

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

Reference: OR-0006549/01
Customer reference: EN010168
Interested Party ref: [REDACTED]

10 July 2026

Dear Examining Authority

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

Environment Agency Examination Deadline 4 Response: Comments on documents submitted at Deadline 3 and Post hearing submissions on Issue Specific Hearing 3

This letter constitutes the Environment Agency's Deadline 4 Response to the above mentioned DCO application.

Our post hearing submissions following Issue Specific Hearing 3 are set out in Appendix 1. Our detailed comments on the Hydraulic Modelling Report Document Reference Exam/9.32 June 2026 [REP3-131](#) are set out in Appendix 2. Our updated comments and position on the issues raised in our Relevant Representation/ Written Representation responses following review of the Deadline 3 submissions is presented in Appendix 3.

I trust this information is of use.

Yours faithfully,

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

Appendix 1: Post Hearing Submissions Issue Specific Hearing 3 Thursday 3 July

Action 24 please provide further detail and justification why a 10 m watercourse buffer is necessary from an ecological perspective

We recommend that all applicants provide a minimum 10m watercourse buffer from the bank-top for all watercourses (ordinary watercourses and main watercourses). This is a standard baseline we request for all schemes, based on professional opinion. The purpose is to provide a wide margin to maintain connectivity and a continuous pathway for wildlife (especially to allow otters to commute in high flow), allow habitat creation across the landscape in the form of tussocky grass, scrub and scattered trees to provide shelter for riparian mammals and a general biodiversity value; and finally to provide a buffer that maintains bank stability and to capture runoff to improve water quality.

However, we stress that the recommendation to provide a 10m buffer around ordinary watercourses is an advisory comment from the Environment Agency, and we defer to the Lead Local Flood Authority for comments on ordinary watercourses.

Action 25: Water vole surveys Applicant to liaise with the Environment Agency on survey discrepancy and provide an update.

It is our position that the design, construction, mitigation and compensation measures of all planning proposals should be based on ecological surveys and assessments, carried out at an appropriate time of year by a suitably experienced surveyor, using recognised survey methodology. This applies to legally protected species, principally those associated with the water environment, and priority species for which the Environment Agency are the lead partner for conservation. This position also corresponds to British Standards 42020:2013 and CIEEM Ecological Impact Assessment Guidelines (EIAG).

Following our response to the Examining Authority's First Written Question EB1.2, during Lime Down Examination ISH3, the applicant confirmed that the spot checks conducted within the Cable Route Corridor to search for evidence of riparian species at watercourses (as mentioned in ES Chapter 9, REP1-015) did not follow standard survey protocol, as signs were recorded ad-hoc during habitat surveys. We are of the opinion that the survey data is not robust enough to confirm species presence/absence, which is essential to inform mitigation and compensation measures. We are particularly concerned that protected species, such as otter, may have places of rest near the crossing locations that the applicant may have missed due to the low survey effort. Therefore, there is the potential to disturb otters or water voles during construction, should a shelter (holts, couches and burrows) be present, which is an offence under the Wildlife and Countryside Act (1981) and Conservation of Habitats and Species Regulations (2017). We are happy to discuss this with the applicant to understand why they have taken this approach so we can consider it

further.

Fisheries

We request that the applicant adds an additional commitment into their Outline Construction Environmental Management Plan that any fish rescue using equipment other than rod and line must have written permission from the Environment Agency under S27(a) of the Salmon and Freshwater Fisheries Act 1975. A full method statement should be submitted when applying for permission detailing on locations, timings, equipment being used, fish welfare measures and reason for rescue.

Further information can be found here: [Apply to use fishing instruments other than rod and line in England - GOV.UK](#)

Appendix 2: Comments on Lime Down Solar Park 9.32 Hydraulic Modelling Report Document Reference Exam/9.32 June 2026 [REP3-131](#). Follow-on review

Document Reference(s): Lime Down Solar Park 9.32 Hydraulic Modelling Report. Document Ref: Exam/9.32. June 2026 REP3-131	
Issue	There is missing information with regards to the input hydrology applied to the model
Impact	It is not possible to repeat or check the flow calculations without a corresponding Flood Estimation Handbook (FEH) calculation record or detail on input catchment locations and other parameters
Solution	Please provide a corresponding FEH calculation record for the design flows if available or at least the grid reference of the downstream lumped catchment, catchment descriptors along with any adjustments made, choice of donor station for median annual flood (QMED) estimation, and pooling group composition. It would also be useful if the applicant could confirm how hydrograph shape has been derived. It is assumed this is based on the Revitalised Flood Hydrograph (ReFH2) approach with model parameters and storm duration informed by catchment descriptors. This should be made clear in the reporting. This is particularly important as the peak flows appear to have changed when comparing the flows shown in the latest version of the model report (June 2026) with the previous version of the model report (April 2026).

Additional narrative

The updated version of the hydraulic modelling report dated June 2026 (document reference: [REP3-131](#)) includes a specific assessment of the 3.3% (1 in 30) Annual Exceedance Probability (AEP) scenario to reflect the functional floodplain. A map is included showing the extent of this scenario within figure 3. Additionally, a map showing the extent of flooding in the 1% (1 in 100) AEP plus 71% (upper) climate change scenario has been included within figure 5. This addresses previous comments raised with respect to defining the extent of the functional floodplain and providing details of an upper climate change scenario within the model report.

The review of the corresponding hydraulic model files for the Gauze Brook undertaken by the Environment Agency in May 2026 identified two key issues, firstly with respect to orifice unit GAU_3290ou under the South Wales Main Line, the model review noted a significant drop in level (80 metres) between the upstream and downstream sill level for the structure. This appeared unrealistic. Additionally, the review highlighted some discordances when comparing bank top elevations within the model with the latest 1 metre horizontal resolution Lidar data dated 2022. The updated model report (June 2026) provides some details in relation to these issues. It appears the downstream sill elevation of 7 metres Above Ordnance Datum (mAOD) for orifice unit GAU_3290ou is a typographical error which will be updated in the model to correctly reflect the downstream sill level of 87 mAOD according to

table 2 of the updated model report.

Table 2 of the updated model report provides some information on the representation of bank levels and why these do not always match with the underlying Lidar DTM data. It appears that bank levels are largely based on topographic survey data rather than Lidar data which would explain some of the differences observed in places. This justification appears reasonable.

Section 2.4 page 10 of the updated model report (June, 2026) states that a separate Flood Estimation Calculation record is available upon request and provides full details of the hydrological assessment. This has not been provided.

The peak flows presented in Table 3 of the updated model report (June 2026) differ from those reported in the previous model report (April 2026). A reduction in the Gauze Brook design flow estimates has been identified in the updated submission. The reason for this change is not explained. In the absence of any justification or revised hydrological assessment, it would be expected that the design flows remain unchanged from the previous submission.

As noted in the previous model review comments, the corresponding Flood Estimation Handbook (FEH) calculation record should be provided to enable verification of the peak flows applied within the hydraulic model.

Appendix 3: Updated comments and position on the issues raised in our Relevant Representation/ Written Representation responses following review of documents submitted at Deadline 3

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 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	Under Discussion 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. We note there are some amendments to our standard protective provisions in the REP3-006 3.1 Draft Development Consent Order (Rev 3) . Our standard protective provisions have been robustly reviewed and they are fit for purpose. Therefore, we do not agree to the proposed changes.
EA-013	REP3-006 3.1 Draft Developmen t Consent Order (Rev	Requirement 13 Construction environment al	Agree- document has been updated to include the Environment Agency as a consultee.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	3)	management plan (CEMP)	
EA-014	REP3-006 3.1 Draft Developmen t Consent Order (Rev 3)	Requirement 14 Operational environment al management plan (OEMP)	Agree- document has been updated to include the Environment Agency as a consultee.
EA-015	REP1-008 3.1 Draft Developmen t 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 Geomorphol ogy	Watercourse Crossings	Agreed- As per Deadline 2 response.
EA-018	Fisheries, Biodiversity and Geomorphol ogy	Commitment s register: mitigation	Agreed- As per Deadline 2 response.
EA-019	Fisheries, Biodiversity and Geomorphol ogy	Ecological assessments	Agree- As per Deadline 2 response.
EA-020	Fisheries, Biodiversity and Geomorphol	Aquatic invertebrates	Agree- As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	ogy		
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	Under Discussion We recommend that all applicants provide a minimum 10 metre watercourse buffer from the bank-top for all watercourses (ordinary watercourses and main watercourses). This is a standard baseline we request for all schemes, based on professional opinion. The purpose is to provide a wide margin to maintain connectivity and a continuous pathway for wildlife (especially to allow otters to commute in high flow), allow habitat creation across the landscape in the form of tussocky grass, scrub and scattered trees to provide shelter for riparian mammals and a general biodiversity value; and finally to provide a buffer that maintains bank stability and to capture runoff to improve water quality. However, we stress that the recommendation to provide a 10m buffer around ordinary watercourses is an advisory comment from the Environment Agency, and we defer to the Lead Local Flood Authority for comments on ordinary watercourses The applicant has not updated the 10m buffer for wash-down in the most recent iteration of the Outline Construction Environmental Management Plan (REP3-093), but we acknowledge the applicant's comment to 'review and update where required'.
EA-022	Water Framework Directive	Groundwater Bodies	Agree The Applicant has updated the Groundwater Bodies Plan (Rev 1) (REP3-140) and ES Volume 1,

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			Chapter 11: Hydrology, Flood Risk and Drainage (Rev 3) [REP3-015]
EA-023	Groundwater and Contaminate d Land	Piling	Agree ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] has been updated as requested
EA-024	Groundwater and Contaminate d Land	Battery Energy Storage System (BESS) foundation solution	Agree The 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092] has been updated as requested.
EA-025	Groundwater and Contaminate d Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	Agree- as per Deadline 2 response.
EA-026	Groundwater and Contaminate d Land	Ground infrastructure will be left in- situ following the decommissio ning phase	Agree- as per Deadline 2 response.
EA-027	Groundwater and Contaminate d Land	Suitable mitigation where groundwater may be encountered.	Agree The following documents have been updated as requested, 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092]

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage (Rev 3) [REP3-015] ES Volume 3 Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 3) [REP3-039]
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	Agree- as per Deadline 2 response.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Agree The Applicant has confirmed that no additional private water supply information has been obtained. The mitigation measures to protect the identified abstractions are identified in 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092]
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	Under Discussion ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] has been updated, including sections 19.10.2 and 19.11.10. 19.10.2 states that “Micro routing of the

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			cable will ensure that no cables are located within 50m of abstractions or GWDTE or within SPZ1." Cable Route Southwest lies within a Source Protection Zone 1 (SPZ1). It is not clear how the micro-routing will ensure that no cables are within SPZ1. Section 19.11.10 makes no reference to avoiding SPZ1. The Applicant has not demonstrated adherence to the conditions set out in the advice note we sent in February 2026. This includes proximity to SPZ1 and springs. More detail is required to demonstrate that the cables will not interact with these sensitive receptors. This should include depth to groundwater and anticipated ground conditions in sensitive groundwater areas.
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 Pre-construction ground investigation will be secured via the Construction

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	d Land		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 and Contaminate d Land	Discovery and Inspection Strategy	Agree- as per Deadline 2 response.
EA-034	Groundwater and Contaminate d Land	Inconsistenc y in the walkover surveys carried out.	Agree. The following documents have been updated as requested. Appendices 19-1 [REP3-069], 19-4 [REP3-075], 19-5 [REP3-077] & 19-8 [REP3-079]
EA-035	Groundwater and Contaminate d Land	Soil contamination during the operational phase.	Agree The following documents have been updated as requested: Outline Operational Environmental Management Plan [REP3-094] ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] Note: Paragraph 19.11.14 of Chapter 19 [REP3-023] refers to a previous iteration of the Outline OEMP. It should reference REP3-094 .
EA-036	Groundwater and Contaminate	Groundwater risks have not been	Agree The Applicant has suggested

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	d Land	appropriately assessed.	discussing the ground investigation design with the Environment Agency once it has been prepared, which we welcome.
EA-037	Groundwater and Contaminate d Land	Storage and management proposals for batteries have not been provided.	Agree- as per Deadline 2 response.
EA-038	Groundwater and Contaminate d Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	Agree- as per Deadline 3 response
EA-039	Groundwater and Contaminate d Land	No Preliminary Risk Assessment s (PRAs) for the interconnecti ng corridors between the main solar panel areas.	Agree Applicant comments noted.
EA-040	Groundwater and Contaminate d Land	Maps and data searches in appendices 19-1, 19-2	Agree Applicant comments noted. Also discussed at meeting with the Applicant on 2 nd June 2026

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		and 19-5 are not complete or specific to those sites	
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 and Contaminate d Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development .	Agree As per Deadline 2 response.
EA-044	Groundwater and Contaminate d Land	Justification for selecting the distances beyond which off site	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		contamination sources would not be significant.	
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Agree Appendix 19-8 [REP3-079] has been updated to address this issue. Note: section 1.4.11 of Appendix 19-8 refers to a previous iteration of the Outline CEMP . It should refer to [REP3-092]
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	Agree The Outline OEMP [REP3-094] has been updated as requested.
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 and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Agree Table 4 in Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP3-057] has been updated as requested.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone	Under Discussion We welcome the addition of the 3.3% (1 in 30) annual exceedance probability

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		3b).	scenario flood depth and extent mapping for the Gauze Brook. We await the updated modelling and delineation of Flood Zone 3b for Lime Down E2 at deadline 4
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Agree Table 5 of the updated Outline Operational Environmental Management Plan (REP3-094) has been updated to state that post flood inspections will be carried out as well as removing debris from fencing where safe and practicable. Where fencing is within mapped flood zones, it will comprise post and wire mesh fencing. This will be designed to maximise the passage of water.
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	Under Discussion The applicant has updated all FRAs to include the following paragraph: <i>'During the construction phase, temporary works and construction activities will be managed to maintain existing floodplain storage, floodplain capacity and overland flood flow routes. Temporary compounds, plant and material storage will be located outside areas identified as potentially susceptible to flooding where reasonably practicable, and construction activities will be undertaken in accordance with the Outline CEMP [REP2-019] to ensure flood risk is not increased elsewhere.'</i> This is not sufficient. The applicant

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			should commit to placing all construction compounds, material storage and plant outside of flood zone 3b. Additionally, more detail is needed for mitigation which will be implemented if compounds need to be located within the floodplain.
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Under Discussion Section 2.3.14 page 12 of the updated Flood Risk Assessment for Lime Down D (REP3-058) and section 2.3.8 page 11 of the updated Flood Risk Assessment for Lime Down E2 (REP3-061) notes that the lowest leading edge of the panel itself does not comprise sensitive electrical equipment and may sit lower depending on the final fixed or tracker arrangement. Where solar PV panels are within areas at risk of flooding, we would typically expect an appropriate freeboard to be applied above the design flood level. This reflects standard practice and is consistent with approaches taken in comparable applications. This position is supported by the Overarching National Policy Statement for Energy (EN-1) Paragraph 5.8.7 states that new energy infrastructure should be designed to remain operational during flood events, while paragraph 5.8.12 highlights the need to safely manage flow conveyance and avoid adverse impacts from obstruction or deflection. If the solar panels themselves were inundated during the design flood event, this would likely compromise

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			their operability. In addition, inundated panels could increase blockage potential within the floodplain and not just present a storage loss, with potential implications for flood flow routes and potential off-site impacts. The applicant should commit to a minimum freeboard for the lowest leading edge of solar panels above the design flood level.
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion The applicant has provided the hydraulic model files for the Gauze Brook and we have reviewed the modelling. The peak flows presented in Table 3 of the updated model report (June 2026) differ from those reported in the previous model report (April 2026). A reduction in the Gauze Brook design flow estimates has been identified in the updated submission. The reason for this change is not explained. In the absence of any justification or revised hydrological assessment, it would be expected that the design flows remain unchanged from the previous submission. As noted in the previous model review comments, the corresponding Flood Estimation calculation record should be provided to enable verification of the peak flows applied within the hydraulic model. See also Appendix 2 for more detailed comments.
EA-054	Flood Risk Assessment	It is not clear how the	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		analysis extent area 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. The applicant has undertaken sensitivity testing on floodplain roughness increasing this by 20% (ST1). This shows that any changes in level and extent from the increased roughness scenario are generally confined to the red line boundary. This test gives confidence that any impacts from the solar panel support columns in terms of conveyance are likely to be very localised and within the red line boundary for the development. There is uncertainty in whether the solar PV panels will be raised with adequate freeboard above the design flood level (see item EA-052). If solar panels are inundated this could have a more notable effect on flood flow conveyance. We therefore seek clarity from the applicant on the freeboard applied to the lowest leading edge of the solar panels above the design flood level before we can move this item to agreed.
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		175,580m2 has been derived.	
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	Under Discussion We have yet to receive the model files for Lime Down E2. Similarly to item EA- 055, we require further clarity from the applicant with regards to the freeboard applied to the lowest leading edge of the solar panels above the design flood level. Please also see item EA-052.
EA-058	Outline Decommissi oning Strategy	No clear commitment to the production of an outline or detailed Decommissi oning Environment al Management Plan.	Agree 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 Table 13 in relation to the proposed ground investigation. We had previously requested that Appendix 3-2 Cable Route Construction Method Statement [APP-183] needs to be updated to

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			include reference to the discovery strategy. This has not been actioned.
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 Managemen t 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-065	Water	Subsurface	Agree

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	Framework Directive Assessment	infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	As per Deadline 2 response.
EA-066	Outline Battery Safety Managemen t 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 Managemen t Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
		site.	
EA-068	Outline Battery Safety Managemen t Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminate d firewater captured at the BESS in a fire event.	Agree As per Deadline 2 response.
EA-069	Outline Battery Safety Managemen t 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 Environment al Managemen t Plan	Water Quality Mitigation Measures are insufficient	Agree 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). Table 5 and 13 of REP3-093 Outline

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			Construction Environmental Management Plan now contains sufficient mitigation measures to protect water quality.
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.
EA-072	Permitting	Permitting Informative	Agree
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion. If it is not possible to place the substation within Lime Down C1 outside of the mapped flood flow routes, further assessment will need to be undertaken at detailed design to determine if the placement of the substation within Lime Down C1 would increase flood risk elsewhere. If there is an increase to flood risk elsewhere, floodplain compensation will be provided, in consultation with the Environment Agency, to ensure that there is no increase in flood risk. Engagement with the Environment Agency will occur throughout the detailed design stage on the need, method of calculating volumes, modelling and design of any floodplain compensation that may be required. We would need to secure this through a requirement within the

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
			Development Consent Order. We request the following wording to secure this: Flood Mitigation Requirement <i>No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as approved.</i> <i>Note:</i> <i>Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate:</i> <i>a) no net loss of floodplain storage within the design flood event;</i> <i>b) compensation provided on a level-for-level and volume-for-volume basis where appropriate;</i> <i>c) no increase in flood risk elsewhere;</i> <i>d) implementation of compensatory storage prior to the associated floodplain loss; and</i> <i>e) appropriate maintenance of the compensation scheme is in place during the operation phase.</i>
EA-074	Outline Landscape and	Herbicide use	Agree- updates in paragraphs 1.3.122 and 1.3.135 in REP3-101 Outline Landscape and Ecological

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	Ecological Managemen t		Management Plan resolve this.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvement s to document	Agree As per Deadline 2 response.
EA-076	Firewater Drainage	Detail of fire water management . A standalone drainage plan is strongly recommende d.	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 Managemen t Plan	Battery replacement s	Agree As per Deadline 2 response.
EA-080	Intrusive Ground	Intrusive Ground	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
	Investigation s	Investigation s	
EA-081	Decomission ing	Decomission ing of cables	Agree As per Deadline 2 response.
EA-082	Ground Investigation s	Purpose, scope and extent of ground investigation s	Agree As per Deadline 2 response.
EA-083	Battery Safety Managemen t Plan	Manual isolation of BESS systems	Agree As per Deadline 2 response.
EA-084	Battery Safety Managemen t Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangement s are installed and commissione d.	Agree As per Deadline 2 response.
EA-085	Battery Safety Managemen t 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	Commitment s Register	Horizontal Directional Drilling	Agree As per Deadline 2 response..

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
EA-088	Commitment s Register	Siting of construction compounds and stockpiles	Agree As per Deadline 2 response.
EA-089	Commitment s Register	Plant maintenance	Agree As per Deadline 2 response.
EA-090	Commitment s Register	Breakout contingency procedures	Agree As per Deadline 2 response..
EA-091	Commitment s Register	Per- and polyfluoroalk yl substances (PFAS)	Agree- As per Deadline 2 response.
EA-092	Commitment s Register	BESS and substation drainage infrastructure	Agree As per Deadline 2 response..
EA-093	Commitment s Register	Hydrological risk assessment	Agree As per Deadline 2 response..
EA-094	Commitment s Register	Ground Investigation s	Agree See our comments on the applicant's responses to other issues surrounding the scope of the proposed ground investigation.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
WR EA-001	Ecology and Biodiversit	Biodiversity Net Gain	Agree

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
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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 -as per Deadline 3 response.
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. We are now named as a consultee for CEMP and OEMP requirements 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 -as per Deadline 3 response.
WR EA-008	Water Quality	Concrete management	Agree - as per Deadline 3 response.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 3 submissions
WR EA-009	Water Quality	Sediment control and SuDS	Agree- as per Deadline 3 response.
WR EA-010	Water Quality	Fuels, oils and chemical storage	Agree We note updates to Table 5 and Table 13 of OCEMP [REP1-96] about volume capacity of storage. Table 5 and 13 of REP3-093 Outline Construction Environmental Management Plan now contains sufficient mitigation measures to protect water quality.
WR EA-011	Water Quality	Wheel wash water disposal	Agree- as per Deadline 3 response.
WR EA-012	Water Quality	Outline Decommissioning Strategy	Agree- as per Deadline 3 response.
WR EA-013	Water Quality	Watercourse buffers	Agree - as per Deadline 3 response.
WR EA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	Agree- as per Deadline 3 response.
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.