East Anglia ONE North and East Anglia TWO Offshore Windfarms

Statement of Common Ground

Environment Agency

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
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Applicable to East Anglia ONE North and East Anglia TWO

Revision Summary				
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01	11/06/2020	Paolo Pizzolla	Ian MacKay/Julia Bolton	Helen Walker
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Description of Revisions			
Rev	**Page**	**Section**	**Description**
01	n/a	n/a	First draft for submission
02	n/a	n/a	Second draft for submission at Deadline 1
03	n/a	n/a	Signed SoCG submitted at Deadline 8
04	n/a	n/a	Signed SoCG submitted at Deadline 12

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Glossary of Acronyms

CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
FRA	Flood Risk Assessment
OLEMS	Outline Landscape and Ecological Management Strategy
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
SPA	Special Protection Area
WFD	Water Framework Directive

Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.

National Grid substation location	The proposed location of the National Grid substation.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.

1 Introduction

1.1 Background

1. This document is applicable to both the East Anglia ONE North and East Anglia TWO Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

2. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and the Environment Agency. It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties.

3. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.

4. This SoCG has been structured to reflect topics of the Applications which are of interest to the Environment Agency. Topic specific matters agreed, not agreed and actions to resolve between the Applicants and the Environment Agency are included within this SoCG.

5. The tables presented below represent the SoCG with the Applicants and the Environment Agency in respect of the following topics:

   - Site Selection and Consideration of Alternatives;
   - Ground Conditions and Contamination;
   - Water Resources and Flood Risk;
   - Onshore Ecology; and
   - DCO.

6. Throughout the SoCG the phrase "Agreed" identifies any point of agreement between the Applicants and the Environment Agency. The phrase "Not Agreed" identifies any point that is not yet agreed between the Applicants and the Environment Agency.

7. The matters considered within this SoCG apply to the Environment Agency's statutory remit which includes groundwater, contamination, onshore riparian

habitats within the onshore development area, and flood risk in relation to Main Rivers (i.e. the Hundred River). Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and the Environment Agency to reach agreement on each matter wherever possible, or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.

1.2 The Development

8. The key offshore components of each project will comprise:

- Offshore wind turbines and their associated foundations;
- Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm's electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;
- Sub-sea cables between the wind turbines and offshore electrical platforms (inter-array), between separate offshore platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
- Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
- Potential for one meteorological mast and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.

9. The key onshore components of each project will comprise:

- The landfall site with up to two transition bays to connect the onshore and offshore cables;
- Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
- Onshore substation; and
- Electrical cable connection between the onshore substation and National Grid substation.

10. National Grid infrastructure will also be required to connect each project to the national electricity grid. Key components of the National Grid infrastructure which is common to both projects will comprise:

- National Grid substation;

- Cable sealing end compounds and a cable sealing end (with circuit breaker) compound; and
- Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons.

1.3 Summary of Agreed, Not Agreed and Outstanding Matters

11. ***Table 1*** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and the Environment Agency for each of the relevant SoCG topics areas.

Table 1 Summary of Agreed, Not Agreed and Outstanding Matters

Topic	Summary
Site Selection and Assessment of Alternatives	All matters have been agreed.
Ground Conditions and Contamination	All matters have been agreed.
Water Resources and Flood Risk	All matters have been agreed.
Onshore Ecology	All matters have been agreed.

2 Statement of Common Ground

12. A summary of the consultation undertaken to date with the Environment Agency and the matters agreed or not agreed between the Applicants and the Environment Agency (based on discussions and information exchanged between the Applicants and the Environment Agency during the pre-application and post-application phases of the Applications) are set out below for each of the SoCG topic areas.

2.1 Site Selection and Assessment of Alternatives

13. The Projects have the potential to impact upon the physical and human environment. ***Chapter 4 Site Selection and Assessment of Alternatives*** of the Environmental Statement (ES) (APP-052) details the methodology adopted for the site selection and assessment of alternatives process and presents the range of locations considered for the siting of each Project's offshore and onshore infrastructure.

14. ***Table 2*** provides an overview of consultation undertaken with the Environment Agency regarding the site selection and assessment of alternatives. Further details on the stakeholder engagement process for site selection and assessment of alternatives can be found in the ***Consultation Report*** (APP-029).

Table 2 Summary of Consultation with the Environment Agency Regarding Site Selection and Assessment of Alternatives

Date	Contact Type	Topic
Pre-Application		
20th February 2018	Meeting	Site selection refinement, assessment of alternatives methodology and site visit.
23rd May 2018	Meeting	Discussion of landfall and coastal processes.
7th June 2018	Meeting	Site selection and definition of onshore development area.
Post-Application		
6th February 2020	Meeting	SoCG meeting 1
28th February 2020	Meeting	SoCG meeting 2

15. ***Table 3*** presents the matters agreed or not agreed in relation to site selection and assessment of alternatives.

Table 3 Site Selection and Assessment of Alternatives

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Site Selection and Assessment of Alternatives						
EA-001	Development of the Proposed Onshore Development Area	The methodology adopted for selecting and assessing the onshore development area (insofar as it relates to the Environment Agency's statutory remit) is considered robust and appropriate.	Agreed	Agreed	Agreed	None
EA-002	Landfall Site Selection and Alternatives	The methodology adopted for selecting and assessing the landfall location options, including the final option (insofar as it relates to the Environment Agency's statutory remit), is considered robust and appropriate.	Agreed	Agreed	Agreed	None
EA-003	Onshore Cable Corridor	The methodology adopted for selecting and assessing the onshore cable corridor (insofar as it relates to the Environment Agency's statutory remit), is considered robust and appropriate.	Agreed	Agreed	Agreed	It is noted that the Environment Agency has no preference in respect of the open trench or trenchless technique options for crossing the Sandlings Special Protection Area (SPA), providing the method selected and associated mitigation measures reflects the ecological sensitivity of the area.

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
EA-004	Onshore Substation and National Grid Substation Location	The methodology adopted for selecting and assessing the onshore substation and National Grid substation location options, including the final option (insofar as it relates to the Environment Agency's statutory remit), is considered robust and appropriate.	Agreed	Agreed	Agreed	None
EA-005	Mitigation	Following the selection of the landfall location, the proposed embedded mitigation adopted to ensure the integrity of the cliff is not compromised and to allow for natural coastal erosion, namely a minimum setback distance of 85m from the cliff top to the transiton bays (***section 6.6.2*** of ***Chapter 6 Project Description*** of the ES (APP-054)) and use of a horizontal drilling (HDD) technique is considered robust and appropriate.	Agreed	Agreed	Agreed	East Suffolk Council is the lead coastal protection authority for this section of the coastline. It is noted that Requirement 13 of the ***draft DCO*** (REP7-006) requires a landfall construction method statement to be prepred by the Applicants and approved by relevant local authority prior to the landfall works commencing.
Draft Development Consent Order						
EA-006	Wording of Requirement(s)	Requirement 13 of the ***draft DCO*** (REP7-006) (Landfall construction method statement) commits the applicant to producing a method	Agreed	Agreed	Agreed	The ***Outline Landfall Construction Method Statement*** (REP8-053) was updated at Deadline 8 to confirm the Applicants' commitment to consult

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		statement for the construction of the landfall works. This will require approval from the relevant planning authority prior to the landfall works commencing. With this in place, measures to mitigate any impacts associated with the landfall construction are adequately secured.				with the Environment Agency during preparation of the final Landfall Construction Method Statement.
Other Matters as Required						
EA-007	None	Not applicable	Not applicable	Not applicable	Not applicable	None

2.2 Ground Conditions and Contamination

16. The Projects have the potential to impact upon ground conditions and contamination. ***Chapter 18 Ground Conditions and Contamination*** of the ES (APP-066) provides an assessment of the significance of these impacts.

17. ***Table 4*** provides an overview of consultation undertaken with the Environment Agency regarding ground conditions and contamination. Further details on the stakeholder engagement process for ground conditions and contamination can be found in the ***Consultation Report*** (APP-029).

Table 4 Summary of Consultation with the Environment Agency Regarding Ground Conditions and Contamination

Date	Contact Type	Topic
Pre-Application		
26th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.).
7th November 2018	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the preliminary environmntal information report (PEIR).
Post-Application		
6th February 2020	Meeting	SoCG meeting 1
28th February 2020	Meeting	SoCG meeting 2

18. ***Table 5*** presents the matters agreed or not agreed in relation to ground conditions and contamination.

Table 5 Ground Conditions and Contamination

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Environmental Impact Assessment						
EA-101	Existing Environment	Sufficient desk-based data has been collected to inform the assessment.	Agreed	Agreed	Agreed	None
EA-102	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	The Applicant will adopt the term 'Principal Aquifer' rather than 'Major Aquifer', 'Secondary Aquifer' rather than 'Minor Aquifer' and 'Unproductive Strata' rather than 'Non Aquifer' in future documentation.
EA-103	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Agreed	None
EA-104	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of ground conditions and contamination.	Agreed	Agreed	Agreed	In principle the Environment Agency agree with all items listed under EA-104, EA-105 and EA-106, subject to the approved Code of Construction Practice (CoCP) (document reference 8.1) incorporating appropriate provisions to deliver the embedded mitigation set out in ***section 18.3.3*** in ***Chapter 18 Ground Conditions and Contamination*** of the

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						ES (APP-066) as noted in the ***Outline CoCP*** (document reference 8.1).
EA-105	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	As above
EA-106	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Agreed	As above
EA-107	Mitigation	No mitigation other than that identified as the embedded mitigation within ***section 18.3.3*** of ***Chapter 18 Ground Conditions and Contamination*** (APP-066) is required.	Agreed	Agreed	Agreed	None
Draft Development Consent Order						
EA-108	Wording of Requirement(s)	The wording of Requirement 22 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with reference to development of a CoCP for the mitigation and	Agreed	Agreed	Agreed	The Applicants will consult with the Environment Agency during preparation of the following sections of the CoCP as per the updated ***Outline CoCP*** (submitted at Deadline 12):

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		monitoring of potential impacts on ground conditions and contamination, is appropriate and adequate.				• Surface water and drainage management plan; • Flood management plan; • Site waste management plan; • Materials management plan; • Pollution prevention and response plan (including groundwater protection method statements & construction method statements for the protection of onshore water); and • Watercourse crossing method statement. The ***Outline CoCP*** (document reference 8.1) confirms that, where appropriate, the Applicants encourage environmental emergency response plans to be tested on-site in consultation with the relevant planning authority and the Environment Agency.
EA-109	Wording of Requirement(s)	The wording of Requirement 18 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with reference to 'a written scheme to	Agreed	Agreed	Agreed	The ***Outline CoCP*** (document reference 8.1) provides: • A commitment to undertake a pre-construction water features survey

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		mitigate the potential for release of contaminants' which includes an investigation and assessment report and the implementation of mitigation measures, is appropriate and adequate.				(visual inspections) where required. This will be used to ensure that water features are identified and subject to hydrogeological risk assessments as necessary prior to works commencing; and • A commitment to undertake a hydrogeological risk assessment for works that could cause changes to aquifer flow or affect aquifer quality within 500m of groundwater dependent ecological sites (i.e. international, European, national and county designations). A screening exercise will be undertaken (utilising desk-based information such as BGS borehole records, solid and superficial geological mapping and OS mapping, site citations, Natural England's Priority Habitats Inventory and Phase 1 habitat survey data where available) to determine whether or not identified ecological sites have features / habitats that are likely to be groundwater fed. Where features / habitats that are likely to be groundwater fed are within 500m of

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						works that require excavations below 1m, a hydrogeological risk assessment will be undertaken. • A commitment to undertake a hydrogeological risk assessment for works that require excavations below 1m within 250m of boreholes or springs.
EA-110	***Outline CoCP*** (document reference 8.1)	The Environment Agency request hydrogeological risk assessments to be undertaken for all onshore preparation and construction works within 250m of a groundwater abstraction, prior to construction commencing in that area, to assess pollution pathways and ensure risks to groundwater and to the use of the abstraction point are considered within the hydrogeological risk assessment.	Agreed	Agreed	Agreed	It was agreed that this would be noted in an updated ***Outline CoCP*** (document reference 8.1) and an updated outline pre-commencement archaeology execution plan.
EA-111	***Outline CoCP*** (document reference 8.1)	The Environment Agency request that no chemicals be stored within 50m of a watercourse of water abstraction borehole.	Agreed	Agreed	Agreed	This commitment is noted within the ***Outline CoCP*** (document reference 8.1).

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Other Matters as Required						
EA-112	None	Not applicable	Not applicable	Not applicable	Not applicable	None

2.3 Water Resources and Flood Risk

19. The Projects have the potential to impact upon ground conditions and contamination. ***Chapter 20 Water Resources and Flood Risk*** of the ES (APP-068) provides an assessment of the significance of these impacts.

20. ***Table 6*** provides an overview of consultation undertaken with the Environment Agency regarding water resources and flood risk. Further details on the stakeholder engagement process for water resources and flood risk can be found in the ***Consultation Report*** (APP-029).

Table 6 Summary of Consultation with the Environment Agency Regarding Water Resources and Flood Risk

Date	Contact Type	Topic
Pre-Application		
27th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.).
7th November 2018	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR.
2nd May 2019	Meeting	Post-PEIR consultation feedback.
Post-Application		
6th February 2020	Meeting	SoCG meeting 1
28th February 2020	Meeting	SoCG meeting 2

21. ***Table 7*** presents the matters agreed or not agreed in relation to water resources and flood risk.

Table 7 Water Resources and Flood Risk

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Environmental Impact Assessment						
EA-201	Existing Environment	Sufficient desk-based data has been collected to inform the assessment.	Agreed	Agreed	Agreed	None
EA-202	Assessment Methodology	Save for works at Work No. 37 (at Marlesford Bridge) the impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	None
EA-203	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project within Work No. 37 (Marlesford Bridge).	Agreed	Agreed	Agreed	Work No. 37 is within Flood Zone 3a & 3b, a functional floodplain. Until detailed assessment works and detailed design is undertaken, it is not possible to establish the precise nature of works required at Work No. 37, or in particular whether ground raising, re-profiling or construction of structures that may divert or affect flood waters will be required. The Applicant will consult the Environment Agency on the need for a Flood Risk Activity Permit for works

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						within Work No. 37 prior to such works commencing. Such works are likely to be classified as 'essential infrastructure'. The Applicants and the Environment Agency agree that to address this matter the Applicants will undertake a Flood Risk Assessment (FRA) of works required within Work No. 37 as part of any future Environmental Permit application. The above points have been noted in an updated ***Outline CoCP*** (REP7-025). Although it is not yet possible to fully assess the potential impacts of the project within Work No. 37 (Marlesford Bridge), an appropriate approach for completing that assessment and ensuring appropriate mitigation is adopted, has been adequately outlined.
EA-204	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Agreed	None
EA-205	Assessment Conclusions	***Chapter 20 Water Resources and Flood Risk Assessment***	Agreed	Agreed	Agreed	The ***Outline CoCP*** (document reference 8.1) includes:

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		(APP-068) of the ES and ***Appendix 20.3 Flood Risk Assessment*** (APP-496) of that chapter adequately characterises the baseline environment in terms of water resources and flood risk.				• A commitment to prepare a Method Statement for any crossings made by a trenchless technique within the onshore cable route (excluding landfall). This will provide details of the design parameters and any measures to minimise impacts upon groundwater; • Mapping of all existing abstraction licences, all domestic abstractions and all protected rights; measures will ensure no derogation to these as a result of the Projects; • A commitment to undertake a pre-construction water features survey (visual inspections) where required. This will be used to ensure that water features are identified and subject to hydrogeological risk assessments as necessary prior to works commencing. • Clear identification of whether dewatering activities will require an environmental permit. It will be specified that any water removed from subsurface excavations is

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						returned to ground and that any water removed from a watercourse will be returned to the same watercourse, unless otherwise agreed with the Environment Agency. • A commitment that any dewatering activities that require an abstraction licence will follow the Environment Agency's Hydrogeological Impact Appraisal for Dewatering • A commitment to undertake a hydrogeological risk assessment for works that could cause changes to aquifer flow or affect aquifer quality within 500m of groundwater dependent ecological sites (i.e. international, European, national and county designations). A screening exercise will be undertaken (utilising desk-based information such as BGS borehole records, solid and superficial geological mapping and OS mapping, site citations, Natural England's Priority Habitats Inventory and Phase 1 habitat survey data where available) to determine whether or not identified ecological

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						sites have features / habitats that are likely to be groundwater fed. Where features / habitats that are likely to be groundwater fed are within 500m of works that require excavations below 1m, a hydrogeological risk assessment will be undertaken. • A commitment to undertake a hydrogeological risk assessment for works that require excavations below 1m within 250m of boreholes or springs.
EA-206	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Agreed	The final CoCP and final Operational Drainage Management Plan will detail the hierarchy of foul water drainage (i.e. connection to mains sewer network or septic tank) and justify the selected foul water drainage solutions for the construction and operational stages of the Projects, as set out in the ***Outline CoCP*** (REP7-025) and the ***Outline Operational Drainage Management Plan*** (document reference ExA.AS-37.D12.V6).

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
EA-207	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Agreed	None
EA-208	Mitigation	The embedded mitigation identified within Section 20.3.3 of the ES (document reference 6.1.20) and the means for implementation are appropriate and adequate. Any further mitigation requirements will be considered pre-construction within the final CoCP.	Agreed	Agreed	Agreed	The Applicant will consult with the Environment Agency during preparation of the following sections of the CoCP as noted in the ***Outline CoCP*** (submitted at Deadline 12): • Surface water and drainage management plan; • Flood management plan; • Site waste management plan; • Materials management plan; • Pollution prevention and response plan (including groundwater protection method statements & construction method statements for the protection of onshore water); and • Watercourse crossing method statement.

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Draft Development Consent Order						
EA-209	Wording of Requirement(s)	The wording of Requirement 18 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with reference to 'a written scheme to mitigate the potential for release of contaminants' which includes an investigation and assessment report and the implementation of mitigation measures, is appropriate and adequate.	Agreed	Agreed	Agreed	None
EA-210	Wording of Requirement(s)	The wording of Requirement 22 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts to water resources and flood risk is appropriate and adequate.	Agreed	Agreed	Agreed	It is noted that Requirement 22 of the ***draft DCO*** (document reference 3.1) includes the provision of a groundwater protection method statement *(Requirement 22(2)(h) a pollution prevention and response plan including a groundwater protection method statement and construction method statements for the protection of onshore water).* The ***Outline CoCP*** (document reference 8.1):

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						• Includes specific reference to the groundwater protection method statement which will consider impacts to groundwater quality and ensure methodologies to minimise construction-phase groundwater quality impacts are in place. • States that the Applicants encourage environmental emergency response plans to be tested on-site in consultation with the Local Planning Authority and the Environment Agency. • Commits the Applicants to not store materials within Flood Zone 2 or Flood Zone 3 along the length of the onshore cable route, and to store spoil outside of the Hundred River flood plain unless otherwise agreed with the Environment Agency. • Commits to undertake a hydrogeological risk assessment for works that could cause changes to aquifer flow or affect aquifer quality within 500m of groundwater dependent ecological sites (i.e.

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
						international, European, national and county designations). A screening exercise will be undertaken (utilising desk-based information such as BGS borehole records, solid and superficial geological mapping and OS mapping, site citations, Natural England's Priority Habitats Inventory and Phase 1 habitat survey data where available) to determine whether or not identified ecological sites have features / habitats that are likely to be groundwater fed. Where features / habitats that are likely to be groundwater fed are within 500m of works that require excavations below 1m, a hydrogeological risk assessment will be undertaken. • Commits to undertake a hydrogeological risk assessment for works that require excavations below 1m within 250m of boreholes or springs.
EA-211	Wording of Requirement(s)	The wording of Requirement 41 provided within the ***draft DCO*** (REP7-006) with reference to an	Agreed	Agreed	Agreed	None

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		'operational drainage management plan', is appropriate and adequate.				
Other Matters as Required						
EA-212	Licensed Agricultural Abstraction	The licensed agricultural abstraction on the Hundred River (Work No. 19) should not be disrupted as a result of any temporary works on the river.	Agreed	Agreed	Agreed	The Outline CoCP (document reference 8.1) confirms that over-pumping at the Hundred River crossing (Work No. 19) will be a non-consumptive operation (i.e. no transmission loss). It was agreed that relevant abstraction licence holder(s) are to be consulted by the Applicants about any works at the Hundred River which have the potential to disrupt flow. It was agreed that appropriate measures are to be identified within the final CoCP to ensure that sufficient flow is maintained along the Hundred River. The above is noted in the ***Outline CoCP*** (document reference 8.1).
EA-213	Water Framework Directive (WFD)	The Environment Agency require the implications of the updated	Agreed	Agreed	Agreed	For each waterbody that could be affected by the Projects, the Applicant will review whether the WFD status

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		WFD coming into force in 2021 to be considered.				objectives have changed and determine whether such changes have any implications for the findings of the assessment. This review will be secured through the final Ecological Management Plan secured under Requirement 21 of the DCO. The above is noted in the updated ***Outline Landscape and Ecological Management Strategy*** (OLEMS) (AS-127).
EA-214	Surface Water Drainage	A Flood Risk Activity Permit may be required to connect the surface water drainage into the Main River (Friston Watercourse).	Agreed	Agreed	Agreed	The surface water discharge rate entering the system is not within the remit of the Environment Agency and would be subject to approval from Suffolk County Council prior to discharge to Friston Watercourse. However, the physical connection into the existing Main River channel would require a Flood Risk Activity Permit from the Environment Agency. The above is noted in the updated ***OLEMS*** (AS-127).

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EA-215	Existing Compensation Discharge	The final CoCP will include information on surface water flow rates and discharge rates during temporary works to ensure the compensation discharge currently operated by Essex & Suffolk Water at the Hundred River (Work No. 19) can be maintained.	Agreed	Agreed	Agreed	As noted in the ***Outline CoCP*** (document 8.7), it is agreed that Applicants will demonstrate that temporary arrangements to maintain flow at the Hundred River crossing will be sufficient to convey the compensation discharge.
EA-216	Maintenance of Friston Watercourse	The framework to ensure that any additional inspection or maintenance works are appropriately undertaken will be agreed between the Applicants and the Environment Agency prior to commencement of Work Nos. 30 and 41.	Agreed	Agreed	Agreed	It is acknowledged that Sustainable Drainage Systems (SuDS) generally reduce sediment transfer downstream due to the settlement function which is inherent within specific SuDS features.

2.4 Onshore Ecology

22. The Projects have the potential to impact upon ground conditions and contamination. ***Chapter 22 Onshore Ecology*** of the ES (APP-070) provides an assessment of the significance of these impacts.

23. ***Table 8*** provides an overview of consultation undertaken with the Environment Agency regarding onshore ecology. Further details on the stakeholder engagement process for onshore ecology can be found in the ***Consultation Report*** (APP-029).

Table 8 Summary of consultation with the Environment Agency regarding onshore ecology

Date	Contact Type	Topic
Pre-Application		
20th February 2018	Meeting	Survey methodologies and mitigation requirements.
27th April 2018	Meeting	Method statement, project updates and approach to the assessment (methodology, impacts, data collection, etc.).
5th November 2018	Meeting	Presentation of assessment, impacts and mitigation in advance of publication of the PEIR.
9th May 2019	Meeting	Post-PEIR consultation feedback.
Post-Application		
6th February 2020	Meeting	SoCG meeting 1
28th February 2020	Meeting	SoCG meeting 2

24. ***Table 9*** presents the matters agreed or not agreed in relation to onshore ecology.

Table 9 Onshore Ecology

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
Environmental Impact Assessment						
EA-301	Existing Environment	Sufficient desk-based data and survey data has been collected to inform the assessment to meet the standard and requirements of the Environment Agency.	Agreed	Agreed	Agreed	It is agreed that the following pre-construction surveys will be undertaken: • Reptiles. • Eel. • Fish. • Otter. • Water vole. The scope of the above surveys will be specified in the Ecological Management Plan. The ***OLEMS*** (AS-127) specifies that the Environment Agency will be consulted on the scope of those pre-construction surveys that fall within the Environment Agency's remit.
EA-302	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project (insofar as it relates to	Agreed	Agreed	Agreed	Pre-construction surveys will inform the detailed design and construction works.

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		the Environment Agency's statutory remit),				
EA-303	Assessment Methodology	The worst case scenario presented in the assessment is appropriate (insofar as it relates to the Environment Agency's statutory remit),	Agreed	Agreed	Agreed	None
EA-304	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of onshore ecology (insofar as it relates to the Environment Agency's statutory remit),	Agreed	Agreed	Agreed	The Environment Agency requests the Applicants provide a description of the baseline for eel and coarse fish prior to construction commencing. The eel and fish baseline established by pre-construction surveys will be presented within the Ecological Management Plan. As per EA-301, the ***OLEMS*** (AS-127) specifies that the Environment Agency will be consulted on the scope of the eel and fish pre-construction surveys.
EA-305	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are	Agreed	Agreed	Agreed	The Environment Agency agrees on points EA-305 and EA-306, subject to specific details being set out within the final Watercourse Crossing Method Statement which will draw on pre-

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		consistent with the agreed assessment methodologies.				construction surveys and a full understanding of the construction works to be undertaken and subsequent effects. The above is set out in the ***Outline Watercourse Crossing Method Statement*** (REP11-074).
EA-306	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies (insofar as it relates to the Environment Agency's statutory remit).	Agreed	Agreed	Agreed	As above
EA-307	Mitigation	No mitigation other than that identified as the embedded mitigation within ***section 22.3.3*** of ***Chapter 22 Onshore Ecology*** (APP-070) is required (insofar as it relates to the Environment Agency's statutory remit).	Agreed	Agreed	Agreed	None
Draft Development Consent Order						
EA-308	Wording of Requirement(s)	The wording of Requirement 21 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with	Agreed	Agreed	Agreed	As noted in the ***OLEMS*** (AS-127), the Environment Agency will be consulted by the Applicants during preparation of the Ecological Management Plan.

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Environment Agency Position	Notes
		reference to development of an Ecological Management Plan for the mitigation and monitoring of potential impacts to onshore ecology is appropriate and adequate (insofar as it relates to the Environment Agency's statutory remit).				
EA-309	Wording of Requirement(s)	The wording of Requirement 22 provided within the ***draft DCO*** (REP7-006) (and supporting certified documents) with reference to development of a CoCP for the mitigation and monitoring of potential impacts to onshore ecology is appropriate and adequate (insofar as it relates to the Environment Agency's statutory remit).	Agreed	Agreed	Agreed	As per the ***Outline CoCP*** (document reference 8.1), the Environment Agency will be consulted by the Applicants during preparation of the Watercourse Crossing Method Statement.
Other Matters as Required						
EA-310	None	Not applicable	Not applicable	Not applicable	Not applicable	None

3 Signatures

25. The above Statement of Common Ground is agreed between East Anglia TWO Limited, East Anglia ONE North Limited and the Environment Agency on the day specified below.

Signed:	[redacted]
Print Name:	Jo Firth
Job Title:	Sustainable Places Team Leader – East Anglia
Date:	28 June 2021
Duly authorised for and on behalf of the **Environment Agency**	
Signed:	Richard M [redacted]
Print Name:	Richard Morris
Job Title:	Senior Project manager
Date:	28th June 2021
Duly authorised for and on behalf of **East Anglia TWO Limited**	
Signed:	Richard Mor [redacted]
Print Name:	Richard Morris
Job Title:	Senior Project Manager
Date:	28th June 2021
Duly authorised for and on behalf of **East Anglia ONE North Limited**	