The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.29 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Environment Agency.

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nationalgrid

Contents

1. Introduction

1.1 Overview

1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application process for a Development Consent Order (DCO) and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.

1.1.2 This SoCG is between National Grid Electricity Transmission Ltd ("National Grid") and the Environment Agency relating to the DCO application for the Sea Link Project (the Proposed Project). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).This Statement of Common Ground

1.1.1 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and the Environment Agency. The SoCG will evolve as the DCO application progresses through examination.

1.2 Role of the Environment Agency in the DCO Process

1.2.1 The Environment Agency (EA) is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs, and is supported by the Flood Forecasting Centre. The EA was established in 1996 to protect and improve the environment. The EA is responsible for regulating major industry and waste, treatment of contaminated land, water quality and resources, fisheries, inland rivers, estuary and harbour navigations, conservation and ecology. The EA are also responsible for managing flood risk from main rivers, estuaries, reservoirs and the sea.

1.2.2 The Environment Agency's role in relation to the Development Consent Order (DCO) process derives from the Planning Act 2008. The roles and responsibilities of the Environment Agency under the 2008 Act fall into the following categories:

- Statutory consultee – as a prescribed consultee under the Planning Act 2008 in relation to any Environmental Impact Assessment (EIA) or as a conservation and environmental body for Flood Risk Assessments (FRAs).
- It is the delivery body, advisor and regulator on a range of environmental, flood risk and climate change matters and an advisor on spatial planning.

1.3 Format of Document and Terminology.

1.3.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.

1.3.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved. The Parties have also indicated the likelihood that agreement will be reached on each item.

1.3.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1. Abbreviations.

Abbreviation/Term	Definition
BNG	Biodiversity Net Gain
CIRIA	Construction Industry Research and Information Association
CoCP	Code of Construction Practice
DCO	Development Consent Order
EA	Environment Agency
EA1N	East Anglia 1 North
EA2	East Anglia 2
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
FRA	Flood Risk Assessment
FRAP	Flood Risk Activity Permit
HDD	Horizontal Directional Drilling
LDC	Land Drainage Consent
MWC	Main Works Contractor
NSIP	Nationally Significant Infrastructure Project
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
Q95	A water level in a river that is exceeded 95% of the time i.e. low flow.
REAC	Register of Environmental Actions and Commitments
SoCG	Statement of Common Ground
SPR	Scottish Power Renewables
WFD	Water Framework Directive

2. Record of Engagement

2.1 Summary of pre-application discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the DCO application.

Table 2.1 Pre-application discussions

Date	Topic	Discussion points
06 February 2024	River Fromus Crossing Meeting	River Fromus Crossing
08 February 2024	Smelt	The inclusion of Smelt into National Grid's assessment
21 February 2024	Stantec, AECOM, National Grid and EA - Geology and Hydrogeology Thematic Meeting	Project update and timeline, statutory consultation – discussions about concerns related to groundwater protection and consideration required for water resources in terms of water use and water requirements, geology and hydrogeology updates – Groundwater Risk Assessment to be undertaken as part of the ES and will identify areas where additional targeted Hydrogeological Risk Assessment will be undertaken following detailed design, discussion on risks of potential drilling fluid breakout at trenchless crossings to be included, and AOB/questions were all discussed in this meeting.
28 February 2024	Physical Processes	Cable burial depths and rock protection, decommissioning
04 March 2024	SCC, ESC, EA Meeting – Water Environment	Project update and progress from previous meeting, stating that Friston SWMP data has been received, Engagement with SPR regarding holistic surface water drainage design and coordinated approach discussed, sequential testing, flood investigation report discussion, baseline flood risk data. River Fromus Crossing update and proposals, drainage design updates and AOB/questions.
02 April 2024	TDC, DCC, EA Meeting – Water Environment	Review of actions from last thematic meeting, groundwater monitoring and flood risk assessment at Kent converter station site, drainage design updates, construction phase dewatering and permitting requirements, AOB

Date	Topic	Discussion points
29 April 2024	SCC, ESC, EA Meeting – Water Environment	Review of actions from last thematic meeting, WFD assessment approach, dewatering approach, updates on River Fromus crossing, updates on Saxmundham converter station drainage, AOB.
28 May 2024	TDC, DDC, KCC, EA – Hydrology meeting	Ecological mitigation land areas, additional consents and licences to DCO, drainage updates, works within River Stour floodplain/riparian zone
27 June 2024	SCC, ESC, EA - Water Environment	Summary email in lieu of thematic meeting, highlighting Project updates since previous thematic meeting, for example the fact it had been accepted for examination.
30 July 2024	Construction Compound within a Source Protection Zone 1- Kent	The proposed temporary construction compound located within a Source Protection Zone 1 in Pegwell area.
28 August 2024	Letter	Letter from EA regarding marine and transitional waterbodies.
17 September 2024	Kent Hydrology EIA Meeting	Water Framework Directive (WFD) Assessment Update, River Stour Crossing – discussions on flood plain compensation, EA recommended consultees for the Stour River works, discussion on the bridge for the crossing; AOB and questions.
17 September 2024	Email	Email from EA regarding ecology tables review and fish surveys.
24 September 2024	Suffolk Hydrology Meeting	Actions from previous meeting, Water framework directive update, Fromus update, update on alternative report, update on permitting strategy
04 December 2024	Letter	Letter from EA regarding River Fromus.
6 December 2024	Letter	Letter from NG regarding 6m bridge option.
3 January 2025	Letter	Letter from EA regarding River Fromus 6m bridge and WFD Compliance
7 January 2025	Email	Initial response from National Grid to the above letter.
11 February 2025	Letter	Comments provided by EA on the draft WFD Assessment
14 February 2025	Letter	Comments provided by EA on the draft FRA

Date	Topic	Discussion points
7 May 2025	Flood Model	Confirmation from EA regarding receipt of the River Fromus flood model.
9 May 2025	Email/Spreadsheet	EA Provided Updated Work Package Tracker
15 August 2025	Meeting	A presentation was given looking at each of the proposed culverts individually. This was followed up with the issuing of the presentation slides with additional information about the culverts.
23 October	Email	EA Provided Updated Work Package Tracker setting out their remaining areas for discussion which now forms the basis of this SoCG.
14 November	Email	Response from the EA on the two ABPmer Landfall Sediment Modelling reports.

Other Correspondence from the Environment Agency

References	Description (e.g. Scoping Opinion, Relevant Rep, Written Rep, Examiner's Questions etc)
KT/2022/129473	01: (01 = feedback on proposed survey methodology and location) 02: superseded = (01 = feedback on proposed survey methodology and location: comments from FBG, Hydrology and GWCL) - no further info 03: charged ground investigation advice (GWCL)
KT/2022/130046	Charged advice relating to river crossing in Kent area
AC/2022/131394/01	Non statutory consultation
AC/2022/131336/01	River crossings consultation
AC/2022/131340/01	Scoping Opinion
XA/2023/100041/01	PEIR report
XA/2024/100083/01	River Fromus Crossing non-statutory Advice
XA/2024/100083/02	Responding to developer letter dated 06 June 2024
XA/2024/100120/01	Consultation on Sea Link WFD scoping tables for Marine (and transitional) waterbodies
XA/2023/100041/02	Re-consultation: Section 42
XA/2024/100150/01	Sea Link - Ecology Survey Tables
XA/2024/100083/03	Sea Link - River Fromus Crossing Technical Note. Supplementary information received (WFD compliance assessment), before consultation was finished.

Date	Topic	Discussion points
XA/2024/100083/04	Sea Link – River Fromus Crossing technical Note and WFD compliance Assessment Fromus	
XA/2024/100212/01	Sea Link River Fromus Invertebrate literature review	
XA/2024/100223/01	River Fromus 6m bridge and WFD compliance	
XA/2024/100234/01	Draft DCO	
XA/2025/100236/01	WFD	
XA/2025/100237/01	FRA	
XA/2025/100237/02	FRA River Fromus Flood Modelling technical note submitted	
XA/2025/100282/01	NaFRA 2 notification email	
XA/2025/100237/03	Fromus Flood Modelling (Suffolk)	
XA/2025/100350/01	Relevant representations and environmental statement	
XA/2025/100370/01	River Fromus Hydraulic modelling	
XA/2025/100370/02	River Fromus Hydraulic modelling	
XA/2025/100376/01	River Conditions Assessment	
XA/2025/100370/03	River Fromus Hydraulic modelling	
XA/2025/100370/04	River Fromus Hydraulic modelling	
XA/2025/100430/01	WFD Classification consultation	
XA/2025/100429/01	Query regarding EA026 and EA027	
XA/2025/100432/01	Principal Areas of Disagreement	
XA/2025/100472/01	Change application	
XA/2025/100350/02	Deadline 2 Response	

3. Areas of Discussion Between the Parties

3.1 Key issues under discussion.

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
EA064	APP-037 2.13 Design and Layout Plans	**Flood Risk** Flood Risk Assessment Both Suffolk and Kent	EA064: The temporary bridge over River Stour and a permanent bridge over the River Fromus are proposed, without any reference to the soffit height in metres Above Ordnance Datum (mAOD) on drawings.	The River Stour temporary bridge will be installed with a soffit height that allows for navigation of the river. The soffit height will be determined at detailed design; however, it shall be a minimum of 4 m above the mean high water springs (MHWS) level. We estimate MHWS to be approximately 2.35 m AOD at the proposed crossing location which would require a soffit level of approximately 6.35 m above ordnance datum (AOD). The River Fromus bridge has been shown with two options which are 4 m and 6 m above the Q95 flow level. We estimate the Q95 flow level to be 6.49 m AOD at the crossing location, therefore the soffit levels of the two bridge options would be approximately 10.49 m AOD and 12.49 m AOD respectively	We do not consider this issue resolved. Previously we had concerns that a temporary bridge over the River Stour and a permanent bridge over the River Fromus are proposed, without any reference to the soffit height in metres Above Ordnance Datum (mAOD) on drawings. In terms of freeboard for the River Fromus crossing, the Applicant has committed to 600 mm above the design flood level in previous discussions, which is suitable from a flood risk perspective for a fluvial watercourse. For the River Stour, the Soffit level should be above the 0.5% flood level with an allowance for additional freeboard. The Applicant is using Mean High Water Spring (MHWS) to detail the soffit level, which is sufficient, but this also needs to be above the relevant flood levels with a freeboard allowance. The tidal level is higher than the fluvial level, therefore we'd need confirmation that the soffit height is above the tidal level. The model suggests that the level within **Document Late Deadline 1 S 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA -Accepted at the discretion of the Examining Authority [REP1-111])** section 2.4.1. l(6.35mAOD) is likely suitable - as it's above both the 0.5% and 1% AEPs. However, we require confirmation of this in documentation, such as in **the Flood Risk Assessment**. We recommend more detail is provided upfront regarding the River Stour crossing design; however, we appreciate that detailed designs will be submitted during the Flood Risk Activity Permitting (FRAP) application. It is crucial that we work with the Applicant on these designs early, as the Applicant should be aware that a FRAP may not be forthcoming, regardless of the DCO being approved.	Under discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
					The Applicant may find SR2015 No.28: Installing a clear span bridge on a main river of up to 8 m span and 4.2 m width helpful.	
EA065	APP-292 6.8 Flood Risk Assessment		EA065: Sequential approach within Flood Zone 3 not clearly applied to avoid Flood Zone 3b.	The Order Limits include land within Flood Zone 3a/b at the following locations: • Landfall – where all construction works and operational infrastructure across the flood zone 3 extent would be underground thereby avoiding any interaction with Flood Zone 3a or 3b. • 1 No. temporary drainage outfall and 1 No. permanent infiltration outfall pipe (buried) and outfall – these aspects of the project are water compatible which is deemed in the NPPF Technical Guidance an appropriate and justified use within Flood Zone 3b • Local to the proposed permanent crossing of the River Fromus – flood modelling has confirmed no interaction with Flood Zone 3b in this location. • Along very localised sections of 2 No. access routes, one to the pylon located adjacent to the Hundred River and one that would provide monitoring access from the B1121 to a permanent outfall. No alteration to the level of the land along these routes are proposed and so there is no potential for impacts on floodplain flow paths or floodplain storage. In the Kent Onshore Scheme, the proposed HVDC underground cable route, Minster Converter Station and Substation, all construction compounds and all cable transition joint bays would be situated in Flood Zone 1 and at landfall all construction works and operational infrastructure across the Flood Zone 3 extent would be underground, thereby avoiding any interaction with Flood Zone 3a or 3b.	We do not consider this issue resolved. We were concerned that the sequential approach within Flood Zone 3 was not being clearly applied to avoid Flood Zone 3b. It is still unclear what approach to the sequential test the Applicant is proposing. In line with PPG Paragraph: 079 Reference ID: 7-079-20220825, some developments may contain different elements of vulnerability, and the highest vulnerability category should be used, unless the development is considered in its component parts. If the Applicant is proposing to split their proposal into component parts (e.g., 1 No. temporary drainage outfall and 1 No. permanent infiltration outfall pipe (buried) and outfall are water compatible), then they would need to provide clarity on what vulnerability is proposed for each component. However, if the applicant is merely stating that these components of are essential infrastructure that have water-compatible uses, these should be designed and constructed to: • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; and • not impede water flows and not increase flood risk elsewhere. We agree that the overhead line tower works would be deemed “essential infrastructure” and so is appropriate for flood zone 3, as long as the exception test is passed. The Overhead Line Towers once constructed should not impede flow as they are to be “open” structures, so therefore should not increase flood risk elsewhere. Additionally, if the overhead line towers are to be placed within the tidal floodplain only, then floodplain compensation won’t be required. However, if	Under discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				Within the floodplain of the River Stour works to overhead line towers are proposed, including erection of new Overhead Line Towers, works to existing Overhead Line Towers and the dismantling of Overhead Line Towers. These works are classified as essential infrastructure which is deemed in the NPPF Technical Guidance an appropriate and justified use within Flood Zone 3b. It is therefore concluded that inappropriate development within the functional floodplain is not proposed.	new overhead line towers are to be constructed within the fluvial floodplain, then the Applicant should consider if and what flood compensation may be required. Please see EA069 and EA089 for more details on the River Stour floodplain.	
EA066	APP-292 6.8 Flood Risk Assessment		EA066: Medium flood risk noted during construction without clear location or specifics.	Areas at high and medium risk of flooding from surface water sources, as defined by the updated National Flood Risk Assessment 2 (NaFRA2) datasets published in January 2025 are illustrated in Plates 2A to 2D in **Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]**. Separate figures are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. Areas at high and medium risk of fluvial flooding (represented by Flood Zone 3) are illustrated in Plates 1A to 1D in **Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]**. Separate figures are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. Mitigation for works within these zones are detailed in Table 1.1 of **Application Document 6.8 Flood Risk Assessment [APP-292]**.	We cannot resolve this issue at this point in time. There is a statement in Ex 1.3.2 within **Application Document 6.8 Flood Risk Assessment [APP-292]** that: "*With these measures in place, the residual risk of flooding during the construction phase has been assessed as low risk for all sources, except where it locally increases to medium*." We note that this relates to all sources. It is unclear as to where the flood risk has been increased during the construction phase from low to medium. It needs to be made clear that flood risk should not increase, so we require the Applicant to change the wording.	Under discussion
EA067	APP-292 6.8 Flood Risk Assessment		EA067: Incident response plan (GG24) lacks explicit flood defence damage contingencies.	An updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has been made as follows: GG24 - An Incident Response Plan will be developed by the contractor for the construction phase. This will be prepared prior to construction works commencing and thereafter complied with. It will outline procedures that will be implemented in case of unplanned events, including but not limited to site flooding, pollution incidents and flood defence damage contingencies. Local	We are satisfied and consider this issue resolved. We welcome the updates to commitment GG24 in the document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]. The specifics relating to trigger thresholds for action (e.g., settlement) should be addressed through a FRAP.	Agreed

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				authorities will be informed of any large-scale incidents under the Incident Response Plan. Smaller scale issues will be recorded in a register that will be made available to local authorities for review on request.	Please note that the applicant's response in Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] doesn't match the issue. The Applicant's response is the same for both EA066 and EA067. This issue relates to the Incident response plan and flood defence contingencies and so we have looked at the Applicant's response to EA068 instead.	
EA068	APP-292 6.8 Flood Risk Assessment		EA068: Open-cut crossings of main rivers suggested under W02. Stockpile setback distances don't consider flood zones.	It is confirmed that no open cut crossings of main rivers are proposed. Commitment W02 requires storing of soil stockpiles to be > 15 m of a main river (>16m where river is tidal) and as described in the response to EA065, interactions with Flood Zone 3b are very limited, hence ensuring stockpiles avoid this zone will be practicable.	We cannot resolve this issue at this point in time. We were concerned that open-cut crossings of main rivers were suggested under W02, and stockpile setback distances didn't consider flood zones. Commitment W02 in the document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) -Accepted at the discretion of the Examining Authority [REP1-102] should explicitly state that no spoil will be stored in Flood Zone 3b and that open cut will be limited to ordinary watercourses. Please note that the applicant's response in Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] doesn't match the issue. It appears the Applicant's response to issue EA068 is relevant to EA067 instead.	Under discussion
EA069	APP-292 6.8 Flood Risk Assessment		EA069: (W06) Construction material storage in Flood Zone 3 with ground raising, however there is no compensatory storage mentioned.	Commitment W06 commits to providing mitigations where temporary storage of construction materials in Flood Zone 3(a) cannot be avoided, limited to the River Stour floodplain. Examples include using model outputs to inform the placement of soil during construction and aligning soil stockpiles to avoid impeding key flood flow routes. Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that accompanies the National Planning Policy Framework compensation for losses of	We do not consider this issue resolved. We have identified that the River Stour floodplain within the boundary of the scheme is fluvially-influenced in areas, as well as having areas of tidal/fluvial crossover, and solely tidal influence. Of particular concern is the right bank floodplain of the River Stour between grid references 630950, 162775 and 632100, 162300 and additionally at grid reference 632650, 159900 as these areas fall within the defended fluvial floodplain, and	Under discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				floodplain storage are not required. This has also been previously agreed with the Environment Agency.	parts of these areas are within the functional floodplain. We would not be requiring compensation for works in tidal areas or areas which have tidal/fluvial cross-over. However, floodplain compensation is required for any areas of development in fluvial areas, to manage the flood risk associated with the River Stour floodplain. This will ensure that the permanent and temporary elements of the scheme are not displacing fluvial flood storage. Given the proposed temporary nature of the bridge (we assume 5-years given the length of the construction phase), associated temporary works, and the large size of the Stour floodplain, we will ensure compensation requirements are proportionate and reasonable. Compensation for temporary works should be balanced against the commitment to fully reinstate the land to its pre-construction condition upon removal. We note that Commitment W06 (REP1-102) states “No construction materials should be stored within Flood Zone 3 and areas of high and medium risk of flooding from surface water, where this cannot be avoided, for example in the River Stour floodplain adequate mitigation measures will be applied. For example, model outputs would inform the placement of soil during construction and soil stockpiles would be aligned in the direction of flow to avoid impeding flood flow routes.” We require a clear commitment to re-instate land to pre-construction levels within 5 years of commencing construction. Currently, the Applicant only commits to this for temporary haul roads. We accept that it may not be possible to provide all the details of stockpiles at this stage. Further detail regarding the stockpiles would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this will be dealt with via the Flood Risk Activity Permit (FRAP) process. At FRAP stage, we’d require the details	

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
					relating to the location, length of time in place, quantity of material and method for storing the material. Please note, this issue interlinks with EA089.	
EA070	APP-039 2.14.2 Indicative General Arrangements Plans - Kent APP-292 6.8 Flood Risk Assessment		Details of attenuation ponds and construction methods including whether any changes to ground level are required to be submitted and reviewed. These details should be included in the CEMP.	The attenuation basins in Kent are designed to be 0.5 m below existing ground level to allow for the relatively high ground water table. Bunding around the attenuation basins will be provided where necessary and additional drainage storage is allowed for within the Converter/Substation platform	We do not consider this issue resolved. We were concerned that details were omitted regarding temporary attenuation ponds and outfalls within floodplain. There were no details regarding their construction method, and the expected changes in ground level in order to construct these temporary features. The Applicant has stated in Document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.7 that attenuation ponds will be 0.5m below existing ground level, but no detail has been provided regarding the “bunding” element. Therefore, we cannot determine the level of risk. We would expect to see more detail of these features, and we want to see clarification regarding whether these temporary attenuation features are to be located within the floodplain. Further detail regarding the attenuation ponds outfalls would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this may be dealt with at FRAP stage. To resolve this issue, we require clarity as to whether the temporary attenuation ponds will be located in the fluvial floodplain. If they are to be located in fluvial floodplain, then we’d require a commitment that floodplain storage compensation will be undertaken. We accept that it may not be possible to provide all the details of stockpiles at this stage. Further detail regarding the stockpiles would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this will be dealt with via the FRAP process. At FRAP stage, we’d require the details relating to the location,	Under Discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
					length of time in place, quantity of material and method for storing the material. Regarding floodplain compensation for the River Stour, please see EA069.	
EA071	APP-340 7.5.3 Outline Onshore Construction Environment Management Plan		EA071: Fencing of compound and construction works may preclude access to Environment Agency assets and flood defences.	Where required, an updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency.	We are satisfied and consider this issue resolved. We were concerned that fencing of compound and construction works may preclude access to Environment Agency assets and flood defences. The Applicant has stated in document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]commitment W28 that fencing required for compounds and working areas will be designed such that there are no restrictions to the Environment Agency's access for the maintenance of their flood defences. We are content with this."	Agreed
EA073	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment		EA073: Culverts are proposed with some retained permanently. Impacts of culverts rated as minor adverse without supporting evidence.	The impacts of culverts that are to be permanently retained on flood risk has been assessed as minor adverse on the basis of the culvert design criteria that are secured through **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]** via a number of commitments in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**.** The commitments provide for culverts that are sized to reflect the span, width and the flow characteristics of the watercourses under peak flow conditions and for culverts that are regularly maintained and kept free from debris. It is also noted that crossing designs have been discussed with the consenting authorities for the culverts (Stour (Kent) Internal Drainage Board (IDB) and Suffolk County Council as Lead Local Flood Authority (LLFA) and key design parameters have been agreed. Where required, the updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following	We are satisfied and consider this issue resolved. We had concerns that culverts were being proposed with some retained permanently. The applicant has confirmed in documents Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.10. I that only ordinary watercourses are to be culverted and so we defer to the consenting authorities for these ordinary watercourses, Stour (Kent) Internal Drainage Board (IDB) and Suffolk County Council as Lead Local Flood Authority as (LLFA)	Agreed

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				further agreement between the Applicant and Environment Agency.		
EA074	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment		EA074: Unclear definition of receptor sensitivity classification and how this has been derived.	The environmental assessment presented in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]** have followed the methodology and used the receptor sensitivity classifications set out in the Design Manual for Roads and Bridges LA113: Road Drainage and the Water Environment (National Highways, 2020), which is suitable for applicable to other linear forms of infrastructure development. With regard to flood risk sensitivity examples are provided for each sensitivity classification in Table 4.6 of the Chapters. Very high sensitivity is assigned to essential infrastructure and highly vulnerable development (as defined by the National Planning Policy Framework), with High sensitivity assigned to more vulnerable development, which includes residential property.	We are satisfied and consider this issue resolved. We were concerned that there was an unclear definition of receptor sensitivity classification and how this had been derived. We do not find the approach set out in the Design Manual for Roads and Bridges (DMRB) to be appropriate for flood risk. For example Table 4.7 in document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment (APP-051), could be interpreted to suggest that an increase in peak flood level may be acceptable. This is at odds with planning policy such as: • The Overarching National Policy Statement for Energy:o states that "Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development." (section 5.8.12). • National Planning Policy Framework: requires that development should not increase flood risk elsewhere (see paragraphs 170, 178b, and 181). We recommend that the Applicant change the wording to make it clear that there will be no increase in flood risk. We are however, content to resolve this issue, as the Applicant has described how receptor sensitivity classification was derived.	Agreed
EA077	APP-292 6.8 Flood Risk Assessment APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment	**Flood Risk** Flood Risk Assessment Suffolk	EA077: Discrepancy in number of permanent culverts retained (two in APP-051, whist three in APP-292).	It is clarified that, as part of the Suffolk Onshore Scheme two permanent culverts are required for the access road (S/WA/0070 and S/WA/0086). Also, permanent bellmouths off the B1119 would be constructed in two locations, where works to existing culverts would be required. The discrepancy between the information in **Application Document 6.8 Flood Risk Assessment [APP-292]** and **Application**	We are satisfied and consider this issue resolved. We previously highlighted a discrepancy in the number of permanent culverts retained (two in documents 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment[APP-051], whilst three in 6.8 Flood Risk Assessment [APP-292]).	Agreed

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] will be noted in the Proposed Project's post submission errata log.	The Applicant has clarified in document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.14. Ithat as part of the Suffolk Onshore Scheme, two permanent culverts are required for the access road (S/WA/0070 and S/WA/0086). They have confirmed the discrepancy between the information in Application Document 6.8 Flood Risk Assessment [APP-292] and Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] will be noted in the Proposed Project's post submission errata log. We are satisfied with this.	
EA078	APP-292 6.8 Flood Risk Assessment APP-119 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report - Suffolk		EA078: Uncertainty around feasibility of HDD (or other trenchless methods) at landfall.	HDD has been assessed as feasible in reviews by trenchless specialists as reported in **Application Document 7.3 Design Development Report [APP-321]** Appendix A Landfall HDD Feasibility Technical Note. As with all construction methods, there are risks and these have been assessed with proposed mitigation measures to ensure the HDD could be completed. An alternative trenchless method, DirectPipe, has also been assessed as a potential alternative for the landfall and could be used in the very unlikely event that HDD was unsuccessful. However, the DirectPipe method requires sufficient space behind the entry point and was less favoured due to constraints in land access and routeing west of the entry point. These constraints would need to be overcome if DirectPipe was to be used. While additional ground investigations are planned, they are not expected to identify any significant challenges or changes in ground conditions. The Crag deposits that form the drilled strata for the HDD are extensive and well understood within East Anglia, and similarly the underlying London Clay, that is routinely drilled using HDD methods	We are satisfied and consider this issue resolved. We previously had uncertainty around feasibility of HDD (or other trenchless methods) at landfall. The Applicant has assessed HDD as being feasible as reported in the document 7.3 Design Development Report [APP-321] and we are satisfied with this.	Agreed

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EA079	APP-292 6.8 Flood Risk Assessment APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA079: Lack of quantified assessment of the rate of coastal erosion at the landfall location over the lifetime of the project.	At the Suffolk landfall, contingency measures have been embedded within the design by locating the onshore HDD entry pit approx. 800 m landward of the Mean Water High Spring (MHWS) line. This location is also landward of the B1353 connecting Aldeburgh to Thorpeness, a key piece of local infrastructure that would most likely attract funding for protection, should it become threatened by coastal erosion in the future. Whilst protection of the road cannot be guaranteed for the long-term (i.e. 50–100 years from present day), it is expected that this would at least be provided covering the short to medium term (i.e. 20-50 years from present day) and therefore allow sufficient time for appropriate action to be undertaken, should this eventuality arise. The Environment Agency's National Coastal Erosion Risk Management (NCERM) projections of future coastal erosion between Aldeburgh and Thorpeness have been reviewed and indicate that the proposed landfall cables and related infrastructure will remain protected over the operation and decommissioning phases. However, further assessment work will be required at the detailed design stage to support this conclusion.	We do not consider this issue resolved. We previously raised there was a lack of quantified assessment of the rate of coastal erosion at the landfall location over the lifetime of the project. We require information relating the Environment Agency's National Coastal Erosion Risk Management (NCERM) data to be presented as part of the Flood Risk Assessment (FRA). If the further assessment work shows NCERM data to not be conservative, then the applicant should liaise with the Environment Agency. There needs to be consideration as to whether erosion over the lifetime of the project would lead to exposure. We support the Applicant's view that further assessment will be undertaken at the detailed designed stage. However we require a commitment that this detail will be provided in due course. To resolve this issue, we require: • A commitment within the Document Late Deadline 1 Submission - 7.5.3.2 (B)CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to ensure that the further assessment takes place at detailed design stage. • The wording for requirement 13. (Decommissioning) in Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036] to be amended to include the wording "for the approval of by the relevant planning authority, in consultation with the Environment Agency". • Input of the wording for a requirement to assess the possibility of decommissioning	Under discussion

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					landfall infrastructure prior to the decommissioning phase of the development. See further information below. We have been engaging with the Applicant's project team regarding the wording of a requirement for assessing the decommissioning and removal of landfall infrastructure. We are currently having this reviewed by East Suffolk Council. Once they have finished their review, we will share with the project team for a final review. We will then request that the requirement is formally added to the Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036].	
EA080	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-292] 6.8 Flood Risk Assessment		EA080: HDD surface level monitoring is not linked to monitoring of flood defence and emergency response.	Commitment W12 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 2 states that: *"At the Suffolk and Kent landfalls the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences*." This commitment provides the Environment Agency with the opportunity to influence the monitoring and to agree with the Applicant appropriate triggers and actions. However, the HDD at Kent is planned 20 m beneath the sea defences with the calculated worst-case long term settlement from the HDD as 3 mm (<5 mm). Similarly the HDD at Suffolk is planned at 23 m beneath the existing natural coastal defences, with the calculated worst-case long-term settlement from the HDD of 3 mm (<5 mm). As such the level of settlement potentially induced by the HDDs is not of a scale that could impair coastal sea defences resulting in compromised defences and flood risk management. It is not therefore deemed	We are satisfied and consider this issue resolved. We previously raised that HDD surface level monitoring was not linked to monitoring of flood defence and emergency response. The applicant states in commitment W12 in the 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)[APP-342] "*At the Suffolk and Kent landfalls the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences."* We are satisfied with this	Agreed

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				necessary to monitor settlement, based on the WCS long term values cited.		
EA081	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment		EA081: Bridge may be retained after operation phase without adaptation plan for future flood risk.	If all the assets accessed via the bridge were decommissioned then the bridge would likely be decommissioned as well, as the maintenance obligation of the bridge would not be something National Grid Energy Transmission or National Grid Ventures (in relation to LionLink) would want to retain.	We do not consider this issue resolved. We previously raised that the bridge over the River Fromus may be retained after operation phase without an adaptation plan for future flood risk. We note that the bridge abutments for the Fromus crossing fall outside the design flood extent and hence there is no loss of floodplain storage associated with the abutments. However, we note that the review of the hydraulic modelling for the Fromus crossing noted that the flood extent is sensitive to Manning's roughness within the river channel at this location. There are higher roughness values causing out of bank flooding and some impact to the proposed right bank bridge abutment. In light of this, it would be prudent to ensure the channel and embankment vegetation in the vicinity of the proposed crossing is well maintained throughout the operational life of the bridge. This is also applies beyond decommissioning phase if the crossing is to be retained. We note that B32 within Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) -Accepted at the discretion of the Examining Authority [REP1-102] states there will be riparian habitat planting along the riparian corridor of the River Fromus. Given the sensitivities shown in the model to manning roughness, increase in vegetation along the watercourse may exacerbate flood risk. To resolve this issue, we require the following: • Alter the wording for requirement 13. (Decommissioning) in Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036] to be amended to include the wording “for the approval of by the relevant planning authority, in	Under discussion

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					consultation with the Environment Agency". • Adjust the Mannings Roughness value in the modelling, re-assess flood risk, and adjust the design if necessary; or commit to providing floodplain compensation in Suffolk (inclusive of the River Fromus).	
EA082	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment		EA082: High surface water flood risk areas which align with watercourses may imply unmapped fluvial flood risk for catchments less than 3 km². Noting that in many cases the Flood Map for Planning (FMfP) has an evidence gap for catchments less than 3 km², fluvial flood risk may not have been adequately assessed.	**Application Document 6.8 Flood Risk Assessment [APP-292]** has used the Risk of Flooding from Surface Water dataset as a proxy to review and assess fluvial flood risk from smaller ordinary watercourses that drain unmapped catchments. There are no smaller ordinary watercourses that have expansive (wide) areas of high surface water flood risk associated with them and no areas where vulnerable operational infrastructure would be located within such a zone. The commitments to retaining buffers between project construction activities and watercourses (with the exception of at watercourse and cable crossing sites) would therefore avoid these flood zones.	We are satisfied and consider this issue resolved. We were concerned that fluvial flood risk may not have been adequately assessed, as high surface water flood risk areas which align with watercourses may imply unmapped fluvial flood risk for catchments less than 3 km². We noted that in many cases, the Flood Map for Planning (FMfP) has an evidence gap for catchments less than 3 km². The Applicant has confirmed within document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.19 that they have used the "Risk of Flooding from Surface Water dataset" as a proxy to review and assess fluvial flood risk from smaller ordinary watercourses that drain unmapped catchments in the Document 6.8 Flood Risk Assessment [APP-292]. They have also confirmed that the commitments to retaining buffers between project construction activities and watercourses (with the exception of at watercourse and cable crossing sites) would therefore avoid these flood zones.	Agreed
EA083	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project	**Flood Risk** Flood Risk Assessment Kent	EA083: Overhead line crossing over River Stour.	Where required, an update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency.	We do not consider this issue resolved. We asked that appropriate mitigation is in place within Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to ensure the River Stour is protected in relation to the overhead line crossing.	Under discussion

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					The applicant has not yet updated the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the requested information.	
EA084	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project		EA084: Landscaping involving Earth Bunds.	Earth bunds are proposed as part of the landscape mitigation around the Saxmundham Converter Station site which are outside the floodplain. The extent of earthworks around the Converter Station will be subject to detail design and will be in accordance with **Application Document 7.12.1 Design Principles – Suffolk [APP-366]** Design Principle R.2.	We are satisfied and consider this issue resolved. We had concerns about landscaping involving earth bunds possibly being in the floodplain. The Applicant has confirmed within document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.21 that the earth bunds are to be located outside of the floodplain.	Agreed
EA085	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project		EA085: Temporary scaffolding over Main River Stour.	The detail of any temporary scaffold structures cannot be submitted at the application stage. This design would be undertaken by the contractor following the detailed design of the permanent assets. If used, the scaffolds would be individual towers either side of the river with only a net spanning the river itself.	We are satisfied and consider this issue resolved. We previously highlighted that as temporary scaffolding over the River Stour (a main river) was proposed, we wanted to see further details. We accept that it may not be possible for the applicant to provide the detailed design of the temporary scaffold structures at this stage. The applicant should be aware that full details will be expected at the FRAP stage, such as detailed design drawings, full dimensions and method statements in relation to its construction and management. The applicant should be aware that a FRAP may not be forthcoming, even in the case of approval of a DCO, and that we would encourage early engagement on its design. We strongly advise the applicant to share key design principles with us as early as they can.	Agreed
EA086	APP-045 6.2.1.4 Part 1 Introduction Chapter 4		EA086: Unclear as to the exact location of temporary cofferdams at HDD exits.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. Where required, an updated **Application Document 9.84 Register of Environmental Actions and Commitments**	We are satisfied and consider this issue resolved. Previously the location of cofferdams at HDD exits were unclear.	Agreed

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	Description of the Proposed Project			**(REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency. Also note, cofferdams are temporary structures for use during construction only.	The Applicant has confirmed in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) -Accepted at the discretion of the Examining Authority [REP1-102] that no cofferdams will be located within 16m of the River Stour or coastal flood defences.	
EA087	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA087: The location of the cofferdam at the Kent Landfall is unclear.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. An update**d Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has been made. Also note cofferdams are temporary structures for use during construction only. Further information on the location and design of the temporary cofferdams at the Kent landfall is provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP2- 011]**.	We are satisfied and consider this issue resolved. Previously the location of the cofferdam at the Kent Landfall was unclear. The applicant has confirmed in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] that no cofferdams will be located within 16m of the River Stour or coastal flood defences.	Agreed
EA088	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA088: Details omitted relating to HDD exit pits and use of rock bags/concrete mattresses.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. Where required, an updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency. Further information on requirements for temporary use of rock bags/concrete mattresses to stabilise and protection the HDD duct end prior to cable installation at the Kent landfall is provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP2-011]**.	We do not consider this issue resolved. Previously we stated that details relating to HDD exit pits and the use of rock bags/concrete mattresses had been omitted. While the Late Deadline 1 Submission - 9.13 Pegwell Bay Construction Method Technical Note - Accepted at the discretion of the Examining Authority [REP1-108] does detail construction methods and some further information, it does not confirm locations or distances from the main river or defence line.	Agreed
EA089	APP-292 6.8 Flood Risk Assessment		EA089: Omission of details regarding mitigation for storage of materials within the River Stour floodplain.	The Proposed Project is looking to use trackway within the flood zone in Kent to access the tower locations, however topsoil striping and stockpiling will still be required as will sub soil stockpiling at the tower locations. These stockpiles will be isolated so as not to create a barrier to the flow of flood water. The temporary bridge crossing will also require ramped approaches. A flood risk activity permit application will be submitted by the contractor for these activities. The photograph	We do not consider this issue resolved. We were concerned that the sequential approach within Flood Zone 3 was not being clearly applied to avoid Flood Zone 3b. It is still unclear what approach to the sequential test the Applicant is proposing. In line with PPG Paragraph: 079 Reference ID: 7-079-20220825, some developments may contain different elements of vulnerability, and	Under discussion

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				below shows similar trackway, isolated stockpiles and ramps used for the Canterbury to Richborough project. 	the highest vulnerability category should be used, unless the development is considered in its component parts. If the Applicant is proposing to split their proposal into component parts (e.g., 1 No. temporary drainage outfall and 1 No. permanent infiltration outfall pipe (buried) and outfall are water compatible), then they would need to provide clarity on what vulnerability is proposed for each component. However, if the applicant is merely stating that these components of are essential infrastructure that have water-compatible uses, these should be designed and constructed to: • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; • not impede water flows and not increase flood risk elsewhere. We agree that the pylons works would be deemed “essential infrastructure” and so is appropriate for flood zone 3, as long as the exception test is passed. The pylons once constructed should not impede flow as they are to be “open” structures, so therefore should not increase flood risk elsewhere. Additionally, if the pylons are to be placed within the tidal floodplain only, then floodplain compensation won’t be required. However, if new pylons are to be constructed within the fluvial floodplain, then the Applicant should consider if and what flood compensation may be required. Please see EA069 and EA089 for more details on the River Stour floodplain.	
EA067	APP-292 6.8 Flood Risk Assessment	**Flood Risk** Outline Construction Environmental Management Plan/ REAC Both Suffolk and Kent	EA067: Incident response plan (GG24) lacks explicit flood defence damage contingencies.	An updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has been made as follows: GG24 - An Incident Response Plan will be developed by the contractor for the construction phase. This will be prepared prior to construction works commencing and thereafter complied with. It will outline	We are satisfied and consider this issue resolved. We welcome the updates to commitment GG24 in the document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]. The specifics relating to trigger	Agreed

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				procedures that will be implemented in case of unplanned events, including but not limited to site flooding, pollution incidents and flood defence damage contingencies. Local authorities will be informed of any large scale incidents under the Incident Response Plan. Smaller scale issues will be recorded in a register that will be made available to local authorities for review on request.	thresholds for action(e.g., settlement) should be addressed through a FRAP. Please note that the applicant's response in Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] doesn't match the issue. The Applicant's response is the same for both EA066 and EA067. This issue relates to the Incident response plan and flood defence contingencies and so we have looked at the Applicant's response to EA068 instead.	
EA068	APP-292 6.8 Flood Risk Assessment		EA068: Open-cut crossings of main rivers suggested under W02. Stockpile setback distances don't consider flood zones.	It is confirmed that no open cut crossings of main rivers are proposed. Commitment W02 requires storing of soil stockpiles to be > 15 m of a main river (>16 m where river is tidal) and as described in the response to EA065, interactions with Flood Zone 3b are very limited, hence ensuring stockpiles avoid this zone will be practicable.	We cannot resolve this issue at this point in time. We were concerned that open-cut crossings of main rivers were suggested under W02, and stockpile setback distances didn't consider flood zones. Commitment W02 in the document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) -Accepted at the discretion of the Examining Authority [REP1-102] should explicitly state that no spoil will be stored in Flood Zone 3b and that open cut will be limited to ordinary watercourses. Please note that the applicant's response in Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] doesn't match the issue. It appears the Applicant's response to issue EA068 is relevant to EA067 instead.	Under discussion
EA069	APP-292 6.8 Flood Risk Assessment		EA069: (W06) Construction material storage in Flood Zone 3 with ground raising, however there is no compensatory storage mentioned.	Commitment W06 commits to providing mitigations where temporary storage of construction materials in Flood Zone 3(a) cannot be avoided, limited to the River Stour floodplain. Examples include using model outputs to inform the placement of soil during construction and aligning soil stockpiles to avoid impeding key flood flow routes. Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that	We do not consider this issue resolved. We have identified that the River Stour floodplain within the boundary of the scheme is fluvially-influenced in areas, as well as having areas of tidal/fluvial crossover, and solely tidal influence. Of particular concern is the right bank floodplain of the River Stour between grid references 630950, 162775 and 632100, 162300 and additionally at grid reference 632650, 159900 as these areas fall within the defended fluvial floodplain, and	Under discussion

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				accompanies the National Planning Policy Framework compensation for losses of floodplain storage are not required. This has also been previously agreed with the Environment Agency.	parts of these areas are within the functional floodplain. We would not be requiring compensation for works in tidal areas or areas which have tidal/fluvial cross-over. However, floodplain compensation is required for any areas of development in fluvial areas, to manage the flood risk associated with the River Stour floodplain. This will ensure that the permanent and temporary elements of the scheme are not displacing fluvial flood storage. Given the proposed temporary nature of the bridge (we assume 5-years given the length of the construction phase), associated temporary works, and the large size of the Stour floodplain, we will ensure compensation requirements are proportionate and reasonable. Compensation for temporary works should be balanced against the commitment to fully reinstate the land to its pre-construction condition upon removal. We note that Commitment W06 (REP1-102) states “No construction materials should be stored within Flood Zone 3 and areas of high and medium risk of flooding from surface water, where this cannot be avoided, for example in the River Stour floodplain adequate mitigation measures will be applied. For example, model outputs would inform the placement of soil during construction and soil stockpiles would be aligned in the direction of flow to avoid impeding flood flow routes.” We require a clear commitment to re-instate land to pre-construction levels within 5 years of commencing construction. Currently, the Applicant only commits to this for temporary haul roads. We accept that it may not be possible to provide all the details of stockpiles at this stage. Further detail regarding the stockpiles would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this will be dealt with via the Flood Risk Activity Permit (FRAP) process. At FRAP stage, we’d require the details	

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					relating to the location, length of time in place, quantity of material and method for storing the material. Please note, this issue interlinks with EA089.	
EA070	APP-039 2.14.2 Indicative General Arrangements Plans - Kent APP-292 6.8 Flood Risk Assessment		EA070: Details omitted regarding temporary attenuation ponds and outfalls within flood plain. Unknown construction method and details on the expected changes in ground level in order to construct these temporary features.	The attenuation basins in Kent are designed to be 0.5 m below existing ground level to allow for the relatively high ground water table. Bunding around the attenuation basins will be provided where necessary and additional drainage storage is allowed for within the Converter/Substation platform.	We do not consider this issue resolved. We were concerned that details were omitted regarding temporary attenuation ponds and outfalls within floodplain. There were no details regarding their construction method, and the expected changes in ground level in order to construct these temporary features. The Applicant has stated in Document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.7 that attenuation ponds will be 0.5m below existing ground level, but no detail has been provided regarding the “bunding” element. Therefore, we cannot determine the level of risk. We would expect to see more detail of these features, and we want to see clarification regarding whether these temporary attenuation features are to be located within the floodplain. Further detail regarding the attenuation ponds outfalls would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this may be dealt with at FRAP stage. To resolve this issue, we require clarity as to whether the temporary attenuation ponds will be located in the fluvial floodplain. If they are to be located in fluvial floodplain, then we’d require a commitment that floodplain storage compensation will be undertaken. We accept that it may not be possible to provide all the details of stockpiles at this stage. Further detail regarding the stockpiles would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this will be dealt with via the FRAP process. At FRAP stage, we’d require the details relating to the location,	Under discussion

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					length of time in place, quantity of material and method for storing the material. Regarding floodplain compensation for the River Stour, please see EA069.	
EA072	APP-292 6.8 Flood Risk Assessment APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA072: Omission of details relating to method and location of defences being monitored.	**Kent Flood Defences –** Embankment along Sandwich Road Natural high ground either side of River Stour The Proposed Project will be drilling beneath the embankment defence adjacent to Sandwich Road so the embankment profile will not be changed by the Proposed Project in any way. Pre and post drill topographical surveys will be undertaken to ensure that there is no impact on the embankment as a result of the works. The naturally high ground on either side of the River Stour will not be changed by the Proposed Project, the temporary bridge crossing will have abutments set 8 m back from the top of bank and the project connection will be overhead in this location. **Suffolk Flood Defence -** Beach Natural High Ground adjacent to Hundred River The Proposed Project will be drilling beneath the beach and the natural high ground adjacent to the Hundred River at depth, existing ground profiles will not be changed by the Proposed Project in any way. Pre and post drill topographical surveys will be undertaken to ensure that there are no impacts on these features as a result of the works. It should also be noted that commitment W12 states that the monitoring protocols would be agreed with the Environment Agency.	We are satisfied and consider this issue resolved. We were concerned about the omission of details relating to method and location of defences being monitored. The applicant has stated in documents Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.9. I,that pre and post drill topographical surveys will be undertaken to ensure that there are no impacts as a result of the works. Additionally, commitment W12 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] states the monitoring protocols will be agreed with the Environment Agency. We are content with this.	Agreed
EA075	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA075: W06 temporary and permanent haul/access roads within floodplain.	The Proposed Project is looking to use trackway within the flood zone in Kent to access the tower locations, however topsoil striping and stockpiling will still be required as will sub soil stockpiling at the tower locations. These will be isolated so as not to create a barrier to the flow of flood water. The temporary bridge crossing will also require	We do not consider this issue resolved. We are concerned that commitment W06 of document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] for	Under discussion

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				ramped approaches. A flood risk activity permit will be required. The photograph below shows similar trackway, isolated stockpiles and ramps. 	temporary and permanent haul/access roads within the floodplain could result in loss of flood storage or impedance to flood flow. The Applicant hasn't indicated that the requirements of a FRAP would need to be considered in regard to any works in floodplain. We require the wording to be updated to reflect this.	
EA076	APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)		EA076: Increase in flood risk for activities within 16m of a tidal-influenced watercourse.	Updates to the wording of commitments GG14 and W02 have been made in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [APP-342]** to stipulate 16 m for tidally influenced watercourses. GG14 Fuels, oils and chemicals will be clearly marked as to their contents and stored responsibly, in a secure, bunded area with an impervious base, away from sensitive water receptors. Where practicable, they will be stored >15 m from watercourses, ponds and groundwater dependent terrestrial ecosystems (or >16 m where a watercourse is tidally influenced). Where it is not practicable to maintain these buffers, additional measures will be identified. Any spillages or leaks are to be dealt with promptly, and all waste disposed of in an appropriate manner. Before any tank is removed or perforated, all contents and residues will be emptied by a competent operator for safe disposal at a licensed facility. All refuelling, oiling and greasing of construction plant and equipment will take place in an appropriate bunded area that includes an impervious base and where possible interceptor drains. All pumps, generators and similarly fuelled equipment are to be placed on drip trays or in a bunded area and all valves, hoses and associated re-	We do not consider this issue resolved. We were concerned that wording within mitigation commitments GG14 and W02 of the reflected activities occurring 15m from watercourses. The Applicant has stated in document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.13. Ithat updates have been made in the CEMP (REAC) to stipulate 16m for tidally influenced watercourses, however the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] has not yet been updated. We therefore cannot consider this resolved.	Under discussion

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				fuelling equipment will be regularly inspected and turned off and securely locked when not in use. Vehicles and plant will not be left unattended during refuelling. Appropriate spill kits will be made easily accessible for these activities. Potentially hazardous materials used during construction will be safely and securely stored including use of secondary containment where appropriate. Stored flammable liquids such as diesel will be protected either by double walled tanks or stored in a bunded area with a capacity of 110% of the maximum stored volume. Spill kits will be located nearby. W02 bullet point no 6: prevent refuelling of any plant or vehicle within 15 m of a watercourse (16 m where river is tidal)		
EA080	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-292 6.8 Flood Risk Assessment Suffolk	**Flood Risk** Outline Construction Environmental Management Plan/ REAC	EA080: HDD surface level monitoring is not linked to monitoring of flood defence and emergency response.	Commitment W12 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 states that: *"At the Suffolk and Kent landfalls the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences*." This commitment provides the Environment Agency with the opportunity to influence the monitoring and to agree with the Applicant appropriate triggers and actions. However, the HDD at Kent is planned 20 m beneath the sea defences with the calculated worst-case long term settlement from the HDD as 3 mm (<5 mm). Similarly the HDD at Suffolk is planned at 23 m beneath the existing natural coastal defences, with the calculated worst-case long-term settlement from the HDD of 3 mm (<5 mm). As such the level of settlement potentially induced by the HDDs is not of a scale that could impair coastal sea defences resulting in compromised defences and flood risk management. It is not therefore deemed	We are satisfied and consider this issue resolved. We previously raised that HDD surface level monitoring was not linked to monitoring of flood defence and emergency response. The applicant states in commitment W12 in the 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)[APP-342] "*At the Suffolk and Kent landfalls the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences."* We are satisfied with this	Agreed

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				necessary to monitor settlement, based on the WCS long term values cited.		
EA083	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project	**Flood Risk** Outline Construction Environmental Management Plan/ REAC Kent	EA083: Overhead line crossing over River Stour.	Where required, an update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency.	We do not consider this issue resolved. We asked that appropriate mitigation is in place within Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to ensure the River Stour is protected in relation to the overhead line crossing. The applicant has not yet updated the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the requested information.	Under discussion
EA085	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project		EA085: Temporary scaffolding over Main River Stour.	The detail of any temporary scaffold structures cannot be submitted at the application stage. This design would be undertaken by the contractor following the detailed design of the permanent assets. If used, the scaffolds would be individual towers either side of the river with only a net spanning the river itself.	We are satisfied and consider this issue resolved. We previously highlighted that as temporary scaffolding over the River Stour (a main river) was proposed, we wanted to see further details. We accept that it may not be possible for the applicant to provide the detailed design of the temporary scaffold structures at this stage. The applicant should be aware that full details will be expected at the FRAP stage, such as detailed design drawings, full dimensions and method statements in relation to its construction and management. The applicant should be aware that a FRAP may not be forthcoming, even in the case of approval of a DCO, and that we would encourage early engagement on its design. We strongly advise the applicant to share key design principles with us as early as they can.	Agreed
EA087	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA087: The location of the cofferdam at the Kent Landfall is unclear.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. An update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has been made.	We are satisfied and consider this issue resolved. Previously the location of the cofferdam at the Kent Landfall was unclear. The applicant has confirmed in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted	Agreed

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				Also note cofferdams are temporary structures for use during construction only. Further information on the location and design of the temporary cofferdams at the Kent landfall is provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP2- 011]**.	at the discretion of the Examining Authority [REP1-102] that no cofferdams will be located within 16m of the River Stour or coastal flood defences.	
EA088	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA088: Details omitted relating to HDD exit pits and use of rock bags/concrete mattresses.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. Where required, an update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency. Further information on requirements for temporary use of rock bags/concrete mattresses to stabilise and protection the HDD duct end prior to cable installation at the Kent landfall is provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note[REP2- 011]**.	We do not consider this issue resolved. Previously we stated that details relating to HDD exit pits and the use of rock bags/concrete mattresses had been omitted. While the Late Deadline 1 Submission - 9.13 Pegwell Bay Construction Method Technical Note - Accepted at the discretion of the Examining Authority [REP1-108] does detail construction methods and some further information, it does not confirm locations or distances from the main river or defence line.	Under discussion
EA089	APP-292 6.8 Flood Risk Assessment		EA089: Omission of details regarding mitigation for storage of materials within the River Stour floodplain.	The Proposed Project is looking to use trackway within the flood zone in Kent to access the tower locations, however topsoil striping and stockpiling will still be required as will sub soil stockpiling at the tower locations. These stockpiles will be isolated so as not to create a barrier to the flow of flood water. The temporary bridge crossing will also require ramped approaches. A flood risk activity permit application will be submitted by the contractor for these activities. The photograph below shows similar trackway, isolated stockpiles and ramps used for the Canterbury to Richborough project.	We do not consider this issue resolved. Previously there was an omission of details regarding mitigation for storage of materials within the River Stour floodplain. We have identified that the River Stour floodplain within the boundary of the scheme is fluvially-influenced in areas, as well as having areas of tidal/fluvial crossover, and solely tidal influence. Of particular concern is the right bank floodplain of the River Stour between grid references 630950, 162775 and 632100, 162300 and additionally at grid reference 632650, 159900 as these areas fall within the defended fluvial floodplain, and parts of these areas are within the functional floodplain. We would not be requiring compensation for works in tidal areas or areas which have tidal/fluvial cross-over. However, floodplain compensation is required for any areas of development in fluvial areas, to manage the flood risk associated with the River Stour	Under discussion

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				 Commitment W06 secures mitigation where storage of materials cannot avoid Flood Zone 3. Examples include using model outputs to inform the placement of soil during construction and aligning soil stockpiles to avoid impeding key flood flow routes. Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that accompanies the National Planning Policy Framework compensation for losses of floodplain storage are not required. This has also been previously agreed with the Environment Agency.	floodplain. This will ensure that the permanent and temporary elements of the scheme are not displacing fluvial flood storage, and increasing flood risk elsewhere. Given the proposed temporary nature of the bridge (we assume 5-years given the length of the construction phase), associated temporary works, and the large size of the Stour floodplain, we will ensure compensation requirements are proportionate and reasonable. Compensation for temporary works should be balanced against the commitment to fully reinstate the land to its pre-construction condition upon removal. We note that Commitment W06 (REP1-102) states “No construction materials should be stored within Flood Zone 3 and areas of high and medium risk of flooding from surface water, where this cannot be avoided, for example in the River Stour floodplain adequate mitigation measures will be applied. For example, model outputs would inform the placement of soil during construction and soil stockpiles would be aligned in the direction of flow to avoid impeding flood flow routes.” We require a clear commitment to re-instate land to pre-construction levels within 5 years of commencing construction. Currently, the Applicant only commits to this for temporary haul roads. We accept that it may not be possible to provide all the details of stockpiled at this stage. Further detail regarding the stockpiles would be needed for us to be fully satisfied from a flood risk perspective, but it is acknowledged that this will be dealt with via the FRAP process. At FRAP stage, we’d require the details relating to the location, length of time in place, quantity of material and method for storing the material. Please note, this issue interlinks with EA069.	
EA079	APP-292 6.8 Flood Risk Assessment APP-074 6.2.4.1 Part 4 Marine	**Flood Risk** Coastal Erosion Assessment	EA079: Lack of quantified assessment of the rate of coastal erosion at the landfall location over the lifetime of the project.	At the Suffolk landfall, contingency measures have been embedded within the design by locating the onshore HDD entry pit approx. 800 m landward of the Mean Water High	EA079 Flood Risk We do not consider this issue resolved.	Under discussion

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	Chapter 1 Physical Environment			Spring (MHWS) line. This location is also landward of the B1353 connecting Aldeburgh to Thorpeness, a key piece of local infrastructure that would most likely attract funding for protection, should it become threatened by coastal erosion in the future. Whilst protection of the road cannot be guaranteed for the long-term (i.e. 50–100 years from present day), it is expected that this would at least be provided covering the short to medium term (i.e. 20-50 years from present day) and therefore allow sufficient time for appropriate action to be undertaken, should this eventuality arise. The Environment Agency's National Coastal Erosion Risk Management (NCERM) projections of future coastal erosion between Aldeburgh and Thorpeness have been reviewed and indicate that the proposed landfall cables and related infrastructure will remain protected over the operation and decommissioning phases. However, further assessment work will be required at the detailed design stage to support this conclusion.	We previously raised there was a lack of quantified assessment of the rate of coastal erosion at the landfall location over the lifetime of the project. We require information relating the Environment Agency's National Coastal Erosion Risk Management (NCERM) data to be presented as part of the Flood Risk Assessment (FRA). If the further assessment work shows NCERM data to not be conservative, then the applicant should liaise with the Environment Agency. There needs to be consideration as to whether erosion over the lifetime of the project would lead to exposure. We support the Applicant's view that further assessment will be undertaken at the detailed designed stage. However we require a commitment that this detail will be provided in due course. To resolve this issue, we require: • A commitment within the Document Late Deadline 1 Submission - 7.5.3.2 (B)CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to ensure that the further assessment takes place at detailed design stage. • The wording for requirement 13. (Decommissioning) in Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036] to be amended to include the wording "for the approval of by the relevant planning authority, in consultation with the Environment Agency". • Input of the wording for a requirement to assess the possibility of decommissioning landfall infrastructure prior to the	

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					decommissioning phase of the development. See further information below. We have been engaging with the Applicant's project team regarding the wording of a requirement for assessing the decommissioning and removal of landfall infrastructure. We are currently having this reviewed by East Suffolk Council. Once they have finished their review, we will share with the project team for a final review. We will then request that the requirement is formally added to the Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036].	
EA090	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-292 6.8 Flood Risk Assessment	**Flood modelling** Flood modelling Suffolk	EA090: Limited detail is provided on the flood risk impacts of ordinary watercourse crossings. Of particular concern are the permanent culverted crossings at locations S/WA/0064.5 and S/WA/0064.4 and the temporary crossing at S/WA/0057 which is within Flood Zone 3.	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 includes several commitments linked to culvert design, specifically W04 requires that culverts will be sized to reflect the span width and the estimated flow characteristics of the watercourses to be crossed under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increases in flood risk at ordinary watercourse crossings. The Applicant has engaged with the Lead Local Flood Authority to discuss the proposed crossings of ordinary watercourses in Suffolk. The sizing calculations would be provided by the appointed contractor for approval by Suffolk County Council as the Lead Local Flood Authority, who are the consenting authority for the S/WA/0064.5, S/WA/0064.4 and S/WA/0057 culvert crossings.	We are satisfied and consider this issue resolved. Previously we had concerns that limited detail had been provided on the flood risk impacts of ordinary watercourse crossings. Of particular concern were the permanent culverted crossings at locations S/WA/0064.5 and S/WA/0064.4 and the temporary crossing at S/WA/0057 which is within Flood Zone 3. We engaged with the applicant's project team 15 August 2025. The proposed culvert designs, including specifications for dimensions, and installation methodologies, were presented and thoroughly reviewed. These designs provided adequate evidence of the applicant's intent to adhere to relevant water management and environmental standards for ordinary watercourses. Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. We stated we would differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts were proposed for main rivers.	Agreed

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EA091	APP-231 6.4.2.4 ES Figures Suffolk Water Environment APP-292 6.8 Flood Risk Assessment		EA091: The Flood Map for Planning has been superseded by the recent NAFRA2 data published in March 2025. One area of change in Suffolk is noted around grid reference 640435, 262050. This location was in Flood Zone 1 in the previous Flood Map for Planning, but is now in Flood Zone 3. In this area two temporary attenuation ponds and joint bays are proposed as well as a temporary crossing (S/WA/0057).	It is confirmed that substations, converter stations, cable joint bays, and all construction compounds remain in Flood Zone 1. The update to the Flood Map for Planning brings one temporary attenuation pond into Flood Zone 3, as illustrated below. The other pond is out with the extent of Flood Zone 3, with Flood Zone 2 marginally encroaching into its footprint. Flood Zone 2 is representative of an extreme flood event with a chance of occurrence of 0.1% in any year, and therefore no issues are anticipated with the siting of this pond. The joint bays (green dots on the plate below) remain in Flood Zone 1.  The pond in Flood Zone 3 would be designed to exclude flood water ingress, for example, with suitable bunding, and would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction period, impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. The project works are located at the	We do not consider this issue resolved. Previously, we stated that the flood map for planning NAFRA2 data hadn't fully been considered for two temporary attenuation ponds, joint bays and a temporary crossing (S/WA/0057). The Document Additional Submission accepted at the discretion of the Examining Authority – Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.4 Supplementary Environmental Information - Flood risk assessment [AS099] describes how one attenuation pond is within Flood Zone 3. This pond will be designed to exclude flood water ingress, and the supplementary note describes how impacts would be negligible due to the small temporary loss of storage. We require clarification from the applicant in regards to: • The volume of water that would be displaced by the pond • Whether the pond would be moved to an area outside of the flood zone • Clarification of how long the temporary attenuation pond would be in place for In addition to the above we request clarification of how the removal of temporary attenuation ponds will be secured. It is not clearly stated within the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] or in Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036].	Under discussion

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				head of the watercourse catchment and there are no vulnerable receptors location in the vicinity of the works. With regard to temporary culvert crossing S/WA/0057 commitment W04 in the **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 requires that this culvert will be sized to reflect the span width and the estimated flow characteristics of the watercourse under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increase in flood risk. The sizing calculations would be provided by the appointed contractor for approval by the Lead Local Flood Authority, who are the consenting authority for this culvert crossing.		
EA092	APP-231 6.4.2.4 ES Figures Suffolk Water Environment		EA092: The Risk of Flooding from Surface Water information presented in figure 6.4.2.4.3 has been superseded by more recent information published in January 2025.	The Risk of Flooding from Surface Water dataset is illustrated in Plates 2A to 2D in **Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]**. Separate plates are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. These figures display the updated National Flood Risk Assessment 2 (NaFRA2) datasets published in January 2025. The Flood Risk Assessment has also used this latest Risk of Flooding from Surface Water dataset in its assessment.	We are satisfied and consider this issue resolved. We previously had concerns that the risk of flooding from Surface Water information presented in figure 6.4.2.4.3 had been superseded by more recent information published in January 2025. The applicant has confirmed they have used and referenced the latest datasets in Plates 2A to 2D in Application Document 6.8 Flood Risk Assessment [APP-292]. We are content with this.	Agreed
EA093	APP-038 2.14.1 Indicative General Arrangements Plans - Suffolk		EA093: The proposed temporary attenuation pond to the northeast of construction compound S03 at grid reference 640130, 262830 falls within an area shown to be at risk of surface water flooding. The extent of flooding shown in the latest Risk of Flooding from Surface Water dataset shows connectivity to the Ordinary Watercourses, which run adjacent to the B1119.	As illustrated below this temporary attenuation pond partially falls within a surface water flood risk zone on the latest NaFRA2 mapping, with the potential for this to reflect a risk from the adjacent ordinary watercourse.	We are satisfied and consider this issue resolved. We previously had concerns that the proposed temporary attenuation pond to the northeast of construction compound S03 at grid reference 640130, 262830 falls within an area shown to be at risk of surface water flooding. This attenuation pond is for surface water, but is located close to an ordinary watercourse. The Risk of Flooding from Surface Water mapping suggested an overland flow route, which could fill the storage basin, and hence reduce its capacity to attenuate surface water runoff from the development. The Applicant has stated within Document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant	Agreed

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				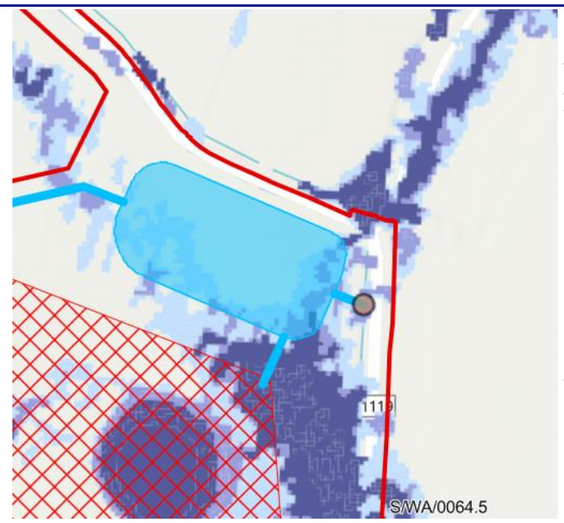 To mitigate the risk of floodwater ingress the pond would be designed with suitable bunding and would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the ordinary watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction period, impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. During detailed design it may be possible to reshape the pond to avoid the high-risk zone.	Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111] section 2.4.30 that to mitigate the risk of floodwater ingress, the pond would be designed with suitable bunding. Furthermore, it would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the ordinary watercourse, once flood levels had receded. They also highlighted that during detailed design, it may be possible to reshape the pond to avoid the high-risk zone	
EA094	APP-038 2.14.1 Indicative General Arrangements Plans – Suffolk APP-292 6.8 Flood Risk Assessment		EA094: In the previous Flood Map for Planning, two temporary attenuation ponds and joint bays in the vicinity of crossing S/WA/0057 were shown to be in Flood Zone 1, but in the most recent update to the Flood Map for Planning (NAFRA2), they are now in Flood Zone 3.	At this location, the update to the Flood Map for Planning brings one temporary attenuation pond into Flood Zone 3, as illustrated below. The other pond is out with the extent of Flood Zone 3, with Flood Zone 2 marginally encroaching into its footprint. Flood Zone 2 is representative of an extreme flood event with a chance of occurrence of 0.1% in any year, and therefore no issues are anticipated with the siting of this pond. The pond in Flood Zone 3 would be designed to exclude flood water ingress, for example, with suitable bunding, and would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction period,	We consider this issue resolved, but please see our responses to EA091 and EA093 above. We were concerned that a recent update to the Flood Map for Planning (NAFRA2) was not considered in the placement of two temporary attenuation ponds and joint bays near crossing S/WA/0057. With regards to the attenuation ponds and joint bays in the vicinity of crossing S/WA/0057, please see our response to EA091 above. Noting the temporary nature of the attenuation pond and measures to ensure no ingress of fluvial flood water, this approach seems reasonable. However, please see the response to EA091 regarding our request for	Agreed

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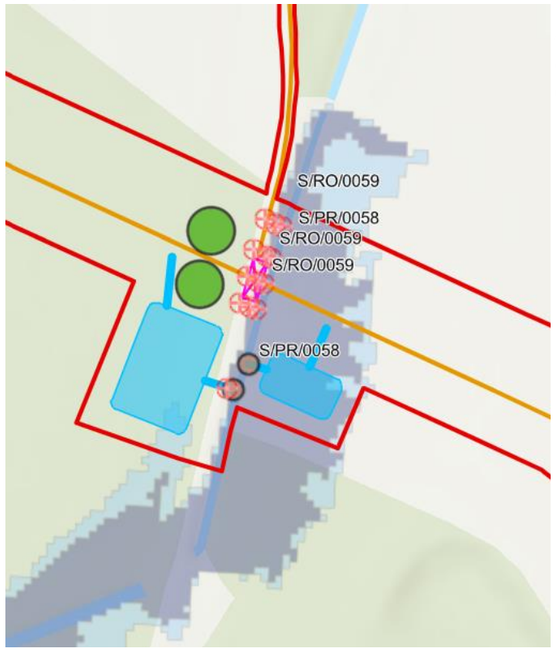
				impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. The project works are located at the head of the watercourse catchment and there are no vulnerable receptors location in the vicinity of the works.  	clarification of how the removal of temporary attenuation ponds will be secured. With respect to construction compound S02 (and S03) as shown on the 2.14.1 Indicative General Arrangements Plans - Suffolk (Version 2, change request) [CR1-024], the Applicant's response regarding the placement and design of the bund for S02 and S03 is considered reasonable (as outlined in our response to EA093).	
EA095	APP-292 6.8 Flood Risk Assessment	**Flood modelling** Flood Risk Assessment Kent	EA095: There are several temporary and permanent crossings over ordinary watercourses which could increase flood risk if not designed appropriately. Of particular concern are the permanent crossings over Minster Stream adjacent to the converter station.	The **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 includes several commitments linked to culvert design, specifically W04 requires that culverts will be sized to reflect the span width and the estimated flow characteristics of the watercourses to be crossed under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increase in flood risk. It is also noted that the Applicant has engaged extensively with the Stour (Kent) Internal Drainage Board that are the consenting authority for all of the watercourses that are proposed to be crossed as part of the Kent Onshore Scheme, including the Minster Stream, to agree a mutually satisfactory set of culvert design parameters.	We are satisfied and consider this issue resolved. We were concerned that there were several temporary and permanent crossings over ordinary watercourses, which could increase flood risk if not designed appropriately. Of particular concern were the permanent crossings over Minster Stream adjacent to the converter station. We engaged with the Applicant's project team 15 August 2025. The proposed culvert designs, including specifications for dimensions, and installation methodologies, were presented and thoroughly reviewed. These designs provided adequate evidence of the Applicant's intent to adhere to relevant water management and environmental standards for ordinary watercourses.	Agreed

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					Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. We stated we would differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts were proposed for main rivers.	
EA096	APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment		EA096: Outdated Flood Map for Planning data from 2023 is being used.	An exercise has been undertaken to compare the latest Flood Map for Planning dataset against the mapping used to inform **Application Document 6.8 Flood Risk Assessment [APP-292]**. The findings are detailed in **Additional Submission 9.4 Supplementary Environmental Information – Flood risk assessment update [AS-099].** There have been no changes to mapped flood zones 2 and 3 in the new Flood Map for Planning dataset within the Order Limits of the Kent Onshore Scheme. The conclusions of the FRA are therefore valid. Within the Order Limits of the Suffolk Onshore Scheme there is one small change. This is associated with an increase in the mapped flood extent for a small watercourse that drains into the River Fromus, where one temporary drainage pond is now located in Flood Zone 3 (previously Flood Zone 1). As noted in response to EA094, design of the pond would factor in the potential for flooding and as a consequence there are anticipated to be no impacts on the Proposed Projects drainage standards in this location, nor any significant flood risk impacts. The conclusions of the FRA remain valid.	We are satisfied and consider this issue resolved. We previously highlighted that the outdated Flood Map for Planning data from 2023 was being used. The Applicant has confirmed that they undertook an exercise to compare the latest Flood Map for Planning dataset against the mapping used to inform the Document 6.8 Flood Risk Assessment [APP-292]. The findings (detailed in Additional Submission accepted at the discretion of the Examining Authority – Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.4 Supplementary Environmental Information - Flood risk assessment [AS-099]) are that there have been no changes to mapped flood zones 2 and 3 in the new Flood Map for Planning dataset, within the Order Limits of the Kent Onshore Scheme. The Applicant has confirmed that within the Order Limits of the Suffolk Onshore Scheme there is one small change. This is associated with an increase in the mapped flood extent for a small watercourse that drains into the River Fromus, where one temporary drainage pond is now located in Flood Zone 3 (previously Flood Zone 1). As noted in response to EA094, design of the pond would factor in the potential for flooding and therefore there are anticipated to be no impacts on the Proposed Projects drainage standards in this location, nor any significant flood risk impacts.	Agreed
EA018	APP-049 6.2.2.2 Part 2 Suffolk	Fisheries – water environment legislation	EA018: The Salmon and Freshwater Fisheries Act 1975 (The Salmon and Freshwater Fisheries Act, 1975) and (The Eels (England	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 are both considered in the Aquatic Ecology Assessment as detailed in	We consider this issue resolved. We raised that The Salmon and Freshwater Fisheries act 1975 and Eels Regulations 2009	Agreed

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	Chapter 2 Ecology and Biodiversity		and Wales) Regulations, 2009) have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this specific legislation has not been considered.	Section 1.1.9 of **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**, which supports the impact assessment. Section 2.1.6 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** states that this chapter is supported by **Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** and therefore the regulations are considered to be relevant and have been complied with during the assessments detailed in the Biodiversity & Ecology chapters. Potential impacts on fish from the construction, operation, and decommissioning of the Proposed Project have been fully considered and assessed.	had not been included in the relevant list of legislation. The applicant provided clarification how the regulations and legislation were considered and compiled over its documentation 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104] and the 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] superseded by document Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) -Accepted at the discretion of the Examining Authority [REP1-047].	
EA051	APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment APP-170 6.3.3.5B ES Appendix 3.5.B Qualitivie Groundwater Risk Assessment APP-340 7.5.3 Outline Onshore Construction Environment Management Plan	**Groundwater and Contaminated Land** Outline Construction Environmental Management Plan/REAC	EA051: The components of the drilling muds are not listed as being included in the “Frac Out Management Plan”.	Section 4.3 of the Groundwater Risk Assessments, **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177]** and **Application Document 6.6.6.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-170]**, includes a sub section on “*Unplanned losses of drilling fluids*", and Paragraph 4.3.20 describes some of the details that would be included. Drilling fluid will be formed of a water and sodium bentonite mix with biological additives to control the fluid properties. Each HDD contractor is required to test and certify their product for OSPAR. The HDD contractor will submit their proposed fluid components to the EA/MMO for approval prior to use.	We are satisfied and consider this issue resolved. The components of the drilling muds were not listed as being included in the “Frac Out Management Plan”. The applicant’s response provided in Section 4.3 of the Groundwater Risk Assessments, Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] and Application Document 6.6.6.5.B Appendix 3.5.b Qualitative Groundwater Risk Assessment [APP-170] includes a sub section on “Unplanned losses of drilling fluids", and Paragraph 4.3.20 describes some of the details that would be included in the Frac Out Management Plan. We therefore consider this issue resolved.	Agreed
EA052	APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment APP-170 6.3.3.5.B ES Appendix 3.5.B Qualitative		EA052: Outdated guidance is referred to in regards to *“Piling and Penetrative Ground Improvement Methods On Land Affected by Contamination: Guidance on Pollution Prevention”*	The reference will be updated in **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3 and **Application Document Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 .	We are satisfied and consider this issue resolved. The Applicant used outdated guidance for “Piling and Penetrative Ground Improvement Methods On Land Affected by Contamination: Guidance on Pollution Prevention”. The Applicant updated 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] and document Late	Agreed

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	Groundwater Risk Assessment APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice				Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) -Accepted at the discretion of the Examining Authority [REP1-102]. This has resolved our concern.	
EA054	APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA054: “GH08 – A protocol will be developed for dealing with any unexpected contamination.” This is vague at this stage.	The Applicant considers that the wording prepared by the EA for a proposed requirement is appropriate and, therefore, the draft DCO will be updated accordingly.	We do not consider this issue resolved. We initially raised that the wording for GH08 in Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] was vague and therefore insufficient for managing risks to controlled waters. We requested a requirement inclusive of the Unsuspected contamination wording (see below) to be included in the draft Development Consent Order. “Unsuspected contamination (1) In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency. (2) Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.	Under discussion

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					(3) Remediation must be carried out in accordance with the approved scheme under sub paragraph (2). (4) Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency." The applicants have agreed to include this wording but neither the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] nor the Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036] has yet been updated with our above requested wording.	
EA055	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice	EA055: Control and Management Measure GG17.	Agreed, an update has been made to measure GG17 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	We are satisfied and consider this issue resolved. The Applicants control management measures GG17 of the Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] risked wash water seeping into groundwater and deteriorate WFD quality waterbodies. The applicant updated measure GG17 of Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the appropriate measures. We consider this issue resolved.	Agreed
EA056	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice	EA056: Control and Management Measure GG24 doesn't include informing the Environment Agency of an incident affecting the environment.	Agreed, an update has been made to measure GG24 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	We are satisfied and consider this issue resolved. The Applicant's Control Management Measure GG24 in the 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] did not	Agreed

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	APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)				include informing the Environment Agency of an incident affecting the environment. The Applicant updated the GG24 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the appropriate measures. We consider this issue resolved.	
EA057	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)		EA057: Control and Management Measure W09 does not include notifying the Environment Agency.	Agreed, an update has been made to measure W09 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	We are satisfied and consider this issue resolved. The Applicant's Control Management Measure W09 in the 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] did not include informing the Environment Agency of a major incident. The Applicant updated the W09 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the appropriate measures. We consider this issue resolved.	Agreed
EA058	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)		EA058: Control and Management Measure GH10 doesn't make reference to requirements for permits or exemptions/exclusions on the use of certain drilling fluids/additives.	Agreed, an update has been made to measure GH10 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	We are satisfied and consider this issue resolved. The Applicant's Control Management Measure GH10 in the7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] did not make reference to the requirement of permits and exemptions/exclusions on the use of certain drilling fluids/additives. The Applicant updated the GH10 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the appropriate measures. We consider this issue resolved.	Agreed
EA059	APP-342 7.5.3.1 Register of Environmental Action and		EA059: W08 and W09 do not mention mitigating the cause of any contamination of private water supplies.	Agreed, an update has been made to measures W08 and W09 in **Application Document 9.84 Register of Environmental**	We are satisfied and consider this issue resolved. The Applicant's Control Management Measure W08 and W09 in the 7.5.3.2 CEMP Appendix	Agreed

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	Commitment (REAC)			**Actions and Commitments (REAC)** submitted at Deadline 3.	B Register of Environmental Actions and Commitments (REAC) [APP-342] did not make reference to mitigating the cause of any contamination of private water supplies. The Applicant updated the W08 and W09 in the Late Deadline 1 Submission -7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] to include the appropriate measures. We consider this issue resolved.	
EA060	APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)		EA060: GH12 does not provide reassurance that if the most vulnerable areas cannot be avoided, that risks will consequently be assessed and managed.	Agreed, an update to measure G12 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made to reflect this additional commitment.	We do not consider this issue resolved. GH12 in the 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], the superseded by document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] does not provide reassurance that if the most vulnerable areas cannot be avoided, that risks will consequently be assessed and managed. The amendment to GH12 states “valuable areas”, it should be vulnerable areas. Once this minor correction is made, we can then consider this item to be resolved.	Under discussion
EA061	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA061: A commitment (GH02) requires a foundation works risk assessment (FWRA) to be undertaken for all locations where trenchless crossings are proposed. The Environment Agency is not listed as to be consulted on the FWRA.	Agreed, an update has been made to measures GH02, GH05 and GH10 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	We are satisfied and consider this issue resolved. We previously highlighted that commitment GH02 in document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]requires a foundation works risk assessment (FWRA) to be undertaken for all locations where trenchless crossings are proposed, but that the Environment Agency was not listed as to be consulted on the FWRA. The Applicant has now updated measures GH02, GH05 and GH10 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority	Agreed

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					[REP1-102]. We are content with this and consider this issue resolved.	
EA062	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA062: Control and Management Measures G05 and GH10 do not mention EPR requirements.	Agreed, an update has been made to measures G05 and GH10 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	We are satisfied and consider this issue resolved. Previously we were concerned that control and management measures GH05 and GH10 did not mention the Environmental Permitting Regulations requirements in document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. The Applicant has made an update to measures GH05 and GH10 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]. We are content with this and consider this issue resolved.	Agreed
EA050	APP-293 6.9 Water Framework Directive Assessment APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology	**Groundwater and Contaminated Land** Hydrogeological Risk Assessment	EA050: The report states that Groundwater bodies within the Zone of Interest (ZOI) have been screened out, in agreement with the Environment Agency. We did not agree to the screening out of the Groundwater Bodies when we were consulted on the Water Framework Directive Assessment Version: V01 January 2025 (refer to our response letter XA/2025/100236/01-L01, dated 11 February 2025. The scheme involved 1.5km of HDD at approximately 15m depth. This has not been discussed in the WFD assessment in relation to groundwater bodies.	Further justification for screening out WFD groundwater bodies was added to Section 3.1.18/3.1.19 of **Application Document 6.9 Water Framework Directive Assessment [APP-293]** following Environment Agency comments on a draft version of the report. The justification draws on findings of the groundwater risk assessments prepared to inform the Environmental Statement. As detailed, **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177]** has assessed the potential risks to groundwater quality from the connection of different aquifer units at trenchless crossings. For the Suffolk Onshore Scheme, the assessment concluded that the horizontal directional drill (HDD) bore is unlikely to connect two aquifer units as the works would remain within the Crag Formation for its full length. Similar conclusions with regard to connection/mixing of aquifers were drawn for the Kent Onshore Scheme. In accordance with commitment GH10 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, a drilling fluid breakout plan will be developed by the contractor where horizontal directional drilling is proposed and included within the Offshore	We are satisfied and consider this issue resolved. We raised concerns with the screening out of groundwater bodies in the Document 6.9 Water Framework Directive Assessment [APP-293]. The Applicant stated that we agreed to this action; however we had not. This was raised in previous consultation responses letter XA/2025/100236/01-L01, dated 11 February 2025. We stated that to resolve this issue, we required the applicant to ensure the Hydrogeological Risk Assessment (GH09) included an assessment of the HDD sections involving: • Assessment of drilling muds • HDD breakout plan • Identification of receptors The applicant response in Document 7.3 Design Development Report [APP-321] and commitments GH02, GH09 and GH10 made in the Late Deadline 1 Submission -7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] have provided the	Agreed

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				and Onshore Construction and Environmental Management Plan's. Commitment GH02 also requires a Foundation Works Risk Assessment (FWRA) to be undertaken by the contractor at trenchless crossing locations as well as at locations of piled foundations. One of the scenarios that will be assessed by the FWRA, in accordance with the Environment Agency guidance, is: "*Contamination of groundwater and subsequently surface waters by turbidity, support fluids, concrete, cement paste or grout*" with drilling muds being assessed under support fluids. In addition, as with any risk assessment this FWRA will identify receptors as part of the process.	appropriate assurances that the HDD drilling breakout plan will be secured.	
EA053	APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology	EA053: Omission of assessment of risks from heat generated by the cable to groundwater.	Issue EA053 is subject to further discussion with the Environment Agency, though as previously highlighted, WFD groundwater bodies were screened out of the WFD assessment.	We do not consider this issue resolved. Previously we raised that the assessment of risks from heat generated by the cable to groundwater had been omitted. We will not resolve this issue until issue EA054 GWCL has been resolved. Once issue EA054 has been resolved, we will consider that whether sufficient mitigation has been proposed resolve this issue.	Under discussion
EA063	APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment	EA063: Ground investigations are being used to fully characterize a site.	In accordance with Commitment GH01 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 intrusive ground investigation will be undertaken to inform detailed design which will assist in further information regarding the likelihood of dewatering being required. In accordance with Commitment GH09 a Hydrogeological Risk Assessment will be undertaken during the detailed design to assess the specific risks to groundwater and groundwater receptors and identify any additional mitigation or remediation as appropriate. If the assessment determines that a contingency plan for potentially encountering groundwater is required than this will be developed through the Hydrogeological Risk Assessment.	We are satisfied and consider this issue resolved. Previously we raised concerns that ground investigations were inappropriately being used to fully characterize a site. The Applicant has confirmed that in accordance with Commitment GH01 in the Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] intrusive ground investigation will be undertaken to inform detailed design, which will assist in further information regarding the likelihood of dewatering being required. In accordance with Commitment GH09 a Hydrogeological Risk Assessment will be undertaken during the detailed design to assess the specific risks to groundwater and	Agreed

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					identify any additional mitigation or remediation as appropriate. If the assessment determines that a contingency plan for potentially encountering groundwater is required, than this will be developed through the Hydrogeological Risk Assessment. We are content with this and consider this issue resolved.	
EA035		**Water resources** Hydrogeological Risk Assessment	EA035Not all receptors have been identified in assessments carried out. Licences 7/35/05/*G/0020 (TM 43925 58267) and AN/035/0005/026 (TM 41155 59562) are not included in possible receptors from groundwater impacts. They are in proximity to 7/35/05/*G/0046 which is included.	A review of the groundwater abstraction licence locations noted by the Environment Agency indicate that one of these locations (AN/035/0005/026) is outside of the 500 m study area used for the assessment of groundwater receptors which is detailed within **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177]** and **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]**. The other abstraction (7/35/05/*G/0020) is located approximately 600 m from proposed underground cabling and therefore the potential for impacts related to changes in groundwater levels is considered to be low. In addition, based on the information obtained to date, dewatering is unlikely to be required to facilitate the construction of the Proposed Project within Suffolk and in accordance within Commitment GH09 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 if unexpected dewatering is found to be required (following the detailed design) that wasn't anticipated by the assessment within the groundwater risk assessment a Hydrogeological Risk Assessment will be undertaken which will assess any potential impacts on water levels and water quality to the relevant receptors within the study area. The groundwater risk assessment within **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** also assess the potential impacts on water quality from the different elements of the Proposed Project within Section 4 of the document. This assessment is supported by **Application**	We are satisfied and consider this issue resolved. Commitment GH09 of the Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] states that a Hydrogeological Risk Assessment will be undertaken during detailed design stage. We are content that this will cover any risks posed by unexpected dewatering.	Agreed

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				Document 6.3.2.5.E Appendix 2.5.E Quantitative Risk Assessment – Suffolk [APP-120] which concludes that there is generally a low/moderate risk of existing contamination being present across the route. **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** assess the potential impacts on water quality from the mobilisation of existing contamination within Paragraph 5.8.9, 5.9.9 and 5.9.10 and concludes that for groundwater and groundwater receptors impacts would be minor and therefore not significant with the implementation of the good practice measures contained within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.		
EA033	APP-340 7.5.3 Outline Onshore Construction Environment Management Plan APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC)	**Water resources** Outline Construction Environment Management Plan	EA033: The outline Construction Environment Management Plan (CEMP) does not include any planning provision for water supply. Furthermore, not all consumptive volumes have been evidenced, and it is unclear whether the water company will be able to provide the volumes.	Water supply requirements have not been finalised to the extent that orders can be placed with suppliers, therefore the Proposed Project is unable to confirm the water sources for tankered supplies at this time. Due to the extended period between submission of the DCO and commencement of works on site, the strategy for supply of materials may change, particularly with regards to water. Supply and demand are subject to seasonable and annual variation depending on weather and are dependent on the contractors' methodology for delivery and the detailed design. The Applicant will be developing the water supply requirements along with their contractors and their supply chains as detailed design progresses. In terms of the strategy for water consumption the Applicant has determined not to extract groundwater locally to the site for construction purposes. Water for construction will be tankered into site to broaden the source area. With respect to the domestic water supplies, applications will be made to the local water companies to provide temporary supplies to the construction compounds and permanent supplies to the Converters and Substations. Should the supply companies be unable to meet the temporary domestic requirements then that water would also be tankered in.	We are satisfied and consider this issue resolved. We were concerned that the 7.5.3 Outline Onshore Construction Environment Management Plan [APP-340] did not include any planning provision for water supply. We seek confidence that sustainable and practical water supply options have been evaluated by the project. Exact volumes are not necessarily required at this stage. This region is classified as seriously water stressed. The Essex and Suffolk Water Resources Management Plan (WRMP) sets out that the company may not be able to supply all new non-domestic demands. In a reasonable worst-case scenario, further evaluation of the catchment abstraction licensing strategy would show that groundwater is closed to new abstraction. Furthermore, surface water abstraction is effectively restricted to the winter. The Applicant should be aware that this may mean that temporary storage could be needed to buffer times of unavailability, or licence trades may need to be sought. The Applicant has confirmed that no surface water or groundwater abstraction is intended and we are satisfied that the option to tanker	Agreed

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				Peak temporary potable water usage is based on the estimate of 327 staff in Suffolk and 241 staff in Kent at the peak of construction. From the Institute of Plumbing, Plumbing Engineering Services Design Guide the daily water demand from Table 2 based on 'Offices and General Workplaces – Without Canteen' is 40 litres per person per day. Therefore, the total daily potable water demand is estimated to be 327 x 40 = 13,080 Litres in Suffolk and 241 x 40 = 9,640 litres in Kent, spread across multiple compound locations. Therefore, should the supply companies be unable to meet this demand an additional tanker would be required every 2 to 3 days. This supply of potable water by tanker was not considered within the traffic figures as it was not felt to be likely; however, the associated number of trips is so small that they would have no potential to influence the findings of the assessment, even if the scenario did occur. To inform the traffic and transport assessment an estimation of the construction vehicle movements was undertaken. This estimation included the movement of tankers to supply water to the site for construction purposes. Estimates of the water consumption to inform the tanker requirements were based on heavy use activities including a possible concrete batching plant (Kent only due to proximity of concrete suppliers) and the trenchless drilling activities in both Kent and Suffolk. An allowance of 60,000 litres per day has been allowed for the batching plant during periods of operation, equating to 2 tankers, and 30,000 litres per day has been allowed for trenchless crossings during drilling works, which equates to 1 tanker. An additional tanker per week per main construction compound has been allowed to cover additional construction activities. Therefore, at peak periods the Applicant has allowed for 22 tankers per week in Kent and 10 tankers per week in Suffolk. This is based on a conservative assessment of the batching plant in Kent operating 6 days per week and trenchless activities potentially operating 7 days per week and allowing for 3 main	water has been evaluated proportionately. We are pleased to see this evaluation is included in traffic movements. However, it is at the Applicant's risk if this is not enough contingency planning, should the local authority deem the numbers of heavy goods vehicles on local roads to be unacceptable.	

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				compounds being used simultaneously in both Suffolk and Kent.		
EA034	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment	**Water resources** Water Framework Directive Assessment	EA034: The impacts on watercourses do not mention the abstraction of surface water and/groundwater for dewatering or consumptive uses of water (for dust suppression, concrete production, wheel washing etc) to allow for construction.	The DCO application is based on the assumption that water for construction activities, including concrete batching, trenchless drilling, dust suppression, and vehicle wash down, would be delivered to site via tankers. New abstractions from local watercourses or from groundwater resources is therefore not proposed by the Proposed Project and the associated impacts of abstraction (and any associated necessary impoundment) have therefore not been assessed within the ES. As noted above, no abstraction of surface or groundwater resources for consumptive uses are proposed; however, there will be a need to dewater excavations. This water will be discharged to onsite drainage systems which will facilitate attenuated discharges to local watercourses and / or infiltration to ground local to the excavation.	We are satisfied and consider this issue resolved. We were concerned that the impacts on watercourses omitted the abstraction of surface water and groundwater for dewatering, or consumptive uses of water. The Applicant has stated that water for construction activities would be delivered on site via tankers, and abstraction from local watercourses or groundwater sources are not proposed.	Agreed
EA002	APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity	**Biodiversity** Habitat Monitoring and Management Plan	EA002: Lack of a precautionary approach regarding temporary habitat loss and protected species.	Paragraphs 2.9.121 to 2.9.133 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** identify one location where a reduction in ditch length would arise, on a watercourse used by water voles. This would facilitate the haul route and associated drainage and would involve culverting of a 20 m stretch of ditch, which would be reinstated following completion of works. This is not a significant loss of ditch given the total length of ditch which is approximately 500 m. There will be a net increase in suitable riparian marginal vegetation in this area due to planting along the River Fromus around the new bridge, as set out in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan (LEMP) – Suffolk [CR1-045]**. Action B17 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 identifies that the culvert will also avoid narrowing of natural channel width. Where bank material cannot be preserved within the	EA002 Biodiversity We do not consider this issue resolved. We raised concerns regarding the temporary habitat loss to protected species, and the precautionary approach taken would not appropriately manage the impacts to ecological receptors. **Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environnmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]** Biodiversity highlights protections through Code of Construction Practice (CoCP) measures B01 to B10. This partially addresses our concerns raised. We require the document **7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]** Section 5.2.3 to be updated to include riparian planting to mature emergent vegetation. This will ensure clarity, address previous concerns about	Under discussion

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				culvert (due to the weight or levels) they will also include a minimum 150 mm wide mammal ledge (with 600 mm headroom where ditch depth allows) to ensure continued accessibility by water voles. The ledge or continuation of bank is provided to ensure there is no requirement for water voles or riparian mammals to cross the haul road itself. Action B25 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 identifies that a watching brief would be introduced during vegetation clearance in the ditch west of the River Fromus. Displacement of water voles if any are encountered would occur under a Class Licence. This would restrict clearance of any locations where water voles are present to either 15 February to 15 April or 15 September to 31 October. While a potential otter couch was recorded along the River Fromus itself, the proposed new bridge over the River Fromus would be clear span and the abutments would be set back 8 m from the bank top (for both bridge design options), so no loss of riparian habitat for mammals is anticipated. It is recognised that pre-construction surveys will be required before works. This is set out in paragraph 7.1.1 of **Application Document 7.5.7.1 Outline Landscape and Ecology Management Plan – Suffolk [CR1-045].**	natural recolonisation and the resulting predation risks for water voles.	
EA003	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project APP-059 6.2.2.12, Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects		EA003: Nine temporary culverts and two permanent culverts are proposed to be constructed in the Suffolk area, to facilitate vehicle crossings over watercourses.	The Applicant has met with the Environment Agency to present information about the various watercourse crossing types proposed, including construction and removal time and impact and the substantial cost differences between culverts and bridges. Information was presented for each of the ordinary watercourses/drains to be crossed including proposed culvert types (flume pipe or box). The presentation also gave an explanation as to why a portal (three sided) culvert design would provide no advantage on most of the watercourses to be crossed, as the extent of the footings would leave no natural bed exposed. Many of the proposed temporary culverts are located where there are existing culverts. A copy of the presentation has been	We are satisfied and consider this issue resolved. The development proposed to culvert multiple watercourse crossings. We maintain a anti-culverting policy for watercourses, due to their impacts to Water Framework Directive and biodiversity receptors. We engaged with the applicant's project team 15 August 2025. The propose culvert designs, including specifications for dimensions, and installation methodologies, were presented and thoroughly reviewed. These designs provided adequate evidence of the applicant's intent to adhere to relevant water management and environmental standards for ordinary watercourses.	Agreed

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				provided to the Environment Agency for their further consideration. Action B17 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 already allows for ledges to aid connectivity in all culverts with aquatic mammal presence: *"The culverts will also avoid narrowing of natural channel width. Where bank material cannot be preserved within the culvert (due to the weight or levels) they will also include a minimum 150 mm wide mammal ledge (with 600mm headroom where ditch depth allows) to ensure continued accessibility by water voles.".* **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** only specifically mentions one culvert because the others were all on dry ditches that did not hold water at time of survey. However, this measure could apply to all culverts considered to have suitability.	Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. We further stated we would differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts were proposed for main rivers.	
EA007	APP-062 6.2.3.2 Part 2 Kent Chapter 2 Ecology and Biodiversity	**Biodiversity** Outline Landscape and Ecological Management Plan	EA007: Mustela lutreola is reported as being present in the site. Mustela lutreola is the Eurasian or European mink which has never been present in the UK.	The Applicant notes this comment and can confirm that the species should have been referred to as American mink (*Neovison vison*). **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** has been updated to correct this error.	We are satisfied and consider this issue resolved. The applicant had made reference to European Mink within Document**: 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062]**, this Invasive species has not been present in the UK. The applicant has updated Document: Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority [REP1-047] to refer to American mink. We agree with this correction and consider this issue resolved.	Agreed
EA008	APP-349 – Outline Landscape and Ecological Management Plan		EA008: Omission of beavers from report.	Beavers are not specifically mentioned in **Application Document 7.5.7.2 (B) Outline Landscape and Ecology Management Plan – Kent [PDA-035]** because based on survey data for the project there is no evidence of beaver in watercourses to be directly affected by the scheme. Habitat creation in the form of scrapes is identified in **Application Document 7.5.7.2 (B) Outline Landscape and Ecology**	We are satisfied and consider this issue resolved. We raised concerns that beavers would be impacted via the development. The applicant has outlined that updated protected species surveys will be required prior to works taking place, including surveys for beavers. If there is evidence of the presence of beavers, the appropriate licences	Agreed

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				Management Plan – Kent [PDA-035] but these are set back from the River Stour. It is recognised that updated protected species surveys will be required for ecological receptors prior to works taking place. This will include, but not be restricted to, survey for beavers. This is identified in Paragraph 7.1.1 of **Application Document 7.5.7.2 (B) Outline Landscape and Ecology Management Plan – Kent [PDA-035]**. If evidence of beaver is recorded in update surveys in areas to be affected by works, then legal requirements will be followed and, if necessary, a licence will be obtained. However, the application has avoided setting out purely hypothetical mitigation.	and procedures will be obtained. This was secured in the document **7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]**. The probability of beavers, their resting places and foraging sites being encountered remains very high. See page 8 of *Assessment of wild living beaver populations in East Kent* at https://publications.naturalengland.org.uk/file/5293201880252416"	
EA006	APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-297 6.12 Biodiversity Net Gain Feasibility Report	**Biodiversity** Biodiversity Net Gain Assessment	EA006: The Biodiversity Net Gain (BNG) parameters line excludes Intertidal habitat in Kent, despite it being stated that impacts from Horizontal Directional Drilling (HDD) in Kent will affect both intertidal and subtidal habitats.	Only DCO Applications accepted for examination after National Implementation of the BNG for NSIPs will have a mandatory requirement to deliver BNG. However, National Policy Statements EN-1 and EN-5 set out the policies for environmental net gain and BNG as it currently applies to NSIPs. Legal BNG obligations are expected to be introduced for NSIPs in May 2026. There is currently no NSIP specific guidance available. In the absence of legal obligation or NSIP-specific guidance, National Grid's approach to BNG for NSIP projects is to: • meet the policy requirements within the current NPS; • deliver its corporate commitments to deliver at least 10% BNG with wider benefits; • maximise the benefits and value from consumer funded BNG; and • follow the spirit of the Town and Country Planning Act BNG legislation and guidance, including using the SBM. Where opportunities are identified to work with other NSIPs to deliver BNG, these will be investigated. Within the **Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055]**, Table 3.4 does not include mudflats	We are satisfied and consider this issue resolved. The applicants **6.12 Biodiversity Net Gain Feasibility Report [APP-297]** excluded the Kent intertidal habitats from impacts to Horizontal Directional Drilling (HDD). The applicant has made a commitment to not use open trenched methods within the Kent intertidal zone, resulting in no habitat loss. The applicant's **6.12 (B) Biodiversity Net Gain Feasibility Report (Clean) [AS-055]** was updated to include the intertidal area. The Document **Late Deadline 1 Submission - 9.13 Pegwell Bay Construction Method Technical Note - Accepted at the discretion of the Examining Authority [REP1-108]** further outlines the construction methodology within the Kent intertidal area and provides the appropriate details to resolve the issue.	Agreed

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				or saltmarsh as there will be no habitat loss of these habitats. Open cut trenching in Pegwell Bay has been ruled out as an installation technique for the transition between the Kent Onshore Scheme and Offshore scheme and the Applicant has made a commitment in the DCO to adopt trenchless techniques (such as horizontal directional drilling (HDD)) between the transition joint bay (TJB) to the exit point. The TJB for the Kent Onshore Scheme will be approximately 800 m inshore (as illustrated on DCO/K/DE/SS/1257 of **Application Document 2.13.2 Design and Layout Plans - Kent [APP-037]** and described in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**). The trenchless technique exit point in the marine environment will be in the intertidal zone, at a location between 105 and 140 m seaward of the lower boundary of the saltmarsh. The HDD will also be between 15 and 20 m below ground level and 15-20 m below the saltmarsh, therefore completely avoiding this habitat. The trenchless technique option will ensure that there is loss or disturbance to saltmarsh habitat. The HDD exit point in the intertidal is within the mudflats where a number of short-term and small in extent construction activities will occur, as described in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** and **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011].** These activities will result in some temporary disturbance of the mudflat habitat, as described and assessed in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [REP1-053]**, however, there will be no permanent habitat loss as the works will be buried and any disturbance to the surface of the mudflats will rapidly disappear with tidal activity. Therefore, given there will be no permanent loss of any saltmarsh or mudflat habitat in the Pegwell Bay intertidal zone, no loss of any habitat that is a qualifying feature of a		

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				protected site will occur. These have therefore been scoped out of the BNG assessment.		
EA001	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project	**Biodiversity** Outline Construction Environment Management Plan	EA001: Working hours of the project do not account for seasonal changes to the time of dawn and dusk.	Works close to watercourses are most likely to result in significant disturbance where works take place close to water vole burrows. The impact assessment for the Proposed Project has assumed that water voles could be present on any wet ditch to be traversed. Irrespective of the time of day when works are undertaken, an ecological watching brief will be in place during any vegetation clearance in these ditches. Displacement of water voles, if any are encountered, would be undertaken under the supervision of a licensed ecologist under Class Licence CL31. This is already committed to in actions B25 and B46 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. As with water voles, works close to watercourses are most likely to result in significant disturbance to otter where works take place close to holts and resting places, since foraging animals are highly mobile and are not fixed at a specific location on a watercourse. No otter holts/resting places or beaver resting places have been identified close to proposed watercourse works, but this information will be updated each year. If any are identified then, as with water voles, irrespective of the time of day when works are undertaken, an ecological watching brief will be in place during any vegetation clearance in these ditches. If necessary appropriate measures to limit disturbance will be determined at that time as these will be dependent on the proximity of the holt or resting place to the works area, or licenses will be applied for to exclude them from the affected area. Given the above, it is not considered necessary to make a further commitment in relation to construction hours.	EA001 Biodiversity We do not consider this issue resolved. We raised concerns that construction work near watercourses during the night have a high potential to disturb nocturnal protected species (otters). Commitment B25 & B26 of Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] do not address potential noise and vibration disturbance to nocturnal wildlife. The Construction Environmental Management Plan (CEMP) and Construction Noise and Vibration Management Plan (NVMP) (NV01) should include wildlife (namely nocturnal protected species) in addition to other 'sensitive receptors' and appropriate site-specific mitigation identified. "	Under discussion
EA005	APP-341 7.5.3.1 CEMP Appendix A Outline Code of		EA005: Control and management measure B01 is vague in regards to when protected species licenses will be obtained. Furthermore, there is no mention of what measures the	Measures B25 (for Suffolk) and B46 (for Kent) of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 are specific and identify that that displacement of water	We are satisfied and consider this issue resolved. Measure B01 of the **7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**	Agreed

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	Construction Practice		contractor should take whilst a licence is being sought.	voles, if any were identified during a watching brief held during vegetation clearance, would take place under Natural England Class Licence CL31. No specific protected species licences are required for the project based upon current survey data, as explained in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049].**	**[APP-341]** was vague regarding the protected species licences. The applicant has revised measure B01 of **Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]** to include the following 'Should protected species be identified during construction that require a licenced, works in that location will be stopped, when safe to do so, until an appropriate licence is in place.' We consider this to be satisfactory.	
EA004	APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice		EA004: Control and management measure GG15 mentions the maintenance of riparian buffers but doesn't mention intended width.	Commitments referring to maintaining riparian buffers between various construction activities (GG14, W02 and GH05) will be updated, with distances consolidated to a uniform buffer of 10m. Regarding the trenchless watercourse crossings, these are currently identified as K/WA/0016 in Kent and S/WA/0006 in Suffolk. At these locations a minimum buffer of 10 m is proposed.	We do not consider this issue resolved. We raised concerns that a riparian buffer zone of 8m form the bank-top of all watercourses should be maintained. The applicant has updated **Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]** to outline reference GG14 (storage of fuels, oils & chemicals) 10m, GG15 (no buffer dimensions provided), W02 (10m in relation to refuelling), GH05 (hazardous materials to water quality) 10m. A uniform buffer 10m for all construction and associated activities such as refuelling and storage of materials is acceptable, however this has not been explicitly reflected in GG15 **[REP1-102]**. We require this to be updated.	Under discussion
EA031	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment	**Geomorphology** Coastal Erosion Assessment/Decommissioning plan Kent	EA031: Inappropriate assessment of the sensitivity of the morphology of Pegwell Bay.	The timescale for recovery of the local morphology within the bay will be dependent on the timing of completion of the works relative to the phasing of the tides and consolidation rates for the backfill. Backfilling of excavations and redistribution of any excess material will be the first stage in the recovery process. Further recovery of the morphology will rely on the redistribution of sediment initiated by tidal currents and, to a lesser extent, the stirring action of locally generated wind-waves. It is expected that full	We are satisfied and consider this issue resolved. We were concerned the applicant had completed an inappropriate assessment of the sensitivity of the morphology at Pegwell Bay. The applicant provided their response within Document Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111]. We agree	Agreed

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				recovery of the bay morphology, such that there is no trace of the excavation or vehicle tracks, will occur over a few spring tides (i.e. a few days) and certainly within a 14-day spring-neap cycle.	with the discussion provided as the biological impacts will be limited.	
EA029	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment	**Geomorphology** Coastal Erosion Assessment/ Decommissioning plan Suffolk	EA029: Cable protection measures, such as rock bags/mattresses, may interfere with sediment transport pathways.	The placement of rock bags / concrete mattress at the HDD exit points in close proximity to the Coralline Crag outcrop is temporary, until the cable pull-in and installation commences. The duration will depend on the installation phasing, with the rock bags / mattresses being present for a few weeks / months. Following cable installation a permanent rock bag / concrete mattress may be placed over the duct end to stabilise the structure, with subsequent burial below natural seabed level, leading to the re-establishment of the sediment transport pathways. The HDD exit point will target an exit location with sufficient depth of seafloor sediments to ensure the duct end and cable can be buried below the level of the seafloor; therefore, it will not be designed such that there is a risk of exiting where the Coralline Crag is at the surface of the seabed. The provided designs are conceptual designs; during detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. The current exit sites are 19 m or more beyond the Coralline Crag; with the advent of gyro guidance systems, HDD exits are typically accurate to within several metres of the planned exit position and rarely exceed 10 m from the exit position. The final design will take account of exit accuracies when micro siting the exists.	We are satisfied and consider this issue resolved. We previously raised that cable protection measures, such as rock bags/mattresses, may interfere with sediment transport pathways. Following review of the Applicant's response in Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103], the applicant is intending to avoid the Coraline Crag outcrop as much as is possible. Furthermore, we are content their appointed contractors will microsite the exit points as far away from the outcrop as possible, following seafloor surveys and ground investigations. We recommend that the site is subject to monitoring following the installation of the cable works, in order to determine if there will be any short/long term effects from the works that may cause alterations in sediment transport characteristics. If there are perceived effects, then mitigation should be considered necessary.	Agreed
EA050	APP-293 6.9 Water Framework Directive Assessment APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter	**Water Framework Directive** WFD Assessment	EA050: The report states that Groundwater bodies within the Zone of Interest (ZOI) have been screened out, in agreement with the Environment Agency. We did not agree to the screening out of the Groundwater Bodies when we were consulted on the Water Framework Directive Assessment Version: V01 January 2025 (refer to our response	Further justification for screening out WFD groundwater bodies was added to Section 3.1.18/3.1.19 of **Application Document 6.9 Water Framework Directive Assessment [APP-293]** following Environment Agency comments on a draft version of the report. The justification draws on findings of the groundwater risk assessments prepared to inform the Environmental Statement.	We are satisfied and consider this issue resolved. We raised concerns with the screening out of groundwater bodies in the Document6.9 Water Framework Directive Assessment [APP-293]. The Applicant stated that we agreed to this action; however we had not. This was raised in previous consultation responses letter XA/2025/100236/01-L01, dated 11 February 2025. We stated that to resolve this issue, we	Agreed

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	5 Geology and Hydrogeology		letter XA/2025/100236/01-L01, dated 11 February 2025. The scheme involved 1.5km of HDD at approximately 15m depth. This has not been discussed in the WFD assessment in relation to groundwater bodies.	As detailed, **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177]** has assessed the potential risks to groundwater quality from the connection of different aquifer units at trenchless crossings. For the Suffolk Onshore Scheme, the assessment concluded that the horizontal directional drill (HDD) bore is unlikely to connect two aquifer units as the works would remain within the Crag Formation for its full length. Similar conclusions with regard to connection/mixing of aquifers were drawn for the Kent Onshore Scheme. In accordance with commitment GH10 of **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3; a drilling fluid breakout plan will be developed by the contractor where horizontal directional drilling is proposed and included within the Offshore and Onshore Construction and Environmental Management Plan's. Commitment GH02 also requires a Foundation Works Risk Assessment (FWRA) to be undertaken by the contractor at trenchless crossing locations as well as at locations of piled foundations. One of the scenarios that will be assessed by the FWRA, in accordance with the Environment Agency guidance, is: "*Contamination of groundwater and subsequently surface waters by turbidity, support fluids, concrete, cement paste or grout*" with drilling muds being assessed under support fluids. In addition, as with any risk assessment this FWRA will identify receptors as part of the process.	required the applicant to ensure the Hydrogeological Risk Assessment (GH09) included an assessment of the HDD sections involving:• Assessment of drilling muds• HDD breakout plan • Identification of receptors The applicant response in Document 7.3 Design Development Report [APP-321] and commitments GH02, GH09 and GH10 made in the Late Deadline 1 Submission -7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] have provided the appropriate assurances that the HDD drilling breakout plan will be secured.	
EA024	APP-160 6.3.3.2.N ES Appendix 3.2.N Aquatic Ecology Survey Report	**Water Framework Directive** Marine Water Framework Directive Assessment Kent	EA024: Sea Trout missing from fish surveys.	Sea trout were not recorded in the fish surveys reported in **Application Document 6.2.3.2 Appendix 3.2 Aquatic Ecology Survey Report [APP-104]**. Section 4.2.25 of **Application Document 6.9 Water Framework Directive Assessment [APP-293]** assesses the status and risks to brown/sea trout. It is noted that: "*Sea trout are widely distributed across the UK*" and "*overall, sea trout is reported to attempt to enter most of the south coast's rivers*".	We are satisfied and consider this issue resolved. We raised concerns that impacts to Sea Trout would be impacted within the River Stour catchment. The applicant has acknowledged in document 6.9 Water Framework Directive Assessment [APP-293] assess the risk to Brown/Sea Trout and notes they are widely distributed across the UK and attempts to enter most South coast rivers. The applicant notes that Sea Trout are in the River Stour and the assessment of impacts and likely	Agreed

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				It is noted that [sea] trout are present in the River Stour; the Assessment of impacts and likely significant effects within the Biodiversity & Ecology chapter of the Environmental Statement and the WFD assessment therefore consider brown/sea trout where "*fish*" are mentioned.	significant effects are noted in Document Late Deadline 1 Submission -6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority [REP1-049] and Document 6.9 Water Framework Directive Assessment [APP-293].	
EA039	APP-075 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology APP-293 6.9 Water Framework Directive Assessment		EA039: Lack of clarity regarding how large plant and equipment will arrive to the HDD exit point in the intertidal environment.	The Applicant is committed to ensuring that there will be no vehicular or pedestrian access across the saltmarsh. Access and egress of vehicles to the mudflats will be via the former hoverport with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey. This is formally committed to with the following commitment being added to the updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The wording of this additional commitment is as follows: "*To ensure there will be no vehicular or pedestrian access across the saltmarsh, access and egress of vehicles to the mudflats will be via the former hoverport with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey.*" Further detail on construction access via the former hoverport and mudflats is also provided in **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]**.	We are satisfied and consider this issue resolved. We were concerned as there was a lack of clarity regarding how large plant and equipment will arrive to the HDD exit point in the intertidal environment. The Applicant has provided a commitment (B67) which resolves our concerns in the Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102].	Agreed
EA011	APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report APP-293 6.9 Water Framework Directive Assessment	**Water Framework Directive** Marine Water Framework Directive Assessment Suffolk	EA011: Records of European smelt omitted.	Smelt records on the River Alde were included in **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**. Section 1.3.16 also states that "*As this species is listed as a Biodiversity Action Plan (BAP) species, NERC Species of Principal Importance (SPI) and are a key indicator species under the WFD it has been*	We consider this issue resolved. We raised concerns that the records of European Smelt being omitted and would be impacted by the development. We agree with the applicant's conclusions stated in section 1.4.29 of Document: **6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F**	Agreed

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				considered further in this report." It is also noted in Section 1.4.29 that: "*smelt migrate into rivers to spawn amongst gravels in fast flowing river water (normally above the saline influence). Given that the habitat present at the proposed bridge location on the River Fromus does not represent suitable spawning habitat for smelt, it is highly unlikely that smelt will be within the vicinity of the Proposed Project*." As such, smelt is considered in the assessment and newly established records in the Alde/Ore estuary would not result in any changes to the assessment – based on the lack of suitable spawning habitat for this species in the Fromus at the location of the proposed bridge crossing.	**Aquatic Ecology Survey Report [APP-104]**, that it is unlikely that smelt will be present in the immediate reach of the Fromus crossing, giving habitat conditions.	
EA012	APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report APP-293 6.9 Water Framework Directive Assessment		EA012: Improper description of eel and lamprey within assemblages.	The exact meaning of *"improper description of eels and lamprey within assemblages*" is unclear. Section 1.2.31 describes the electric fishing methodology employed on the River Fromus based on the habitats present. Habitat quality detailed in Section 1.3.74 was described generally, and the deep silt deposits and stagnant water is suggested as an explanation for the lower fish diversity compared to other Environment Agency (EA) monitoring sites on the River Fromus which were more species-rich and which contained diverse flow and depth patterns and in-stream macrophytes – the presence of European eel at this site is noted despite the description of 'poor habitat' (Section 1.3.74). Likewise, the presence of lamprey is assumed where the species has been identified in desk study data – refer to EA009 above: The presence of brook lamprey in the River Fromus was noted in the desk study detailed in **Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** (e.g. Section 1.3.14, 1.4.25, and 1.4.26).	We do not consider this issue resolved. We raised concerns regarding the description of Eel and Brook Lamprey assemblages in **Document: 6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**. The desk study in Document: **6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** recorded brook lamprey in the River Fromus, and this should be reflected in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]**. As brook lamprey have not been recorded in the Fromus and given that a single survey may not capture their true status, fish populations fluctuate annually and lamprey can burrow into fine sediment, making detection difficult. It is precautionary and appropriate to explicitly note brook lamprey as historically present in the document **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]**. Sections 2.7.72-74 should be updated to include brook lamprey.	Under discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
					The mitigation measures outlined in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]** are considered sufficient to protect brook lamprey where present.	
EA019	APP-293 6.9 Water Framework Directive Assessment		EA019: Noise impacts from cable excavation have not been included.	An assessment of potential noise effects from cable installation (including ploughing, jetting, and trenching) on fish was considered in **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]**. This assessment screened out effects on this receptor, stating that the noise level would be very low and does not pose a risk of injury or significant disturbance to fish. This was based on sound measurements made during a generic cable trenching which recorded a maximum unweighted Sound Pressure Level (SPL_{RMS}), of 178 dB re. 1µPa **Invalid source specified.**.	We do not consider this issue resolved. Our concern relates to the noise impacts to fish from cable excavation. The sound pressure level quoted in reference 2.4.11 B of document **Late Deadline 1 Submission - 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111]** is unweighted, and therefore does not provide any context as to how different species of fish may perceive the sound. Please note this issues is specifically regarding diadromous fish. Updates should be made to document **6.2.4.3 (B) Part 4 Marine Chapter 3 Fishe and Shellfish Ecology (Clean) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority [AS-022]** and the applicant should consider the cable excavation operations against the noise criteria set out in (Popper, 2014) where the risk of fish can be presented in the near, intermediate and far distances from source.	Under discussion
EA020	APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project		EA020: Using box culverts to permanently and temporarily culvert watercourses for crossings.	Appropriate design of temporary and permanent culverts is recommended and assessed in the Aquatic Ecology assessment, to ensure continued fish passage and ecological connectivity. The Applicant has met with the Environment Agency to present details of each watercourse crossing and has provided further justification for watercourse crossing method choices. Where culverts are adopted, commitment W03 states that: "*Riverbank and in-channel vegetation will be retained where not directly affected by*	We are satisfied and consider this issue resolved. We raise concern regarding proposed culverts outlined in the project design. We raised this issue as we maintain an anti-culverting policy for watercourses, due to their impacts to fish spawning habitats and WFD status of the waterbody. We engaged with the applicant's project team on 15 August 2025. The proposed culvert designs, including specifications for dimensions and installation methodologies	Agreed

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
				installation works. Where ditches retaining seasonal flows are crossed, culverts in waterbodies will either preserve the natural bed or be box culverts with inverts sunk a minimum of 300 mm below the hard bed of the watercourse and natural / existing bed material placed across the inside of the culvert, to maintain existing channel gradients and habitat for aquatic invertebrates, as well as to ensure continued passage for in channel species."	were presented and thoroughly reviewed. These designs provided adequate evidence of the applicant's intent to adhere to relevant water management and environment standards for ordinary watercourses. Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. As culverts are only proposed on ordinary watercourses, we differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts are proposed for main rivers.	
EA026	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment		EA026: Omission of quantitative assessment of possible scour via shear strength modelling.	The bed material at the location of the Horizontal Directional Drill (HDD) pit excavation within Pegwell Bay is described as silty-sand overlying chalk in the landfall assessment report (ABPmer, 2024). The sediment is therefore predominantly sand and any uncertainty relating to the estimation of scour involving predominantly cohesive sediments is therefore not considered to be a relevant risk to any potential for deterioration in the WFD water quality of a waterbody. The Applicant notes that the key concern identified is a deterioration in water quality, presumably to an increase in suspended sediment concentration (SSC) and possibly the release of contaminants contained within the undisturbed bed material. Precise details of how the intertidal exit point will be enclosed during installation have yet to be confirmed. Consequently, at this stage it is not possible to simulate potential scour effects with any certainty which, among other factors, will depend on the scale and timing of these works. Given the nature of the bed material and the relatively low energy environment, any scouring can be expected to be highly localised, limited in depth and extent. Also, the sediment is believed to be predominantly sand with only a relatively small proportion of the excavated material classified as silt that could potentially contribute to a deterioration in water quality. It is therefore unlikely that any disturbance due to scouring would be	We are satisfied and consider this issue resolved. We were concerned that there was an omission of quantitative assessment of possible scour via shear strength modelling. The project team was able to share the following documents: • Document [PDA-037] 9.20.1: Landfall Sediment Modelling Report Aldeburgh" by ABPmer. • Document [PDA-038] 9.20.2: Landfall Sediment Modelling Report Pegwell Bay" by ABPmer. For the landfall area within Suffolk, the design appeared to consider the current erosion rate and anticipated foreshore lowering. Cable burial depths, shown in the cross-sections, reflected these considerations. The report highlighted the sheltered/low energy nature of Pegwell Bay, with limited amounts of sediment input and reduced wave climate due to the protection of the Goodwin Sands. We concluded that the impacts would not be large enough at a waterbody scale to affect Water Framework Directive (WFD) water quality. We subsequently submitted a response letter (dated 14 November 2025, ref.XA/2025/100429/02-L01)	Agreed

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				significantly different from the effect of ongoing, natural processes resulting from a combination of tidal currents and moderate wave action.	stating that we were content to resolve the issue.	
EA027	APP-195 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling		EA027: Only sediments along the offshore cable corridor have been characterised and studied/modelled, not landfall locations. This assessment, as it stands, fails to characterise the effects of sediment disturbance at landfall.	As noted, discrete locations along the offshore cable corridor were used to characterise the effects of sediment disturbance using modelling techniques. It is the applicant's view that results for the sediment release position closest to the Suffolk landfall can be used to provide an indication of likely dispersion patterns within the nearshore area approaching the HDD exit point. The Kent HDD exit point is located within the relatively sheltered intertidal area of Pegwell Bay where conditions are quite different from the offshore tidal environment. However, at this location any disturbance of seabed material will be contained within a cofferdam (or similar structure) and will not therefore have a detrimental impact on the local marine environment which is why further characterisation of the effects of disturbance at this landfall is not considered necessary. See also the Applicant response to EA-026.	We are satisfied and consider this issue resolved. We were concerned that sediment disturbance at landfall locations was not characterised. The project team was able to share the following documents: • Document [PDA-037] 9.20.1: Landfall Sediment Modelling Report Aldeburgh" by ABPmer. • Document [PDA-038] 9.20.2: Landfall Sediment Modelling Report Pegwell Bay" by ABPmer. For the landfall area within Suffolk, the design appeared to consider the current erosion rate and anticipated foreshore lowering. Cable burial depths, shown in the cross-sections, reflected these considerations. The report highlighted the sheltered/low energy nature of Pegwell Bay, with limited amounts of sediment input and reduced wave climate due to the protection of the Goodwin Sands. We concluded that the impacts would not be large enough at a waterbody scale to affect Water Framework Directive (WFD) water quality. We subsequently submitted a response letter (dated 14 November 2025, ref.XA/2025/100429/02-L01) stating that we were content to resolve the issue.	Agreed
EA036	7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357] 7.7 Marine Biosecurity Plan [APP-360]	Marine Biosecurity Plan / Outline Offshore Invasive Non-Native Species Management Plan	EA037 Inappropriate characterisation of INNs dispersion.	Pelagic larvae of benthic species, including the larvae or propagules of Invasive Non-Native Species (INNS) (which comprises benthic invertebrates and invasive seaweeds), can be transported to new areas by water currents and tides. The distance travelled by such dispersive stages is highly variable between species, depending on propagule duration, or the time spent in the water column, before settling to the seabed and according to larval behaviour. Thus, dispersal distance ranges from a few metres to several	We are satisfied and consider this issue resolved. We were concerned the characterisation of Invasive Non-Native Species (INNS) dispersion was inappropriate. The regional approach for the identification of INNs has been clarified by the Applicant within the **Document 7.7 (B) Marine Biosecurity Plan [REP1-023]** and **Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027]**.	Agreed

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				hundred kilometres (Shanks, 2009) though for coastal waters distances are generally not as great since many types of larvae remain within the coastal boundary layer where currents are slower and more variable, leading to lower than predicted dispersal. Evidence indicates there is potential for some benthic invertebrate species dispersive stages to travel much further than the tidal cycle distance (in this case 17 km). Therefore, a regional approach for the identification of INNS that could be dispersed by project activities, is more appropriate. Based on the regional RAPID Life plans (RAPID LIFE Project, 2020) and (RAPID LIFE Project, 2018) . **Application Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027]** and **Application Document 7.7 (B) Marine Biosecurity Plan [REP1-023]** have now been updated.		
EA037	Marine Biosecurity Plan / Outline Offshore Invasive Non-Native Species Management Plan	The red ripple bryozoan (Watersipora subatra) is not included in the plan.	Red ripple bryozoan (*Watersipora subatra*) was first detected in 2008 in marinas in Plymouth, Devon and Poole in Dorset (https://www.nonnativespecies.org/non-native-species/information-portal/view/4340). There are limited records for the southeast of England, but anecdotal evidence suggest it may be widespread (RAPID Life, 2018). It is not included in the Regional Invasive Alien Species Management Plan (RIMP) for the East Region (RAPID Life, undated), though a single observation of this species was made from the Harwich Harbour Ferry, in Harwich Quay in 2024. Information presented in the RIMP for southeast England (RAPID Life, 2018) identifies this species as colonising via the pathways of hull fouling and aquaculture and is found mainly on hard surfaces in shallow water (marinas, harbours), but recently also on boulders on natural shores. Watersipora subatra is categorised as an Amber RAPID Life Category which indicates it is a '*High priority species that is already currently widespread'*. Two other bryozoan species, the ruby bryozoan Bugula neritina and the erect bryozoan Bugula stolonifera, are both listed in **Application Document 7.7 (B) Marine**	We are satisfied and consider this issue resolved. We were concerned Red Ripple Bryozoan (Watersipora subatra) was not included in the Marine Biosecurity Plan. The Applicant has now added this to the list of species in the **Document 7.7 (B) Marine Biosecurity Plan [REP1-023**]. However, we could not find reference to it in the **Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027]**	Agreed

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				Biosecurity Plan [REP1-023] and **Application Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027]**. Both species are also categorised as Amber on RAPID Life, and they have the same pathways to introduction and are found on the same hard artificial and natural hard surfaces as Watersipora subatra. Therefore, the assessments and measures identified in the Marine Biosecurity Plan and INNS plan also take account of potential risk to marine biosecurity from Watersipora subatra because the risks and measures required are the same as they are for Bugula neritina and Bugula stolonifera. For completeness, Watersipora subatra has been added to the list of species in Version B of **Application Document 7.7 (B) Marine Biosecurity Plan [REP1-023]** and **Application Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027].**		
EA038		Marine Biosecurity Plan / Outline Offshore Invasive Non-Native Species Management Plan	EA-038 Incomplete sentence - “Therefore, it can be concluded that it is not likely that the Proposed Project will influence the introduction or spread of INNS as”	This sentence follows on from the preceding paragraphs which detail the reasons for low risk of INNS introduction so the sentence should end at “INNS”. The additional word “as” will be removed if this document is re-submitted for other reasons, however it is not otherwise considered necessary to make this correction.	We are satisfied and consider this issue resolved. We were concerned that a sentence relating to the project’s influence on the introduction or spread of Invasive Non-Native Species (INNS) was left incomplete. The Applicant has clarified that the use of “as” was a mistake.	Agreed
EA025	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-062 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	**Water Framework Directive** Water Framework Directive Assessment Both Suffolk and Kent	EA025: Culverting is proposed. We have a general policy against culverting due to the impacts to meeting WFD objectives.	The Applicant notes the Environment Agency’s general policy against culverting. Justification for the selection of culverts to cross watercourses for construction access is based on several factors. These include: • The temporary nature of most of the culverts that are proposed, with a commitment to remove these culverts and reinstate watercourses on completion of construction of the Proposed Project. • The small size and the geometry of most of the channels where culverts are proposed, and their function as land drainage ditches. These channels typically receive land drainage from small, localised	We are satisfied and consider this issue resolved. We raised concern regarding proposed culverts outlined in the project design. We raised this issue as we maintain an anti-culverting policy for watercourses, due to their impacts to the WFD status of the waterbody. We engaged with the applicant’s project team on 15 August 2025. The proposed culvert designs, including specifications for dimensions and installation methodologies were presented and thoroughly reviewed. These designs provided adequate evidence of the applicant's intent to adhere to relevant water management	Agreed

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				catchments and several, particularly those crossed by the Suffolk Onshore Scheme, do not maintain year-round flow. • The larger scale and impact of the construction works associated with bridging watercourses (linked to piling or creation of shallow foundations required to support bridge abutments given the ground conditions in the Kent Onshore Scheme) and the programme and cost implications for the Proposed Project. The Applicant has recently met with the Environment Agency to present details of each watercourse crossing and to provide further justification for ordinary watercourse and drain crossing method choices. Where culverts are proposed the Proposed Project has secured a range of commitments to the design of these structures to ensure that they are passable for fish, and mammals (e.g. water vole, otter); that flow and sediment transport pathways are maintained and that there would be no increase in flood risk upstream of the structures. These commitments are detailed in, and secured, by inclusion within **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3. Further to this meeting, the Environment Agency has responded to the applicant stating: *"Following confirmation that you have been in consultation with the Internal Drainage Board (IDB), and our meeting with yourselves on 15 August 2025, we wish to resolve our position on proposed culverting of ordinary watercourses within the project boundary. Therefore, for all ordinary watercourses (including those under WFD classification and not) we will defer to the IDB and Lead Local Flood Authority in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively*.".	and environmental standards for ordinary watercourses. Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. As culverts are only proposed on ordinary watercourses, we differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts are proposed for main rivers.	
EA042	**Application Document 6.2.1.4 (C) Part 1**		EA042: Potential use of herbicides to remove vegetations from the	An update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline	We are satisfied and consider this issue resolved.	Agreed

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	Introduction Chapter 4 Description of the Proposed Project [REP1-051]		temporary culvert location near watercourses.	3 will be made following further agreement between the Applicant and Environment Agency.	We were initially concerned for the potential use of herbicides to remove vegetations from the temporary culvert location near watercourses. The Applicant has now added mitigation commitment W29 in Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103], which resolves our concerns.	
EA009	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	**Water Framework Directive** Water Framework Directive Assessment Suffolk	EA009: Brook Lamprey presence is omitted from the report.	The presence of brook lamprey in the River Fromus was noted in the desk study detailed in **Application Document 6.3.2.2.F Appendix 2.2F Aquatic Ecology Survey Report [APP-104]** (e.g. Section 1.3.14, 1.4.25, and 1.4.26). Reference to this document is made in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and potential impacts on brook lamprey are considered where fish, fish of regional importance, and migratory/migrating fish are mentioned in the Environmental Statement (ES) chapter (e.g. Section 2.7.74, 2.9.154, 2.9.236, 2.9.238).	We do not consider this issue resolved. We raised concerns that Brook Lamprey had been omitted from a **Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049].** The desk study in **Late Deadline 1 Submission - 7.5.4.2 (B) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent (Clean) - Accepted at the discretion of the Examining Authority [REP1-104]** recorded brook lamprey in the River Fromus, and this should be reflected in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority [REP1-047]**. As brook lamprey have been recorded in the Forums and given that a single survey may not capture their true status, fish populations fluctuate annually and lamprey can burrow into fine sediment, making detection difficult. It is precautionary and appropriate to explicitly note brook lamprey as historically present in the document **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority [REP1-047]**. Sections 2.7.72-74 should be updated to include brook lamprey. We acknowledge that the mitigation measures in place are considered sufficient to protect brook lamprey where present. However, we require brook lamprey to be included in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity**	Under discussion

Ref	Relevant Application Document	Description of Matter from Work Package Tracker	EA Issue from RR	National Grid Current Position	EA Current Position	Status
					(Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047].	
EA010	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. **Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA010: A single run electrofishing survey is not deemed appropriate for detecting the presence of eel or lamprey.	In **Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** it is noted that a semi-quantitative electric fishing survey was completed to supplement existing fish monitoring data in the catchment and, as per best practice guidance (UK Technical Advisory Group (UKTAG), 2008), counts of fish species present were obtained from a single removal, using data from the first pass of depletion sampling. Both brook lamprey and eel were identified to be present in the River Fromus during the desk study and potential impacts on these species are assessed in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. Eel is mentioned specifically multiple times within the document and lamprey are considered where fish, fish of regional importance, and migratory/migrating fish are mentioned. As such, the presence of eel and brook lamprey in the electrofishing surveys would not change the outcome of the assessments or mitigation proposals, as these species are assumed to be present.	We do not consider this issue resolved. We raised concerns that Brook Lamprey had been omitted from Document **6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**. Currently, Late Deadline 1 Submission - **6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]** references European eel and brown trout, but omits brook lamprey. Sections 2.7.72-74 should be updated to include brook lamprey in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]**. The mitigation measures outlined in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]** are considered sufficient to protect brook lamprey where present. Please see EA009 above.	Under discussion
EA011	**Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** **Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA011: Records of European smelt omitted.	Smelt records on the River Alde were included in **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**. Section 1.3.16 also states that "*As this species is listed as a Biodiversity Action Plan (BAP) species, NERC Species of Principal Importance (SPI) and are a key indicator species under the WFD it has been considered further in this report*." It is also noted in Section 1.4.29 that: "*smelt migrate into rivers to spawn amongst gravels in fast flowing river water (normally above the saline influence). Given that the habitat present at the proposed bridge location on the River Fromus does not represent*	We consider this issue resolved. We raised concerns that the records of European Smelt being omitted and would be impacted by the development. We agree with the applicants conclusions stated in section 1.4.29 of Document: **6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**, that it is unlikely that smelt will be present in the immediate reach of the Fromus crossing, giving habitat conditions.	Agreed

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				suitable spawning habitat for smelt, it is highly unlikely that smelt will be within the vicinity of the Proposed Project." As such, smelt is considered in the assessment and newly established records in the Alde/Ore estuary would not result in any changes to the assessment – based on the lack of suitable spawning habitat for this species in the Fromus at the location of the proposed bridge crossing.		
EA012	**Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** **Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA012: Improper description of eels and lamprey within assemblages.	The exact meaning of *"improper description of eels and lamprey within assemblages*" is unclear. Section 1.2.31 describes the electric fishing methodology employed on the River Fromus based on the habitats present. Habitat quality detailed in Section 1.3.74 was described generally, and the deep silt deposits and stagnant water is suggested as an explanation for the lower fish diversity compared to other Environment Agency (EA) monitoring sites on the River Fromus which were more species-rich and which contained diverse flow and depth patterns and in-stream macrophytes – the presence of European eel at this site is noted despite the description of 'poor habitat' (Section 1.3.74). Likewise, the presence of lamprey is assumed where the species has been identified in desk study data – refer to EA009 above: The presence of brook lamprey in the River Fromus was noted in the desk study detailed in **Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** (e.g. Section 1.3.14, 1.4.25, and 1.4.26).	We do not consider this issue resolved. We raised concerns regarding the description of Eel and Brook Lamprey assembladges in Document: **6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104].** The desk study in Document: **6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]** recorded brook lamprey in the River Formus, and this shoudl be reflected in **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047].** As brook lamprey have not been recorded in the Fromus and given that a single survey may not capture their true status, fish populations fluctuate annually and lamprey can burrow into fine sediment, making detection difficult. It is precautionary and appropriate to explicitly note brook lamprey as historically present in the document **Late Deadline 1 Submission - 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047].** Sections 2.7.72-74 should be updated to include brook lamprey. The mitigation measures outlined in Late Deadline 1 Submission - 6**.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) - Accepted at the discretion of the Examining Authority Biodiversity [REP1-047]** are considered sufficient to protect brook lamprey where present."	Under discussion

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					Please see EA009 and EA010 above.	
EA013	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**. **Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA013: The current designs of the Soffit hights over the river Fromus risk the WFD status of the area.	The Applicant is in discussions with the Environment Agency regarding the soffit height of the proposed Fromus bridge crossing above the Q95 flow water level. The Environment Agency has confirmed that a soffit height 6 m above the Q95 level would not risk the Water Framework Directive (WFD) ecology status of the waterbody. The Applicant and the Environment Agency are currently engaging is positive and collaborative discussions to explore and agree the most appropriate soffit height, recognising that the application for the Proposed Project presents and considers soffit heights between 4 m and 6 m. The Applicant is confident that the outcome of these discussions will be an agreement with the Environment Agency that a soffit height of less than 6 m will be acceptable. While recognising the ongoing positive discussions being held with the Environment Agency, the position of the Applicant as reported in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** is summarised here. This concluded there would be only a negligible effect on aquatic invertebrates as a result of a bridge with a 4 m soffit height above the Q95 water level, and it is considered that this would not represent a risk to current WFD status. It is noted that although (Petrin, 2022) indicates an effect of watercourse crossings on macroinvertebrate assemblages, it states that "*The study is inconclusive regarding the mechanisms mediating the ecological impact of roads. The ecological effects are likely caused by a combination of factors including fragmentation, pollution, and hydrological change among others*." Likewise, (Blakely, 2023) states that "*The challenge remains to properly identify the primary drivers and mechanisms of change in these ecosystems and mitigate their*	We do not consider this issue resolved; however we believe good progress has been made towards a resolution with the applicant's project team. We have engaged with the project team on the matter of the Fromus Crossing's soffit height and its potential impacts to WFD weak dispersing polarotactic invertebrates. Initially we proposed a requirement for a 5m soffit height, including a monitoring and contingency plan for the invertebrates. The project team reviewed the wording for this requirement, and made proposals for adjusting its wording. We have since readjusted our position, to request a requirement for a soffit height of 4m, including a monitoring and contingency plan for the invertebrates. We informed the project team on 23 October 2025. Our legal department is currently viewing the wording to this requirement, and will respond in due course. Once we have confirmed the wording with our legal department, we will send to the project team for a final review. Following this, we will request it to be input into the draft Development Consent Order. We will mark this issue as resolved, once we have reviewed a draft of the Development Consent Order with the wording for the requirement included.	Under discussion

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				ecohydrological impacts". Neither paper suggests that a bridge soffit height of 4 m above the Q95 water level would be a mechanism/driver for impacts on macroinvertebrate assemblages. It remains the Applicant's view that the published paper on the 'giant mayfly' in the River Tisza in Hungary is not of relevance to the mayfly and other riverfly species present within the River Fromus, and that a proposed bridge of 4 m soffit height above Q95 water level would not represent a risk to WFD status. Irrespective of the above, we note the EA has included a proposed requirement for potential inclusion in the Draft DCO relating to the bridge height. This would allow for a 5 m soffit height above the Q95 water level as long as there is also a monitoring and contingency plan in place. The EA has confirmed the nature of the contingency would be a fund held in place to be used for enhancements to the river, should the monitoring confirm there is an impact on riverfly species because of the bridge. The applicant has proposed alternative wording for the requirement and is in ongoing discussions with the EA; however it seems very likely that a suitably worded requirement can be agreed. In more recent discussions the EA has confirmed it would agree to a 4 m high soffit height with a commitment to the monitoring and contingency as originally proposed for the 5 m bridge.		
EA014	**Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**.		EA014: Assumption that smelt are unlikely to use the River Fromus for spawning, due to a lack of suitable spawning habitat.	Smelt records on the River Alde were included in **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**. Section 1.3.16 also states that "*As this species is listed as a Biodiversity Action Plan (BAP) species, NERC Species of Principal Importance (SPI) and are a key indicator species under the WFD it has been considered further in this report*." It is also noted in Section 1.4.29 that: "*smelt migrate into rivers to spawn amongst gravels in fast flowing river water (normally above the saline influence). Given that the habitat present at the proposed bridge location on the River Fromus does not represent suitable spawning habitat for smelt, it is highly*	We consider this issue resolved. We raised concerns that European Smelt would be impacted by the development. We agree with the applicants conclusions stated in section 1.4.29 of Document: 6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2F Aquatic Ecology Survey Report [APP-104], that it is unlikely that smelt will be present in the immediate reach of the Fromus crossing given habitat conditions. We agree that mitigation provided is suitable in protecting any smelt spawning habitat downstream.	Agreed

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				unlikely that smelt will be within the vicinity of the Proposed Project." Smelt have therefore been considered, including the possibility that spawning habitat exists in the downstream reaches of the Fromus, however this would not change the findings of the Environmental Statement or the proposed mitigation measures required at the proposed crossing.		
EA015	**Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA015: Eel migration routes inaccurately detailed.	Section 4.2.29 of **Application Document 6.9 Water Framework Directive Assessment [APP-293]** specifies that the Offshore scheme is located in the vicinity of several estuaries which are used by migrating European eel. Subsequently, impacts of the Offshore Scheme on eels are discussed in section 4.2.33, 4.2.37, and 4.2.41. Further, the presence of European eel is noted in Suffolk in the River Fromus WFD watercourse in section 3.2.3.1 and an assessment of the Suffolk and Kent Onshore schemes has resulted in mitigation being proposed to avoid impacts to eels (e.g. Sections 4.2.2, 4.2.12, 4.2.20). Impacts to European eel in this area are assessed in the **Application Document (B) 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]** and appropriate mitigation is proposed to ensure there are no significant effects to migrating eel.	We consider this issue resolved. We raised concerns that impacts to Eel were not properly assessed and understood regarding the proposed Suffolk landfall site, Ore/Alde and Minsmere Old River, and along the Suffolk coast. The applicant addressed these concerns in sections: - 4.2.33, 4.2.37 and 4.2.41 of document **6.9 Water Framework Directive [APP-293]**. - Mitigations were provided 4.2.2, 4.2.12, 4.2.20 of document **6.9 Water Framework Directive [APP-293]**. - Mitigations were provided in the **6.2.4.3. (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology (Clean) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority [AS-022]**.	Agreed
EA016	**Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA016: Insufficient detail regarding impacts on Smelt from combined thermal plumes from the cable and plumes emitted from Sizewell B (SZB) and Sizewell C (SZC).	A detailed assessment of potential thermal effects on fish and shellfish, including smelt and their migration, was included in **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]**. This assessment concluded that thermal effects from the Proposed Project would be limited to a small area of the sediment itself, close to the cable. Thermal modelling was used from Eastern Green Link 2, which was a similar HVDC transmission with bundled cables buried to a depth of 1.5 m. This indicated that within 500 mm of the seabed surface the increase in sediment temperature was limited to approximately 3°C. Seawater at the seabed surface will have a cooling effect and will dissipate any temperature increases further.	We consider this issue resolved. We requested further detail regarind thermal plume impacts on Smelt from combined thermal plumes from cables and inter project thermal plumes. We agree with the applicants response outlined in Document: **6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology (Clean) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority [AS-022]** that impacts to smelt are negligible given the availability of water column above 500mm of thermal uplift zone and justification provided in Document Late Deadline 1 Submission - **9.34.1**	Agreed

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				Therefore, given the localised and small thermal emissions, effects to migratory smelt was considered to be negligible. Potential cumulative effects with Sizewell C were assessed in **Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]**. Sizewell C is located over 5 km from the Proposed Project boundary. This assessment considers thermal effects in-combination with the operation of Sizewell B. This assessment modelled potential effects to migratory smelt within 3 km to assess a precautionary migratory corridor past the project. Within this, modelling indicated that a >2ºC uplift exceeds 25% of the corridor for 18.7% of the year. The assessment also noted that experimental studies have shown that smelt will tolerate temperature increases of up to 4ºC above background. On this basis, there is not considered to be a cross-over in potential effects between the two projects, which are 5 km away from each other. This is also due to any potential thermal emissions from the Proposed Project cable being highly localised and limited to seabed sediments surrounding the cable. There is not considered to be a potential cumulative effect on smelt migration and no further assessment is required.	**Applicant's Detailed Responses to Relevant Representations identified by the ExA - Accepted at the discretion of the Examining Authority [REP1-111]** reference **2.4.8.B.**	
EA017	**Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA017: Outdated data is made reference to regarding trout.	Section 4.2.25 of **Application Document 6.9 Water Framework Directive Assessment [APP-293]** uses a range of information sources from 1998 to 2022, such as EA TraC data, to assess the status and risks to brown/sea trout. The applicant has been unable to identify any more up to date information. If the EA holds information that is not in the public domain, the applicant would welcome sight of it. It is noted that "*sea trout are widely distributed across the UK*" and "*overall, sea trout is reported to attempt to enter most of the south coast's rivers.*" Section 4.2.29 also states that the Offshore scheme is in the vicinity of several estuaries and rivers which are used by migratory brown trout. Where the presence of trout is confirmed through desk study and/or surveys, or where their presence is assumed,	We consider this issue resolved. We were concerned the data used regarding trout. We agree with the applicant approach outlined in section 4.2.29 of **document 6.9 Water Framework Directive [APP-293]** that the species are assumed to be present for the worst-case scenario assessment of the Environmental Assessment.	Agreed

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				the species is assessed accordingly. As such, basing this comment on 2011 data is not considered to be a substantive issue because the ES assumes a worst case for assessment purposes which is that the species is present irrespective of whether numbers are decreasing or increasing.		
EA022	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.9 Water Framework Directive Assessment [APP-293]**		EA022: Inconsistency as to whether the proposed piling technique is percussive or vibro.	The Applicant confirms that a commitment has been made to the use of non-percussive piling as opposed to percussive piling. This is committed to via mitigation commitment B10 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 which states that: "*The foundations of bridges across the River Fromus and the River Stour would use soft-start non-percussive piling techniques to limit disturbance, which would assist in allowing sounds to increase gradually allowing fish in the immediate vicinity to swim away*."	We are satisfied and consider this issue resolved. Their were inconsistencies in the pilling techniques outlined in Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] and Document 6.9 Water Framework Directive Assessment [APP-293]. The applicant has outlined the commitment B10 of Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102] and we are satisfied this secures the appropriate pilling techniques that reduce the impacts to sensitive fish receptors.	Agreed
EA023	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**		EA023: Entrapment of fish into permanent outfalls has not been assessed.	Section 2.8.5 of **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** details the mitigation commitment B18 – Drainage outfalls would be designed to exclude eels from accessing SuDS, for example by having outfall pipes situated above the receiving water level. This mitigation measure would also make outfalls inaccessible to other fish species.	We are satisfied and consider this issue resolved. We raised concerns regarding the entrapment of fish into permanent outfalls. The applicant has provided appropriate mitigation measures in section 2.8.5 of Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) This document has been superseded by REP1-049 [PDA-021] that explain commitment B18 of Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority [REP1-102]. We agree with the measures provided that would make outfalls inaccessible to other fish species	Agreed
			EA028: Unclear whether the culvert over Western River Fromus Tributary will be permanent or temporary.	The culvert would be permanent. It is identified in both the temporary and permanent impact sections of the chapter because the loss will commence during the construction period.	We are satisfied and consider this issue resolved.	Agreed

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				However, as per paragraph 2.9.202 of **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** the culvert will be: "*a culvert that is permanently retained following construction*." A 13 m span is required to accommodate the 10 m wide access road and drainage either side. As per paragraph 2.9.202 of **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** there would be extensive habitat creation as part of the Proposed Project, including permanent attenuation ponds around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project). As a result, there would be a long-term overall increase in wetland habitats due to the Suffolk Onshore Scheme.	We raised concern regarding proposed culverts outlined in the project design. We raised this issue as we maintain an anti-culverting policy for watercourses, due to their impacts to the WFD status of the waterbody. We engaged with the applicant's project team on 15 August 2025. The proposed culvert designs, including specifications for dimensions and installation methodologies were presented and thoroughly reviewed. These designs provided adequate evidence of the applicant's intent to adhere to relevant water management and environmental standards for ordinary watercourses. Following this meeting, we stated to the applicant that we'd resolve this issue in regard to ordinary watercourses. As culverts are only proposed on ordinary watercourses, we differ to the Internal Drainage Board (IDB) and Lead Local Flood Authority (LLFA), in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively. No culverts are proposed for main rivers.	
EA030	**Application Document 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	EA030: Breakout point is in a high-risk location.	Sea Link has committed to avoiding the Coralline Crag outcrop as described in MPE07 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The HDD exit locations presented are conceptual designs. The Contractor's designs will be such that the exit points and any associated sediment excavations for the exit are sufficiently beyond the seaward limit of the Coralline Crag outcrop to allow burial within the natural seabed, as per EA029.	We are satisfied and consider this issue resolved. We previously raised that the drilling breakout point was in a high risk-location. Following review of the Applicant's response in Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103], the applicant is intending to avoid the Coraline Crag outcrop as much as is possible. Furthermore, we are content their appointed contractors will microsite the exit points as far away from the outcrop as possible, following seafloor surveys and ground investigations. We recommend the site is subject to monitoring following the installation of the cable works, in order to determine if there will be any short/long term effects from works that may cause alterations in sediment transport characteristics. If there are perceived effects,	Agreed

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					then mitigation should be considered necessary.	
EA046	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** **Application Document 6.3.2.4.A ES Appendix 2.4A Water Environment Baseline Data [APP-115]**		EA046: The WFD watercourses Hundred River and River Fromus have 'high' sensitivities to changes in water quality, and the potential impacts on water quality especially during the construction and decommissioning phases.	An updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency.	We do not consider this issue resolved. We were concerned that there would be potential impacts to water quality for the WFD watercourses Hundred River and River Fromus, especially during the construction and decommissioning phases. We requested regular water quality monitoring to be carried out both during and after the construction and decommissioning phases. We welcome the addition of W26 in Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103]. However, a commitment to monitoring, including taking water samples, should be included in all phases of the project – construction, operation and decommissioning. Currently there is a lack of detail, and it should be made clear that site walkovers and visual monitoring alone are not a suitable method of monitoring. A monitoring plan should provide details of frequency, quantity, location and method of monitoring. These locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings. Methods may include in-situ handheld devices or samples sent off to laboratories. Monitoring should start prior to construction, so that the water quality of any possibly affected areas are known, and a baseline is established. To resolve this issue, we require the outline CEMP to commit to providing this further detail within the full CEMP. Regarding the decommissioning phase, the draft DCO should be updated to include the Environment Agency as a named consultee for requirement 13.	Under discussion

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EA032	**Application Document 6.9 Water Framework Directive Assessment [APP-293]**	**Water Framework Directive** Water Framework Directive Assessment Kent	EA032: Risk of movement of the mouth of the River Stour by Pegwell Bay.	A copy of a specialist report that was commissioned from ABPmer has now been provided to the EA to inform ongoing discussions. In summary, the report concludes that recent trends in migration of the River Stour low water channel and the ongoing use of channel management practices (i.e. dredging) are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset. As such it is considered that a target DOL of 1.5 m is sufficient.	We do not consider this issue resolved. We were concerned that the cable burial depth would not be deep enough to avoid the moving mouth of the River Stour. We requested that the cables be buried a minimum 3m below the bed of the low flow of the channel of the mouth of the Stour. The Applicant provided Document 9.20.2 Landfall Sediment Modelling Report Pegwell Bay [PDA-038]. The Applicant has outlined their conclusion on this report regarding the River Stour low water channel migration and the installed cables. They assert that recent trends in migration of the channel, and the ongoing use of channel management practices (i.e. dredging), are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset. The applicant concludes that a 1.5m target depth of lay is sufficient. The report does not conclude that the mouth of the Stour will not move across the route of the cable. It states it is still a risk, and gives evidence which suggests it is more likely. It states that historical data shows the mouth of the river has recently increased its speed of movement northward from 4m per year, to 7.8 m per year. Based on a 50-year project life span, this means the mouth of the Stour will move directly into the cable route which is around 390 m north of the present channel. The report states there is evidence of an old meandering river channel in LIDAR data where the cable is to be routed. There is an equilibrium between the rate of longshore transport from the south and the tidal prism of the estuary. A larger tidal prism can be achieved by the channel moving northwards. It is likely the tidal prism will reduce with sea level rise as it is forced upwards against flood embankments further inland. To counteract this, it is highly possible the rate of northward migration may increase in speed rather than remaining at the same rate. This kind of	Under discussion

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					behaviour has been observed in one other uncontrolled estuary mouth in Kent. In order to mitigate for the risk, as stated in our previous relevant representation response, we require the depth of the cable to be deeper than the mouth of low flow Stour channel. Alternatively, the cable route needs moving further north away from the mouth of the Stour. The Applicant should also provide a comparison of the depth of the mouth of the low flow Stour channel with the likely depth of the cable.	
EA041	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**	**Water Framework Directive** Outline Construction Environmental Management Plan Both Suffolk and Kent	EA041: **APP-045** Disposal of contaminated construction/concreting water. **APP-051 and APP-064** Rainfall runoffs from the batching plant area.	**Application Document 9.83 Code of Construction Practice** submitted at Deadline 3 includes a commitment (W14) to the contractor developing a more detailed Drainage Management Plan that must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing. The Plan will demonstrate how the contractor will manage surface water runoff from across the worksites in terms of both runoff quantity and quality, including details of how offsite impacts would be managed and mitigated. This commitment (W14) therefore ensures that any contaminated waters generated during construction, for example from concrete batching, would be suitably treated on site or disposed of via an appropriate off-site facility, thereby preventing contamination of the water environment, in compliance with all regulations and site best practice.	EA041 Water Quality We do not consider this issue resolved. We were concerned that the disposal of contaminated construction and concreting water, as-well as rainfall runoffs from the batching plant area, may introduce contaminants into the receiving water environment. The Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103] and the 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] do not contain relevant mitigation measures for concrete washout water for using concrete during construction. There is only reference to “Avoid scabbling (roughening of concrete surfaces) if possible”. Concrete can be a risk to water quality, as it is a known source of hazardous substances, particularly during the curing phase. To resolve this issue, we’d require specific commitments/measures within the outline CEMP including: • A commitment to identify areas where concrete works are proposed, and specify whether any of these will be cast in-situ, or precast and delivered. • A commitment that for in-situ concrete pours, there will be	Under discussion

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					detailed provision for timing, weather conditions, and runoff control. • These construction works should be minimised during heavy precipitation events, and carried out during dry months where practicable. • A commitment to detail containment measures for concrete washout (such as lined washout pits, bunded areas). We believe that by providing the above commitments in the outline CEMP, the Applicant can ensure flexibility in the project's design. Simultaneously, this will provide us with confidence that impacts to the environment will be mitigated in due course.	
EA042	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003]**		EA042: Potential use of herbicides to remove vegetations from the temporary culvert location near watercourses.	An updated **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has been made to secure this commitment	We are satisfied and consider this issue resolved. We were initially concerned for the potential use of herbicides to remove vegetations from the temporary culvert location near watercourses. The Applicant has now added mitigation commitment W29 in Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103], which resolves our concerns.	Agreed
EA043	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**		EA043: Dewatering of both rainfall runoffs and potentially elevated groundwater at the construction site.	**Application Document 9.83 Code of Construction Practice** submitted at Deadline 3 includes a commitment (W14) to the contractor developing a more detailed Drainage Management Plan that must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing. The Plan shall demonstrate how the contractor would manage rainfall runoff from across the worksites in terms of both runoff quantity and quality, including details of how offsite impacts would be managed and mitigated. This commitment (W14) therefore ensures that any	We do not consider this issue resolved. We were concerned that dewatering of both rainfall runoffs and potentially elevated groundwater at the construction site. We note that in Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], GH07 already states that any temporary dewatering activities during construction will be undertaken in accordance with EA guidance, and if required, an Abstraction Licence and Environmental Permit (for the discharge). If discharge at the site is required, the Applicant should confirm that a	Under discussion

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				contaminated rainfall runoff generated during construction, for example, silty runoff, would be suitably treated on site or disposed of an appropriate off-site facility, thereby preventing contamination of the water environment. In addition, in accordance within commitment GH07 of **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3 any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance, and if required by the guidance, an Abstraction Licence and Environmental Permit (for the discharge), and will be limited to the depth and time required to facilitate construction activities. Where applicable, Environmental Permitting Regulation permits would be secured for the discharge of runoff, as detailed in Commitment GG01 within **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3.	water discharge activity permit will be sought within GH07. The wording should be amended to include this. In 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], it mentions in W02 that silt fences may be used for open cut watercourse crossings and installation of vehicle crossing points. This is not in relation to other construction activities and dewatering. We require this mitigation to be expanded to cover other activities. GG15 says that silt traps as a general project commitment, but specific consideration must be given to managing any discharges. Please also see EA045. The draft DCO should be updated to include the Environment Agency as a named consultee for requirement 6, specifically (o) Construction Drainage Management Plan and (q) Operational Drainage Management Plan.	
EA044	**Application Document 6.9 Water Framework Directive Assessment [APP-293]** **Application Document 9.84 Outline Code of Construction Practice** submitted at Deadline 3		EA044: Material storage and dust suppression location too close to waterbodies.	An update to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 will be made following further agreement between the Applicant and Environment Agency.	We are satisfied and consider this issue resolved. We were initially concerned that material storage and dust suppression locations would be too close to waterbodies. In Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked) - Accepted at the discretion of the Examining Authority [REP1-103], GH05 and GG14 have been updated to ensure these activities are at-least 10m away from a watercourse.	Agreed
EA045	**Application Document 9.84 Outline Code of Construction Practice** submitted at Deadline 3		EA045: Pumping (over pumping) process may allow silty water to enter the water course downstream.	Where ditches contain water, damming and over pumping is proposed at open cut watercourse crossing locations and installation of vehicle crossing points. Over pumping would include for sediment disturbance mitigation and treatment where required. These mitigation measures are described in commitment W02 within **Application Document 9.83 Code of Construction Practice** submitted at Deadline 3 and include installation of downstream pollution booms,	We do not consider this issue resolved. We were concerned that the pumping (over pumping) process may allow silty water to enter the water course downstream. In 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], it mentions in W02 that silt fences may be used for open cut watercourse crossings and installation of vehicle crossing points. This is not in relation to other construction activities	Under discussion

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				temporary lagoons, tanks, bunds, silt fences or silt screens and straw bales.	and dewatering. We require this mitigation to be expanded to cover other activities. GG15 says that silt traps as a general project commitment, but specific consideration must be given to managing any discharges. Please also see EA043 for more details. The draft DCO should be updated to include the Environment Agency as a named consultee for requirement 6, specifically (o) Construction Drainage Management Plan and (q) Operational Drainage Management Plan.	
EA032	**Application Document 6.9 Water Framework Directive Assessment [APP-293]**	**Water Framework Directive** Outline Construction Environmental Management Plan Kent	EA032: Risk of movement of the mouth of the River Stour by Pegwell Bay.	A copy of a specialist report that was commissioned from ABPmer has now been provided to the EA to inform ongoing discussions. In summary the report concludes that recent trends in migration of the River Stour low water channel and the ongoing use of channel management practices (i.e. dredging) are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset. As such it is considered that a target DOL of 1.5 m is sufficient.	We do not consider this issue resolved. We were concerned that the cable burial depth would not be deep enough to avoid the moving mouth of the River Stour. We requested that the cables be buried a minimum 3m below the bed of the low flow of the channel of the mouth of the Stour. The Applicant provided Document 9.20.2 Landfall Sediment Modelling Report Pegwell Bay [PDA-038]. The Applicant has outlined their conclusion on this report regarding the River Stour low water channel migration and the installed cables. They assert that recent trends in migration of the channel, and the ongoing use of channel management practices (i.e. dredging), are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset. The applicant concludes that a 1.5m target depth of lay is sufficient. The report does not conclude that the mouth of the Stour will not move across the route of the cable. It states it is still a risk, and gives evidence which suggests it is more likely. It states that historical data shows the mouth of the river has recently increased its speed of movement northward from 4m per year, to 7.8 m per year. Based on a 50-year project life span, this means the mouth of the Stour will move directly into the cable route which is around 390 m north of the present channel. The report states there is evidence of an old meandering river channel in LIDAR data	Under discussion

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					where the cable is to be routed. There is an equilibrium between the rate of longshore transport from the south and the tidal prism of the estuary. A larger tidal prism can be achieved by the channel moving northwards. It is likely the tidal prism will reduce with sea level rise as it is forced upwards against flood embankments further inland. To counteract this, it is highly possible the rate of northward migration may increase in speed rather than remaining at the same rate. This kind of behaviour has been observed in one other uncontrolled estuary mouth in Kent. In order to mitigate for the risk, as stated in our previous relevant representation response, we require the depth of the cable to be deeper than the mouth of low flow Stour channel. Alternatively, the cable route needs moving further north away from the mouth of the Stour. The Applicant should also provide a comparison of the depth of the mouth of the low flow Stour channel with the likely depth of the cable.	
EA047	**Application Document 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment [REP1-051]**		EA047: Insufficient HDD breakout plan in regards to Pegwell Bay.	There is a high level, but clear, break out plan in document **Application Document 7.3 Design Development Report [APP-321]** Appendix A Landfall HDD Feasibility Technical Note, Section 3.5.2. The HDD contractor will produce their own, more detailed, drilling fluid management plan, that includes drilling fluid breakout mitigation measures, but the essence of their plan will be the same: During pilot hole drilling the contractor will have a “spotter” walking the drill alignment as the HDD drills from the saltmarsh to the exit. The spotter will quickly identify any frac out, drilling will stop, and the frac out will be contained and removed. During reaming of the bore, the fluids are contained within the cofferdam. The cofferdam is at least 100 m from the saltmarsh. There will be pumps and storage at the cofferdam to recover any escaped fluid should any escape. There will be personnel at the location who will be able to quickly identify any losses and take the necessary remediation action. If drilling fluid does escape from the cofferdam, the fluid	We are satisfied and consider this issue resolved. We raised concerns the impacts of HDD drilling would impact Pegwell Bay, via recuing the water quality and damage the saltmarsh. We requested a HDD break out plan be outlined. The Applicant’s response in Document 7.3 Design Development Report [APP-321]and commitments GH02, GH09 and GH10 made in the Document Late Deadline 1 Submission - 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) - Accepted at the discretion of the Examining Authority Register of Environmental Actions and Commitments [REP1-102] have provided the appropriate assurances the HDD drilling breakout plan will be secured.	Agreed

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				is more dense than water and remains in situ on the seabed unless there are strong currents or wave action. This is also true for flocculated drilling fluid. The incoming tide at the location, even with a very strong easterly wind, is very unlikely to move drilling fluid more than 20 m from the loss location. Therefore, in the unlikely event that fluid is lost from the cofferdam and not removed, there is a very low risk of any fluid being washed 100 m inshore to the edge of the saltmarsh. Before removal of the cofferdam, the drilling fluid will be removed from within the dam as far as practicable. Following removal of the dam the duct end will be buried and a watch will be kept for any accumulations of drilling fluid, that will be removed using the same methods as used during pilot drilling.		
EA021	**Application Document 9.84 Outline Code of Construction Practice**	**Water Framework Directive** Outline Construction Environmental Management Plan Suffolk	EA021: The control and management measures have not considered the European Eel (*Anguilla anguilla*).	European eel is known to burrow in sediments to seek refuge, using their heads to penetrate the sediment (Steendam, 2020). This species has a preference for sand to coarse gravel sediments, although have greater burrowing performance with fine gravel. The intertidal sediment at the Kent Landfall is comprised of mud and so is not considered suitable for eel burrowing. The benthic characterisation survey of the intertidal at the Suffolk Landfall identified the sediment to comprise coarse sand mixed with pebbles on the low shore. Trenchless techniques will be used to avoid the intertidal at this location and so potential effects to European eels are negligible. Any cable installation (including ploughing, jetting, and trenching) will be short-term and will move away from the landfall over a short period of time. The proposed works are also away from nearby estuaries and would not influence burrowing eels in these areas. Noise from cable installation and other activities and the potential effects on European eel was assessed in **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]** and concluded that effects would be negligible.	We consider this issue resolved. We were concerned that control and management measures have not considered European eel (Anguilla anguilla) in the Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. European eel are likely to be within the sediment in estuarine and intertidal areas and are at risk from disturbances from noise, any dredgings or jetting construction activities. The Eel (England and Wales) Regulations 2009 apply to any diversion structure that is capable of abstracting at least 20 cubic metres of water through any one point in any 24-hour period. These criteria may be met by such activities as jetting, and as such, the risk to European eel should be assessed when details of the location and specifications of the equipment being used for sediment removal or dispersal are known. After consulting the Marine Management Organisation (MMO) with regards to the above activities, it is understood the above activities would require an Eels exemption, with the MMO as the discharging	Agreed

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					authority. The MMO outline within their protective provisions Schedule 16 Deemed Marine Licence Under The 2009 Act, Part 2, Pre-construction plans and documentation 4. –(1) to (3) of the Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) - Accepted at the discretion of the Examining Authority [REP1-036] that the Environment Agency would be consulted on the licence applications for pre-construction plans that would impact Eels. We therefore consider this issue resolved	
EA040	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-004]** **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**	**Water Framework Directive** Outline Operation Environment Management Plan / Fire Safety Management Plan Both Suffolk and Kent	EA040: In the unplanned event of a fire at a substation or converter station, fire suppressing agent/firewater may enter the site drainage system and subsequently the water environment.	Substation and Converter station drainage includes for isolation valves on the last chamber before the drainage is routed outside the compound fence line enabling isolation of the positive drainage system. In addition, all the assets within the Sea Link project are linked to attenuation ponds where runoff from the compounds would be collected, stored and treated prior to discharge. The attenuation features associated with each of the compounds will provide sufficient storage for firewater runoff in the event that an isolation chamber could not be reached safely. Firewater would then be treated or removed prior to discharge into the surrounding water environment.	We do not consider this issue resolved. We previously raised that in the unplanned event of a fire at a substation or converter station, fire supressing agent/firewater may enter the site drainage system and subsequently the water environment. When checking the submitted documents, only 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1A-003] does not contain any references to firewater or isolation valves. It should be secured in the relevant documentation that a shut off valve will be placed on the attenuation pond outfall, and will be automated (set in the off position when fire suppression systems are activated). We seek clarification from the Applicant that the automatic shutoff valves will also include a manual override, in case the automation fails. This important equipment must be monitored and maintained to prevent equipment failure. Therefore, we request that the automatic shutoff valves are committed to have a specific maintenance programme, with clearly defined frequency of checks. This will guarantee these remain operational at all times, ensuring that they perform in the event of a fire. With regard to firewater disposal, for advice, our preference is the removal of any contained firewater offsite. If any contained water is proposed to be released, it may be subject to a water discharge activity permit and should	Under discussion

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					be discussed further with the Environment Agency. Information is available at: Discharges to surface water and groundwater: environmental permits - GOV.UK	
EA048 and EA049	**Application Document 7.5.3 Outline Onshore Construction Environment Management Plan [APP-340]** **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**	**Waste** Outline Construction Environmental Management Plan / Material and Waste management Plan Both Suffolk and Kent	EA048: The outline Onshore CEMP includes a number of waste management measures but does not consider all potential waste types likely to be produced during the project construction.	Requirement 6 in **Application Document 3.1 (E) draft Development Consent Order [CR1-027]** requires a Material and Wate Management Plan to be produced and approved by the appropriate discharging authority prior to construction. This plan, when produced, will include reference to all relevant waste legislation and waste classifications.	We do not consider this issue resolved. We previously raised that not all relevant waste legislation or waste types were mentioned in the 7.5.3 Outline Onshore Construction Environment Management Plan [APP-340]. We note the applicant's response stating that a "Material and Wate Management Plan [is] to be produced and approved by the appropriate discharging authority prior to construction. This plan, when produced, will include reference to all relevant waste legislation and waste classifications. We are content with this approach. However, we need confidence that we will be consulted on this plan in due course. Under Appendix Y of our relevant representation response letter, we requested to be consulted on the Material and Waste Management Plan. For this to be resolved, we require the wording for requirement 6 of the Late Deadline 1 Submission - 3.1(E) draft Development Consent Order (Clean) -Accepted at the discretion of the Examining Authority [REP1-036] to be amended to include the wording "approved by the relevant authority, in consultation with the Environment Agency" specifically for (n) Material and Waste Management Plan.	Under discussion

4. Approvals

Signed	

On Behalf of	National Grid
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

Signed	

On Behalf of	Environment Agency
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

5. References

Blakely, T. e. (2023). Effects of urbanization, biotic and abiotic factors on aquatic insect diversity in urban ponds. *Frontiers in Ecology and Evolution*.

Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

National Highways. (2020). *LA 113 Road Drainage and the Water Environment. Design Manual for Roads and Bridges. Revision 1.* Retrieved from www.standardsforhighways.co.uk: Available at: https://www.standardsforhighways.co.uk

Petrin, Z. (2022). Road effects on benthic macroinvertebrate assemblages in boreal headwater streams. *Science of the Total Environment*.

Popper, A. e. (2014). ASA S3/SC1.4 TR-2014 Sound Exposure Guidelines for Fishes and Sea Turtles. *SpringerBriefs in Oceanography*.

RAPID LIFE Project. (2018). *Regional Invasive Alien Species Management Plan (RIMP): South East Region. Version 1. Non-native Species Secretariat.* Retrieved from https://www.nonnativespecies.org/assets/Document-repository/RAPID_South_East_RIMP.pdf

RAPID LIFE Project. (2020). *Regional Invasive Species Management Plan (RIMP): East of England Region.* Retrieved from www.nonnativespecies.org: https://www.nonnativespecies.org/assets/Document-repository/RAPID_East_of_England_RIMP.pdf

Shanks, A. L. (2009). Pelagic Larval Duration and Dispersal Distance Revisited. *The Biological Bulletin*, 216(3), 373–385.

Steendam, C. (2020). Burrowing behaviour of the European eel (Anguilla anguilla): effects of life stage. *Journal of Fish Biology*, pp. 1332–1342.

The Eels (England and Wales) Regulations. (2009).

The Planning Inspectorate. (2024). *Advice on working with public bodies in the infrastructure planning process, Annex D: Environment Agency.* Retrieved from https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-eleven-working-with-public-bodies-in-the-infrastructure-planning-process/nationally-significant-infrastructure-projects-advice-note-eleven-annex-d-enviro

The Salmon and Freshwater Fisheries Act. (1975). HMSO.

UK Technical Advisory Group (UKTAG). (2008). *UK Environmental Standards and Conditions (Phase 2) Final Report (SR1–2007).*

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