

AENC-NG-CNS-REP-0050

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.15 Draft Statement of Common Ground - Environment
Agency

Final Issue A

August 2025

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(g)

nationalgrid

Contents

1.	Introduction	1
1.1	Overview	1
1.2	Project Description	1
1.3	Format and structure of this document	2
2.	Record of Key Engagement	3
2.1	Introduction	3
2.2	Summary of Key Engagement	3
3.	Matters Agreed, Not Agreed or Under Discussion	6
3.1	Overview	6
3.2	Hydrology, Land Drainage and Flood Risk	7
3.3	Ecology and Biodiversity	16
3.4	Contaminated Land, Geology and Hydrogeology	18
3.5	Other Matters (inc. Waste Management and Pollution)	21
4.	Confirmation of Agreement	23
<hr/>		
Table 2.1	Summary of Key Engagement between National Grid and the Environment Agency	3
Table 3.1	Agreement status for matters presented in Section 3	6
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk	7
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	16
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology	18
<hr/>		
	Abbreviations	24
<hr/>		

1. Introduction

1.1 Overview

- 1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and the Environment Agency (EA). It identifies areas of the Norwich to Tilbury project (the 'Project') within the Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.
- 1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to the EA. The applicable matters considered within this SoCG apply to the EA's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):
- Hydrology, Land Drainage and Flood Risk
 - Ecology and Biodiversity
 - Contaminated Land, Geology and Hydrogeology
 - Other Matters (inc. Waste Management and Pollution)
- 1.1.3 This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).

Note: This draft SoCG has been prepared at an early phase of the DCO process, ahead of submission. It is intended to be a live and working document which will be updated as the Project progresses and shared with the Environment Agency key points for discussion. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.

1.2 Project Description

- 1.2.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:
- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations

- Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1))
 - Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
 - Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
 - A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
 - A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
 - Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
 - Ancillary and/or temporary works associated with the construction of the Project.
- 1.2.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).
- 1.2.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.
- 1.2.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.3 Format and structure of this document

- 1.3.1 This SoCG is structured as follows:
- **Section 2** provides a summary of the key engagement undertaken to date with the EA.
 - **Section 3** summarises the key matters and captures the status of each issue / matter.
 - **Section 4** includes the sign off sheet.

2. Record of Key Engagement

2.1 Introduction

- 2.1.1 The EA is a prescribed consultee for the purpose of section 42(1)(a) of the Planning Act 2008 and is named as such in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.
- 2.1.2 The EA is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs with the stated purpose ‘to protect or enhance the environment, taken as a whole’.
- 2.1.3 The EA has been encouraged to discuss and work with National Grid to provide a local perspective at the pre-application stage of the application process for the project.
- 2.1.4 National Grid has engaged with the EA on the Project throughout the pre-application process. This has included:
 - Non-statutory consultation in Spring 2022 and Summer 2023
 - Statutory Consultation in Spring 2024
 - Targeted Consultations in Spring 2025
 - One to one / small group technical meetings on specific detailed matters
 - Sharing of papers and documentation at key stages
- 2.1.5 Further details on National Grid’s engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

- 2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and the EA.

Table 2.1 Summary of Key Engagement between National Grid and the Environment Agency

Date	Format	Topic/Description
Hydrology, Land Drainage and Flood Risk		
June 2022	Technical note	National Grid shared the Draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Thematic Group meeting.
July 2022	Meeting	National Grid held a Hydrology and Land Drainage Thematic Group Meeting to discuss the EIA assessment approach.

Date	Format	Topic/Description
May 2023	Technical note	National Grid issued a technical note setting out the approach to preparing the Flood Risk Assessment (FRA) for the Project.
May 2023	Technical note	National Grid issued a technical note setting out the approach to preparing the Water Framework Directive (WFD) Assessment for the Project.
February 2024	Meeting	Meeting to discuss the River Stour crossing.
March 2024	Technical note	National Grid issued the FRA Screening Report for comment.
June 2024	Technical note	National Grid issued a technical note to agree key principles regarding floodplain compensation for pylons and temporary works.
July 2024	Meeting	National Grid held a meeting to discuss comments on the Flood Compensation Storage Technical Note and specifics for the FRA.
July 2024	Technical note	National Grid issued the WFD Assessment Stage 1 & 2 (with appendices) document for review.
September 2024	Technical note	National Grid issued the Works In, Over and Under Watercourses – Technical Note document for review.
September 2024	Technical note	National Grid issued the Surface Water Management Principles - Technical Note document for review.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Technical note	National Grid issued the WFD Assessment Stage 3 document for review.
January 2025	Technical note	National Grid issued the Draft FRA for review and comment.
January 2025	Meeting	National Grid held a meeting to discuss comments on the draft WFD Assessment.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on the draft FRA.
January 2025	Meeting	National Grid held a meeting to discuss the updated draft design ahead of targeted consultations.
February 2025	Technical note	National Grid issued the Draft WFD Stage 4 Assessment for review and comment.

Date	Format	Topic/Description
March 2025	Technical note	National Grid issued the Draft Typical Culvert Crossing drawing to support the draft WFD Assessment.
March 2025	Technical note	National Grid issued the Draft FRA including comments log and associated figures.
April 2025	Technical note	National Grid issued the Draft CoCP for comment.
April 2025	Meeting	National Grid held a meeting to discuss the comments raised by the Environment Agency in response to the WFD Stage 4 assessment report regarding the design of clear span bridges, specifically the height that can be achieved between the Q95 water level and the bridge soffit on watercourses with good/high WFD status for invertebrates.
Ecology and Biodiversity		
July 2022	Technical note	National Grid issued the Biodiversity Assessment Methodology & Arboriculture Assessment Methodology for review ahead of the Thematic Group Meeting.
July 2022	Meeting	National Grid held an Ecology and Biodiversity Thematic Group meeting to discuss Biodiversity and Arboriculture.
September 2024	Meeting	National Grid held a meeting to discuss fish and drainage.
Contaminated Land, Geology and Hydrogeology		
July 2022	Technical note	National Grid issued the Draft Geology and Hydrogeology Assessment Methodology document for review
July 2022	Meeting	National Grid held a meeting to discuss the proposed methodology for the Geology and Hydrogeology Assessment.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to the EA which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, amber, green status shows the level of agreement with the EA. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 Sections that remain highlighted in yellow within these tables show points where both parties will seek to discuss and where possible agree a position in due course. The parties have been unable to do so at this stage because the relevant information is still being authored ahead of submission of the DCO application. These points will be the subject of ongoing discussion with stakeholders once the Environmental Statement and other relevant documentation is published.
- 3.1.5 Table 3.2 to Table 3.5 provides the matters agreed, not agreed or under discussion in relation to the various topics.

3.2 Hydrology, Land Drainage and Flood Risk

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.2.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 9.2 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	Please ensure that consideration has been given to compliance with the Eel (England and Wales) 2009 Regulations. The EA can't find reference to it in the CoCP. Please ensure any temporary over pumping works use 2mm screens to prevent the entrainment of eels.	Under discussion
EIA – Approach and Methods				
3.2.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.2.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES.</p>	To be completed once the ES has been issued.	Under discussion
3.2.4	Assessment methodology	The outline methodology for assessing Hydrology, Land Drainage	The outline methodology for assessing Hydrology, Land Drainage and Flood Risk	Under Discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
		<p>and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>Technical notes for the following are still under consideration:</p> <ul style="list-style-type: none"> Works In, Over and Under Watercourses 	<p>was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>Technical notes for the following are still under consideration:</p> <p>Works In, Over and Under Watercourses</p> <p>The EA responded to the 'Works In, Over and Under Watercourses' technical note on 20 September 2024.</p> <p>The EA responded to the stage 4 WFD assessment on 16 April 2025. The EA stated they were pleased to see that clear span bridges and soffits will be provided as high as feasible. It is also their understanding that all proposed culverts are now on ordinary watercourses and no culverts are proposed on main rivers.</p>	
3.2.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The key parameters and assumptions presented are considered appropriate.</p>	To be completed once the ES has been issued.	Under Discussion
EIA – Baseline Conditions				
3.2.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES.</p>	To be completed once the ES has been issued.	Under Discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
		The baseline conditions and receptors presented are considered appropriate.		
3.2.7	Sensitivity of receptors	The criteria for assigning the value/sensitivity of Hydrology, Land Drainage and Flood Risk receptors are shown set out in in Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES . The criteria presented are considered appropriate for the assessment.	To be completed once the ES has been issued.	Under Discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.2.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	To be completed once the ES has been issued.	Under Discussion
3.2.9	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES and set out in the Outline CoCP (document reference 7.2). The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	To be completed once the ES has been issued.	Under Discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
3.2.10	Additional mitigation	The consideration of additional mitigation measures are presented in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	To be completed once the ES has been issued.	Under Discussion
EIA – Assessment Conclusions				
3.2.11	Construction effects	The assessment of effects during construction is presented in Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The assessment of effects during construction presented is considered appropriate.	To be completed once the ES has been issued.	Under Discussion
3.2.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	To be completed once the ES has been issued.	Under Discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.2.13	Outline CoCP (General)	The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES and is appropriate for managing construction impacts from the Project.	Various comments have been received on the Outline CoCP which are detailed below. The EA request that consideration should be given to compliance with the Eel (England and Wales) 2009 Regulations. We can't find reference to it in the CoCP. Please ensure any temporary over pumping	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
		National Grid issued the Outline CoCP to the EA on 3 rd April 2025.	works use 2mm screens to prevent the entrainment of eels.	
3.2.14	Outline CoCP (Water Resources including abstractions and discharges)	NG note that the Project is engaging with the relevant Water Companies (including Anglian Water and Essex & Suffolk Water) with regards to securing necessary water supplies and the appointed Main Works Contractor(s) would develop a further detailed Water Supply Strategy.	<p>The EA provided the following comments on 22nd April around Water Resources and the Outline CoCP:</p> <ul style="list-style-type: none"> For any water that is expected to be tankered in, the source of such supply and the quantity of water tankered in, would need to be identified and specified. <p>Details around where any water supply for the construction and operational phases come from and the quantities involved and the purposes for which water will be used, will help the EA in assessing any impact it may have on the environment and water availability in the area. The EA will be able to amend the 'under discussion' note once clarification or methodology has been proposed/provided.</p>	Under discussion
3.2.15	Outline CoCP (Flood Defences)	NG note that this will be managed by the main works contractor during construction, however further details will be included in the final iteration of the CoCP.	<p>The EA provided the following comments on 22nd April in their response to the oCoCP:</p> <ul style="list-style-type: none"> Any works to existing flood defences, or for works within 8m of a main river/defence if fluvial or 16m if tidal, will be covered by applying for a flood risk activity permit which covers the risks to raised defences effected by the scheme. As previously communicated, we would highly recommend early engagement with our permitting team. The EA recommend engaging in the permitting 	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
			process as soon as possible. The FRAP application process should provide an opportunity to highlight any impacts.	
Water Framework Directive (WFD)				
3.2.16	General Approach	The WFD assessment has been undertaken in a staged manner, with each stage report shared with the EA for review and comment, Stages 1 to 4 of the assessment have been approved to date.	The WFD assessment has been undertaken in a staged manner, with each stage report shared with the EA for review and comment, Stages 1 to 4 of the assessment have been approved to date. EA response on the Stage 4 WFD Assessment received on 18 th February 2025 with further comments received on 3 rd March 2025.	Agreed
3.2.17	Zone of Influence (Zol)	NG and the EA have agreed the proposed Zol and the scoped-in elements for each surface water and groundwater body within the Zol.	NG and the EA have agreed the proposed Zol and the scoped-in elements for each surface water and groundwater body within the Zol.	Agreed
3.2.18	Cumulative impacts of culverting, culvert design and passability for fish, invertebrates, water vole and otters	Comments received from the EA have been noted and incorporated into the updated WFD assessment as well as the Outline CoCP.	<p>The EA provided the following comments on 22nd April:</p> <ul style="list-style-type: none"> • We understand that no new culvert locations are proposed and the new/upgraded culverts as part of this consultation are only proposed where there are existing culverts in situ. In any case, it should be ensured that where culverts are proposed that it is adequately demonstrated why this is both necessary and the only reasonable and practicable alternative. • Where culverts are already in place and will be upgraded, they should be made as wide and high as possible to reduce 	Agreed

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
			<p>the environmental impact they are having.</p> <ul style="list-style-type: none"> We welcome the justification provided within our dedicated WFD meeting. Where it has been robustly demonstrated that the culverting is both necessary and the only reasonable practicable alternative, the length of any culvert should be restricted to the minimum necessary to meet the applicant's objective. 	
3.2.19	Soffit heights of single span bridges	The commitment made during the 04/04/25 meeting, confirming that all statutory main rivers and designated WFD waterbodies proposed to be crossed have a WFD Invertebrate Class of good or high, is considered acceptable.	EA commented that they would accept the commitment made during the 04/04/25 meeting, confirming that all statutory main rivers and designated WFD waterbodies proposed to be crossed are crossed using single span bridges. Agreed that watercourses with a WFD Invertebrate Class of good or high are crossed using single span bridges and that the height from Q95 to soffit will be maximised to reduce ecological impacts.	Agreed
Flood Risk Assessment (FRA)				
3.2.20	Flood Risk Assessment (General)	NG issued the Draft FRA on the 22 nd January 2025. The scope, methodology, assessment and conclusions drawn in the FRA are considered appropriate and proportionate.	<p>The EA provided the following comments on 22nd April:</p> <ul style="list-style-type: none"> Draft FRA referenced EN020027 dated January 2025. At present, we would have no objection if this FRA was to support the DCO application for the Norwich to Tilbury project, as we consider it provides a suitable way to make assessment of the flood risks arising from the proposed development' 	Agreed

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
3.2.21	Flood risk activity permits (FRAP)	<p>Comments have been received and are noted. Please refer to the approach set out in the Section 5.5 of the DCO submission: '<i>Consents and licenses required under other legislation.</i>'</p> <p>The Main Works Contractor will be responsible for applying for FRAPs and will begin pre application discussions with the EA at an early stage of their appointment.</p>	<p>Comments were raised by the EA on 12th February on the following:</p> <ul style="list-style-type: none"> The applicant will need environmental permit(s) for flood risk activities as a result of this project for works under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. As a significant number of flood risk activity permits are likely to be required, the Environment Agency recommend beginning the pre-application process for these as soon as possible as these come through a separate regime to the DCO. 	Agreed
3.2.22	Flood Risk Assessment (Sustainable Drainage Systems (SuDS))	<p>The guidance and advice provided by the EA is noted and will be referred to in the updated FRA and the Outline CoCP. An additional appendix has been added to the FRA providing more detail on how the Project's surface water drainage will be managed.</p> <p>National Grid issued the Draft FRA for review and comment in January 2025. National Grid issued the Draft FRA including comments log and associated figures.</p>	<p>The following comments were made by the EA on 22nd April regarding Sustainable Drainage Systems:</p> <ul style="list-style-type: none"> Infiltration sustainable drainage systems (SuDS) shall only be used where it can be demonstrated that they will not pose a risk to the water environment and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable 	Agreed

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
			<p>vehicle parking areas shall incorporate appropriate pollution prevention measures and SuDS treatment train components appropriate.</p> <ul style="list-style-type: none"> • The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. • Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource • SuDS should be constructed in line with good practice and guidance documents. 	
3.2.23	Flood Risk Assessment (Groundwater Flood Risk)	The guidance and advice provided by the EA is noted and will be referred to in the updated FRA.	<ul style="list-style-type: none"> • The following comments were made by The EA on 22nd April regarding Ground Conditions and Contaminated land: • The EA are pleased that the Groundwater Flood risk section has been expanded and more details provided on groundwater flood risk, and that the risks have been assessed and included in the FRA. • Where any infiltration is proposed that groundwater levels are monitored well in advance of the detailed design conclusion, to ensure that peak seasonal groundwater levels do not encroach on the base of any infiltration feature. 	Agreed

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
Other matters as required				
3.2.24	Flood Compensation Storage	<p>National Grid have agreed with the EA that flood compensation storage will be provided for all pylons situated in the 1 in 100 year plus climate change floodplain.</p> <p>It is agreed that flood compensation storage for any temporary works is not required.</p>	<p>National Grid have agreed with the EA that flood compensation storage will be provided for all pylons situated in the 1 in 100 year plus climate change floodplain.</p> <p>It is agreed that flood compensation storage for any temporary works is not required.</p>	Agreed

3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
Outline Code of Construction Practice (oCoCP)				
3.3.1	Outline CoCP	<p>The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES and is appropriate for managing construction impacts from the Project.</p> <p>National Grid issued the Outline CoCP to the EA on 3rd April 2025.</p> <p>The comments received will be taken on board for the next iteration of the Outline CoCP.</p>	<p>The EA provided the following comments on 22nd April around Fisheries, Biodiversity and Ecology:</p> <ul style="list-style-type: none"> • Include reference to the ideal working windows for in-channel works. • Timing restrictions may be applied based on local fish populations and river types. • Only native plant species must be used for reinstating habitats. • Ensure gravel is retained in-channel wherever possible. Reinstated material should closely match what is removed, particularly gravel, which should be 15–40mm in size. 	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
			<ul style="list-style-type: none"> Where culverts are being proposed, they must: <ul style="list-style-type: none"> Leave the bed and margins of the watercourse intact wherever possible. Facilitate passage of water voles and otters, including during a 1-in-100-year flood event. New culverts should be sized to maintain the current land drainage regime and to avoid narrowing of natural channel widths. During culvert installation, downstream flows will be maintained. There is a need to design watercourse crossings to be primarily clear span bridges. Where culverts are unavoidable, they must be designed to maintain natural processes and support ecological connectivity. Crossings must be passable to fish, water voles, and otters, in line with previous comments. 	
Fish, Aquatic Invertebrates and Macrophytes				
3.3.2	Desk study/survey approach.	National Grid have adopted a desk study/survey approach to fish, aquatic invertebrates and macrophytes. NG have delivered a presentation on this approach to the EA.	The EA identified specific fish and invertebrate classifications of importance to the assessment, these have been included and we accept the desk study/survey approach provided.	Agreed
3.3.3	Mitigation Proposals	The EIA mitigation proposals are presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES . The mitigation proposals presented are considered appropriate.	To be completed once the ES has been issued.	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
3.3.4	EIA Assessment Conclusions	The EIA assessment conclusions are presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES . The assessment of effects presented is considered appropriate.	To be completed once the ES has been issued.	Under discussion

3.4 Contaminated Land, Geology and Hydrogeology

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
EIA – Approach and Methods				
3.4.1	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.2	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
EIA – Baseline Conditions				
3.4.3	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES . The baseline conditions and receptors presented are considered appropriate.	To be completed once the ES has been issued.	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.4	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	To be completed once the ES has been issued.	Under discussion
3.4.5	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and set out in the Outline CoCP (document reference 7.2). The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	To be completed once the ES has been issued.	Under discussion
EIA – Assessment Conclusions				
3.4.6	Construction effects	The assessment of effects during construction is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The assessment of effects during construction presented is considered appropriate.	To be completed once the ES has been issued.	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
3.4.7	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES . The assessment of effects during operation (and maintenance) presented is considered appropriate.	To be completed once the ES has been issued.	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.8	Outline CoCP	<p>The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and is appropriate for managing construction impacts from the Project.</p> <p>National Grid issued the Outline CoCP to the EA on 3rd April 2025.</p> <p>Comments from the EA on the Outline CoCP will be taken on board for the next iteration of this document.</p>	<p>The following points were raised by The EA on 23rd April 2025 concerning private supplies and drilling support fluids:</p> <ul style="list-style-type: none"> Mitigation measures are included in other commitments in general for pollution prevention, but mitigation against derogation of private supplies is not. If vulnerable receptors are identified and monitored, mitigation measures should also be applied. Where drilling support fluids are used, any additives should be registered as an exclusion to demonstrate they will not have a detrimental effect on water quality. <p>Comments received on the 1st iteration of the SoCG:</p> <p>A Piling Works Risk Assessment was also mentioned in the REAC. This should also be provided as an appendix.</p> <p>As EA have not yet read the final ES, the EA have no further comments for the yellow highlighted points 3.5.3 to 3.5.7.</p>	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
Other matters as required				
3.4.9	Groundwater Risk Assessment	The Groundwater Risk Assessment is presented as an Appendix to Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES (document reference 6.9.A3). The Assessment is considered appropriate.	To be completed once the ES has been issued.	Under discussion

3.5 Other Matters (inc. Waste Management and Pollution)

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Other Matters (inc. Waste Management and Pollution)

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
Outline CoCP				
3.5.1	Outline CoCP and Site Waste Management Plan (SWMP)	Arcadis shared the Outline CoCP (including the SWMP) with the EA on the 3 rd April 2025. Comments from the EA on the Outline CoCP will be taken on board for the next iteration of this document.	The EA provided the following comments on 22 nd April concerning the (SWMP): <ul style="list-style-type: none"> • Outdated waste legislation is listed. It is missing key legislation most notably Environmental Permitting (England and Wales) Regulations 2016. • Include material quantities and inspection/test results in records to be kept as part of 2.4.8 • Landfill waste acceptance criteria (WAC) analysis must not be used for waste classification and hazardous waste assessment purposes. • There has been no mention in section 5 of Norfolk, only Suffolk and Essex. • There is no mention throughout of mirror coded wastes and how these wastes will 	Under discussion

ID	Matter	National Grid's Position	The Environment Agency's Position	Status
			<p>be managed. Please consider once there is an understanding on coding and classification.</p> <ul style="list-style-type: none"> Waste management methods and appropriate facilities are to be determined once waste is assessed and classified correctly. Update to include checks to determine if the carrier has the correct type of licence i.e. upper or lower tie and update to confirm if waste brokers or dealers are to be used. <p>Comments received on the 1st iteration of the SoCG:</p> <p>Once each waste has been classified, NG must consider options following the Waste Hierarchy, so that landfill is a last resort. Reuse or recovery must be prioritised where possible & appropriate.</p>	
3.5.2	Outline CoCP (Pollution Prevention)	<p>Arcadis shared the Outline CoCP (including the SWMP) with the EA on the 3rd April 2025.</p> <p>Comments from the EA on the Outline CoCP will be taken on board for the next iteration of this document.</p>	<p>The EA provided the following comments on 22nd April concerning pollution prevention:</p> <ul style="list-style-type: none"> Any storage facilities must be compliant with the Control of Pollution (Oil Storage) (England) Regulations 2001. Vehicle wash water should not be discharged to watercourses or groundwater, even after sediment removal. It is likely to contain oils and detergents therefore should be discharged to foul sewer or to a sealed tank for appropriate disposal off site Details of measures at each location should be provided and agreed. 	Under discussion

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and the Environment Agency on the date specified below.

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of the Environment Agency:

.....

Date:

.....

Abbreviations

Abbreviation	Full Reference
CoCP	Code of Construction Practice
DCO	Development Consent Order
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
ES	Environmental Statement
FRA	Flood Risk Assessment
GW	Gigawatt
LLFA	Lead Local Flood Authority
NETS	National Electricity Transmission System
REAC	Register of Environmental Actions and Commitments
SWMP	Site Waste Management Plan
SoCG	Statement of Common Ground
WFD	Water Framework Directive
ZoI	Zone of Influence

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com