as a proxy for fluvial flood risk. This mapping is derived from direct rainfall hydraulic modelling combined with Light Detection and Ranging (LiDAR) digital terrain model data.</p> <p>Where the RoFSW mapping has been used in this way we have asked the applicant to undertake checks to ensure that this dataset is representative or conservative in the context of fluvial flood risk and informing the design flood level for the development. The applicant has used the Manning's equation to explore how water levels within the smaller Ordinary Watercourses might respond to increasing flows</p>

ExQ1	Question to:	Question:	Environment Agency Response
			<p>and has placed this in context with water levels estimated from the RoFSW data.</p> <p>The application of the Manning’s equation in this context has some limitations. Firstly, the cross sections have been derived from Lidar data rather than channel survey. Lidar tends to underestimate channel depth. Additionally, the Mannings equation assumes a depth averaged and spatially uniform velocity across the cross section, which is unlikely to be the case, particularly in the context of floodplain flow. The Mannings calculation does provide some useful information particularly regarding the relative change in water levels with increasing flow which can be useful when trying to understand the risk to solar PV infrastructure.</p> <p>This analysis indicates that water levels within these smaller Ordinary Watercourses are relatively insensitive to increases in flow. On this basis, the use of RoFSW mapping is considered to provide a reasonable proxy for understanding the fluvial flood risk to the proposed development from these smaller Ordinary Watercourses which are not covered by the Flood Map for Planning.</p> <p>In terms of any loss of floodplain storage from the development, the applicant has provided sufficient evidence to demonstrate that this would be negligible in the context of the Gauze Brook and Gabriels Well/ Robbourn Brook and hence has not undertaken “with development” hydraulic modelling for the purposes of quantifying the impact from a loss of floodplain storage.</p>

ExQ1	Question to:	Question:	Environment Agency Response
			<p>We have asked the applicant to commit to a freeboard of +600mm above the design flood level for solar panels within any area of flood risk and we are waiting for the applicant to confirm that this will be undertaken. Additionally, we note there is some uncertainty in the placement of the sub-station within Lime Down C. If it is not possible to place this sub-station outside of the area of flood risk shown by the RoFSW mapping, we have asked that appropriate compensatory storage is provided. Our position on these matters is reflected in our comments in Appendix Two.</p> <p>With regards to the impact of the development on surface water runoff, in the context of flood risk we would defer to the view of the Lead Local Flood Authority as to whether the proposed technical assessment and mitigation is appropriate. We note that attenuation storage and controlled discharge is proposed for areas of hardstanding, such as the Battery Energy Storage System (BESS). In terms of the solar PV panel areas, we note that the applicant is proposing vegetation cover below the panel areas and will ensure small gaps between each panel to allow water to drip onto the ground below. For any new development we would expect runoff to be limited to greenfield runoff rates such that flood risk elsewhere is not increased.</p> <p>Flood Zone 3b</p> <p>Flood Zone 3b is determined by the Local planning authority. The Planning Practice Guidance states when determining the extent of FZ3b local planning authorities should use the</p>

ExQ1	Question to:	Question:	Environment Agency Response
			<p>3.33% Annual Exceedance Probability (AEP) extent to determine the extent of flood zone 3b. In addition to the 3.33% AEP extent, local planning authorities are advised to include land that designed to flood up to the 0.1% AEP, such as flood alleviation schemes. Local planning authorities would not usually take recorded historic flood events into consideration when determining flood zone 3b as the output from hydraulic modelling is the main driver for determination. The evidence presented within the SLD report may be taken into consideration by the local planning authority determining if this is reported as a flood event and it can be determined that all flooding occurred from a fluvial source. However, this information needs to be submitted to the local planning authority and then it is up to them to determine if they need to alter the extent of Flood Zone 3b. Furthermore, the applicant is currently undertaking hydraulic modelling for both the Gauze Brook and Rodbourne Brook which includes the 3.33% AEP scenario and will be the best available modelling for the determination of Flood Zone 3b.</p>

<p>FHW 1.5</p>	<p>The LLFA The Environment Agency The Applicant</p>	<p>Flood Risk Assessment – Manning Calculations Results Figure 1 (page 10) of SLD’s representation [REP1-174] shows the flows calculated using Manning’s open channel flow formula. It is in section ‘Fluvial Flooding’ which discusses in detail the information submitted in the flood risk assessments submitted by the applicant.</p> <p><u>All Parties:</u></p> <p>1) The LLFA, the EA and the applicant are asked to submit a response to the analysis done by SLD and its conclusions. In your response, please set out the implications for the interaction with surface water flood risk and the potential impact to on site and off site flood risk.</p> <p><u>The Applicant:</u></p> <p>2) Paragraph 25 of the SLD representation refers to inconsistencies/mistakes between references to the 0.1% Annual Exceedance Probability (AEP) and the 1% AEP events in the flood risk assessments. The applicant is asked to review, confirm and address</p>	<p>The analysis submitted by SLD with respect to the applicant’s calculated flows based on the Mannings equation is correct in that the calculated flows are large at some of the cross-sections and unrealistic when placed in the context of catchment area and recorded flows on the River Avon at Fosse Way and Great Somerford, and on the Gauze Brook at Rodbourne for Storm Bert in 2024. As an example, the catchment where the flow calculation of 154.2m³/s is shown for cross section C1-2 within Lime Down C1 has an area of 3.91km² based on the Flood Estimation Handbook (FEH) webservice (catchment outlet grid reference: 387200,183950). The true peak 0.1% (1 in 1000) annual exceedance probability flow could be potentially an order of magnitude or more lower than 154.2m³/s based off catchment area.</p> <p>Many of the smaller Ordinary Watercourses which cross the site have no associated Flood Zone mapping given their catchment area is less than three square kilometres, which was the lower limit for catchment area used in the New National Modelling (NNM) used to define the Flood Zones within the Order Limits for Lime Down Solar Park. Given the evidence gap in flood risk information for some of the smaller Ordinary Watercourses the applicant proposed to use the Risk of Flooding from Surface Water (RoFSW) mapping as a proxy for fluvial flood risk. We asked the applicant to undertake some checks to place the RoFSW outputs in context with respect to fluvial flood risk and provide supporting evidence that the RoFSW was reasonable (or conservative) in terms of informing the fluvial design flood for</p>
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ExQ1	Question to:	Question:	Environment Agency Response
		<p>any inconsistencies in the flood risk assessments.</p>	<p>the development in the absence of Flood Zones or more detailed hydraulic modelling.</p> <p>Whilst the Mannings analysis does have its limitations as described in our response to question FHW1.4 above, it does help to contextualise how the 0.1% (1 in 1000) annual exceedance probability extent from the RoFSW mapping compares against water levels derived at cross sections along with the associated flow and additionally how sensitive water levels are to increasing flows.</p> <p>Our view is that whilst the assessment does have its limitations and associated uncertainties, in terms of informing fluvial flood risk to the site, the use of the RoFSW dataset is proportionate for the smaller Ordinary Watercourses and drainage ditches. Noting that only small portions of solar panel areas encroach into the RoFSW extents. In terms of accounting for uncertainty within both the detailed hydraulic model results and any proxy datasets used to inform flood risk such as the RoFSW mapping, we have asked that the applicant makes a commitment to ensure 600mm (0.6 metres) of freeboard is included above the design flood level for any solar PV panels placed in areas of flood risk. This should help to ensure the development remains operational during times of flood and that flows are not deflected because of inundated panels. We are waiting for the applicant to confirm that they will commit to this.</p> <p>We note that the applicant is proposing to sequentially locate any built infrastructure such as the Battery Energy Storage System (BESS) and substations outside of areas of flood risk</p>

ExQ1	Question to:	Question:	Environment Agency Response
			<p>where possible. We have asked the applicant that where this is not possible that appropriate compensatory flood storage is provided to ensure no loss of floodplain storage and deflection of flood flow routes (for example in the context of the substation within Lime Down C1). Our position on these matters is reflected in our comments in Appendix Two.</p> <p>With regards to offsite flood risk, the Mannings assessment undertaken by the applicant was more of a comparator to help us better understand whether the use of the RoFSW mapping was a suitable proxy for fluvial flood risk and to help understand the sensitivity of water levels to increasing flow. It is not a suitable method for establishing the impacts of the site on flood risk elsewhere, particularly in the context of surface water runoff and drainage from hard standing areas of the development and the solar PV panels themselves.</p> <p>From a flood risk perspective, we would defer to the Lead Local Flood Authority's position with regards to the assessment of surface water runoff and the management of surface water runoff from the built aspects of the development. We would expect that any formalised Sustainable Drainage System features are located outside of areas of fluvial flood risk to ensure there is no fluvial-surface water interaction. Additionally, we would expect that runoff is limited to greenfield rates such that flow contributions to watercourses are not increased over existing conditions. In terms of managing runoff from the solar PV panel areas, we note the applicant is proposing vegetation cover, gaps</p>

ExQ1	Question to:	Question:	Environment Agency Response
			between the panels, and management methods to ensure runoff is not increased.

ExQ1	Question to:	Question:	Environment Agency Response
FHW 1.6	The LLFA The Environment Agency	<p>Flood Risk Assessment – Cable Route Corridor</p> <p>SLD notes in its submission at D2 [REP2-051] that the main risks regarding disruption to existing small scale drainage and potential disturbances to groundwater flow paths are not addressed. Considering this and the information included in the outline management plans, the LLFA and EA are asked to confirm if they think these issues are sufficiently addressed and if not, explain why not and where it should be addressed.</p>	<p>The Environment Agency would defer to the Lead Local Flood Authority (LLFA) to give formal assessment of the possibility of groundwater flooding, and the impact the proposed development may have on this. However, through assessing the possible risk of pollution of groundwater and implementing sufficient mitigation the applicant has proposed to undertake pre-construction ground investigations to identify the presence of shallow groundwater. This will help identify the risk of groundwater flooding during the construction phase where the biggest risk may lie.</p>

ExQ1	Question to:	Question:	Environment Agency Response
FHW 1.10	The LLFA The Environment Agency	<p>Operation – Surface Water Run-off Discharge to Watercourses</p> <p>The applicant explains in the outline drainage strategies [APP-210 to APP-218] that surface water would be generally discharged into SUDS and local drainage features which would eventually discharge into local watercourses and main rivers.</p> <p>Given that quantification of the surface water run-off volumes to be discharged is not available at this point, the LLFA and the EA are asked to provide information regarding the ability of the receiving watercourses to receive these discharges without increasing flood risk in the wider catchment.</p>	<p>From a flood risk perspective, we would defer to the Lead Local Flood Authority's position with respect to surface water runoff and the management of surface water runoff from the built aspects of the development. Currently the applicant has proposed that if discharge to watercourses became necessary all formal drainage would discharge at the greenfield runoff rate. This is the rate we would expect all new development to discharge at to ensure there is not increased runoff to watercourses.</p>

ExQ1	Question to:	Question:	Environment Agency Response
RWM 1.3	The Applicant The Environment Agency All Local Authorities	<p>Waste</p> <p>Can each party provide commentary on the proposed development's compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013?</p>	<p>Reference is made in REP2-022 7.13 Outline Operational Environmental Management Plan that the company will follow the WEEE regulations regarding disposal of waste electrical and electronic equipment produced.</p> <p>The applicant should follow the guidance on Gov.uk and adhere to the Regulations: Waste Electrical and Electronic Equipment (WEEE) - GOV.UK and ensure suppliers and disposal routes for electronic and electrical equipment are compliant.</p>

Appendix 2: Environment Agency (EA) position on issues raised in our Relevant Representation/ Written Representation responses following Deadline 2 submissions

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
EA001- EA-011s summaris e the issues below	See below	See below	NA
EA-012	REP1-008 3.1 Draft Developmen t Consent Order (Rev 2)	Disapplying Flood Risk Activity Permits	<p>Under Discussion</p> <p>We have now agreed in principle to the applicant’s request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule and subject to the inclusion of our standard protective provisions in the Development Consent Order.</p> <p>We note there are some amendments to our standard protective provisions in the draft Development Consent Order REP1-008 EN010168-001285-3.1 Draft Development Consent Order (Rev 2) Tracked.pdf</p> <p>Our standard protective provisions have been robustly reviewed and they are fit for purpose. Therefore, we do not agree to the proposed changes.</p>
EA-013	REP1-008 3.1 Draft Developmen t Consent Order (Rev 2)	Requirement 13 Construction environment al management	<p>Under Discussion- document has not been updated to include the Environment Agency as a consultee.</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
		plan (CEMP)	
EA-014	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 14 Operational environmental management plan (OEMP)	Under Discussion - document has not been updated to include the Environment Agency as a consultee.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed - As per Deadline 2 response.
EA-016	Fisheries	Fish species protection	Agreed - As per Deadline 2 response.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed - As per Deadline 2 response.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	Agreed - As per Deadline 2 response.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	Agree - As per Deadline 2 response.
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	Agree - As per Deadline 2 response.
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	Under Discussion We note the differences in watercourse buffers but would prefer to see at least a 10 metre buffer. There is a discrepancy in watercourse buffer distances where staff are to wash plant

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>and vehicles as a biosecurity measures. Table 5 (oCEMP) states the minimum buffer is 10m whereas Section 15.3.1 (Outline Ecological Protection and Mitigation Strategy REP1-106) states the minimum buffer is 15m.</p> <p>There is inconsistency in REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) Table 11-2 says “Following consultation with the Environment Agency, a precautionary 10 m stand-off will be applied”, however section 11.9.2 on page 42 still says “Eight metre buffers from infrastructure will be established around watercourses”.</p> <p>Additionally, APP-283 Outline Landscape and Ecological Management Plan (OLEMP) has not been updated.</p>
EA-022	Water Framework Directive	Groundwater Bodies	<p>Under Discussion Resolved in principle. The Applicant has noted our 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. We await this update.</p>
EA-023	Groundwater and Contaminated Land	Piling	<p>Under Discussion Resolved in principle. 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. Additionally, a full Piling Risk Assessment, in line with appropriate guidance on assessing risks from foundation design, is secured via the</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>Outline Construction Environmental Management Plan [REP1-096] and will be supported by ground investigation to be undertaken prior to the construction phase.</p> <p>We have reviewed the BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128] and it satisfies our previous concerns. However, the reference EN010168/EXAM/9.X still remains in the 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) (Tracked) [REP1-028]. This should be updated to correctly signpost to the BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128].</p>
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	<p>Under Discussion</p> <p>The Applicant has stated that 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. 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 Construction Environmental Management Plan (oCEMP) [REP1-096].</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			In the updated oCEMP [REP2-020] the applicant commits to produce a piling risk assessment (Table 5) or foundation works risk assessment (Table 13), but these are only proposed for the substation and not the BESS. This requires updating before we can resolve this issue.
EA-025	Groundwater and Contaminated Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	Agree- as per Deadline 2 response.
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	Agree- as per Deadline 2 response.
EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	<p>Under Discussion</p> <p>Our previous comments remain valid as the required updates to Chapter 11, Appendix 11-10 and Chapter 19 have not been made. Previous comments copied below.</p> <p>Chapter 11 Table 11-1 ID 3.5.4 has not been updated. Chapter 11 Section 11.10, Appendix 11-1 and Chapter 19, which are referenced in ID 3.5.4, do not appear to have been updated with any relevant information. Discussion of requirements around dewatering in the oCEMP have not been updated. However, ground investigation works are committed to in the REP1-</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>097 7.12 Outline Construction Environmental Management Plan (Rev 2). Completion of this, and subsequent detailed assessment of conditions, should be sufficient to resolve the issue. For completeness, we would like to see relevant chapters or supporting documents updated as relevant with additional information.</p>
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	<p>Agree- as per Deadline 2 response.</p>
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	<p>Under Discussion Resolved in principle. Previous comment remains valid.</p> <p>The Applicant has stated that 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) (Clean) [REP1-106] was updated at Deadline 1 with a clarification concerning licensed groundwater abstractions. We believe this is an incorrect reference and it should be 6.3 Environmental Statement Volume 3, Appendix 19-10 Private Water Supply Correspondence with Wiltshire Council [APP-256]. This has not been updated.</p>
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	<p>Under Discussion No additional information has been submitted – previous comments remain valid.</p> <p>The applicant has confirmed in REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) Table 19-6, that “Cables will be selected in order to minimise thermal loss considering</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			available guidance from the EA.” In February 2026 we sent additional guidance on thermal impacts to the applicant as requested. This set out our expected approach to considering thermal impacts, including conditions for when further desk-based assessment will be required. The applicant does not appear to have referenced or otherwise considered this guidance. The applicant has not provided commentary on whether all conditions can be discounted, and, if not, the outcomes of the assessment. The proposed mitigation is too vague to give us reassurance that thermal impacts on groundwater receptors has been appropriately mitigated.
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	Agree- as per Deadline 2 response.
EA-032	Groundwater and Contaminated Land	Ground conditions	Agree In Principle (subject to changes to the draft Development Consent Order see EA-013) Pre-construction ground investigation will be secured via the Construction Environmental Management Plan on which we will be consultees. We recommend that a period of groundwater monitoring, in accordance with relevant British Standard guidance for site investigations, is included as part of the ground investigation.
EA-033	Groundwater	Discovery	Agree- as per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	and Contaminated Land	and Inspection Strategy	
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	<p>Under Discussion Resolved in principle. The applicant has noted our comments and agreed to make the required updates to the documents. We believe that the following documents require updating; Appendix 19-1 [REP1-065], 19-4 [REP1-071], 19-6 [REP1-075]. & 19-7 [REP1-077]. Previous comments included below as they remain useful. We note some changes made to the relevant documents, but some inconsistencies remain. For example, in Table 4 of both Appendix 19-1 and Appendix 19-4, it still states that a site walkover was carried out by Delta Simons on 31 January 2024. However, Section 1.2.16 of both appendices states that “A site walkover of Lime Down A was carried out between 1st and 2nd May 2025.” We acknowledge that there may have been multiple site walkovers, but this is not explained in the text or PDA-009 EA-034. This is a minor issue, and we do not expect it to affect the outcomes of the assessments, but it remains unresolved.</p>
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	<p>Under Discussion Partially resolved. Table 13 of the Outline Operational Environmental Management Plan [REP2-021] has been updated to include reference to a discovery and inspection strategy. REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) Paragraph 19.11.12 and REP1-115 7.26 Commitments Register (Rev 2), has not been updated as requested to</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			include reference to a discovery and inspection strategy during the operational phase.
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	<p>Under Discussion</p> <p>We have noted confirmation in REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) and the REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) that a ground investigation will be completed.</p> <p>However, an outline scope and limitations of this in the submitted documents is still not clearly set out. We note the clarification of the scope in PDA-009 EA-036. This appears acceptable in principle, and we will resolve this issue. However, the applicant should be aware that if we are not satisfied with the scope, methodology and interpretation of the investigation results, we may request further works pre-commencement before we can agree that risks to controlled waters have been adequately assessed and mitigation is appropriate.</p>
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not been provided.	Agree - as per Deadline 2 response.
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been	<p>Agree</p> <p>Resolved. The Applicant has updated the Outline CEMP [REP1-096] and Commitments Register [REP1 114] to include environmental controls for trenchless techniques.</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
		adequately addressed.	
EA-039	Groundwater and Contaminate d Land	No Preliminary Risk Assessment s (PRAs) for the interconnecti ng corridors between the main solar panel areas.	Under Discussion Resolved in principle. The Applicant has acknowledged that Chapter 19 Appendices require review and updates. We understand that there was some rationalisation of study area boundaries between PEIR and ES which will be reviewed to ensure that all relevant information is captured.
EA-040	Groundwater and Contaminate d Land	Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	Under Discussion Resolved in principle. The Applicant has updated the 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]. This matter was also discussed at a meeting with the applicant on 2 nd June 2026. They explained that the map searches cover the whole revised proposed Order Limits. For completeness we require the explanation provided in the meeting to be documented within the affected Appendices (19-1, 19-2 and 19-5).
EA-041	Groundwater and Contaminate d Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.
EA-042	Groundwater and Contaminate d Land	PRA- off-site vehicle repair garage	Agree As per Deadline 2 response.
EA-043	Groundwater	Unclear	Agree

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	and Contaminate d Land	whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development	As per Deadline 2 response.
EA-044	Groundwater and Contaminate d Land	Justification for selecting the distances beyond which off site contaminatio n sources would not be significant.	Agree As per Deadline 2 response.
EA-045	Groundwater and Contaminate d Land	Monks Park Mine	Under Discussion We note that the Applicant has stated that no Horizontal Directional Drilling (HDD) is planned in the vicinity of Monks Park Mine. Our previous comments also related to the potential stabilisation of the mine, which would require an assessment of risks to controlled waters which has not been addressed. We requested an update to Chapter 19 and Appendix 19-8 to address this issue. Previous comments for information We have reviewed the REP1-130 9.14 Cable Route Corridor Mining Risk- Technical Memorandum We note in section 6.2.4 there is a commitment to obtain geoenvironmental samples to be analysed for a range of

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>relevant contaminants of potential concern. We support this proposal. Other discussion of contamination or the potential risk to controlled waters is not addressed, and we have identified no relevant updates to Chapter 19 or Appendix 19-8 which specifically address this issue. The potential for treatment and ground stabilisation of mine workings is discussed as Section 7. If mine workings requiring stabilisation are flooded and mine water is not pumped dry, the introduction of stabilisation materials could be construed as discharge direct to groundwater for which there would be need for risk assessment. This may need a permit. Many cement-based grouts contain PFA, and some may be prohibited. If displacing groundwater in tunnels, grout may have high barium content. Any pumping may require a permit for abstraction and discharge after treatment. Pumping may also cause localised subsidence in some cases.</p>
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	<p>Under Discussion</p> <p>The Applicant has stated that they 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.</p> <p>We had previously requested that oOEMP requires updating which has not been actioned. Previous comments copied for information.</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>We have reviewed the REP1-125 Firewater Containment and Drainage Strategy – Lime Down Substation (Revision 1, dated May 2026, Document Reference: EXAM/9.9), and this has provided some clarity. Many elements will need to be agreed during detailed design in due course. In paragraph 2.4.4 it states “[the oOEMP] confirms that retained firewater will be subject to inspection, testing and controlled disposal.” We have not identified this information in the oOEMP, so this is not resolved.</p> <p>The fate of retained water is discussed in paragraph 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the applicant proposes to release captured water to the environment, a relevant discharge permit should be obtained from the Environment Agency. It can take approximately 4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time.</p>
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration of the need for sealed drainage.	Agree As per Deadline 2 response.
EA-048	Groundwater	Table 4:	Under Discussion

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	and Contaminate d Land	SuDS Mitigation Indices is blank.	Resolved in principle. The Applicant has noted our previous comment and will update Table 4 in ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP1-047].
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Under Discussion No further information has been submitted. Previous comments below. It appears some of the solar PV panel supports are within areas of functional floodplain within Lime Down D and Lime Down E2. In revision 2 (May 2026) of the updated Flood Risk Assessment and Drainage Strategy the applicant describes how the panelled areas are not expected to give rise to a material loss of floodplain storage or material obstruction of flood flow routes. This seems reasonable based on the volumetric calculations and associated level estimates provided for Lime Down D and Lime Down E2. We note that the applicant has undertaken further modelling for Lime Down E2 and will delineate Flood Zone 3b based on this modelling. We await this information before taking a final view on this matter.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Under Discussion No further information has been submitted. Previous comments below. No further information has been submitted. Previous comments below. Section 2.3.15 page 17 within the updated REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) notes that any fencing within areas of flood interaction will be permeable to both water and debris passage and will

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			not impede flood flow routes. This is welcomed although we would ask that more specificity is provided. Please can the applicant provide details on the type of fencing that will be used in terms of mesh spacing and how blockage risk will be managed. Mesh spacing should be as wide as possible to reduce blockage risk. There should be a commitment within the Operational Environmental Management Plan to ensure any debris is removed from fencing following floods.
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	Under Discussion No further information has been submitted. Previous comments below. The applicant needs to undertake additional assessment of the impact the construction phase may have on the floodplain capacity and flow routes. Additionally, additional mitigation commitments may needed. For example, there should be no storing of materials and/or construction compounds within flood zone 3b and where practicable outside of the 1 in 100 year extent.
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Under Discussion No further information has been submitted. Previous comments below. Within the updated Flood Risk Assessment and Drainage Strategy REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) and REP1-052 6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2)(May 2026) paragraph 2.3.8 notes that electrical infrastructure including inverter, transformers, and substation, will either be located outside of modelled flood

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>extents or raised above a minimum freeboard of 0.6 metres above the design flood level. This is welcomed, however, there doesn't appear to be a value assigned to the freeboard applied above the design flood level for the solar PV panels. For Lime Down E, paragraph 2.3.13 states that these will be above the design flood level with an appropriate freeboard allowance. Paragraph 2.3.13 within the Flood Risk Assessment for Lime Down D/BESS states that for both fixed and tracker panels all sensitive electrical equipment mounted on the Solar PV Panels will be elevated so that there is not less than 0.6 metres of freeboard above the design flood level. For clarity, the applicant should confirm what the freeboard will be to the lowest leading edge of the respective solar panels. The applicant should make a commitment to ensure there is a 0.6 metre freeboard above the design flood level for the solar panels themselves. If a freeboard of less than 0.6 metres is being adopted for the Solar PV panels, then the applicant should provide clear justification as to why this is reasonable and clarify what the minimum freeboard will be.</p>
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	<p>Under Discussion The applicant has now provided the model files and we have submitted our comments to them. The applicant has indicated they will be submitted to the Examining Authority at Deadline 3.</p>
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area	<p>Agreed. As per Deadline 2 response.</p>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
		of 275,000m2 has been derived.	
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	Under Discussion No further information has been submitted. Previous comments below. Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and have sent our comments to the applicant. This will help us to form a view on flood flow conveyance impacts
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of 175,580m2 has been derived.	Agreed As per Deadline 2 response.
EA-057	Flood Risk Assessment	Impacts of the solar panel	Under Discussion No further information has been submitted. Previous comments below.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
		support frames on flood flow conveyance is not discussed. Lime Down E2	Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and have sent our comments to the applicant. This will help us to form a view on flood flow conveyance impacts
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Agreed As per Deadline 2 response.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	Under Discussion We note the amendment to the Outline CEMP [REP2-019] to include reference to the discovery strategy and updates to

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>Table 13 in relation to the proposed ground investigation.</p> <p>We had previously requested that Appendix 3-2 Cable Route Construction Method Statement [APP-183] needs to be updated to include reference to the discovery strategy. This has not been actioned.</p>
EA-060	Biodiversity Net Gain	Trading Rules	Agree As per Deadline 2 response.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has not been provided.	Agree- As per Deadline 2 response.
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	Agree- As per Deadline 2 response.
EA-063	Water Framework Directive Assessment	Change the description from “Supports Good” to “Not High” and possibly add an explanation.	Agree As per Deadline 2 response.
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	Agree As per Deadline 2 response.
EA-066	Outline Battery Safety Management Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.	Agree As per Deadline 2 response.
EA-067	Outline Battery Safety Management Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site.	Agree As per Deadline 2 response.
EA-068	Outline Battery Safety Management	No details are provided of the proposed	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	t Plan	testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event.	
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	Agree As per Deadline 2 response.
EA-070	Outline Construction Environmental Management Plan	Water Quality Mitigation Measures are insufficient	Under Discussion Water Quality Mitigation Measures associated with Vehicle washdown, concrete laying, foul water strategy and drilling fluid have been resolved due to updates to: REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2); REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) REP1-101 7.14 Outline Decommissioning Strategy (Rev 2). However, REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2) Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage. There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding capacity, but also be covered to reduce

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary. Oil separators could also be used.
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	Agree As per Deadline 2 response.
Informatives/ advice to applicant			
EA-072	Permitting	Permitting Informative	Agree
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion- no information provided to address this. Whilst we recognise it is uncertain at this stage if it isn't feasible to sequentially locate the substation within Lime Down C1 outside of the mapped surface water flow route an assessment of the impact is required to ensure flood risk isn't increased elsewhere and if it is appropriate mitigation (compensatory storage) needs to be put in place to ensure the development satisfies paragraph 5.8.12 within the overarching National Policy Statement for Energy. Therefore, if "where feasible" is included there would need to be acknowledgement that further assessment and potentially compensatory storage may be required.
EA-074	Outline Landscape and Ecological Management	Herbicide use	Under Discussion- the Outline Landscape and Ecological Management has not been updated.
EA-075	Outline	Improvement	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	Ecological Protection and Mitigation Strategy	s to document	
EA-076	Firewater Drainage	Detail of fire water management . A standalone drainage plan is strongly recommended.	Agree As per Deadline 2 response.
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development .	Agree As per Deadline 2 response.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	Agree As per Deadline 2 response.
EA-079	outline Battery Safety Management Plan	Battery replacements	Agree As per Deadline 2 response.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agree As per Deadline 2 response.
EA-081	Decommissioning	Decommissioning of cables	Agree As per Deadline 2 response.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	Agree As per Deadline 2 response.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	Agree As per Deadline 2 response.
EA-085	Battery Safety Management Plan	Emergency Response Plan	Agree As per Deadline 2 response.
EA-086	Foundation Design	Piling Risk Assessment references	Agree As per Deadline 2 response..
EA-087	Commitments Register	Horizontal Directional Drilling	Agree As per Deadline 2 response..
EA-088	Commitments Register	Siting of construction compounds and stockpiles	Agree As per Deadline 2 response.
EA-089	Commitments Register	Plant maintenance	Agree As per Deadline 2 response.
EA-090	Commitments Register	Breakout contingency procedures	Agree As per Deadline 2 response..
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	Agree- As per Deadline 2 response.
EA-092	Commitment	BESS and	Agree

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
	s Register	substation drainage infrastructure	As per Deadline 2 response..
EA-093	Commitment s Register	Hydrological risk assessment	Agree As per Deadline 2 response..

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
WR EA-001	Ecology and Biodiversity	Biodiversity Net Gain	Agree
WR EA-002	Draft DCO	“Substantially in accordance with” requirements	Under Discussion We maintain our previous position set out in our written representation REP1-151
WR EA-003	Draft DCO Soil Management	Requirement 17	Agree
WR EA-004	Draft DCO	Procedure for Discharge of Requirements	Under Discussion We note the increase in timeframe but request the full 15 working days consultation period as set out in our written representation REP1-151
WR EA-005	Water Quality	Foul Drainage	Agree We acknowledge updates to REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) section 11.10.27, 11.10.64 and 11.10.67. Details in Table 5 in Outline Construction Environmental Management Plan (OCEMP) [REP2-

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			019], section 2.13 of Outline Operational Environmental Management Plan (OOEMP) [REP2-021] and Table 15 in Outline Decommissioning Strategy (ODS) [REP1-100] are consistent with Chapter 11. This resolves this issue which was raised in our written representation REP1-151 .
WR EA-006	Water Quality	Water Quality Monitoring	Agree We acknowledge updates to section 11.9.2 in Chapter 11 [REP1-017] , REP1-096 OCEMP Table 5 , REP1-098 OOEMP Table 5 and REP1-100 ODS Table 5 . Details are sufficient at this point in the project, however, as commented in relation to Relevant Reps EA-002 we still need to be named as a consultee for CEMP and OEMP to ensure we can review details post-consent. This resolves this issue which was raised in our written representation REP1-151 .
WR EA-007	Water Quality	Vehicle washdown and refuelling areas	Agree We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) . Paragraph 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) and Table 5 of OCEMP [REP1-96] were updated to address concerns over

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			water quality impacts from concrete laying and washout. Section 11.9.2-11.9.4 in REP1-017 , Table 5 of OCEMP [REP1-96] and Table 5 of ODS [REP1-100] were updated to address concerns over wheel washing controls and SuDS.
WR EA-008	Water Quality	Concrete management	Agree We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) . Paragraph 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) and Table 5 of OCEMP [REP1-96] were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.9.4 in REP1-017 , Table 5 of OCEMP [REP1-96] and Table 5 of ODS [REP1-100] were updated to address concerns over wheel washing controls and SuDS.
WR EA-009	Water Quality	Sediment control and SuDS	Agree We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) . Paragraph 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			<p>and Drainage (Rev 2) and Table 5 of OCEMP [REP1-96] were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in REP1-017, Table 5 of OCEMP [REP1-96] and Table 5 of ODS [REP1-100] were updated to address concerns over wheel washing controls and SuDS.</p>
WR EA-010	Water Quality	Fuels, oils and chemical storage	<p>Under Discussion</p> <p>We note updates to Table 5 and Table 13 of OCEMP [REP1-96] about volume capacity of storage. However, as stated previously in REP2-049 EA-070, Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage. There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding capacity, but also be covered to reduce contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary. Oil separators could also be used.</p>
WR EA-011	Water Quality	Wheel wash water disposal	<p>Agree</p> <p>We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2). Paragraph 11.9.4 in REP1-017</p>

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) and Table 5 of OCEMP [REP1-96] were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in REP1-017 , Table 5 of OCEMP [REP1-96] and Table 5 of ODS [REP1-100] were updated to address concerns over wheel washing controls and SuDS.
WR EA-012	Water Quality	Outline Decommissioning Strategy	Agree With updates to Table 5 of Outline Decommissioning Strategy [REP1-100] we are satisfied that SuDS features, vehicle washing, refuelling distances from watercourses, and foul water strategy is consistent with the OCEMP.
WR EA-013	Water Quality	Watercourse buffers	Agree Table 11-1 of Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage [REP1-017] and Table 5 of OCEMP [REP1-096] confirmed a distance of 10m from watercourses for vehicle washdown and refuelling.
WR EA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	Agree Table 5 of OCEMP [REP1-96] confirmed distances of HDD launch and reception pits, and using PFAS free products, where practical. Table 13 of OCEMP confirmed there would be a drilling fluid breakout contingency procedure. Section 1.2.4 of REP1-094 Water Framework Directive Assessment suggested no

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 2 submissions
			deterioration due to HDD.
WR EA-015	Statement of Common Ground	Statement of Common Ground	Under Discussion The next version of the Statement of Common Ground will be submitted at Deadline 4.