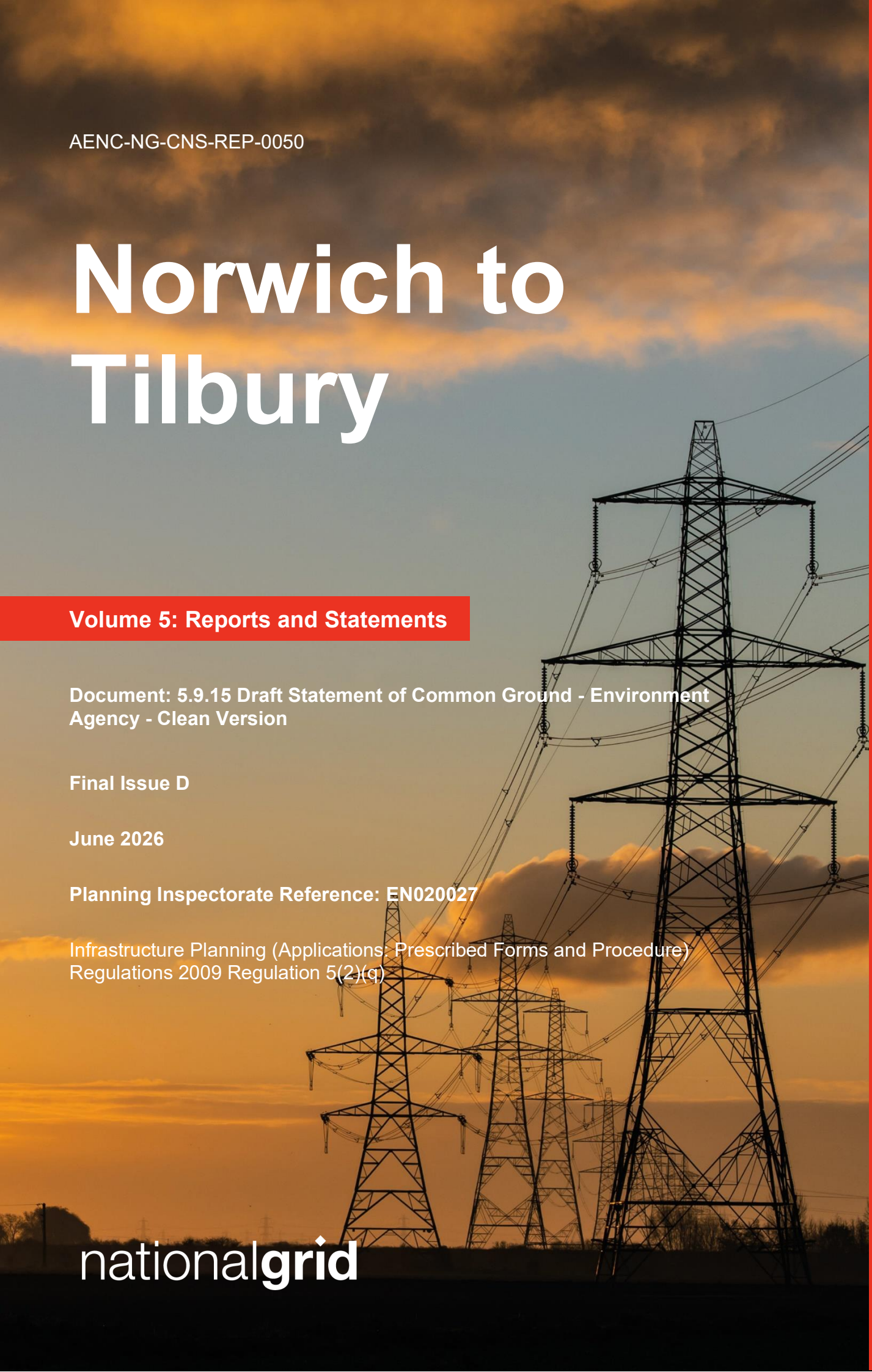
AENC-NG-CNS-REP-0050

# Norwich to Tilbury



## Volume 5: Reports and Statements

**Document: 5.9.15 Draft Statement of Common Ground - Environment Agency - Clean Version**

**Final Issue D**

**June 2026**

**Planning Inspectorate Reference: EN020027**

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

nationalgrid

# Revision History

| Version | Date | Submitted at |
|---|---|---|
| A | 29 August 2025 | DCO Application |
| B | 26 February 2026 | Deadline 1 |
| C | 12 May 2026 | Deadline 4 |
| D | 10 June 2026 | Deadline 5 |

# Contents

# 1. Introduction

## 1.1 Overview

1.1.1 This 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).

## 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 |
|---|---|---|
| **General** | | |
| July 2025 | Technical Note | National Grid shared the draft DCO requirements for the Project. |
| August 2025 | Technical Note | National Grid shared the draft submission documents for the Project. |
| December 2025 | Meeting | National Grid held an optional thematic meeting to discuss the Statement of Common Ground |

| Date | Format | Topic/Description |
|---|---|---|
| December 2025 | Meeting | National Grid held an optional thematic meeting to discuss the Statement of Common Ground |
| January 2026 | Meeting | National Grid held a meeting to discuss Relevant Representations made by the EA. |
| January 2026 | Meeting | National Grid held a meeting to the WaLOR with Suffolk Wildlife Trust and the EA. |
| February 2026 | Email Correspondence | National Grid shared the most recent iteration of the draft Statement of Common Ground for consideration |
| February 2026 | Email Correspondence | EA shared an updated version of the Statement of Common Ground back with National Grid. |
| April 2026 | Email Correspondence | EA shared an updated version of the Statement of Common Ground back with National Grid. |
| **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. |
| 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. |

| Date | Format | Topic/Description |
|---|---|---|
| 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. |
| 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 and associated appendices 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. |

| Date | Format | Topic/Description |
|---|---|---|
| **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. |
| February 2024 | Meeting | Meeting to discuss the River Stour crossing. |

# 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 Table 3.2 to Table 3.6 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 | 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) [APP-126]** and **Section 9.2 of Chapter 12 (Hydrology, Land Drainage and Flood Risk)** of the **ES [APP-221].**<br>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.<br><br>The Applicant can confirm that the wording of commitment B11 of **7.2 Outline CoCP [REP4-164]** has been updated to make reference to the Eel (England and Wales) 2009 Regulations and screen size. | The Environment Agency requested that consideration had been given to compliance with the Eel (England and Wales) 2009 Regulations. It must be ensured any temporary over pumping works use 2mm screens to prevent the entrainment of eels. National Grid have confirmed this has been secured in commitment B11.<br><br>It was confirmed following correspondence on 17 February that this matter can be agreed. | Agreed |
| **EIA – Approach and Methods** | | | | |
| 3.2.2 | Study area | The study area was agreed through **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| 3.2.3 | Data sources | 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 [APP-221]**. | Comments have been provided as part of the Environment Agency's relevant representation. The most notable comments in relation to data sources can be found in the Contamination and Land Quality section.<br>It is considered that this matter can be agreed for Hydrology, Land Drainage and Flood Risk topic, but further discussion is required for data sources for Waste Management (refer to section 3.6) and land contamination. | Agreed |
| 3.2.4 | Assessment methodology | The outline methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. | The outline methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.<br>Technical notes for the following are still under consideration:<br>• Works In, Over and Under Watercourses<br>The EA responded to the 'Works In, Over and Under Watercourses' technical note on 20 September 2024.<br>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 is feasible. It is also their understanding that all proposed culverts are now on ordinary watercourses and no culverts are proposed on main rivers.<br>The EA confirmed in a meeting to discuss the Statement of Common Ground on 2 | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | | December 2025 that this matter can be agreed for Hydrology, Land Drainage and Flood Risk topic, | |
| 3.2.5 | Key parameters and assumptions | 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 [APP-221]**. The key parameters and assumptions presented are considered appropriate. | The EA confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be agreed for Hydrology, Land Drainage and Flood Risk topics, | Agreed |
| **EIA – Baseline Conditions** | | | | |
| 3.2.6 | Baseline conditions and receptors | 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 [APP-221]**. The baseline conditions and receptors presented are considered appropriate. | The EA confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be agreed for Hydrology, Land Drainage and Flood Risk topic. | Agreed |
| 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 [APP-221].** The criteria presented are considered appropriate for the assessment. | The EA confirmed in a meeting to discuss the Statement of Common Ground that this matter can be agreed for Hydrology, Land Drainage and Flood Risk topic. | Agreed |
| **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 | Mitigation measures state where a main river is crossed by a trenchless crossing, the cables will be laid at least 1 m below the | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | effects, are set out in **Section 12.6** of **Chapter 12** (**Hydrology, Land Drainage and Flood Risk**) of the **ES [APP-221]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br><br>The mitigation measure noted by the EA is commitment W06 of **7.2 Outline CoCP [REP4-164].** | hard bed level of the river and will remain at or below this level for not less than 3 m from the bank of the river. Marker posts shall also be positioned on each bank of the river to indicate the location of the under-crossing and the nature of the works.<br><br>The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | |
| 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 [APP-221]** and set out in **7.2 Outline CoCP [REP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | Agreed |
| 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 [APP-221]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. | The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | Agreed |
| **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** | It is important that during construction/demolition activities that the natural riverbanks remain undisturbed and | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | **and Flood Risk**) of the **ES [APP-221]**. The assessment of effects during construction presented is considered appropriate.<br><br>In relation to avoiding disturbance to natural riverbanks and reducing potential harm due to vibration, commitments within **7.2 Outline COCP [REP4-164]** (NV04, W06 and W20) provide for avoidance and mitigation of such impacts.<br><br>The EA will be given the opportunity to review HDD designs and operators' fluid loss procedures as secured by commitments GH11 and GH12 in **7.2 Outline CoCP [REP4-164]**. GH11 states: "*At trenchless crossings, and where otherwise indicated in the ES, within Appendix 9.3: Groundwater Baseline and Qualitative Groundwater Risk Assessment (document reference 6.9.A3), a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors (including the risk of breakout of drilling fluids and turbidity, where appropriate) at those locations and identify any additional mitigation or remediation that may be required. The nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders, as appropriate*". | unharmed with vibration minimised as far as reasonably practicable.<br>In relation to groundwater, section 7.7 (protection of watercourses) of the Outline Landscape and Ecological Management Plan, states in paragraph 7.7.6 *"…This will protect the banks and channel of the River Stour removing any direct construction impacts".* The main risk associated with HDD works remains in the event of catastrophic fluid loss, or 'frac-out'. A significant frac-out can have severe ecological consequences, particularly within aquatic habitats. Appropriate design, particularly regarding depth of the drill pathway, must be carefully considered to lessen the impact of any potential frac outs, which are not uncommon. High levels of scrutiny are therefore required regarding the design of HDD works and operators associated fluid loss procedures. It is important we are given the opportunity to review HDD designs and operators' fluid loss procedures (this has historically been during either where HDD works have required a Flood risk activity permit (FRAP), or where we have been consulted during the Discharge of Protective Provisions where the requirement for a FRAP has been replaced).<br><br>It was confirmed following correspondence on 17 February that this matter is agreed. | |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| 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 [APP-221].** The assessment of effects during operation (and maintenance) presented is considered appropriate. | The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | Agreed |
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.2.13 | Outline CoCP (General) | The **7.2 Outline CoCP [REP4-164]** includes all relevant construction mitigation measures specified in **Chapter 12** (**Hydrology, Land Drainage and Flood Risk**) of the **ES [APP-221]** and is appropriate for managing construction impacts from the Project. | Various comments have been received on the Outline CoCP which are detailed below.<br>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 works use 2 mm screens to prevent the entrainment of eels.<br>Whilst the CoCP includes commitment B04, we require a method statement that will manage invasive non-native species. The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | Agreed |
| 3.2.14 | Outline CoCP (Water Resources including abstractions and discharges) | The Applicant notes 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. | The EA provided the following comments on 22 April 2025 around Water Resources and the Outline CoCP:<br>• 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. | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | National Grid confirm that GH11 of **7.2 Outline CoCP [REP4-164]** commits to the preparation of a hydrogeological risk assessment that will assess the specific risks to groundwater and groundwater receptors and the nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders, as appropriate. Commitment W16 of the **7.2 Outline CoCP [REP4-164]** secures water use efficiency during construction of the Project. | 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.<br>Details of water efficiency measures to be used, such as dust suppression operations at night times which would reduce water loss due to evaporation, would be beneficial to the environment and the applicant in demonstrating the proposal is minimising any negative impacts it may have on water resources in the water bodies in or around which the construction and operational phases will take place.<br>The EA confirmed on 10 February 2026 that this matter can be amended to Agreed, on the understanding that GH11 deals with measures correctly.<br>In relation to piling and penetrative ground improvement methods on land affected by contamination, we would also like to see water resources-related impacts considered in these risk assessments. | |
| 3.2.15 | Outline CoCP (Flood Defences) | The Applicant notes that the final CoCP will be managed by the main works contractor during construction, however further details have been included in **7.2 Outline CoCP [REP4-164]**. | The EA provided the following comments on 22 April 2025 in their response to the oCoCP:<br>• Any works to existing flood defences, or for works within 8 m of a main river/defence if fluvial or 16 m if tidal, will be covered by applying for a FRAP which | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | The Applicant is engaging in the flood defence pre application discussions and continue engagement on the permitting process following discussions with the Environment Agency on 2 December 2025. | 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 process as soon as possible. The FRAP application process should provide an opportunity to highlight any impacts.<br>It should be noted that the granting of a DCO will not automatically grant a FRAP. We therefore welcome National Grid's commitment to engage in flood defence pre-application discussions at the earliest possible moment. | |
| **Water Framework Directive (WFD)** | | | | |
| 3.2.16 | General Approach | The **WFD Assessment [APP-332]** 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.<br>EA response on the Stage 4 WFD Assessment received on 18 February 2025 with further comments received on 3 March 2025. | Agreed |
| 3.2.17 | Zone of Influence (ZoI) | The Applicant and the EA have agreed the proposed ZoI and the scoped-in elements for each surface water and groundwater body within the ZoI. | National Grid and the EA have agreed the proposed ZoI and the scoped-in elements for each surface water and groundwater body within the ZoI. | Agreed |
| 3.2.18 | Cumulative impacts of culverting, culvert | Comments received from the EA have been noted and will be incorporated into the | The EA provided the following comments on 22 April: | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | design and passability for fish, invertebrates, water vole and otters | updated **WFD Assessment [APP-332]** as well as within the as well as **7.2 Outline CoCP [REP4-164]**.<br><br>The Applicant acknowledges comments made by the EA in their Relevant Representations and has provided a response to this matter at Deadline 1 (**8.4.1 Applicant's Comments on Relevant Representations**). It is considered that robust commitments for culvert design are secured by the DCO that would avoid any significant cumulative effects. | • 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.<br>• Where culverts are already in place and will be upgraded, they should be made as wide and high as possible to reduce the environmental impact they are having.<br>• 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.<br><br>The EA advised in their Relevant Rep that a method statement detailing management of the safe passage of fish, otters, water vole within culverts as per Standard Mitigation 8.6.8 B11 on page 65 of Chapter 8 Ecology and Biodiversity will be required prior to works taking place. | |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| 3.2.19 | Soffit heights of singe 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 (set out in commitment W12 of **7.2 Outline Code of Construction Practice [REP4-164]**), 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.<br>We have previously advised that soffits for permanent road bridges must be 600mm above the 1:100 plus climate change flood level, open span and not encroach into the channel/reduce channel capacity (otherwise hydraulic modelling maybe required). Level for level flood compensation may be required for any land raising in the 1:100 plus climate change flood outline. | Agreed |
| **Flood Risk Assessment (FRA)** | | | | |
| 3.2.20 | Flood Risk Assessment (General) | The Applicant issued the draft **7.9 Flood Risk Assessment [APP-331]** on the 22 January 2025. The scope, methodology, assessment and conclusions drawn in **7.9 Flood Risk Assessment [APP-331]** are considered appropriate and proportionate. | The EA provided the following comments on 22 April 2025:<br>• 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) | Comments have been received and are noted. Please refer to the approach set out in **5.5 Consents and Licences Required Under Other Legislation [APP-084]**. 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. | Comments were raised by the EA on 12 February 2025 Ion the following:<br>• 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) | The guidance and advice provided by the EA is noted and will be referred to in **7.9 Flood Risk Assessment [APP-331]** and **7.2 Outline Code of Construction Practice [REP4-164].** An additional appendix has been added to **7.9 Flood Risk Assessment [APP-331]** providing more detail on how the Project's surface water drainage will be managed. | The following comments were made by the EA on 22 April 2025 regarding Sustainable Drainage Systems:<br>• 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.<br>• 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 vehicle | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | | parking areas shall incorporate appropriate pollution prevention measures and SuDS treatment train components appropriate.<br>• 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.<br>• Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource<br>• 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 is referred to in **7.9 Flood Risk Assessment [APP-331]** and **7.2 Outline Code of Construction Practice [REP4-164].** | The following comments were made by The EA on 22 April regarding Ground Conditions and Contaminated land:<br>• 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.<br>• 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 | The Applicant has 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 (set out in commitment W17 of **7.2 Outline Code of Construction Practice [REP4-164]**).<br>It is agreed that flood compensation storage for any temporary works is not required. | Initial compensatory storage details are described in the **Flood Risk Assessment (FRA) (document reference 7.9).** Full details will be provided by the Main Works Contractor(s) in support of future FRAP applications for creation of the storage areas. The Project design has been revised following initial consultation with the Environment Agency during pre-application and no land within the Order Limits encroaches into the Tilbury Flood Storage Area, nor the defended floodplain of the River Thames. We are broadly satisfied with the initial compensatory storage details provided for the Project. They seem to be precautionary, hydraulically linked and designed to drain following a flood event. Provision of compensatory storage is secured by commitment W17 within the Outline **CoCP (document reference 7.2).** | 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 | **7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction related mitigation measures specified in **Chapter 8** (**Ecology and Biodiversity**) of the **ES [AS-026]** and is appropriate for managing construction impacts from the Project.<br>The EA requests on culvert design and timings have been included within **7.2 Outline Code of Construction Practice [REP4-164]**. Commitments for the culverts to provided safe passage for fish, otter and water vole is identified in commitment B11 of **7.2 Outline Code of Construction Practice [REP4-164]** and will inform detailed design. An invasive species working method statement has been included within **7.4 Outline Landscape and Ecological Management Plan [REP2-018]**. More detail will be provided within the final versions of both the CoCP and the LEMP, specific to the phase of works, post consent and following detailed design. | The EA provided the following comments on 22 April 2025 around Fisheries, Biodiversity and Ecology:<br>• Include reference to the ideal working windows for in-channel works.<br>• Timing restrictions may be applied based on local fish populations and river types.<br>• Only native plant species must be used for reinstating habitats.<br>• 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.<br>• Where culverts are being proposed, they must:<br>– Leave the bed and margins of the watercourse intact wherever possible.<br>– Facilitate passage of water voles and otters, including during a 1-in-100-year flood event.<br>• 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. | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | | 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.<br>Prior to works commencing, the Environment Agency requires a method statement that will manage invasive non-native species (INNS) via personnel, vehicles, plant, or machinery as per Commitment Reference B04 of the Construction Code of Practice. | |
| **Fish, Aquatic Invertebrates and Macrophytes** | | | | |
| 3.3.2 | Desk study/survey approach. | The Applicant has adopted a desk study/survey approach to fish, aquatic invertebrates and macrophytes.<br>The Applicant has 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 [AS-026]**. The mitigation proposals presented are considered appropriate.<br>The requirement for biosecurity measures on the River Tas and the associated tributaries specifically for crayfish plague, was included in **7.2 Outline Code of Construction** | In relation to White Clawed Crayfish - Chapter 8 of the Environmental statement in section 8.5.35 states that the native white clawed crayfish (WCC) have been scoped out of the study area, however there are records of WCC on the River Tas (which is within the Study Area). WCC may be present where there are no recent records on the River Tas system and its tributaries. Where works are likely to impact this watercourse, it will be critical that | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | **Practice [REP4-164]** which was submitted at Deadline 4. | appropriate biosecurity measures are in place to prevent the transfer of crayfish plague on clothing, equipment and machinery.<br><br>We are pleased that commitment B04a states "all in-channel works associated with the tributaries of the River Tas, known to support white-clawed crayfish, will follow strict biosecurity procedures in order to avoid the spread of crayfish plague. The 'check, clean, dry' biosecurity procedure will be implemented, this will involve checking of all machinery/equipment, thoroughly cleaning machinery/equipment to remove all mud/debris, disinfecting machinery/equipment and finally drying equipment fully to ensure removal of any crayfish plague spores". | |
| 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 [AS-026]**. The assessment of effects presented is considered appropriate.<br>Further watercourse surveys were completed over the 2025 season and updated reports were issued to the Planning Inspectorate in November 2025 in the updated **ES Chapter 8** (**Ecology and Biodiversity**) **[AS-026]**. | When responding to the Relevant Representation, 65% of watercourse surveys had been submitted, with 35% surveyed post March 2025 available at time of review. The applicant subsequently advised these were submitted during the consultation. The Environment Agency therefore subsequently advised the applicant that we welcome the full results of the watercourse surveys in the Environmental Statement Chapter 8.<br>The Environment Agency reviewed the additional documentation and has no further comments at this stage. It is noted the | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | | following requirements and commitments are in place and as part of this, will require to review:<br>• The method statement that will manage invasive non-native species (INNS) and biosecurity via personnel, vehicles, plant, or machinery as per Commitment Reference B04 on page 45 of the Construction Code of Practice.<br>• A method statement detailing management of the safe passage of fish, otters, water vole within culverts as per Standard Mitigation 8.6.8 B11 on page 65 of Chapter 8 Ecology and Biodiversity.<br>• Detailed plans for Horizontal Directional Drilling designs and operators' fluid loss procedures (this has historically been during either where HDD works have required a FRAP, or where we have been consulted during the Discharge of Protective Provisions where the requirement for a FRAP has been replaced). | |

## 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 **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** 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 **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** 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 [APP-181]**. The baseline conditions and receptors presented are considered appropriate.<br>The Applicant has updated **3.1 Draft DCO (Revision D) [REP4-037]** to include the Environment Agency as a named consultee in respect of the code of construction practice in Requirement 4 (construction management plans). | The assessments *in general* appear to be sound, with no clear issues within Chapter 9 of the ES. We agree with the approaches taken. No concerns raised within baseline conditions or receptors.<br>Whilst are satisfied that commitments GH13 and GH14 will be followed and are happy to agree this matter, it would be beneficial to refer to these within the Environmental Statement.<br>The Environment Agency request to be a named consultee in relation to the discharge of Requirement 4 (Construction Management Plans). | Agreed |

| 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 [APP-181]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.<br>The EA's comments are noted and the Applicant will continue to engage with the EA on the development of the final versions of management plans.<br>The Applicant has updated **3.1 Draft DCO (Revision D) [REP4-037]** to include the Environment Agency as a named consultee in respect of the code of construction practice in Requirement 4 (construction management plans). | It was confirmed that no concerns were raised with embedded mitigation in the meeting to discuss the Statement of Common Ground in December 2025<br>The Environment Agency request to be a named consultee in relation to the discharge of Requirement 4 (Construction management Plans). | Agreed |
| 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 [APP-181]** and set out in **7.2 Outline Code of Construction Practice [REP4-164].** The standard mitigation is considered appropriate and adequate, in terms of its | For the mitigation measures, they are generally followed from the Outline CoCP, but the ES makes no reference to two commitments - GH13 and GH14. Although measures are not listed within Chapter 9, they will be abided by as they are committed to within the Outline CoCP.<br>Whilst we appreciate commitments GH13 and GH14 will be followed, it would be beneficial to make reference to these within the Environmental Statement. | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | nature and scale, to address potential effects.<br>The EA's comments are noted and the Applicant will continue to engage with the EA on the development of the final versions of management plans.<br>The Applicant has updated **3.1 Draft DCO (Revision D) [REP4-037]** to include the Environment Agency as a named consultee in respect of the code of construction practice in Requirement 4 (construction management plans). | The Environment Agency request to be a named consultee in regards to Requirement 4 (Construction Management Plans). | |
| **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 [APP-181]**. The assessment of effects during construction presented is considered appropriate.<br>**Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** provides an assessment of the potential impacts on groundwater levels and flows during construction of Overhead Line and Underground Cables. It is considered that any changes to groundwater flow or levels would only arise where dewatering would be required, Commitment GH07 of **7.2 Outline Code of Construction** | We are satisfied that the applicants' comments have addressed t he majority of the comments raised previously. Our comments are secured by commitment and will be subject to discha rge of requirement consultations. We are satisfied with the presence of commitments GH08 and GH10. We have kept our previous comments into this statement of common ground update for information, and these provide clarification to the applicant ahead of satisfying requirements.<br>The Environment Agency has limited comments, but the construction effects assessment should consider potential derogation of private water | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | **Practice [REP4-164]** secures the requirement for appropriate assessment to be undertaken where this would be the case, and commitment GH11 of **7.2 Outline Code of Construction Practice [REP4-164]** secures the requirement for Hydrogeological Risk Assessment to be undertaken at trenchless crossings.<br><br>A drilling fluid breakout method statement, informed by sufficient Ground Investigation data, would be prepared by the Main Works Contractor(s) who would engage with the Environment Agency to agree suitable procedures and safeguards for water environment receptors. This is secured by commitment GH12 within **7.2 Outline Code of Construction Practice [REP4-164].**<br><br>**Environmental Statement Appendix 9.4 Hydrogeological Risk Assessment [APP-185]** has been informed by preliminary ground investigation undertaken for the Project within the area of the River Stour and Higham Road trenchless crossings. This has then been used to inform the assessment included within **Environmental Statement Appendix 9.3 Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** for the Higham Road and River Stour trenchless crossings. It is also noted that in some areas of the proposed trenchless crossing the Lambeth and Thanet formation is | supplies and groundwater flow changes during piling and HDD works.<br><br>The main risk associated with HDD works remains in the event of catastrophic fluid loss, or 'frac-out'. A significant frac-out can have severe ecological consequences, particularly within aquatic habitats. Appropriate design, particularly regarding depth of the drill pathway, must be carefully considered to lessen the impact of any potential frac outs, which are not uncommon. High levels of scrutiny are therefore required regarding the design of HDD works and operators associated fluid loss procedures. It is important we are given the opportunity to review HDD designs and operators' fluid loss procedures (this has historically been during either where HDD works have required a FRAP, or where we have been consulted during the Discharge of Protective Provisions where the requirement for a FRAP has been replaced).<br><br>The Environment Agency have also provided comments in their Relevant Rep regarding Higham Road, River Stour (north and south). National Grid suggest there is a significant thickness of undifferentiated Lambeth Group and Thanet Sands is anticipated to lie between the bottom of the proposed crossing and the | |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| | | indicated to be absent and the superficial deposits lie directly on the chalk.<br>Commitment GH11 included within **7.2 Outline Code of Construction Practice [REP4-164]** includes for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations. This will be informed by further ground investigation and detailed design information. This will identify any additional mitigation that may be required. The nature and scope of any mitigation will be agreed with the Environment Agency.<br>The list of contaminants of concern included within Environmental Statement **Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** are preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. These contaminants will be picked up in any further risk assessments undertaken. | Chalk. This is used as justification that there is a low permeability barrier between the chalk and the trenchless cabling. This may not be a safe assumption as the Thanet Sands Formation of the Lambeth Group forms a higher conductivity aquifer, often horizontally discontinuous and usually in direct contact with the underlying chalk. A close study of borehole logs is required. Full comments are located in paragraph 7.6 of the Environment Agency's Relevant Rep.<br><br>The Environment Agency has raised several comments in relation to Appendix 9.1 – Baseline Information and Preliminary Contamination Risk Assessment. Generally comment, where landfills are referred to, their contaminants of concern are not broad enough and should include a broader suite, for example including PFAS. | |
| 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 [APP-181].** The assessment of effects during operation (and maintenance) presented is considered appropriate. | The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2nd December 2025 that this matter can be changed to agreed | Agreed |

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| **Draft DCO / Outline Management Plans / Mitigation and Monitoring** | | | | |
| 3.4.8 | Outline CoCP | **7.2 Outline Code of Construction Practice [REP4-164]** includes all relevant construction mitigation measures specified in **Chapter 9** (**Contaminated Land, Geology and Hydrogeology**) of the **ES [APP-181]** and is appropriate for managing construction impacts from the Project.<br>**7.2 Outline Code of Construction Practice [REP4-164]** includes commitments GH02 and GH11 which secure the requirement for Foundation Works Risk Assessment and Hydrogeological Risk Assessment to be undertaken where piling and/or dewatering is proposed – with any mitigation to be agreed with the Environment Agency, as appropriate.<br>Commitment GH12 included within **7.2 Outline Code of Construction Practice [REP4-164]** requires the provision of a drilling fluid breakout method statement plan which would include assessment of the additives used to support the drilling fluid and a permit will be sought if necessary.<br>The Foundation Works Risk Assessment, as set out in commitment GH02 within **7.2 Outline Code of Construction Practice [REP4-164]** will be undertaken by the Main Works Contractor following detailed design. | The following points were raised by the EA on 23 April 2025 concerning private water supplies and drilling support fluids:<br>• 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.<br>**Update February 2026:**<br>Commitment GH11 requires the production of a hydrogeological risk assessment. We are satisfied this can be dealt with via this method and would expect to be consulted as part of its production. It is essential that the applicant ensures they have identified all private abstractions and ensures no derogation to these supplies. We welcome early discussions with the applicant to ensure this is scoped appropriately.<br>The applicant has committed to undertaking a Foundation Works Risk assessment in commitment GH02. The Environment Agency expect to be consulted as part of its production.<br>Our comments in relation to drilling fluid/bentonite breakout are not copied here but are the same as our comments in 3.4.6 above. | Agreed |

| 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 [APP-181]**. The Assessment is considered appropriate.<br>Commitment GH07 within **7.2 Outline Code of Construction Practice [REP4-164]** secures the requirement for temporary construction dewatering to be undertaken in accordance with EA guidance including obtaining an abstraction licence and discharge permit, if required.<br>Commitment GH14 within **7.2 Outline Code of Construction Practice [REP4-164]** secures the requirement to discharge water removed, as close to the excavations as possible. | The Groundwater Risk Assessment should confirm that HDD bentonite additives will be screened against the JAGDAG list to determine whether they are hazardous substances or non-hazardous pollutants under the Environmental Permitting Regulations. Where additives are classified as hazardous substances, an environmental permit will be required.<br>We are satisfied that the National Grid have taken on board comments raised during pre-application around dewatering and discharging it as close to the source as possible as secured by commitment GH14. We are satisfied that commitment GH07 ensures that dewatering activities will be undertaken in accordance with Environment Agency guidance. | Agreed |

## 3.5 Waste Management

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Waste Management

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| 3.5.1 | Outline CoCP and Site Waste Management Plan (SWMP) | Comments from the EA on **Appendix B - Outline Site Waste Management Plan (SWMP) [REP2-016]** have been taken on board and a version was submitted at Deadline 2.<br><br>Update May 2026:<br><br>The Applicant can confirm that the **Appendix B - Outline Site Waste Management Plan (SWMP) [REP2-016]** has been updated with this amendment and will be submitted at Deadline 5. | The Environment Agency previously reviewed the Outline Site Waste Management Plan (SWMP) and advised that it must be updated to reflect current legislation and guidance.<br><br>The applicant has provided an updated Outline **SWMP [APP-302].** We are pleased that the majority of our comments have been addressed. The only remaining comment that we have outstanding in the 7.2 Appendix B – Outline Site Waste Management Plan relates to section 5.6.2. The following wording should be removed – 'The site will be registered as a producer of hazardous waste prior to transfer of hazardous waste from the site.'<br><br>This is because there has been no legal requirement to register your premises as a hazardous waste producer since 2016, as explained in our previous comments. There is no system in place to enable a registration | Agreed |

## 3.6 Other Matters

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Other Matters

| ID | Matter | National Grid's Position | The Environment Agency's Position | Status |
|---|---|---|---|---|
| **Outline CoCP** | | | | |
| 3.6.1 | Outline CoCP (Pollution Prevention) | National Grid shared **7.2 Outline Code of Construction Practice [REP4-164]** (including the SWMP) with the EA on the 3 April 2025.<br>Comments from the EA on **7.2 Outline Code of Construction Practice [REP4-164]** have been taken on board in the DCO submission documents | The EA provided the following comments on 22 April concerning pollution prevention:<br>• Any storage facilities must be compliant with the Control of Pollution (Oil Storage) (England) Regulations 2001.<br>• 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<br>• Details of measures at each location should be provided and agreed.<br>The Environment Agency confirmed in a meeting to discuss the Statement of Common Ground on 2 December 2025 that this matter can be changed to agreed. | Agreed |

# 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 |
| 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