

Examining Authority
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Reference: OR-0011060/01
Customer reference: EN010168
Interested Party ref: [REDACTED]

2 October 2026

Dear Examining Authority

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

Environment Agency Examination Deadline 7 Response: Comments on documents submitted at Deadline 6 and post hearing submissions

This letter constitutes the Environment Agency's Deadline 7 Response to the above mentioned DCO application.

Our post hearing submissions following Issue Specific Hearings 5 and 7 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 6 submissions are presented in Appendix 2.

I trust this information is of use.

Yours faithfully

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Appendix 1: Issue Specific Hearing 5 and 7 Post Hearing Submissions

Issue Specific Hearing 5

Action 13 Applicant and the EA To update their SoCG: - To reflect the hearing discussion about the hydraulic modelling for the Gauze Brook - To reflect the conversation regarding the location of the substation in Lime Down C1 to ensure that they have a mechanism for the EA to be consulted at design stage - To show the progress regarding the thermal implications of cables on sensitive groundwater receptors (Water Framework Directive).

Please see Appendix 2 for an update on these matters; EA-030, EA-053 and EA-073. The Statement of Common Ground will be updated for Deadline 8.

Action 24: Environment Agency to provide their comments regarding Professor Skeffington's points on the thermal implications of the cable route corridor in its hearing statement.

In terms of the definition of groundwater [Protect groundwater and prevent groundwater pollution - GOV.UK](#) section 2 sets out the legal definition (accessed September 2026).

We understand from the Applicant that although the cables may be within the Source Protection Zone 1 (SPZ1) they will not be located at a depth that means they are in contact with groundwater and that they will take steps to avoid it impacting groundwater within the SPZ1.

A hydrogeological risk assessment, secured via the Construction Environmental Management Plan, will be completed if any previously unidentified risks to groundwater receptors emerge during detailed design stage (as detailed in the **outline Construction Environmental Management Plan [REP6-029]**). This will be carried out in consultation with the Environment Agency and should include risk of heat pollution. A groundwater monitoring plan will also be implemented.

The matter of heat pollution of groundwater is an emerging topic. Following the 2023 amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent deterioration of the groundwater quality.

Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of DEFRA's [Environmental permitting: Core guidance](#) (accessed September 2026). However, we take a proportionate and pragmatic approach in our application of the

principles of the Environmental Permitting Regulations. Requiring a permit would be disproportionate for many activities at or near the ground surface.

Discharge of heat to water should be a material consideration for developments involving emissions of heat, but accountability to comply with extant environmental legislation lies with the developer and the landowner. These are the principles that we follow for each DCO application that we are consulted on, but we assess each application on a case by case basis.

We are satisfied that the measures the Applicant has committed to during the detailed design. Therefore, Appendix 2 sets out that EA-030 is now agreed.

Issue Specific Hearing 7

9.63 Permitted Preliminary Works (PPW) Environmental Management Plan [REP5-106](#)

Water Quality Monitoring

The **Permitted Preliminary Works Environmental Management Plan** [[REP5-106](#)] references water quality monitoring in the **Outline Construction Environmental Management Plan (OCEMP)** [[REP6-030](#)], with the Water Management Plan (WMP) providing the details. However, it needs to be clarified how this is secured given we won't be able to agree to CEMP/WMP until the final versions. Discussions on water quality monitoring will be agreed at a later stage prior to construction according to the OCEMP.

The applicant may still wish to do water quality monitoring prior to construction as part of the environmental surveys mentioned in the PPW, but it may not be able to count as the baseline without discussions with the Environment Agency. Timing of baseline surveys is important such that it is a true baseline prior to plant and disturbance of ground. However, if PPW works are minimal a baseline survey conducted post-PPW and prior to construction may still be representative. This is under discussion with the applicant.

We note the following discrepancies between PPW EMP and OCEMP (Table 3-5 of both):

- Storage of Materials and Plant section: OCEMP says "An Emergency Spillage Plan will be produced" but there is no reference to this in PPW EMP.
- Discharge/Disposal of Site Runoff section OCEMP includes "Runoff from equipment and access tracks will be directed to permeable SuDS" but currently no reference to this in PPW EMP.
- The OCEMP says "Concrete pouring, concrete washout and similar cementitious activities" but this not included in the PPW EMP. If concrete is required as part of preliminary works it should be included in PPW EMP.
- PPW EMP includes 10 metre buffers from all water environment receptors
- There is no inclusion of an emergency response plan in the spillage risk section in the PPW EMP.

- Silt Management section of the OCEMP is not in the PPW EMP.

Groundwater and Contaminated Land

We suggest Table 2-1 Remedial work in respect of any contamination or other adverse ground conditions – Summary of works - *‘including potential remediation of contaminated land’* should also include ‘groundwater.’

Table 3-13 bullet 9 states that “a discovery and inspection strategy will be put in place which details the requirements and procedures for encountering land and/ or groundwater contamination, should they be encountered.”

According to paragraph 1.1.5 the Permitted Preliminary Works EMP is a detailed plan and no approval mechanism is necessary under the Requirements. So it should include the detail of the discovery and inspection strategy.

Flood Risk

Plant and materials should be stored outside of flood zone 3B to align with the CEMP.

Mitigation Route Map [\[REP5-102\]](#)

Some of the references to other documents are not correct, i.e. they reference previous versions. For example, outline CEMP is listed as REP4-049, but the latest is REP6-029.

Table 3-13 A discovery and inspection strategy states that this is included in the CEMP and DEMP, but it is also mentioned in the Outline Environmental Management Plan (OEMP) so that should be added. The OEMP is secured by Requirement 14.

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 6

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 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- as per Deadline 6 response.
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 Order (Rev 3)	Requirement 14 Operational environmental management plan (OEMP)	Agreed as per Deadline 4 response.
EA-015	REP1-008 3.1 Draft Development Consent	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	Order (Rev 2)		
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 Directive	Groundwater Bodies	Agree- as per Deadline 4 response.
EA-023	Groundwater and Contaminated Land	Piling	Agree- as per Deadline 4 response
EA-024	Groundwater and Contaminated Land	Battery Energy Storage	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	ted Land	System (BESS) foundation solution	
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 (PFAS) based materials	Agree- as per Deadline 2 response.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstraction	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
EA-030	Groundwater and Contaminated Land	s Thermal implications of cables	Agree The Applicant has stated in the latest version of Chapter 19 (Rev 4) (REP5-027) that <i>"Micro routing (considering both alignment and depth of cable placement) of the cable will ensure that no cables are located in contact with groundwater within 50m of abstractions or GWDTE or within SPZ1."</i> We understand from the Applicant's email of 17th September that although the cables may be within the Source Protection Zone (SPZ1) they won't be located at a depth that means they are in contact with groundwater and that they will take steps to avoid it impacting groundwater within SPZ1. It is our understanding that a hydrogeological risk assessment, secured via the CEMP, will be completed if any previously unidentified risks to groundwater receptors emerge during detailed design (as detailed in the outline Construction Environmental Management Plan (REP6-029)). This will be carried out in consultation with the Environment Agency. We assume that this means risks including heat pollution. A groundwater monitoring plan will also be implemented. Discharge of heat to water should be a material consideration for developments involving emissions of heat but it is the Applicant's responsibility to decide whether their activities require an Environmental Permit. As a reminder of our site-specific advice note that we issued for Lime Down Solar, here are the key points.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
			Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. Groundwater activities are defined in section 3.34 pp20 of DEFRA's Environmental permitting: Core guidance (accessed September 2026). However, we take a proportionate and pragmatic approach in our application of the principles of the Environmental Permitting Regulations. Requiring a permit would feel disproportionate for many activities at or near the ground surface. Accountability to comply with extant environmental legislation lies with the developer and the landowner. They should consider the thermal implications of developments which emit heat such as buried electricity cables, and the potential risks to the water environment via a desk-based assessment, as a minimum. On the basis that a Hydrogeological Risk Assessment (secured by the CEMP) will be completed if any previously unidentified risks to groundwater receptors emerge during detailed design, and a groundwater monitoring plan will be implemented, we are able to resolve issues EA 030 and FHW 2.8.
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatica	Agree- as per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
		lly self-actuating valves	
EA-032	Groundwater and Contaminated Land	Ground conditions	Agree- as per Deadline 4 response.
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	Mitigation proposals	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	Contaminated Land	managing risks to groundwater have not been adequately addressed.	
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas.	Agree- as per Deadline 4 response.
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	Agree- as per Deadline 4 response.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	Agree As per Deadline 2 response.
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	Agree As per Deadline 2 response.
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	Agree- as per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	ted Land	are provided for the proposed 400kV and 132kV Substation s.	
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 As per Deadline 4 response.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Agree As per Deadline 6 response
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	Agree – as per Deadline 5 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
		on flood risk.	
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Agree – as per Deadline 5 response.
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion We are awaiting additional information from the applicant to be incorporated into the modelling report regarding the Rodbourne Gauge, including an assessment of how the modelled results compare with the historical gauge record. The hydraulic model schematisation for the Gauze Brook is considered reasonable. Subject to the receipt and review of this additional information, and confirmation that the model results have been appropriately evaluated in the context of the gauge record and that the conclusions of the assessment remain unchanged, we anticipate that this matter can be agreed.
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	Agree As per Deadline 5 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
		discussed. Lime Down D/BESS	
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 support frames on flood flow conveyance is not discussed. Lime Down E2	Agree As per Deadline 6 response.
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 RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
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 6 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	Agree As per Deadline 2 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
		ce frequency and protocols for key controls at the BESS site.	
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	Water Quality Mitigation	Agree As per Deadline 4 response.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	Environmental Management Plan	Measures are insufficient	
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. 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

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
			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 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 RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
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 recommended.	Agreed As per Deadline 2 response.
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	Intrusive	Agreed

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
	Ground Investigations	Ground Investigations	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 delivered to site before all firewater containment arrangements are installed and commissioned.	Agreed 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 RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 6 submissions
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	Commitments Register	BESS and substation drainage infrastructure	Agree 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 6 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- as per Deadline 6 response
WR EA-005	Water Quality	Foul Drainage	Agree -as per Deadline 3 response.
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	Water	Outline	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 6 submissions
EA-012	Quality	Decommissioning Strategy	
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 8.

Issues raised as part of Deadline 4 Response

EA Deadline 4 response REP4-097	Issue	Topic	Environment Agency Updated Position following Deadline 6 submissions
Action 25	Cable Route Corridor	Species surveys	Agree - as per Deadline 6 response.
Action 25	Fisheries	Outline Construction Environmental Management Plan	Agree - as per Deadline 6 response.

Issues raised as part of Deadline 5 Response

EA Deadline 5 response REP5 124	Issue	Topic	Environment Agency Updated Position following Deadline 6 submissions
DCO2.1	Lime Down C1	Mapped Surface Water flow route- review this dataset to ensure that there are no significant changes in flood extent and depth.	Agree We welcome the additional text relating to the Flood Map for Planning Surface Water dataset in the updated Flood Risk Assessment and Outline Drainage Strategy for Lime Down C1 dated August 2026 [REP6-010] . Please note the outstanding issue EA-073 regarding compensatory flood storage.
FHW2.8	Outline Construction Environmental Management Plan	Groundwater Monitoring Plan- consultation and reporting	Agree The Outline CEMP [REP6-029] has been updated to include details of the groundwater monitoring plan that will be implemented (table 13). It states that the Environment Agency will be consulted on the monitoring strategy.

Issues raised as part of Deadline 6 Response

EA Deadline 6 response REP6- 074	Issue	Topic	Environment Agency Updated Position following Deadline 6 submissions
EA-01	Natural Flood Management Viability Report	The comparison mapping in figures 8 and 9	Under Discussion- document has not been updated

	(REP5-109)	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	
EA-02	Natural Flood Management Viability Report (REP5-109)	The assessment does not demonstrate how the proposed interventions perform during more frequent flood events.	Under Discussion- document has not been updated
EA-03	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)	The hydraulic model outputs presented within the FRA do not appear to reflect the latest hydraulic modelling.	Under Discussion- document has not been updated