

Examining Authority
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Our ref: OR-0009808/01

Your ref: EN010168

Interested Party ref: [REDACTED]

Date: 21 August 2026

Dear Examining Authority

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

Environment Agency Examination Deadline 6 Response: Comments on documents submitted at Deadline 5

This letter constitutes the Environment Agency's Deadline 6 Response to the above mentioned DCO application.

Our flood risk comments on the updated documents are set out in Appendix 1. Our updated comments and position on the issues raised in our Relevant Representation/ Written Representation/ Examination responses following review of the Deadline 5 submissions is presented in Appendix 2.

I trust this information is of use.

Yours faithfully

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Appendix 1: Flood Risk comments on updated documents:

Lime Down D – Natural Flood Management Viability Report. August 20206.

Revision 1 ([REP5-109](#))

Document Reference(s): Lime Down D – Natural Flood Management Viability Report. August 2026. Revision 1. Options mapping. Figures 8 (option 1) and 9 (option 2) ([REP5-109](#))

Issue	The comparison mapping in figures 8 and 9 does not clearly demonstrate the spatial impacts of the proposed interventions or clearly identify areas where flood extent is reduced or increased relative to the baseline
Impact	It is difficult to fully understand the flood risk changes due to the Option 1 and Option 2 interventions
Solution	Please present Figures 8 and 9 as water level difference maps, clearly identifying areas that are wet in the baseline but dry with the interventions in place, and vice versa.

Additional narrative/ explanation

Whilst it is acknowledged that the impacts from options 1 and 2 associated with the design event (1% Annual Exceedance Probability AEP plus 39% climate change) appear relatively small, it would be helpful if Figures 8 (option 1) and 9 (option 2) were presented as water level difference maps, clearly identifying areas that are wet in the baseline scenario but dry with the interventions in place, and vice versa. This would provide a clearer representation of the changes resulting from the proposed measures.

Document Reference(s): Lime Down D – Natural Flood Management Viability Report. August 20206. Revision 1 ([REP5-109](#))

Issue	The assessment does not demonstrate how the proposed interventions perform during more frequent flood events.
Impact	It is unclear whether the scheme provides measurable flood risk benefits under lower magnitude, more frequently occurring events
Solution	Please consider simulating a more frequent event, such as the 3.3% Annual Exceedance Probability (AEP) (1 in 30 year) event, and include additional discussion and comparison mapping of any resulting flood risk benefits within the report. Alternatively, provide justification for why the assessment of more frequent events is not considered necessary.

Additional narrative/ explanation

Whilst it is acknowledged that the impacts associated with the design event (1% AEP plus 39% climate change) appear relatively small, it would also be beneficial to assess a more frequent event, such as the 3.3% AEP (1 in 30 year) scenario, to clearly demonstrate any potential benefits under lower magnitude, more frequently occurring flood events.

It is recognised that the A429 bridge acts as a hydraulic constriction within the system. However, additional evidence and discussion regarding the scheme's performance during more frequent flood events would provide further clarity on the magnitude and extent of any flood risk benefits.

Environmental Statement Volume 3 Appendix 11.6: Flood Risk Assessment and Outline Drainage Strategy – Lime Down D/BESS. August 2026. Revision 5

Document Reference(s): Environmental Statement Volume 3 Appendix 11.6: Flood Risk Assessment (FRA) and Outline Drainage Strategy – Lime Down D/BESS. August 2026. Revision 5 ([REP5-056](#))

Issue	The hydraulic model outputs presented within the FRA do not appear to reflect the latest hydraulic modelling.
Impact	It is unclear whether the predicted flood risk impacts to the proposed development have changed following the updated hydraulic modelling.
Solution	Please update the mapping within the Lime Down D/BESS FRA to reflect the latest Gauze Brook hydraulic modelling or provide justification for retaining the outputs from the previous Flood Modeller-TUFLOW model to inform the scheme design.

Additional narrative/ explanation

It is appreciated that the model outputs are broadly similar in terms of flood extent. However, some clarification on the rationale for not updating the model results within the Lime Down D/BESS FRA would be helpful.

Lime Down D – Hydraulic Modelling Report. August 2026. Revision 2. ([REP5-096](#))

We have no comments on the updated Gauze Brook Hydraulic Modelling Report itself, which contains an appropriate level of detail. However, we are currently reviewing the hydraulic model files and model construction and will provide any comments arising from that review to the applicant in due course.

With regards to the hydrology, the applicant has provided a Flood Estimation Calculation Record in Appendix C of the updated model report. The hydrological assessment is considered reasonable. The applicant has elected to adopt the more conservative Flood Estimation Handbook (FEH) statistical peak flow estimates in preference to those derived from ReFH2. A flow gauge is present on the Gauze Brook at Rodbourne, downstream of the study reach; however, this dataset has not been incorporated into the assessment. The Rodbourne gauge is not classified by the National River Flow Archive (NRFA) as suitable for estimation of the Median Annual Maximum flood (QMED) or pooled analysis and therefore its exclusion is not considered unreasonable. Nevertheless, the dataset may have provided some value as a sense check of hydrograph shape and catchment response characteristics. The

peak flows derived for the study catchment do not appear unreasonable when considered alongside recorded flows at Rodbourne, noting that the gauged catchment area is slightly larger.

The applicant may wish to consider the following in relation to the hydrological assessment:

1. Whilst not considered fundamental to the conclusions of the assessment, it would be beneficial to include a brief discussion of the potential value and limitations of the Rodbourne gauge data, particularly in relation to ReFH2 parameter estimation and verification of hydrograph shape.

Environmental Statement Volume 3 Appendix 11.4: Flood Risk Assessment and Outline Drainage Strategy – Lime Down C1. August 2026. Revision 5
(REP5-052).

No comments; although the applicant should note the Environment Agency's ask for a requirement in relation to the location of the substation within Lime Down C1 (field C33) as shown below:

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.

Note:

Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate:

- a) no net loss of floodplain storage within the design flood event;*
 - b) compensation provided on a level-for-level and volume-for-volume basis where appropriate;*
 - c) no increase in flood risk elsewhere;*
 - d) implementation of compensatory storage prior to the associated floodplain loss;*
- and*
- e) appropriate maintenance of the compensation scheme is in place during the operation phase.*

Appendix 2: Updated comments and position on the issues raised in our Relevant Representation/ Written Representation/ Examination responses following review of documents submitted at Deadline 5

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
EA001-EA-011s summarise the issues below	See below	See below	NA
EA-012	REP5-012 3.1 Draft Development Consent Order (Rev 5)	Disapplying Flood Risk Activity Permits	Agree 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. Our standard protective provisions are now included in the draft Development Consent Order so we can agree this matter.
EA-013	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 13 Construction environmental management plan (CEMP)	Agreed- as per Deadline 4 response.
EA-014	REP3-006 3.1 Draft Development Consent	Requirement 14 Operational	Agreed as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	Order (Rev 3)	environmental management plan (OEMP)	
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	Agree- As per Deadline 5 response
EA-022	Water Framework	Groundwater Bodies	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	Directive		
EA-023	Groundwater and Contaminated Land	Piling	Agree- as per Deadline 4 response
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	Agree- as per Deadline 4 response.
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.	Agree- as per Deadline 4 response.
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances	Agree- as per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		(PFAS) based materials	
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Agree- as per Deadline 4 response.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	Under discussion We are satisfied with the updates made to Environmental Statement Chapter 19: Ground Conditions [REP5-026], specifically 19.10.2 (bullet 9), Paragraph 19.11.10 and Table 19-6. However, we had previously requested that a commitment to secure assessment of thermal impacts, and route the cables accordingly prior to construction be included in the Construction Environment Management Plan Currently, there is no securing mechanism for the assessment of thermal impacts and micro-siting of the cable route.
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- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	Agree- as per Deadline 2 response.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	Agree- as per Deadline 4 response.
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	Agree- as per Deadline 4 response.
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	Agree- as per Deadline 4 response.
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 adequately addressed.	Agree- as per Deadline 4 response.
EA-039	Groundwater	No	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	er and Contamina ted Land	Preliminary Risk Assessme nts (PRAs) for the interconne cting corridors between the main solar panel areas.	
EA-040	Groundwat er and Contamina ted Land	Maps and data searches in appendice s 19-1, 19-2 and 19-5 are not complete or specific to those sites	Agree- as per Deadline 4 response.
EA-041	Groundwat er and Contamina ted Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.
EA-042	Groundwat er and Contamina ted Land	PRA- off-site vehicle repair garage	Agree As per Deadline 2 response.
EA-043	Groundwat er and Contamina ted Land	Unclear whether ground investigatio n to	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	Agree As per Deadline 2 response.
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Agree- as per Deadline 4 response
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	Agree- as per Deadline 4 response.
EA-047	Groundwater and	Present the SuDS	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	Contaminated Land	options with consideration of the need for sealed drainage.	
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Agree As per Deadline 4 response.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Agree The applicant has included maps showing extents of the 3.3% (1 in 30) annual exceedance probability scenario. No land raising is within the functional floodplain, only small portions of panelled areas. The applicant has assessed and confirmed that the impacts of this on flood flows and floodplain storage loss would not give rise to increases in flood risk elsewhere.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Agree- as per Deadline 4 response.
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	Agree – as per Deadline 5 response.
EA-052	Flood Risk Assessment	It is not clear what	Agree – as per Deadline 5 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	nt	freeboard allowances are proposed.	
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion The applicant has submitted updated hydraulic model files and an updated hydraulic modelling report for the Gauze Brook. We have reviewed the updated modelling report and have no concerns regarding the modelling approach adopted or the methods used to calculate the design flood flows. However, we are currently reviewing the hydraulic model files themselves and will provide any further comments arising from that review to the applicant in due course.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m2 has been derived.	Agreed. As per Deadline 2 response.
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	Agree As per Deadline 5 response.
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area	Agreed As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		of 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	Agree We have reviewed the hydraulic modelling for Lime Down E2 and consider it reasonable for assessing flood risk to the proposed development. The impacts of the solar panel support frames on flood risk elsewhere have been quantified using the detailed hydraulic modelling outputs. The resulting loss of floodplain storage associated with the support frames is considered negligible (less than 1 m ³) and is therefore not expected to result in an increase in flood risk elsewhere.
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	Agree- As per Deadline 5 response.
EA-060	Biodiversity Net Gain	Trading Rules	Agree As per Deadline 2 response.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has	Agree- As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		not been provided.	
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-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		status of WFD Groundwater Bodies and should not be excluded from assessment.	
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 RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
EA-068	Outline Battery Safety Management Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event.	Agree As per Deadline 2 response.
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	Agree As per Deadline 4 response.
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		in accordance with Waste Technical Guidance WM3	
EA-072	Permitting	Permitting Informative	Agree
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion. We welcome the proposal to site the Lime Down C1 substation outside mapped flood flow routes where practicable. However, we consider that there needs to be a separate flood compensation requirement as this relates to the overarching principles of the scheme. It must be ensured that development in Lime Down C1 cannot commence 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 mitigation put in place to avoid flood risk to third parties. The requirement explicitly requires a formal submission, review, and written sign-off (“approved in writing”) by the Local Planning Authority and the Environment Agency. The requirement provides a pre-commencement trigger which would ensure that development is halted in Lime Down C1 until it is satisfied. The mitigation proposed is unknown at this time. 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</i>

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
			<i>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 Ecological Management	Herbicide use	Agreed- as per Deadline 4 response.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	Agreed As per Deadline 2 response.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly	Agreed As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		recommended.	
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	Agreed As per Deadline 2 response.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	Agreed As per Deadline 2 response.
EA-079	outline Battery Safety Management Plan	Battery replacements	Agreed As per Deadline 2 response.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agreed As per Deadline 2 response.
EA-081	Decommissioning	Decommissioning of cables	Agreed As per Deadline 2 response.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	Agree As per Deadline 2 response.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	Agreed As per Deadline 2 response.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be	Agreed As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
		delivered to site before all firewater containment arrangements are installed and commissioned.	
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 polyfluoralkyl substances (PFAS)	Agree- As per Deadline 2 response.
EA-092	Commitments Register	BESS and	Agree

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 5 submissions
	nts Register	substation drainage infrastructure	As per Deadline 2 response..
EA-093	Commitments 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 5 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	Agree We note the applicant’s explanation that we will be notified on the day of consultation. Ideally we would have the 15 working day consultation period specified in the DCO but we recognise we would have this time to consider applications so can agree this matter.
WR	Water	Foul Drainage	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 5 submissions
EA-005	Quality		
WR EA-006	Water Quality	Water Quality Monitoring	Agree- as per Deadline 4 response.
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.
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- as per Deadline 4 response.
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 6.

Issues raised as part of Deadline 4 Response

EA Deadline 4 response REP4-097	Issue	Topic	Environment Agency Updated Position following Deadline 5 submissions
Action 25	Cable Route Corridor	Species surveys	Agree We have reviewed the Outline Environmental Protection Management Strategy (REP5-082) and the applicant has updated the timing of pre commencement inspections in paragraph 10.3.2 so the inspection will be carried out two months in advance of works commencing by a suitably qualified ecologist, which we agree to.
Action 25	Fisheries	Outline Construction Environmental Management Plan	Agree We have reviewed the Outline Construction Environmental Management Plan (REP-072) and the requested commitment has been included.