FIVE ESTUARIES OFFSHORE WIND FARM

FIVE ESTUARIES OFFSHORE WIND FARM ENVIRONMENTAL STATEMENT

VOLUME 6, PART 3, CHAPTER 6: HYDROLOGY, HYDROGEOLOGY AND FLOOD RISK

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DEFINITION OF ACRONYMS

| Term | Definition |
|-------|--|
| AEP | Annual Exceedance Probability |
| AOD | Above Ordnance Datum |
| CFMP | Catchment Flood Management Plan |
| CIRIA | Construction Industry Research and Information Association |
| CoCP | Code of Construction Practice |
| DCO | Development Consent Order |
| ECC | Export Cable Corridor |
| EA | Environment Agency |
| EACN | East Anglia Connection Node |
| EIA | Environmental Impact Assessment |
| ES | Environmental Statement |
| ETG | Expert Topic Group |
| FRA | Flood Risk Assessment |
| HDD | Horizontal Directional Drilling |
| IEMA | Institute of Environmental Management and Assessment |
| LLFA | Lead Local Flood Authority |
| LNR | Local Nature Reserves |
| NPPF | National Planning Policy Framework |
| NPS | National Policy Statement |
| NSIP | Nationally Significant Infrastructure Project |
| PEIR | Preliminary Environmental Information Report |
| OnSS | Onshore Substation |
| PWS | Private Water Supply |
| RBMP | River Basin Management Plans |
| rBWD | Revised Bathing Waters Directive |
| SAC | Special Area of Conservation |
| SFRA | Strategic Flood Risk Assessment |
| SMP | Shoreline Management Plan |
| SPA | Special Protection Area |
| SSSI | Sites of Special Scientific Interest |



| Term | Definition |
|--------|---|
| SuDS | Sustainable Drainage Systems |
| тсс | Temporary Construction Compound |
| ТЈВ | Transition Joint Bay |
| uPBTs | ubiquitous, persistent, bioaccumulative, toxic substances |
| VE | Five Estuaries |
| VE OWF | Five Estuaries Offshore Wind Farm |
| WFD | Water Framework Directive |
| WTGs | VE wind turbine generators |
| WWTW | Wastewater Treatments Works |



GLOSSARY OF TERMS

| Term | Definition |
|-------------------------------------|---|
| Ancient Woodland | Typically, a woodland that has existed continuously since 1600 or before (this can include areas where trees have been cut down and/ or replanted). |
| | The areas where the WTGs will be located. |
| Array Areas | These should be referred to as the northern and southern arrays to differentiate them. |
| Temporary Construction Compounds | Temporary Construction Compounds (TCC) associated with onshore cable works. |
| Development Consent Order | An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP) from the Secretary of State (SoS) for the Department for Energy Security and Net Zero (DESNZ). |
| Effect | Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact in question with the sensitivity of the receptor in question, in accordance with defined significance criteria. |
| Environmental Statement | The documents that collate the processes and results of the EIA. |
| European sites | Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas. |
| Evidence Plan | A voluntary consultation process with specialist stakeholders to agree the approach to the Environmental Impact Assessment. |
| Habitats Regulations | The Conservation of Habitats and Species Regulations 2010. |
| Impact | An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial, resulting from the activities associated with the construction, operation and maintenance, or decommissioning of the project. |
| Landfall | The area where the Export Cables come ashore and transition from the marine environment to the terrestrial environment. |



| Term | Definition |
|------------------------------------|--|
| Local Nature Reserve | Statutory designation for places with wildlife or geological features that are of special interest locally. |
| Maximum Design Scenario (MDS) | The maximum design parameters of the combined project assets that result in the greatest potential for change in relation to each impact assessed. |
| Mitigation | Mitigation measures are commitments made by the project to reduce and/or eliminate the potential for significant effects to arise as a result of the project. |
| Onshore ECC | The Onshore ECC is the working area for the onshore cable construction. |
| OnSS | Where the power supplied from the wind farm is adjusted (including voltage, power quality and power factor as required) to meet the UK System-Operator Transmission-Owner Code for supply to the National Grid substation. |
| OnSS Access Zone | The area which will contain the final OnSS access route (both construction and operational) |
| OnSS Construction Zone | The area in which the final OnSS TCC footprint will be located. |
| PEIR | The Preliminary Environmental Impact Report. The PEIR was written in the style of a draft Environmental Statement (ES) and formed the basis of statutory consultation. Following that consultation, the PEIR documentation has been updated into the final ES that is accompanying the application for the Development Consent Order (DCO). |
| PWS | Private Water Supply is a supply of water not provided by a water company where the use is for domestic purposes or as part of a public or commercial activity. |
| River Basin Management Plans | River basin management plans (RBMPs) set the legally binding locally specific environmental objectives that underpin water regulation (such as permitting) and planning activities. |
| Revised Bathing Water Directive | Revised Bathing Water Directive is required to monitor and assess bathing water. It ensures timely information is given to the public during the bathing season and requires applicants to disseminate information on bathing water quality actively and promptly. |
| Special Area of Conservation | A special area of conservation is defined in the European Union's Habitats Directive, also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. |



| Term | Definition |
|--------------------------------|---|
| Shoreline Management Plan | A Shoreline Management Plan (SMP) is a strategy for managing flood and erosion risk for a particular stretch of coastline, over short, medium and long-term periods. |
| Substation Zone | The area in which the final onshore substation (OnSS) footprint will be located. |
| Water Framework Directive | The Water Framework Directive (WFD) (2000/60/EC) introduced a comprehensive river basin management planning system to help protect and improve the ecological health of our rivers, lakes, estuaries and coastal and groundwaters. |
| Waste Water Treatment Works | Wastewater treatment which aims to remove contaminants from sewage to produce an effluent that is suitable to discharge to the surrounding environment or an intended reuse application, thereby preventing water pollution from raw sewage discharges. |



6 HYDROLOGY, HYDROGEOLOGY AND FLOOD RISK

6.1 INTRODUCTION

- 6.1.1 This chapter of the Environmental Statement (ES) has been prepared by SLR for GoBe on behalf of Five Estuaries Offshore Wind Farm Ltd (the Applicant) and presents the results of the Environmental Impact Assessment (EIA) for the potential impacts of the Five Estuaries Offshore Wind Farm (VE) on Onshore Hydrology, Hydrogeology and Flood Risk. Specifically, this chapter considers the potential impact of VE from the landfall, along the onshore Export Cable Corridor (ECC) and incorporating the Onshore Substation (OnSS) during the construction, operation and maintenance (O&M), and decommissioning phases.
- 6.1.2 VE is a Nationally Significant Infrastructure Project (NSIP). An ES is provided as part of a Development Consent Order (DCO) application under the Planning Act 2008.
- 6.1.3 VE is a proposed extension to the operational Galloper Offshore Wind Farm (OWF). Full details of the development proposals are set out in Volume 6, Part 1, Chapter 1: Introduction, of this ES.
- 6.1.4 This chapter has been informed by several other chapters in the ES, namely:
 - > Volume 6, Part 2, Chapter 3: Marine Water and Sediment Quality;
 - > Volume 6, Part 3, Chapter 1: Onshore Project Description;
 - > Volume 6, Part 3, Chapter 4: Onshore Biodiversity and Nature Conservation; and
 - > Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use.
- 6.1.5 This hydrology, hydrogeology and flood risk chapter:
 - > Details the existing baseline established from desk studies, dedicated surveys and consultation;
 - Outlines the potential environmental effects on hydrology, hydrogeology and flood risk arising from VE, based on the information gathered and the analysis and assessments undertaken to date and assess whether they are significant (in EIA terms);
 - Identifies any assumptions and limitations encountered in compiling the environmental information; and
 - > Highlights any necessary monitoring and/or mitigation measures which could prevent, minimise, reduce, or offset the possible environmental effects identified at the relevant stage in the EIA process.
- 6.1.6 Compensatory measures are proposed at an onshore location for Lesser Black Backed Gull (LBBG) to compensate for the predicted worst-case impacts of VE on this species in relation to Habitats Regulation Assessment. Further details of the location of these measures and an assessment of the potential impacts are available in Volume 6, Part 8: LBBG EIA.

6.2 STATUTORY AND POLICY CONTEXT

LEGISLATION AND POLICY GUIDANCE

- 6.2.1 Project design has considered technical guidance and other codes of best practice during the design phase of the development, to limit the following:
 - > Potential contamination of ground and surface waters;



- Potential flooding of the existing water environment and surrounding sensitive users;
- > Potential change to groundwater or surface water hydrology; and
- > Other potential impacts on the water environment.
- 6.2.2 VE will be developed in accordance with the following European legislation, National legislation, National and Local Planning Policy and Strategy, and other relevant guidance.

EUROPEAN LEGISLATION

- 6.2.3 The Water Framework Directive (2000/60/EC) (the WFD) provides the foundation for the protection of the UK's water environment. The WFD seeks to protect all elements of the water cycle and to enhance the quality of groundwater, surface waters, estuaries, and coastal waters. The WFD is transposed and implemented within England through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. Volume 6, Part 2, Chapter 3: Marine Water and Sediment Quality also makes reference to the WFD in assessment of the offshore water environment.
- 6.2.4 The Groundwater Directive (2006/118/EC), including amendments to Annex II detailed under Directive 2014/80/EU) (the GWD) is designed to combat groundwater pollution and sets out procedures for assessing quality of groundwater. Aspects of the GWD are transposed and implemented through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, the Environmental Permitting (England and Wales) Regulations 2016 and the Groundwater (England and Wales) Regulations 2009.
- 6.2.5 The Floods Directive (2007/60/EC) which requires assessment of all watercourses and coastlines to determine risk of flooding and action to take adequate and coordinated measures to reduce flood risk. The Flood Risk Regulations 2009 transpose the EU Floods Directive into law in England and Wales.
- 6.2.6 The revised Bathing Water Directive (rBWD) (2006/7/EC) came into force in March 2006. The rBWD has been implemented in England and Wales via the Bathing Water Regulations 2013 (as amended), with Bathing Waters classified against the standards set by the rBWD since 2015. The rBWD provides more stringent standards than the previous Directive and places an emphasis on providing information to the public.

NATIONAL LEGISLATION

- 6.2.7 The objectives of the directives discussed above that are relevant to this assessment are met through the following UK legislation, relevant to the protection of the water environment:
 - The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 transposes the WFD and aspects of the GWD into UK legislation;
 - The Environmental Permitting (England and Wales) Regulations 2016 are the main implementing regulations for the environmental permitting regime. The Environmental Permitting (England and Wales) Regulations 2016 also supersede and incorporate the Groundwater (England and Wales) Regulations 2009 which



implemented Article 6 of the GWD, detailing measures to prevent or limit inputs of pollutants into groundwater;

- The Flood Risk Regulations 2009 transposes the EU Floods Directive into UK legislation and sets out requirements of the Environment Agency (EA) and local authorities in preparing assessments and mapping of flood risk for each river basin district in England and Wales;
- The Flood and Water Management Act 2010 includes provisions for the management of risk in connection with flooding and sets out requirements for Lead Local Flood Authorities (LLFA) in preparing strategies for local flood risk management;
- The Water Resources Act 1991 regulates water resources, water quality and flood defence;
- > The Land Drainage Act 1991 sets out requirements for maintenance of watercourses by riparian owners;
- > The Environment Act 1995 sets out roles and responsibilities for the EA;
- The Private Water Supplies (England) Regulations 2016 transpose requirements of European Law on the quality of water intended for human consumption from private abstractions; and
- The Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017 set out the requirements for EIA for nationally significant infrastructure projects.

NATIONAL AND LOCAL PLANNING POLICY AND STRATEGY

- 6.2.8 Planning policy on offshore renewable energy NSIPs, specifically in relation to hydrology, hydrogeology and flood risk, is contained in the National Policy Statements (NPSs):
 - > Overarching NPS for Energy (EN-1) (DESNZ 2023);
 - > NPS for Renewable Energy Infrastructure (EN-3) (DESNZ 2023); and
 - > NPS for Electricity Networks Infrastructure (EN-5) (DESNZ 2023).
- 6.2.9 The principal guidance for the proposals is that provided by the NPSs, together with National Planning Policy Framework (NPPF) and local development plan policies, which provide additional relevant context.
- 6.2.10 The NPSs identify a number of issues relevant to this chapter. The policies of particular relevance to hydrology, hydrogeology and flood risk from NPS EN-1 and NPS EN-3 are summarised in Table 6.1 below.
- 6.2.11 Guidance in relation to renewable energy projects is provided within NPS EN-3. For offshore wind farms, this document focuses primarily on the offshore elements of the Project. In relation to flood risk, NPS EN3 refers to NPS EN-1, Section 5.8.
- 6.2.12 Guidance in relation to the scope of assessment required is provided within NPS EN-3.
- 6.2.13 Guidance specifically relating to onshore grid connections and climate change adaptation is provided in NPS EN-5. In relation to flood risk, NPS EN 5 refers to NPS EN-1, Section 5.8.



6.2.14 In November 2023, the government published revised versions of the NPS documents in reflection to the March 2023 consultation on the draft statements. Since publication, the guidance was updated in January 2024 and in through this update it has come into effect. It is expected that the statements will be reviewed every five years, which will ensure that they reflect evolving policy and legislative changes.

NATIONAL PLANNING POLICY FRAMEWORK

- 6.2.15 The National Planning Policy Framework (NPPF), prepared by the Department for Communities and Local Government was published in March 2012 and revised in December 2023. Chapter 14 of the NPPF, Meeting the challenge of climate change, flooding and coastal change, along with the Planning Practice Guidance (PPG) which expands on policies contained in the NPPF, recommends a proactive strategy to mitigate and adapt to climate change and requires that flood risk, sustainability and water quality are considered. In addition, the NPPF requires that account is taken of the potential for pollution arising from previous use of the land when determining suitability for a proposed use. NPPF (2012) informs section 5.8 Flood Risk of the Overarching National Planning Policy Statement for Energy (EN-1).
- 6.2.16 Chapter 15 of the NPPF, Conserving and enhancing the natural environment, along with guidance contained within PPG requires that account is taken of the potential for impact on water quality (in relation to water supply and the natural environment) and local hydrological regimes. NPPF informs section 5.16 Water Quality and Resources of the Overarching National Planning Policy Statement for Energy (EN-1).

TENDRING DISTRICT LOCAL PLAN 2013-2033 AND BEYOND, TENDRING DISTRICT COUNCIL, ADOPTED JANUARY 2022

6.2.17 The following policies within the Local Plan are considered relevant to the local water environment:

POLICY PPL 1: DEVELOPMENT AND FLOOD RISK

- 6.2.18 All development proposals should include appropriate measures to respond to the risk of flooding on and/ or off site. Within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the EA) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1 ha or more, development proposals must be accompanied by a Flood Risk Assessment (FRA).
- 6.2.19 All new development within Flood Zones 2 and 3 must not result in a net loss of flood storage capacity, unless there is compensation on site or, if not possible, adjacent off site capacity. Where possible opportunities should be sought to achieve an increase in floodplain storage.
- 6.2.20 All major development proposals should consider the potential for new Blue and Green Infrastructure to help mitigate potential flood risk and include such Green Infrastructure, where appropriate.
- 6.2.21 All development proposals will be considered against the NPPF's 'Sequential Test', to direct development toward sites at the lowest risk of flooding, unless they involve land specifically allocated for development on the Policies Maps or Local Maps.



6.2.22 Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs.

POLICY PPL4: BIODIVERSITY AND GEODIVERSITY

- 6.2.23 Environmentally designated sites will be protected from any development likely to have an adverse effect on their integrity. Where proposals for development are likely to significantly impact upon International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. As a minimum, there should be no significant impacts upon any protected species, including European Protected Species and schemes should consider the preservation, restoration or re-creation of priority habitats, ecological networks and the protection and recovery of protected species populations.
- 6.2.24 Proposals for new infrastructure and major development should consider the potential for enhanced biodiversity, appropriate to the site and its location, including, where appropriate, within Green Infrastructure.

POLICY PPL 5: WATER CONSERVATION, DRAINAGE AND SEWERAGE

6.2.25 All new development must make adequate provision for drainage and sewerage and should include Sustainable Drainage Systems (SuDS) as a means of reducing flood risk, improving water quality, enhancing the Green Infrastructure network and providing amenity and biodiversity benefits.

POLICY PPL 13: ARDLEIGH RESERVOIR CATCHMENT AREA.

6.2.26 Ardleigh Reservoir is surrounded by a catchment area within which certain proposals for development will be subject to consultation with the operator of the site. This may result in restrictions being imposed or planning permission being refused if the development could materially affect the quality of water draining into the reservoir.

NORTH ESSEX CATCHMENT FLOOD MANAGEMENT PLAN, ENVIRONMENT AGENCY, DECEMBER 2009:

6.2.27 The Catchment Flood Management Plan (CFMP) provides guidance on understanding the scale and extent of flooding across the region and sets policies for managing flood risk within the catchment. The search area falls largely within the "Coastal Streams" sub-area, governed by Policy 2. A small portion of the search area surrounding Little Clacton falls within the "Clacton-on-Sea" sub-area, governed by Policy 3 (Areas of low to moderate flood risk where we are generally managing existing flood risk effectively).

TENDRING DISTRICT COUNCIL STRATEGIC FLOOD RISK ASSESSMENT, TENDRING DISTRICT COUNCIL, MARCH 2009:

6.2.28 The Strategic Flood Risk Assessment (SFRA) identifies and maps flood risk at a regional scale, including consideration of residual tidal flood risk associated with a breach of defences. The SFRA provides an appraisal of flood risk in the Tendring District and presents recommendations on development and flood risk for the primary purpose of informing the Local Plan.

ESSEX AND SOUTH SUFFOLK SHORELINE MANAGEMENT PLAN 2, EAST ANGLIA COASTAL GROUP, OCTOBER 2010:

6.2.29 The Shoreline Management Plan (SMP) outlines strategy for managing flood and erosion risk along the coastline, over short, medium and long-term periods. SMP2 covers the Essex and South Suffolk coastline from Landguard Point to Two Tree Island. The hydrology, hydrogeology and flood risk study area is contained within Management Unit C, Tendring Peninsula, and the Policy Development Zones for Holland-on-Sea (PDZ C2) and Clacton-on Sea (PDZ C3). The SMP states that for PDZ C2 the current line will be held until 2055 and from this point a dual policy of either managed realignment or hold the line.

OTHER RELEVANT GUIDANCE

- 6.2.30 Relevant UK guidance on good practice for construction projects that will be referenced during assessment is detailed in the following documents:
 - Control of Water Pollution from Construction Sites (C532), Construction Industry Research and Information Association (CIRIA 2001);
 - > Environmental Good Practice on Site (C741) (CIRIA, 2015);
 - > Control of water pollution from linear construction projects (CIRIA, 2006);
 - > The EA's approach to groundwater protection, version 1.2, February 2018; and
 - > The SuDS Manual (C753) (CIRIA, 2015).
- 6.2.31 The CIRIA guidance provides help on environmental good practice for the control of water pollution arising from construction activities. It focuses on the potential sources of water pollution from within construction sites and the effective methods of preventing its occurrence.
- 6.2.32 The EA guidance is part of a wider suite of documents and guidance relating to groundwater protection which sets out principles for assessing risk, protecting groundwater, and permitting abstractions and discharges from groundwater. The full suite of documents relating to groundwater can be found on the GOV.UK website (GOV 2022).
- 6.2.33 The SuDS Manual incorporates the latest research, industry practice, and guidance for design, delivery, and maintenance of SuDS.
- 6.2.34 The relevant legislation and national planning policy for offshore renewable energy NSIPs, specifically in relation to hydrology, hydrogeology and flood risk, is outlined in Table 6.1 below.



| Legislation/ Policy | Key Provisions | Section where comment is addressed |
|---|--|--|
| Overarching National Policy Statement for Energy (NPS EN- 1) (2023) | Paragraph 4.10.13 of NPS EN-1 requires that applicants for new energy infrastructure must take into account the potential impacts of climate change using the latest UK Climate Projections available at the time, in order to ensure that appropriate mitigation or adaptation measures have been identified for the estimated lifetime of the new infrastructure. | The characterisation of the flood risk baseline and future baseline has been established using the EA Flood Map for Planning, the local authority Strategic Flood Risk Assessment (SFRA) and data from recent hydraulic models, which take into account climate change effects. This information is contained in Volume 5, Report 5.3.1: Onshore ECC Flood Risk Assessment (FRA) and Volume 5, Report 5.3.2: OnSS FRA. Flood risk has been considered for |
| | | the life of the development in Section 6.7.62 to Section 6.7.66. |
| NPS EN-1 | Paragraph 5.8.13 of NPS EN-1 requires that applications for energy projects of 1 hectare or greater in Flood Zone 1 and all energy projects located in Flood Zones 2 and 3 should be accompanied by a FRA. A FRA may also be required where there maybe flooding issues other than from rivers and the sea (for example from surface water), or where the EA, Drainage Board or other body have indicated that there may be drainage problems. The FRA should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. The minimum requirements for what should be included in a FRA are also outlined at paragraph 5.8.15 of NPS EN-1. | FRA reporting undertaken in consultation with the EA and local authorities, compliant to NPS EN- 1, paragraph 5.7.5: Volume 5, Report 5.3.1: Onshore ECC FRA. Volume 5, Report 5.3.2: OnSS FRA. |

Table 6-1 Legislation and policy context.



| Legislation/ Policy | Key Provisions | Section where comment is addressed |
|------------------------|--|---|
| NPS EN-1 | Paragraphs 5.8.18 - 5.8.19 of NPS EN-1 require applicants to hold pre-application discussions with the EA and any other relevant bodies. Any concerns regarding flood risk should be discussed and all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would alleviate concerns should be taken. | Consultation with the EA has been undertaken as part of the VE Evidence Plan (Hydrology and Flood Risk Expert Topic Group (ETG)) process, as set out in Section 6.3. |
| NPS EN-1 | Paragraph 5.8.19 of NPS EN-1 states the importance of a FRA and how it would inform the Secretary of State (SoS) to reach a decision, Paragraph 5.8.21 reiterates the importance of a sequential test as part of the site selection process and how it would minimise risk. Paragraph 5.8.25 also lists a number of appropriate SuDS mitigation strategies. | FRA reporting has been undertaken in consultation with the EA and local authorities which includes consideration of the sequential approach: Volume 5, Report 5.3.1: Onshore ECC FRA. Volume 5, Report 5.3.2: OnSS FRA includes consideration of the sequential approach. The OnSS design includes a SuDS based surface water drainage scheme which will manage rainfall runoff from the proposed OnSS and will not increase flood risk locally or in the wider area. |



| Legislation/ Policy | Key Provisions | Section where comment is addressed |
|--|--|--|
| NPS EN-1 | Paragraph 5.16.3 of NPS EN-1 requires applicants to undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment where it is considered that a project could have effects on the water environment. | The baseline environment (Section 6.7) is described for the hydrology, hydrogeology and flood risk study area. An assessment of the impacts on water quality, resources and physical characteristics is provided in Section 6.10, Section 6.11 and Section 6.12. |
| | Paragraphs 5.16.14 to 5.16.15 ask the SoS to ensure that proposals have regard for River Basin Management Plans (RBMP) and meets the requirements of the WFD. | The assessment of sensitivity for environmental receptors takes into consideration RBMPs and WFD status (Section 6.7 and Table 6.10). |
| Overarching National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2023) | Paragraph 2.6.2 of NPS EN-3 notes that where precise details of proposed developments are not known, the maximum potential adverse effects of the project should be considered. | Where options exist, the maximum footprint (referred to as the Maximum Design Scenario) has been considered within this assessment as described in Section 6.8. |
| NPS EN-3 (2023) | Paragraph 2.8.198 of NPS EN-3 states that assessment should be undertaken for all stages of the lifespan of the proposed wind farm. | Environmental assessment has been undertaken for all stages of the lifespan of the proposed wind farm at Section 6.10, Section 6.11 and Section 6.12 for the construction, operation and decommissioning stages respectively. |



| Legislation/ Policy | Key Provisions | Section where comment is addressed |
|-----------------------------|---|---|
| | Paragraph 167 of NPPF states that local planning authorities should ensure that flood risk is not increased elsewhere and where appropriate, applications should be supported by a site- specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where it can be demonstrated that: | |
| National Planning Policy | > within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; | Volume 5, Report 5.3.1: Onshore ECC FRA. |
| Framework (NPPF) (2021) | > the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; | Volume 5, Report 5.3.2: OnSS FRA. |
| | it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; | |
| | > any residual risk can be safely managed; and > safe access and escape routes are included where appropriate, as part of an agreed emergency plan. | |



| Legislation/ Policy | Key Provisions | Section where comment is addressed |
|------------------------|--|---|
| NPPF | Paragraph 169 of NPPF requires that major developments incorporate sustainable drainage systems, in line with Local Authority guidance; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits. | The potential for the proposed onshore infrastructure associated with VE to cause additional run-off is assessed within the FRA for the Onshore ECC provided in Volume 5, Report 5.3.1: Onshore ECC FRA. Volume 5, Report 5.3.2: OnSS FRA. The OnSS design will include a SuDS based surface water drainage scheme which would manage rainfall runoff and will not increase flood risk locally or in the wider area. |

6.3 CONSULTATION

- 6.3.1 Consultation is a key part of the Development Consent Order (DCO) application process. Consultation regarding hydrology, hydrogeology and flood risk has been conducted through the Evidence Plan Process (EPP), ETG meetings, the EIA scoping process (VE, 2022) and the Preliminary Environmental Information Report (PEIR) process (VE, 2023).
- 6.3.2 A Scoping Opinion for VE was sought from the SoS. The Scoping Opinion, which includes responses from the EA, Local Authorities and Anglian Water, identifies areas of the assessment methodology for further consideration.
- 6.3.3 Statutory consultation was undertaken under Section 42 of the Planning Act 2008. A PEIR was published as part of that formal consultation which provided preliminary information on hydrology, hydrogeology and flood risk within Volume 3, Chapter 6: hydrology, hydrogeology and flood risk.
- 6.3.4 Given the changes in the project design between PEIR and ES, some areas of land will be affected differently by the proposals than consulted on at PEIR. Changes were made following feedback from the PEIR consultation, increased understanding of the local environment from dedicated surveys and coordination work with the North Falls project. To comply with the requirements of the Planning Act 2008, a targeted consultation was held with those affected by the changes from 5 December 2023 to Wednesday 31 January 2024.
- 6.3.5 The baseline assessment to inform the ES was completed through a desk-study exercise, including data requests from and consultation with relevant statutory bodies. Consultation has been undertaken with the EA, Essex County Council and Tendring District Council in relation to the scope of the hydrological assessment and to discuss any specific requirements for flood mitigation measures.



- 6.3.6 An overview of the technical consultation process is presented within Volume 6, Part 1, Chapter 1: Introduction and further consultation detail is presented in the Consultation Report (Volume 5, Report 5.1). As identified in Volume 6, Part 1, Chapter 4: Site Selection and Consideration of Alternatives and Volume 6, Part 3, Chapter 1: Onshore Project Description, the Project design envelope has been refined from the design envelope presented at the PEIR stage. This refinement has been based on stakeholder consultation feedback.
- 6.3.7 A summary of the key issues raised during consultation, specific to hydrology, hydrogeology and flood risk, is outlined in Table 6.2, together with how these issues have been considered within the ES.

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|--|---|
| November 2021 Scoping Opinion | Operational effects on WFD status of ground or surface water bodies. The Scoping Report proposed to scope out operational effects as the onshore cable route and landfall will be fully reinstated following construction and thus there will be no significant change to surface land use, hydro-morphology, runoff regimes, hydrogeological recharge and no potential for pollution. On the basis that effects on surface and groundwater during construction will be assessed in the ES, the Inspectorate agreed that this matter can be scoped out of further assessment. | This comment has been addressed in Section 6.4.2. |
| November 2021 Scoping Opinion | Accidental spillages and leakages from all stages of the development proposals. The Scoping Report proposed to scope out pollution effects from accidental spillages and leakages due to the implementation of a Code of Construction Practice (CoCP) and containment at source of any potential pollutants during all stages of the project. The Inspectorate agreed that this matter can be scoped out of further assessment, subject to the ES identifying the potential sources of pollutants, the measures designed as mitigation and how these measures have been secured. Specific reference should be made to accidental releases of bentonite. | This comment has been addressed in Section 6.4.2. An outline CoCP outlining these measures has also been provided as part of the DCO application (Volume 9, Report 9.21). |
| November 2021 Scoping Opinion | Cumulative effects. The Scoping Report proposed to scope out consideration of cumulative effects from cable laying during operation. The Inspectorate agreed that this matter can be scoped | This comment has been addressed in Section 6.4.2. |

Table 6-2 Summary of consultation relating to Hydrology and Flood Risk

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|--|---|
| | out of further assessment, as there are unlikely to be significant effects once cables are installed. | |
| November 2021 Scoping Opinion | Transboundary impacts. The Scoping Report proposed to scope out transboundary effects from the onshore elements of the development proposals for hydrology and flood risk because of the localised nature of the effects. The Inspectorate agreed that this matter can be scoped out of further assessment. | This comment has been addressed in Section 6.4.2. |
| November 2021 Scoping Opinion | Baseline data. The information listed should also include groundwater vulnerability mapping as advised by the EA in their Scoping Response. | This comment has been addressed in Section 6.7. |
| November 2021 Scoping Opinion | Effects on groundwater resources. The ES should provide information on the potential disruption to groundwater flow as a result of excavations in the secondary aquifer and include an assessment if a Likely Significant Effect (LSE) could arise. | Assessed as Impact 4 in Table 6.15. A groundwater risk assessment is included at Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment. |
| November 2021 Scoping Opinion | Effects from HDD. The ES should provide information on the potential effects of HDD, including effects on hydraulic continuity and groundwater quality. If LSE could arise then an assessment of these matters should be included in the ES. | Assessment of HDD effect is included in Section 6.10. |
| November 2021 Scoping Opinion | For all HDD work the CoCP or Environmental Management Plan (EMP) should include full details of the assessment and methodologies that will be followed in order to protect the water environment. This should include the selection of the correct drilling fluid pressure to | An outline CoCP outlining these measures has also been provided as part of the DCO application (Volume 9, Report 9.21). |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|--|
| | prevent breakout, the installation of casing in a manner that will maintain existing hydraulic relationships, the need for inert drilling fluids, and the potential for clogging of the aquifer(s). There should be a monitoring plan that will allow breakouts to be identified rapidly and details of mitigation measures in the case of a significant escape. | |
| November 2021 Scoping Opinion | When determining the value of a receptor, the importance of abstractions to the individual should be considered as opposed to solely the regional or local importance of an aquifer i.e. where a groundwater abstraction is the sole source of private water supply (PWS) it should be considered of high value; no derogation of such an abstraction will be permissible without the consent of the owner. | Sensitivity of PWS is defined in Table 6.10 and a groundwater risk assessment has been undertaken for all abstractions within the study area (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment). |
| November 2021 Scoping Opinion | The potential for excavations in the shallow aquifer to cause temporary changes to groundwater flow needs to be included, and the need to assess and mitigate resulting impacts on groundwater dependent water features (shallow abstractions, watercourses, wetlands, ponds etc). The potential for HDD to cause impacts should also be included, as should the potential impacts of dewatering on proximal controlled waters receptors. | Assessment of effect on groundwater is included in Section 6.10 and a groundwater risk assessment has been undertaken for all abstractions within the study area (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment). Assessment of HDD effect is included in Section 6.10. |
| November 2021 Scoping Opinion | The applicant will need to consider the longer term management intent for the area as indicated in the Essex to South Suffolk Shoreline Management Plan (SMP). The proposed landfall location is within and area that falls within the Policy Development | The ECC FRA considered the resilience of installed infrastructure to flooding. The ECC FRA is included at Volume 5, Report 5.3.1: Onshore ECC FRA. |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|--|
| | Zone (PDZ) C2 which has a dual policy within the SMP for Epoch 3 (2055-2105) of Hold the Line/Managed Realignment. Therefore the location, construction and access/ egress to any infrastructure considered within the area will need to ensure it is adequately protected against flood risk as part of the planning stage. | |
| November 2021 Scoping Opinion | The sequential approach should be applied within the site to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is covered by Flood Zone 3, the FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest. | The sequential approach is considered in the ECC FRA and the OnSS FRA, included at Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA. |
| November 2021 Scoping Opinion | Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of the FRA and will need to be agreed with the Local Council. | The inclusion of an emergency flood plan is included at Volume 5, Report 5.3.1: Onshore ECC FRA. |
| April – May 2023 Section 42 Response | Little Bromly Parish Council raised concern regarding potential impact on the water system: drainage and water table (for wells) around Little Bromley, impact on the Tendring plateau, comment on the fragility of utility provision, use of boreholes and other irrigation systems for farms. | Assessment of effect on groundwater is included in Section 6.10 and a groundwater risk assessment has been undertaken for all abstractions within the study area (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment). |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|---|
| April – May 2023 Section 42 Response | Concerns raised regarding increased flood risk from development of the land potentially causing property flooding, given the high water table. | Assessment of flood risk is included in Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA. |
| May 2023 Section 42 Response | ECC state that further information is required to cover drainage concerns and drainage elements onsite. Details should include any temporary works (culverts) to ordinary watercourses, drainage channels for the purpose of access. Surface water management during the construction phase. The proposal should enlist the required mitigation to prevent onsite/offsite flooding. Measures taken to prevent any pollutants entering surface water or groundwater. Appropriate measures to deal with spills and leakages onsite. | Comments relating to surface water drainage is covered in Section 6.10 and Section 6.11. Surface water drainage is also discussed in the ECC FRA and the OnSS FRA, included at Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA. Comments relating to potential pollution to surface water or to groundwater is covered in Section 6.10 and Section 6.12 Comments relating to spills/leakages is scoped out as agreed in Section 6.4.2. An outline CoCP outlining best practice measures has also been provided as part of the DCO. application (Volume 9, Report 9.21). |
| May 2023 Section 42 Response | The LLFA recommends that the drainage proposal for the areas under Essex should comply with SuDS Design Guide. The proposal should assess the areas susceptible to surface water flooding and demonstrate appropriate measures to mitigate any adverse impacts during the construction phase and any implication associated with | The ECC FRA and the OnSS FRA make reference to the LLFA SuDS Design Guide and state that surface water management will be subject to approval of the LLFA. The FRA's are included at Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA. |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|---|
| | existing drainage interruption/blockage or temporary diversions. | |
| May 2023 Section 42 Response | ECC note that consultation with the LLFA is required to have section 23 consent for the areas where the project will have direct or indirect effect on drainage channels, or ordinary watercourses. | The ECC FRA and the OnSS FRA make reference to a requirement for consent from the LLFA for any works affecting ordinary watercourses. The FRA's are included at Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA. |
| May 2023 Section 42 Response | ECC note that the SMP highlights that the defences at Holland-on-Sea are under pressure and a landward realignment would create a more sustainable situation by reducing the pressure on defences and moving towards a more natural coastal frontage. The longer-term management intent for the area where landfall is proposed has a dual policy of both Hold the Line and Managed Realignment. The applicant is required to consider the implications of a managed realignment on the siting of the onshoring of the cabling and associated infrastructure, as well as the access and egress for construction and any ongoing maintenance. | The ECC FRA considered the resilience of installed infrastructure to flooding. The ECC FRA is included at Volume 5, Report 5.3.1: Onshore ECC FRA. |
| May 2023 Section 42 Response | ECC noted that the potential for damage to flood defences or surface water drainage infrastructure during construction has been scoped in for assessment (6.4.1), and it is therefore assumed that any potential impact of horizontal drilling on the integrity of the seawall will also be covered by this and included. | Comments relating to potential risk from trenchless cabling techniques is covered in Section 6.10. |
| | | |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|--|---|
| April 2023 Section 42 Response | The EA have stated that there is a lack of information in relation to the potential impacts to existing defences and how the proposed cable route would pass under the tidal defence at Holland on sea or the main river crossings. EA reviewed information at earlier consultations and were satisfied works would not have any adverse impact on the defences. However, in the absence of the detail within this consultation we cannot assume what was discussed at the Expert Topic Group is going to be delivered and therefore we will need to see more information with regard to how the cable will pass under the tidal defence at Holland Haven, this should include drawings showing depth, type of construction with evidence/calculations that this underpass will not affect the stability of the defence. | The ECC FRA makes reference to a requirement for consent from the EA for any works that cross flood defence infrastructure. The FRA is included at Volume 5, Report 5.3.1: Onshore ECC FRA. An outline Landfall Methodology has been produced which includes more information on the proposed crossing of the sea defence. This is included at Volume 9, Report 28 |
| April 2023 Section 42 Response | The EA state that there are no proposals on how the compounds [on the landward side of Holland Haven] will be protected against potential flood waters, no mitigation or contingency proposals. The EA highlight that the SMP has the policy of Hold the Line for Epoch 2 (2025-2055) but then reverts to a dual policy of Hold the Line/ Managed Realignment for Epoch 3 (2055-2105). The EA state that allowance needs to be made to account for not just the current situation, but the impacts that climate change and sea level rise will have on the flood risk area, and ensure that adequate protective measures are incorporated into any new developments. | Section 6.7 covers the resilience of the installed infrastructure and Volume 5, Report 5.3.1: Onshore ECC FRA covers potential flood response measures during construction. The ECC FRA at Volume 5, Report 5.3.1 assesses risk in relation to the existing alignment during the construction phase (within Epoch 2) and notes that following construction and reinstatement there will be no risk. |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|---|
| April 2023 Section 42 Response | The EA states that there is an assumption that the impact on coastal the defences is low from trenchless crossing works. However, there is no mention of the methodology around the depth and techniques of the Horizontal Directional Drilling (HDD). Further information is required. | Section 6.10.29 states that agreement through consent will be required to undertake works crossing, or within 8 m of flood defences or Main Rivers or within 16 m of a tidal main river. |
| April 2023 Section 42 Response | The EA notes that in the ECC FRA there is reference to the standard of protection for the tidal defences being 0.5% AEP. The EA confirm that this is for present day but this will reduce over time due to the impacts of Climate Change and Sea Level Rise. Any infrastructure within the Flood Zone will be at increased risk of flooding in the future and appropriate consideration should be given to mitigate for the future risks. This is also important given comments above in relation to uncertainty of the frontline defences being maintained in the longer term | The ECC FRA at Volume 5, Report 5.3.1 assesses risk in relation to the existing alignment during the construction phase (within Epoch 2) and notes that following construction and reinstatement there will be infrastructure present and therefore no risk. |
| April 2023 Section 42 Response | The EA notes it is under no legal obligation to undertake maintenance or improvement works, these decisions are carried out under permissive powers and subject to availability of funding. It cannot be assumed that the defences will be maintained to the current standard of protection for the future. The methodology of trenchless techniques is noted, and the impacts of these methods is unlikely to compromise the defences but as highlighted above further information will be required. We recognise that further ground investigations will inform the final construction method and it must be ensured that we are consulted on this detail. | Section 6.10.28 states that agreement through consent will be required to undertake works crossing flood defences. |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|---|---|
| April 2023 Section 42 Response | The EA state that further information is needed on how the underpass of the defence and crossing of the main rivers will be carried out assuming that these crossings will have no detrimental effect on the tidal defence structures and watercourses. Documents show three main river crossings on Holland Brook, Kirby Brook by the tidal defence and at Tendring Brook. If they are directionally drilling under the watercourses, we are satisfied but have not seen final documentation. | Section 6.10.28 states that agreement through consent will be required to undertake works crossing flood defences and Main Rivers. |
| April 2023 Section 42 Response | The EA state that the tidal defence at Holland Haven could realigned in the future so there is no guarantee that the current tidal defence arrangements would protect the transition joint bay compound or cable routes within the tidal flood risk area. We would need to see evidence this has been taken into consideration. | The ECC FRA at Volume 5, Report 5.3.1 assesses risk in relation to the existing alignment during the construction phase and notes that following construction and reinstatement there will be no risk as all infrastructure is buried and flood resilient. |
| April 2023 Section 42 Response | Although the EA's Asset Performance team are unaware of any future funding issues there is also no guarantee that funding for works to maintain the tidal defence between Holland on Sea and Frinton On sea will be available in the future. The funding for any damage repair or projects would be looked at on a case-by-case basis. | The ECC FRA at Volume 5, Report 5.3.1 assesses risk in relation to the existing alignment during the construction phase and notes that following construction and reinstatement there will be no risk. |
| April 2023 Section 42 Response | The EA note that in Table 6.12 there is mention of hydraulic breaks where gradients are significant. The EA request that the applicant consider both trench gradient and also groundwater hydraulic gradients. | Table 6-12 includes reference to hydraulic groundwater gradient as well as topographic gradient. |

| Date and consultation phase/ type | Consultation and key issues raised | Section where comment addressed |
|---|--|--|
| April 2023 Section 42 Response | The EA note the potential for breakout of bentonite and would expect measures to prevent this and manage any incidents to be included in the CoCP. | Section 6.10.62 sets out controls within the CoCP (Application Document 9.21) which will be implemented to prevent any potential release of drilling fluid (bentonite) to the water environment. |
| April 2023 Section 42 Response | EA note that shallow groundwater is identified in the baseline assessment. The EA require the applicant to consider any potential dewatering requirements and their effects on water features. Abstractions have been identified. Has the water feature survey considered the potential effects of trenchless drilling, breakout of HDD muds/bentonite breakout into these abstractions? This should be assessed. | Assessment of effect on groundwater is included in Section 6.10 and a groundwater risk assessment has been undertaken for all abstractions within the study area (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment). |
| April 2023 Section 42 Response | Consideration of temporary dewatering requirements at an early stage is essential in case background monitoring is required - if required, the EA may require consultation and time should be allowed for assessment of any licencing requirements as to not adversely impact the project timeline. | The groundwater risk assessment (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment) includes for potential groundwater monitoring following site investigations into potential abstractions identified. |

6.4 SCOPE AND METHODOLOGY SCOPE OF THE ASSESSMENT IMPACTS SCOPED IN FOR ASSESSMENT

- 6.4.1 The following impacts have been scoped into this assessment:
 - > Construction:
 - > Impact 1: Generation of turbid or polluted runoff which could enter the water environment;
 - Impact 2: Changes to surface water runoff patterns which could affect flood risk;
 - > Impact 3: Potential for damage to flood defences or surface water drainage infrastructure; and
 - Impact 4: Pollution or disruption of flow to groundwater through ground excavations or piling.
 - > Operation and maintenance:
 - Impact 5: Changes to surface water drainage at the onshore substation location.
 - > Decommissioning:
 - > Impact 6: Generation of turbid runoff which could enter the water environment.

IMPACTS SCOPED OUT OF ASSESSMENT

- 6.4.2 Based on the baseline environmental information currently available and the project description outlined in Volume 6, Part 3, Chapter 1: Onshore Project Description and in accordance with the Scoping Opinion (PINS, 2021), a number of potential impacts have been scoped out, these include:
 - > Operation and Decommissioning Phases:
 - Any impact on WFD status for assessed surface water or groundwater bodies; and
 - > Consideration of cumulative effects from the onshore cabling.
 - > All phases:
 - Accidental spillages and leakages of oils, fuel and other polluting substances which could potentially enter the water environment; and
 - Consideration of transboundary effects from the onshore elements of VE for hydrology, hydrogeology and flood risk.



STUDY AREA

- 6.4.3 The hydrology, hydrogeology and flood risk study area for the onshore elements of the VE (as described in Volume 6, Part 3, Chapter 1: Project description) extends from the mean high-water spring (MHWS) to the Grid Connection Point onshore, plus a 2 km buffer around the proposed OnSS and the Onshore ECC (including landfall, access routes and Temporary Construction Compounds (TCC) areas) as shown in Figure 6.1.
- 6.4.4 The Onshore ECC and OnSS arrangement have been designed in co-ordination with the adjacent North Falls offshore wind farm (NF) project, and the onshore cable routes of the two projects will run immediately adjacent. Moreover, the OnSS for VE and NF have been co-located in the same location to the west of Little Bromley. Further detail on the coordination between the two projects is included in Volume 6, Part 3, Chapter 1: Onshore Project Description.
- 6.4.5 The Onshore ECC will be approximately 22 km, but installed in cable lengths of up to 500 m from the landfall compound to the proposed National Grid connection point at the East Anglia Connection Node (EACN). A maximum design scenario length of 24.5 km of onshore cabling has been included to allow for micrositing within the Onshore ECC. A 2 km buffer around the OnSS, the Onshore ECC, TCCs and associated off route haul roads have been used as the hydrology, hydrogeology and flood risk study area in this assessment. The study area extends a short distance along the Essex coastline from Holland-on-Sea in the south-west to Frinton-on-Sea, and approximately 20 km inland in a north-westerly direction, following the general direction of Holland Brook, towards Ardleigh and the River Stour. The Office for National Statistics suggests that there are no "Built up Areas" in the Onshore ECC and OnSS search area boundary. The hydrology, hydrogeology and flood risk study area includes smaller settlements including Walton-on-the-Naze, Little Clacton, Thorpe-le-Soken and Bromley Cross.
- 6.4.6 The DCO boundary has been separated into seven sections which are as follows:
 - Route Section 1 Landfall between Holland-on-sea and Frinton-on-sea including beach access onto Manor Way, extending to the Eastern Mainline (Sunshine Coast Line) railway spur;
 - Route Section 2 Continues north from the Sunshine Coast Line railway spur to the west of Kirby Cross across agricultural fields towards the B1033 (Thorpe Road).
 - Route Section 3 Passes north of the B1033 (Thorpe Road) and the B1034 (Sneating Hall Lane) then continues north-west through agricultural land around Thorpe Le Soken crossing Landermere Road, Golden Lane towards the intersection of Thorpe Road/ Swan Road;
 - Route Section 4 Continues northwards from the Thorpe Road/ Swan Road junction, through agricultural fields to the east of Tendring village, passing to the east of Tendring Heath towards the A120 (Harwich Road). This section is divided into Section 4A (south of Tendring Brook) and 4B (north of Tendring Brook);
 - > Route Section 5 Extends north from the A120 (Harwich Road) to Bentley Road;
 - Route Section 6 Extends from Bentley Road, crossing Payne's Lane, Spratts Lane and Barlon Road to the crossing of Ardleigh Road; and



- > Route Section 7 Extends north from the crossing of Ardleigh Road to the proposed location of the OnSS and National Grid substation.
- 6.4.7 A 2 km offset buffer distance is considered appropriate for data collection and assessment taking into account the nature of the development and likely zone of influence on hydrological receptors, including upstream and downstream catchments that are in hydrological continuity with the DCO order limits. The hydrology, hydrogeology and flood risk study area and available data have been discussed and agreed with stakeholders and includes receptors downstream of the onshore elements of VE which are considered to be in hydraulic continuity within the DCO order limits.





6.4.8 The hydrology, hydrogeology and flood risk study area has been refined and amended in response to the refinement of the Onshore ECC, confirmed location of the OnSS and landfall, feedback from consultees, and/ or the identification of additional constraints (environmental and/ or engineering) including hydraulic conductivity within the hydrology, hydrogeology and flood risk study area.

DATA SOURCES

BASELINE DATA

- 6.4.9 Baseline data relevant to hydrology, hydrogeology and flood risk has been sourced from publicly available information and opensource data from a range of sources. The data review includes assessing the following:
 - > EA data and data.gov.uk:
 - > Flood Zone mapping;
 - > Spatial flood defence data and mapping;
 - > Flood warning and flood alert areas;
 - > Main Rivers;
 - > Ordinary watercourses;
 - > Groundwater Source Protection Zones (SPZ); and
 - > Water Framework Directive (WFD) surface water and groundwater classification data.
 - > British Geological Survey (BGS) Mapping:
 - > Geology (artificial ground, superficial deposits, bedrock);
 - > Borehole/ well data;
 - > Aquifer designation; and
 - > Groundwater Vulnerability.
 - > Defra's MAGIC website/ Natural England:
 - > Statutory and non-statutory environmental designations.
 - > Cranfield Soil and Agrifood Institute Soilscapes map viewer:
 - > Soil type and character.
 - > Essex County Council and Tendring District Council:
 - > Local Flood Risk Management Strategy;
 - Shoreline Management Plan SMP8 (Landguard Point to Two Tree Island); and;
 - > Strategic Flood Risk Assessment.
 - > Channel Coastal Observatory:
 - > Anglian Coastal Monitoring data and reporting.



- Past planning applications and reporting for other similar local schemes in the area. It is acknowledged that these reports will be specific to cable corridors for other projects and infrastructure locations and as such time may have elapsed since their completion.
- 6.4.10 Targeted data requests and consultation with a number of stakeholders and regulatory bodies have been submitted. The information requested includes:
 - > Environment Agency:
 - Flood modelling and mapping, flood defence asset information and flood event history;
 - Catchment data for the operational surface water catchments of Colne Essex and Stour relating to water quality and WFD classification;
 - Catchment data for the Essex Gravels groundwater catchment relating to water quality and WFD classification;
 - > Coastal management data; and
 - Licensed abstractions or water users including data supporting groundwater Source Protection Zone (SPZ) designations.
 - > Essex County Council/ Tendring District Council:
 - > Registered private water supplies;
 - > Shoreline monitoring data;
 - Sustainable drainage guidance to meet Lead Local Flood Authority (LLFA) requirements; and
 - > Local flood event history.
 - Review and survey of public or private water supply (PWS) abstraction from Envirocheck.

DESIGNATED SITES

6.4.11 There are a small number of environmentally designated sites (Ramsar; Special Area of Conservation (SAC); Special Protection Area (SPA); Site of Special Scientific Interest (SSSI); Local Nature Reserves (LNR)) within the hydrology, hydrogeology and flood risk study area. Holland Haven SSSI and LNR are within the DCO order limits. There are no Ramsar sites, SAC, or SPA located within the DCO order limits, however a number of sites with potential hydraulic connection to the site have been identified within the 2 km study area. This is summarised in Table 6.3.

| Site | Closest Distance to VE | Feature or Description |
|--|---|---|
| International | | |
| Hamford Water Ramsar | Not within DCO order limits. Within and downstream of north-east boundary of the study area. | Site for nationally and internationally important numbers of wintering and nesting waterbirds, and refuge for migratory waterbirds. |
| Stour and Orwell Estuaries Ramsar | Not within DCO order limits. Approximately 1.1 km north of the study area at Manningtree. | Extensive mudflats, low cliffs, saltmarsh, and areas of vegetated shingle, supports internationally and nationally important numbers of wintering wildfowl and waders, nationally scarce plants and invertebrates. |
| Colne Estuary (Mid-Essex Coast Phase 2) Ramsar | Not within DCO order limits. Approximately 5.3 km south west of the study area at Brightlingsea. | International importance for wintering Brent Geese <i>Branta bernicla bernicla</i> and Black-tailed Godwit <i>Limosa limosa</i> ; national importance for breeding little terns and other species of wintering waders and wildfowl. |
| Hamford Water SPA | Not within DCO order limits. Within and downstream of the north-east boundary of the study area. | Site for nationally and internationally important numbers of wintering and nesting waterbirds, and refuge for migratory waterbirds. |
| Stour and Orwell Estuaries SPA | Not within DCO order limits. Approximately 1.1 km north of the study area at Manningtree. | Extensive mudflats, low cliffs, saltmarsh, and areas of vegetated shingle, supports internationally and nationally important numbers of wintering wildfowl and waders, nationally scarce plants and invertebrates |
| Colne Estuary (Mid-Essex Coast Phase 2) SPA | Not within DCO order limits. Approximately 5.3 km south west of the study area at Brightlingsea. | International importance for wintering Brent Geese <i>Branta bernicla bernicla</i> and Black-tailed Godwit <i>Limosa limosa</i> ; national importance for breeding little terns and other species of wintering waders and wildfowl. |

Table 6-3: Statutory designated sites with relevance to hydrology, hydrogeology and flood risk.

| Site | Closest Distance to VE | Feature or Description |
|--|--|---|
| Hamford Water SAC | Not within DCO order limits. Within and downstream of the north-east boundary of the study area. | The SAC is within the boundary of Hamford Water SPA and Hamford Water Ramsar, important habitat for Fisher's estuarine moth <i>Gortyna borelii lunata</i> . |
| Essex Estuaries SAC | Not within DCO order limits. Approximately 5.3 km south west of the study area at Brightlingsea. | Estuaries; mudflats and sandflats not covered by seawater at low tide; Salicornia and other annuals colonizing mud and sand; Spartina swards Spartinion maritimae; Atlantic salt meadows Glauco-Puccinellietalia maritimae; Mediterranean and thermo-Atlantic halophilous scrubs Sarcocornetea fruticosi. |
| National | | |
| Holland Haven Marshes SSSI | Within DCO order limits and study area. | Located in the lower reaches of Holland Brook, downstream of the Eastern Mainline railway spur, is a 208.8 ha biological SSSI providing important habitat for nationally scarce aquatic plant species, botanically important grasslands and rare invertebrates. |
| Weeleyhall Wood Nature Reserve SSSI | Not within DCO order limits. Approximately 250 m south- west of the study area at Weeley Heath. | Located in the mid to lower end of the search area, is a 32 ha woodland habitat protecting vulnerable flora and fauna. |
| Riddles Wood SSSI | Not within DCO order limits. Approximately 4.1 km south- west of the study area, east of Brightlingsea. | A 37.3 ha biological SSSI, ancient oak-hazel, oak-hornbeam, chestnut coppice, with rich and varied ground flora. |
| Hamford Water SSSI | Not within DCO order limits. Within and downstream of north-east boundary of the study area. | A site for nationally and internationally important numbers of wintering and nesting waterbirds, and refuge for migratory waterbirds. |
| Stour and Copperas Woods Ramsey SSSI | Not within DCO order limits. Approximately 3.5 km north- east of the study area at Wrabness. | A 77.1 ha biological SSSI, ancient coppice woodland with a coppice-with- standards structure containing the only example in the county where coastal and woodland habitats meet. |

| Site | Closest Distance to VE | Feature or Description |
|--|---|---|
| Cattawade Marshes SSSI | Not within DCO order limits. Approximately 1.1 km north of the study area at Manningtree. | A 82.2 ha biological SSSI, grazing marshes with associated open water and fen habitats. |
| Bullock Wood SSSI | Not within DCO order limits. Approximately 3.1 km west of the study area. | A 23.3 ha biological SSSI, ancient coppice-with-standards woodland with a wide range of tree species. |
| Wivenhoe Gravel Pit SSSI | Not within DCO order limits. Approximately 3.4 km south west of the study area. | A 2.1 ha geological SSSI with exposed sediments of interglacial origin interbedded with early Thames gravels. |
| Stour Estuary SSSI Not within DCO order limits. Approximately 1.25 km north of the study area at Manningtree. | | A 2,523 ha biological and geological SSSI, important for wintering wildfowl, coastal saltmarsh, sheltered muddy shores, two scarce marine invertebrates and a vascular scarce plant assemblage. |
| Colne Estuary SSSI | Not within DCO order limits. Approximately 5.3 km south west of the study area at Brightlingsea. | A 2,915 ha biological and geological SSSI, important for wintering wildfowl and breeding, with areas of foreshore of geological interest. |
| Holland Haven LNR | Within DCO order limits and study area. | 22.1 ha LNR forming part of the wider SSSI. |



ASSESSMENT METHODOLOGY

- 6.4.12 There are no published guidelines or criteria for assessing and evaluating effects on hydrology within the context of an EIA. The proposed assessment will therefore be based on a methodology derived from the Institute of Environmental Management and Assessment (IEMA) guidance. The methodology sets out a list of criteria for evaluating the environmental effects and is outlined in Volume 6, Part 1, Chapter 3: Environmental Impact Assessment Methodology.
- 6.4.13 The terms used to define sensitivity and magnitude of impacts are based on those used in the Design Manual for Roads and Bridges (DMRB) methodology (DMRB 2020). This covers drainage and the water environment.
- 6.4.14 Professional judgement and a qualitative risk assessment methodology has been used to assess the findings in relation to each of these criteria to give an assessment of significance for each potential impact.
- 6.4.15 As an impact assessment, this chapter does not explicitly consider the risk of flooding to VE but does consider how the proposals may alter flood risk at the Onshore ECC and within the OnSS and elsewhere. The flood risk to the VE is considered separately in Volume 5, Report 5.3.1: Onshore ECC FRA; and Volume 5, Report 5.3.2: OnSS FRA.
- 6.4.16 A qualitative risk assessment methodology has been used to assess the significance of the potential effects associated with VE. Two factors have been considered using this approach: the sensitivity of the receiving environment and the potential magnitude of impact, should that potential impact occur. This approach provides a mechanism for identifying the areas where site specific mitigation measures are required and for considering the effectiveness of mitigation measures proposed to manage the risk presented by VE. This approach also allows effort to be focused on reducing risk where the greatest benefit may result.
- 6.4.17 Effects assessed as minor adverse or less would be considered not significant in terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. If the assessment results in moderate or major adverse effects, then this effect would be considered to be significant in EIA terms.
- 6.4.18 This approach provides a mechanism for identifying the areas where site specific mitigation measures will be required and for identifying mitigation measures appropriate to the risk presented by the development proposals. This approach also allows effort to be focused on reducing risk where the greatest benefit may result.
- 6.4.19 The approach to assessment and data gathering will be agreed through liaison with relevant bodies prior to commencement and consultation will be undertaken at key stages throughout the EIA process.

6.5 ASSESSMENT CRITERIA AND ASSIGNMENT OF SIGNIFICANCE

6.5.1 Determination of the criteria for significance of effects is a two stage process that involves defining the sensitivity of the receptors and the magnitude of the impacts on those receptors. This section describes the criteria applied in this chapter to assign values to the sensitivity of receptors and the magnitude of potential impacts. Unless stated otherwise the terms used to define sensitivity and magnitude are based on those used in the DMRB guidance.



6.5.2 The criteria for sensitivity used in this chapter are outlined in Table 6.4 below. Whilst a sensitivity category of 'very high' is proposed as a potential category for sensitivity criteria within the DMRB methodology, for the purposes of the assessment of hydrology, hydrogeology and flood risk effects, the categories within the range of 'high' to 'negligible' are considered to appropriately cover the potential receptors. Where a receptor could be placed within more than one category of value, professional judgement has been applied to determine which category is appropriate.

| Receptor sensitivity/ importance | Definition | Receptor |
|--|---|--|
| | | Watercourses or water bodies of good chemical status/ high ecological status and/ or high quality targets under the WFD. |
| | | Watercourses or water bodies draining through environmentally designated areas of international importance. |
| | | Watercourses or water bodies supporting highly sensitive abstractions. |
| High | High importance and rarity, international level and limited | Watercourses, water bodies or floodplain with a designation for ecological/ conservation value. |
| 1 light | potential for substitution. | Development classified as 'highly vulnerable' to flood risk (under NPPF). |
| | | Narrow floodplain where a small increase in volume results in a relatively large increase in flood levels. |
| | | Public potable water supply from either surface or groundwater source. |
| | | Aquifer is a Principal Aquifer providing regionally important potable water supply and classified as SPZ. |

Table 6-4: Sensitivity/importance of the environment.

| Receptor sensitivity/ importance | Definition | Receptor | | | |
|--|--|--|--|--|--|
| | Medium importance and rarity, national or regional level, limited potential for substitution | > Watercourses or water bodies of good chemical status/ moderate to good ecological status and/ or moderate to high quality targets under the WFD. | | | |
| | | Watercourses or water bodies draining through environmentally designated areas of national importance. | | | |
| | | Watercourses or water bodies supporting moderately sensitive abstractions. | | | |
| Medium | | Development classified as 'more vulnerable' to flood risk (under NPPF). | | | |
| | | > Private Water Supply (PWS) for potable use or non-drinking water abstraction for agricultural use from either surface or groundwater source. | | | |
| | | Aquifer is a Principal or Secondary A Aquifer not designated as SPZ. | | | |
| | | > Bathing water monitored water body. | | | |

| Receptor sensitivity/ importance | Definition | Receptor |
|--|--|---|
| | | > Watercourses or water bodies with a chemical water quality status classed as fail or an ecological water quality status classed as poor and/ or moderate quality targets under the WFD. |
| | | > Watercourses or water bodies of local importance. |
| Low | Low importance and rarity, local or district level | Watercourses or water bodies supporting abstractions of limited sensitivity. |
| | | > Receptors classified as 'less vulnerable' to flood risk (under NPPF). |
| | | > Wide floodplain where a large increase in volume results in a small increase in flood levels. |
| | | > Aquifer is a Secondary A or Secondary B Aquifer. |
| | Very low importance and rarity, local level | > Watercourses or water bodies with a chemical water quality status classed as fail and an ecological water quality status classed as poor and/ or low-quality targets under the WFD. |
| Negligible | | > Watercourses or water bodies of limited local importance. |
| | | > Watercourses or water bodies supporting no recorded abstractions. |
| | | > Non-productive geology in terms of groundwater resource. |

6.5.3 The criteria for magnitude of Impact used in this chapter are outlined in Table 6.5 below.

| Table 6-5: Impact magnitude definitio | ns |
|---------------------------------------|----|
|---------------------------------------|----|

| Magnitude | Description/ reason | | | | |
|-----------|--|--|--|--|--|
| | > Long term or permanent loss of resource and/or quality and integrity of resource; likely to cause exceedance of statutory objectives and/or breaches of legislation; severe damage to key characteristics, features or elements (Adverse). | | | | |
| High | Large scale or major improvement of resource quality; extensive restoration or enhancement; major long-term improvement of attribute quality (Beneficial). | | | | |
| | Changes to land within the site boundary resulting in an increase in runoff with flood potential and also significant changes to erosion and sedimentation patterns. | | | | |
| | Major changes to groundwater levels, flow regime and risk of groundwater flooding. | | | | |
| | > Loss of resource, but not adversely affecting the overall integrity; partial loss of/damage to key characteristics, features or elements with/without exceedance of statutory objectives or with/without breaches of legislation (Adverse). | | | | |
| Medium | Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality (Beneficial). | | | | |
| | > Moderate changes to erosion and sedimentation patterns. | | | | |
| | Moderate changes to groundwater levels, flow regime and risk of groundwater flooding. | | | | |
| | Some measurable change in attributes, quality or vulnerability; reversible or minor loss of, or alteration to, one (maybe more) key characteristics, features or elements (Adverse). | | | | |
| Low | > Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring (Beneficial). | | | | |
| | > Minor changes to erosion and sedimentation patterns. | | | | |
| | Minor changes to groundwater levels, flow regime and risk of groundwater flooding. | | | | |



| Magnitude | Description/ reason |
|------------|---|
| | > Very minor or no loss or detrimental alteration to one or more characteristics, features or elements; impact of insufficient magnitude to affect the use/integrity (Adverse). |
| Negligible | Very minor or no benefit to or positive addition of one or more characteristics, features or elements; impact of insufficient magnitude to affect the use/integrity (Beneficial). |
| | No alteration or very minor changes with no impact to watercourses, hydrology, hydrodynamics, erosion and sedimentation patterns. |

- 6.5.4 The significance of the effect upon hydrology, hydrogeology and flood risk is determined by correlating the potential magnitude of the impact and sensitivity of the receptor, as defined in the matrix presented at Table 6.6. This approach uses the term "beneficial" for an advantageous or positive effect on an environmental resource or receptor or "adverse", for a detrimental or negative effect on an environmental resource or receptor. Where a range of significance is presented in Table 6.6, the final assessment for each effect is based upon expert judgement.
- 6.5.5 Adverse effects of moderate and above are considered significant in EIA terms. All beneficial effects and adverse effects below moderate are not considered significant in EIA terms. The broad definitions of the terms used are set out in Volume 6, Part 1, Chapter 3: Environmental Impact Assessment Methodology.

| | | | Sensitivity | | | | |
|-----------|------------|------------|-------------|------------|------------|------------|--|
| | | | High | Medium | Low | Negligible | |
| | | High | Major | Major | Moderate | Minor | |
| | Adverse | Medium | Major | Moderate | Minor | Negligible | |
| lde | | Low | Moderate | Minor | Minor | Negligible | |
| Magnitude | Neutral | Negligible | Minor | Negligible | Negligible | Negligible | |
| Mag | | Low | Moderate | Minor | Minor | Negligible | |
| | Beneficial | Medium | Major | Moderate | Minor | Negligible | |
| | | High | Major | Major | Moderate | Minor | |

Table 6-6: Matrix to determine effect significance.

Note: Effects of 'moderate' significance or greater are defined as significant with regards to the EIA Regulations 2017.



6.6 UNCERTAINTY AND TECHNICAL DIFFICULTIES ENCOUNTERED

- 6.6.1 The assessment is based on publicly available data obtained from the EA, Essex County Council and Tendring District Council and commercial data supply companies, as well as additional information supplied from stakeholders during the scoping and consultation stages.
- 6.6.2 The assessment is limited by a lack of detailed information on:
 - > Flow data for all watercourses and drainage channels; and
 - > Water quality data for specific locations.
- 6.6.3 Overall, a moderate to high level of certainty has been applied to the study. Where available, catchment data regarding water quality has been used to inform the assessment, with a hydrological site walkover undertaken which included all Main River crossings within the hydrology, hydrogeology and flood risk study area. The information accessible in order to complete the assessment is considered sufficient to establish the baseline within the VE onshore hydrology, hydrogeology and flood risk study area, therefore, there are no data limitations that would affect the conclusions of this assessment.
- 6.6.4 The Maximum Design Scenario (MDS) data identified in Section 6.8 have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. These scenarios have been selected from the details provided in the project description (Volume 6, Part 3, Chapter 1: Onshore Project Description and Volume 6, Part 2, Chapter 1: Offshore Project Description). Effects of greater significance are not predicted to arise should any other development scenario to that assessed here be taken forward in the final design scheme, within the assessed boundaries.

6.7 EXISTING ENVIRONMENT

- 6.7.1 This section provides a general description of the hydrological and hydrogeological resources, flood risk and defines potential environmental receptors within the hydrology, hydrogeology and flood risk study area. Observations from the hydrology characterisation survey and desk study have been included where relevant.
- 6.7.2 The Onshore ECC has been broken down into a number of route sections (detailed in paragraph 6.4.6) which describe the route in relation to significant local features.

GENERAL DESCRIPTION AND LAND USE

- 6.7.3 Land use within the DCO order limits and the wider hydrology, hydrogeology and flood risk study area is predominantly agricultural, passing the northern outskirts of Thorpe-le-Soken and situated between the villages of Little Bromley, Tendring Heath and Great Holland. The ECC extends north-west from landfall, roughly parallel to and north of Holland Brook. Tendring Brook crosses through the ECC to the north of Tendring village and continues south-west draining into Holland Brook. Kirby Brook meanders parallel to the coastline crossing the entire width of the southernmost section of the Onshore ECC.
- 6.7.4 Land to the west of Holland-on-sea is also built up from the larger town of Clactonon-Sea. Land to the north of Frinton-on-sea is a mixture of agricultural and the smaller towns of Walton-on-the-Naze and Kirby-le-Soken.

SECTION 1 - LANDFALL TO THE EAST COAST MAIN LINE SPUR (SUNSHINE COAST LINE) RAILWAY

- 6.7.5 The coastal area of the proposed landfall at Sandy Point is between the towns of Holland-on-sea and Frinton-on-Sea. There are pedestrian walkways adjacent to the coast in the form of a promenade.
- 6.7.6 Holland Haven Marshes SSSI extends parallel to the coast along the hydrology, hydrogeology and flood risk study area. Frinton Golf Course is to the north-east of the site. A water treatment plant is located to the north of Manor Way, immediately south-west of the ECC, adjacent to Holland Haven Country Park.
- 6.7.7 Man-made sea-defences are present along the coast including engineered high ground, Frinton promenade embankment, groynes and Princes Esplanade Wall.

SECTION 2 - LAND NORTH OF THE SUNSHINE COAST LINE RAILWAY TO THE B1033 (THORPE ROAD)

6.7.8 Comprises land to the west of Kirby Cross and the main land use is agricultural.

SECTION 3 - LAND NORTH OF THE B1033 (THORPE ROAD) TO THE INTERSECTION OF THORPE ROAD/ SWAN ROAD

- 6.7.9 Covers the south of Tendring, the east of Weeley, Thorpe le Soken, the southern section of Landermere and Beaumont which are small towns. The ECC within this section is predominantly comprised of agricultural land.
- 6.7.10 Beaumont Cut crosses into the 2 km VE hydrology, hydrogeology and flood risk study area just north of Golden Lane in Thorpe le Soken.

SECTION 4 - LAND NORTH OF THE INTERSECTION OF THORPE ROAD/ SWAN ROAD TO THE A120 (HARWICH ROAD)

- 6.7.11 This section covers Little Bentley, Tendring Heath, Tendring Green and Stones Green. Wolves Hall Airstrip is present approximately 5 km from the southern boundary of this section at Thorpe Road. Small residential neighbourhoods are scattered across this area, with agricultural land being the majority land use of this section.
- 6.7.12 Tendring Brook crosses from south to north just southwards of Logs Lane. This section is divided into Section 4A (south of Tendring Brook) and 4B (north of Tendring Brook).
- SECTION 5 LAND NORTH OF THE A120 (HARWICH ROAD) TO BENTLEY ROAD
- 6.7.13 This section is located to the south east of Little Bromley, crossing predominantly agricultural land. This section also crosses the upper reach of Holland Brook at Abbotts Hall Farm.

SECTION 6 - LAND WEST OF BENTLEY ROAD TO ARDLEIGH ROAD CROSSING

6.7.14 This section is located to the south west of Little Bromley, crossing predominantly agricultural land. Spratts Lane approximately forms the watershed point between the Holland Brook catchment (east) and the Tenpenny Brook catchment (west).



SECTION 7 - LAND NORTH OF ARDLEIGH ROAD CROSSING TO THE ONSS

6.7.15 The OnSS area is primarily surrounded by farmland. The hydrology, hydrogeology and flood risk study area boundary borders an industrial estate with a sand, gravel quarry to the west. To the north west of the OnSS greenhouse polytunnel businesses are clustered between Harwich Road and Hundgerdown Lane. Further west of the hydrology, hydrogeology and flood risk study area, beyond Ardleigh village, Ardleigh reservoir and treatment plant is present.

HYDROLOGICAL SETTING

- 6.7.16 The proposed landfall site is located at Sandy Point, between Holland Haven and Frinton-on-Sea, on the coastline between Holland-on-Sea and Frinton-on-Sea. The North Sea borders this section of the coastline.
- 6.7.17 The hydrology, hydrogeology and flood risk study area includes a number of catchments associated with EA statutory Main Rivers and ordinary watercourses. Definitions of these hydrological features are provided below, and their locations are identified in Figure 6-2.
 - Main Rivers watercourses where the EA has permissive powers over their management; and
 - Ordinary watercourses includes rivers, streams, ditches, drains which do not form part of a Main River, and which are managed by Essex County Council. Essex County Council are the Lead Local Flood Authority (LLFA) for the local area.
- 6.7.18 EA statutory Main Rivers include:

HOLLAND BROOK

6.7.19 Holland Brook is a Main River draining a catchment size of 54.9 km² which rises in Little Bromley and flows south eastwards past the towns of Tendring, Weeley and Little Clacton to its mouth at Holland-on-Sea. Further upstream Holland Brook receives inflows from the statutory Main Rivers and tributaries of Tendring Brook, Weeley Brook, Parker's Ditch and Kirby Brook. This river predominantly flows through rural, arable and grassland land-uses and passes beneath the Colchester to Walton-on-the-Naze railway line at Thorpe-le-Soken, and at a point approximately 1.8 km west of Great Holland, along the Colchester to Clacton-on-Sea section of the line.

KIRBY BROOK

6.7.20 Kirby Brook is a Main River draining an upstream catchment size of 6.56 km² which rises in farmland south of Kirby Cross village and is a tributary of Holland Brook. Kirby Brook flows south-east towards the coastline south of Frinton-on-Sea, where it then runs southwards parallel to the coastline to its confluence with Holland Brook at Holland-on-Sea, immediately upstream of Holland Sluice. The Onshore ECC intersects the lower reach of Kirby Brook at the point where it passes through Holland Haven Country Park to its confluence with Holland Brook. The river flows through a mix of land uses, from agricultural land at its source to the edge of Frinton-on-Sea's residential neighbourhood and the remainder of the watercourse flows through Frinton Golf Course and Holland Haven Marshes SSSI site, bordering the coastline.



TENDRING BROOK

6.7.21 Tendring Brook is a Main River draining an upstream catchment size of 9.81 km² and a tributary of Holland Brook. Tendring Brook flows from farmland to the north-east of Tendring towards the south where it meets its confluence with Holland Brook south of Hillhouse Lane. The river runs through rural agricultural land. The Onshore ECC crosses Tendring Brook within woodland to the north-east of Tendring.

BEAUMONT CUT

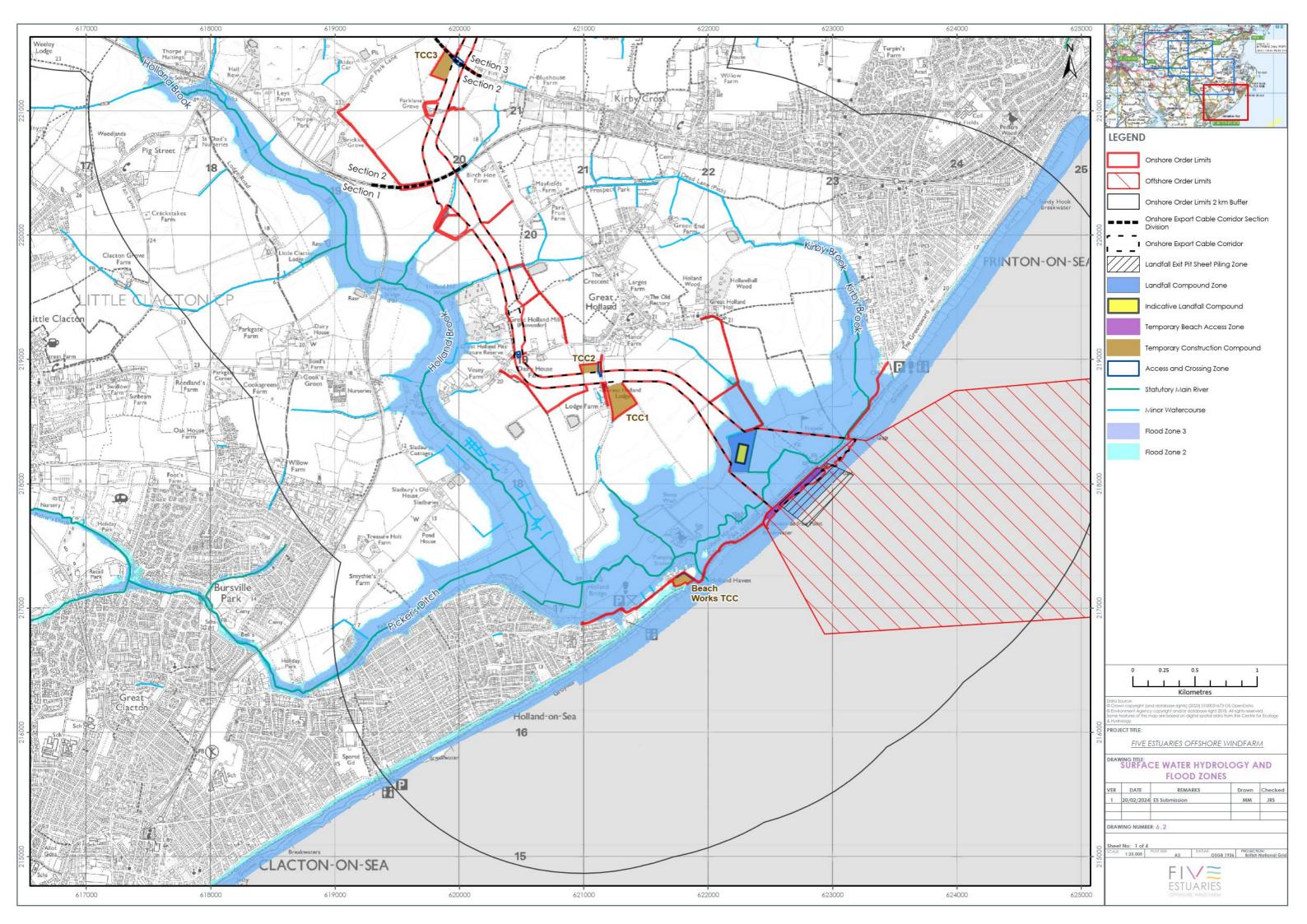
6.7.22 Beaumont Cut is designated as a Main River from a point approximately 150 m northeast of the Onshore ECC and drains an upstream catchment of 3.19 km². The river flows eastwards into the 7.78 ha coastal embayment of Hamford Water National Nature Reserve. This reserve consists of marsh, mud flats and sand. The Onshore ECC does not intersect the Main River reach of this river; however, the headwaters do extend onto land within the ECC, immediately south of Swan Road.

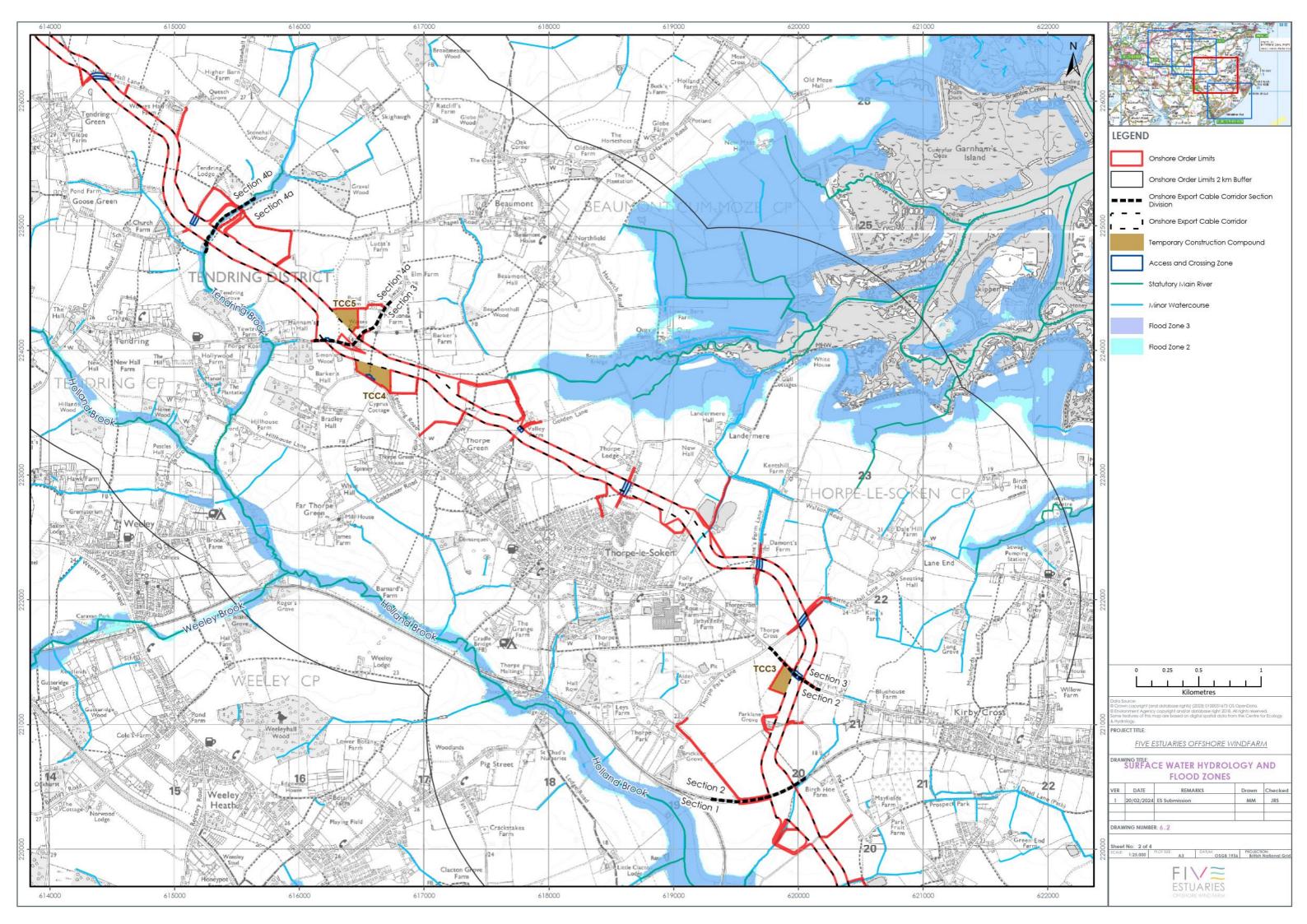
NON-MAIN RIVER WATERCOURSES

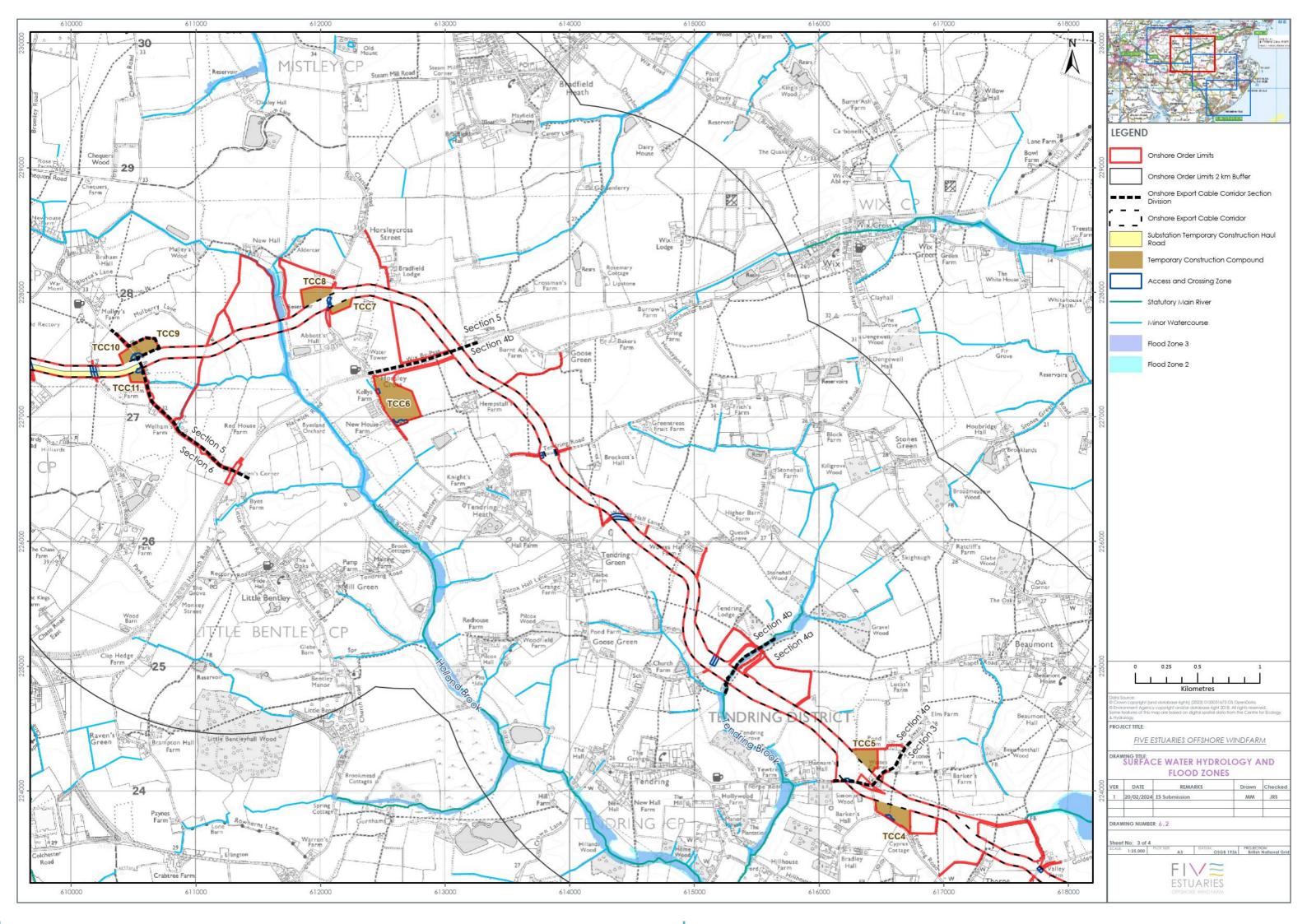
- 6.7.23 The hydrology and flood risk study area crosses several existing field drains, ditches and irrigation channels. Most of the surface water channels crossed are ordinary watercourses and form tributaries to the Main River watercourses detailed above. The exception to this is land to the north-west of the ECC, north of Great Bromley. This land is drained by tributaries of Tenpenny Brook which flow south from the OnSS area and Onshore ECC, joining Tenpenny Brook at Great Bromley. Tenpenny Brook continues south, draining into Colne Estuary approximately 10 km downstream of the ECC.
- 6.7.24 Surface water features are detailed in Figure 6-2.

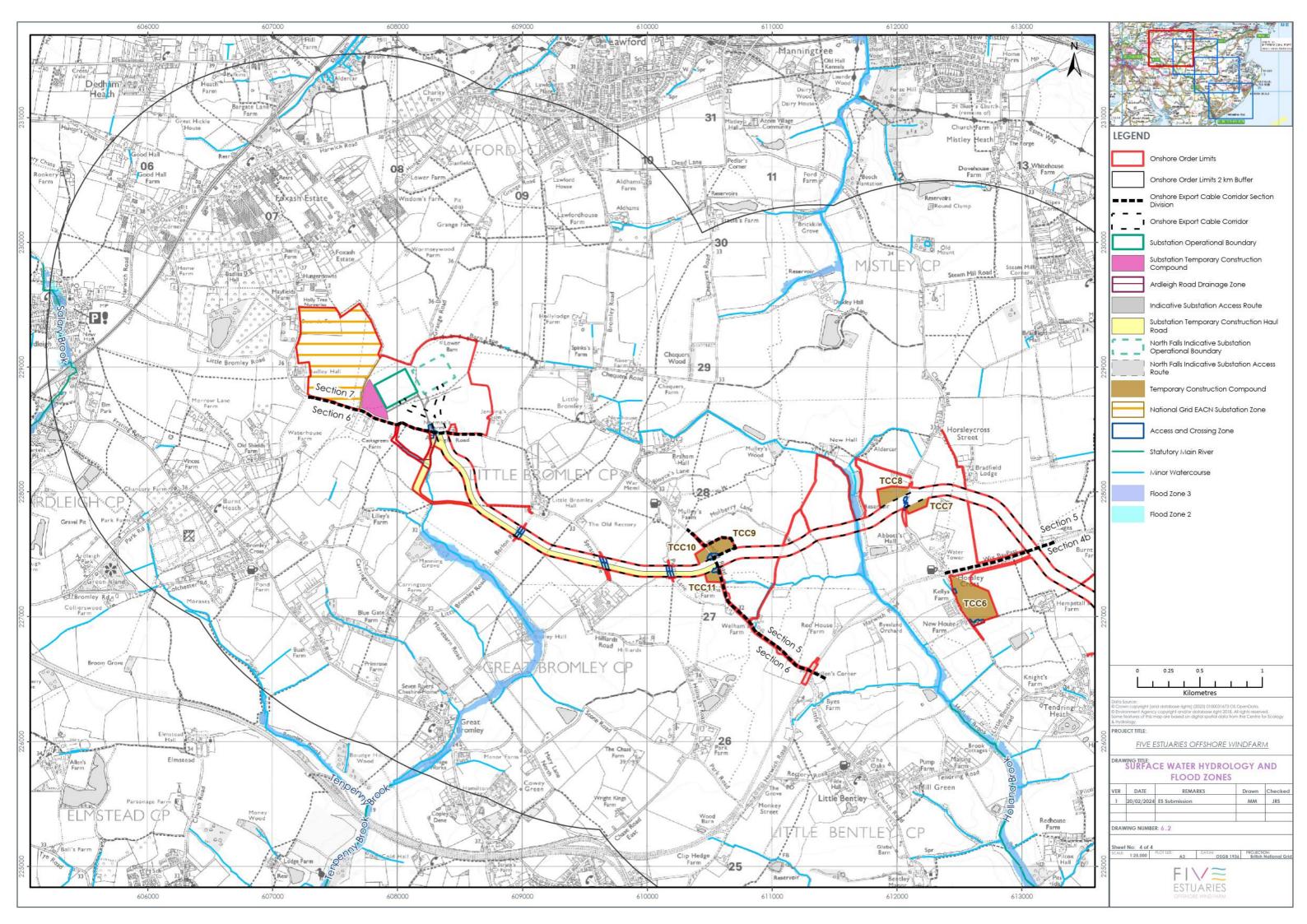
WATERCOURSE SENSITIVITY

6.7.25 Sensitivities have been assigned to all watercourses within the hydrology, hydrogeology and flood risk study area as defined in Table 6.10.











GEOLOGICAL AND HYDROGEOLOGICAL SETTING AND GROUND CONDITIONS

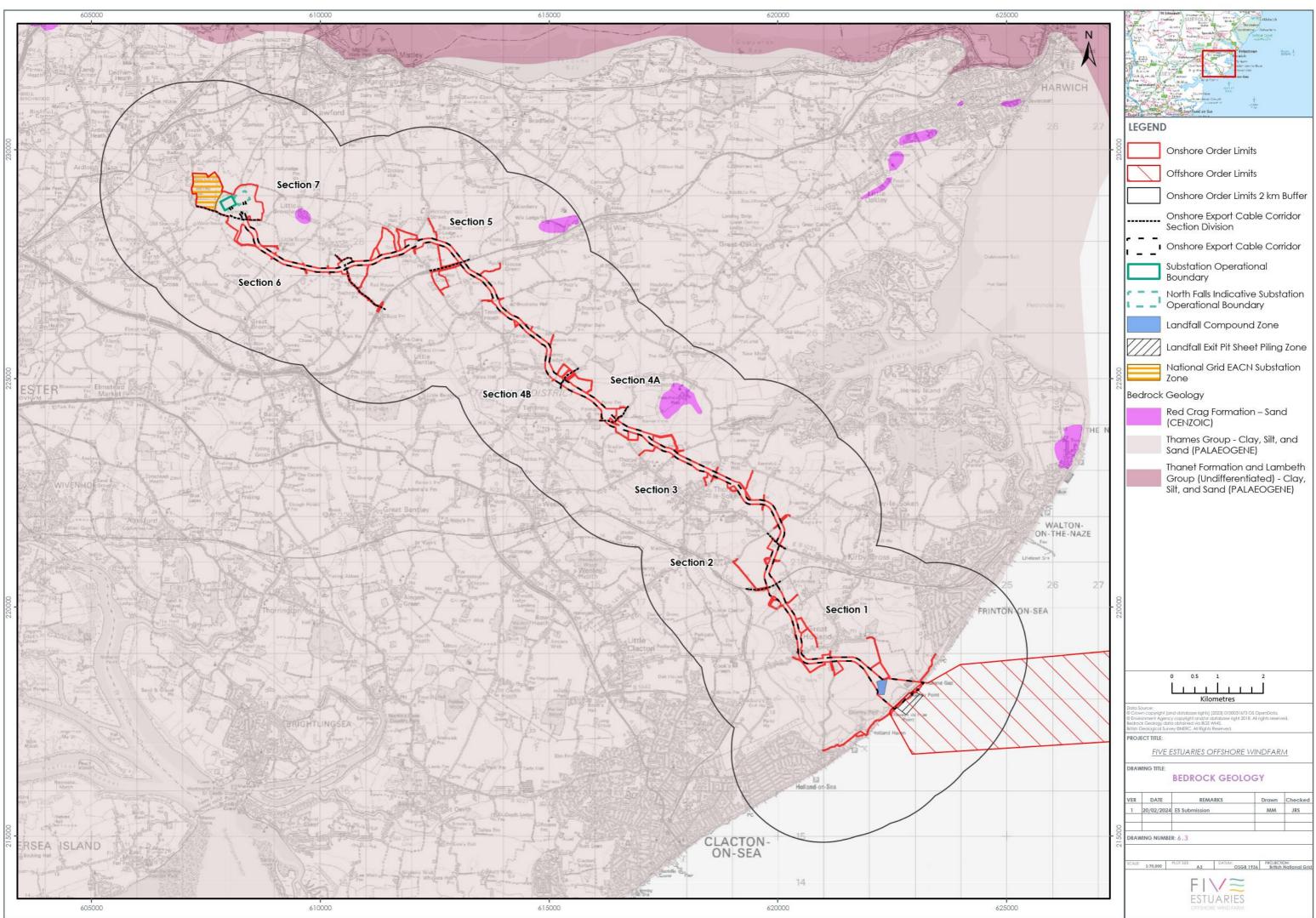
- 6.7.26 The geological and hydrogeological setting of the site and ground conditions are described in detail within Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use, with geology shown in Figure 6-3 and Figure 6-4.
- 6.7.27 Bedrock geology underlying the hydrology, hydrogeology and flood risk study area is composed of the Thames Group, clay, silt, sand and gravel, overlying Thanet Formation lay, sand and silt with subsidiary flint, mudstone and sandstone. The Thames Group and Thanet Formation overlies chalk of the Newhaven Chalk and Culver Chalk formations. The Thames Group and Thanet Formation bedrock is defined as an unproductive aquifer.
- 6.7.28 The BGS Geoindex indicates that superficial deposits crossed by the Onshore ECC route consist mainly of cover sand underlain by the Kesgrave Catchment Subgroup sand and gravels. A band of alluvium, consisting of clay and silt, is present at landfall and within the search area associated with the alignment of major watercourses.
- 6.7.29 The Kesgrave Catchment sand and gravel is defined as Secondary A aquifer and the cover sand is defined as Secondary B aquifer. The smaller areas of alluvium are also defined as Secondary A aquifer.
- 6.7.30 Secondary A and Secondary B aquifers have the potential to store and yield water at a local scale. The superficial deposit aquifers are designated on the EA's Groundwater Vulnerability Map as being Low or Medium – Low vulnerability. This classification relates to the vulnerability of groundwater to a pollutant discharged at ground level based on the hydrological, geological, hydrogeological and soil properties within a single square kilometre.
- 6.7.31 The northernmost section of the hydrology and flood risk study area (from Little Bromley to 0.36 km north of Lodge Lane in Tendring) is within Groundwater Source Protection Zone (SPZ) 3.
- 6.7.32 Visual observations and anecdotal evidence gathered during walkover surveys have identified the following features which confirm the BGS data and the presence of shallow groundwater within some sections of the hydrology, hydrogeology and flood risk study area:
 - > BGS logs indicate that the superficial sands and gravels typically range in thickness between 4 m and 12 m.
 - Solution Section Se
 - Landowner at Hawkin's Farm on Payne's Lane verbally informed of historic land drainage within fields on the ECC route between Payne's Lane and Bentley Road. Historic chamber may be present close to the existing pylon within the field which collects field drainage and local springs prior to discharge to the headwaters of Holland Brook.
 - Several water pipe connecting points which are likely to be used for irrigation purposes on farmland at Thorpe Park Farm, south of the B1033 Frinton Road. Further consultation with landowners will look to confirm the location and purpose of all pipework and any local groundwater abstractions.

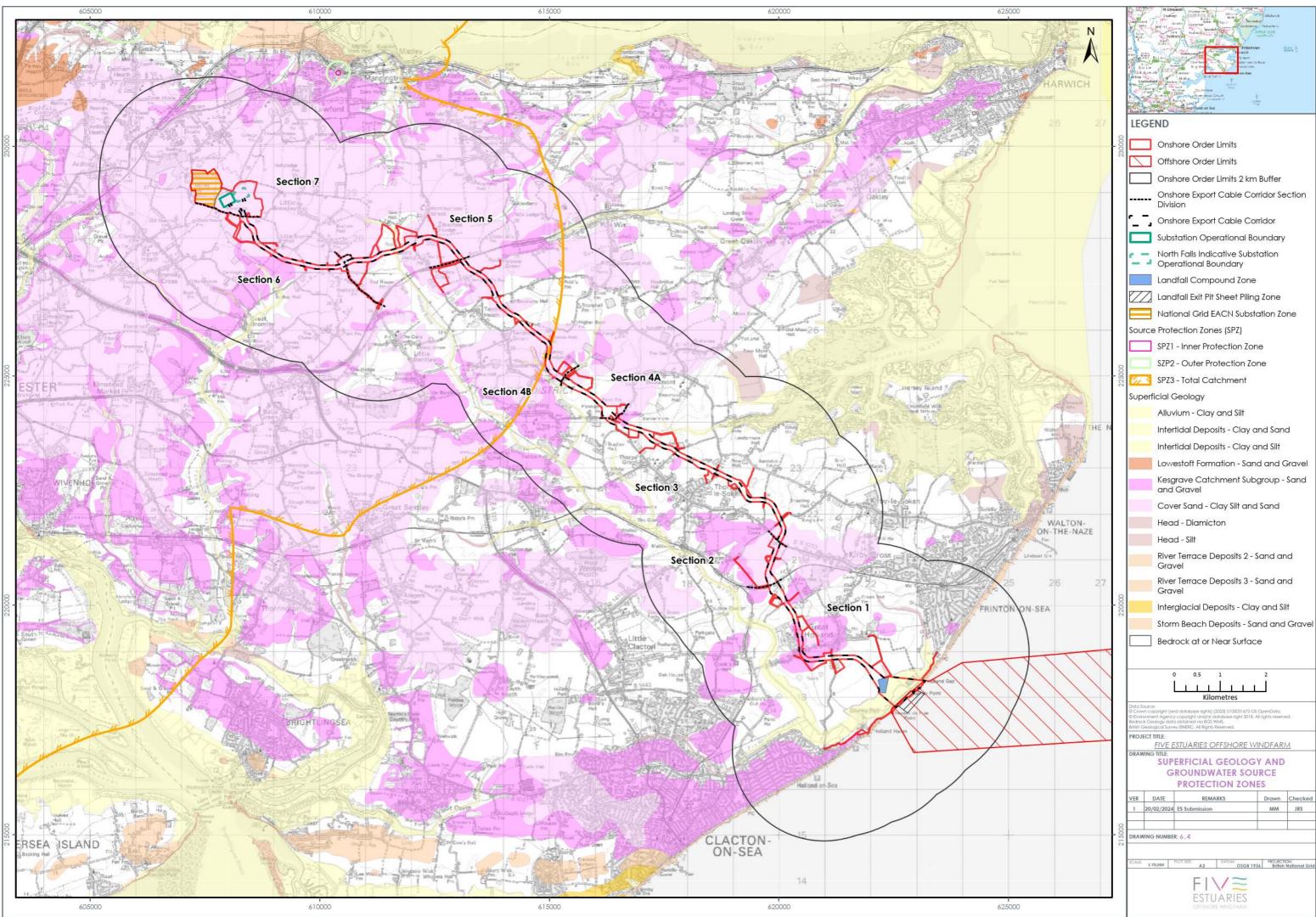


6.7.33 Ground investigations (SOCOTEC, 2023) have been undertaken within the north of the search area in order to inform the design and positioning of the OnSS. These investigations indicate groundwater seepages in the base of most trial pits around the proposed VE and North Falls OnSS locations, indicating that these have potentially been extended until groundwater has been hit. This ground investigation data indicates groundwater levels typically between 2.3 m and 3.3 m below ground level (32 m – 33 m AOD), although it should be noted that the investigations were completed in mid May and mid October respectively and therefore winter peak water levels will potentially be higher.

GROUNDWATER SENSITIVITY

6.7.34 Sensitivities have been assigned to all groundwater bodies beneath the hydrology, hydrogeology and flood risk study area, as defined in Table 6.10.





FLOOD RISK

TIDAL AND FLUVIAL FLOOD RISK

- 6.7.35 The landfall site is located at Sandy Point on the coastline between Holland-on-Sea and Frinton-on-Sea. The MHWS level of the North Sea extends over the beach area and is within the Onshore ECC. The Essex coastline is served by a range of coastal flood defences including:
 - > The South Frinton beach groynes;
 - > Frinton Promenade (embankment);
 - > Frinton Beach Huts Wall;
 - > Holland Gap to Chevaux de frise Point (wall);
 - > Chevaux de fries to Holland Cliffs (wall);
 - > Defences at Holland Cliffs (wall);
 - > Defences behind Holland Haven Beach (embankment);
 - > Defences at Holland Sluice (wall); and
 - > Martello Bay to Holland Haven (engineered high ground).
- 6.7.36 The defences run parallel to the coastline and protect the land from Clacton-on-Sea to Frinton-on-Sea, which includes the hydrology, hydrogeology and flood risk study area. The defences provide protection against tidal flooding for at least a 1 in 200-year event (0.5% Annual Exceedance Probability (AEP)).
- 6.7.37 Areas of the ECC at landfall and inland into Holland Haven Marshes and Frinton Golf Course are detailed on the EA Flood Map for Planning (FMfP) to be within Flood Zone 3. EA Flood Zone 3 is defined as 'high risk' areas which are at risk of flooding, in the absence of flood defences, for 1 in 100-year event (1% AEP) or greater from fluvial sources; or with a 1 in 200- year event (0.5% AEP) or greater from sea flooding. Areas inland from the coastal defences, along the alignment of the Onshore ECC, through Great Holland northwards, are located within Flood Zone 1. The EA Flood Zone 1 is defined as a 'low risk' and represents land which has a less than 0.1% AEP of flooding.
- 6.7.38 Away from the landfall area, flood defences are noted to be present along Hamford Water and Beaufort Cut to the north of the hydrology, hydrogeology and flood risk study area and along the Holland Brook estuary and the Colne Estuary to the south.
- 6.7.39 Tendring Brook flows through the Onshore ECC at Tendring. The immediate corridor of the watercourse is defined by the EA as Flood Zone 3 for fluvial flood risk. Similarly, the upper reaches of Holland Brook are crossed by the Onshore ECC at Horsley Cross and the immediate watercourse corridor is designated as Flood Zone 3. The headwaters of Tenpenny Brook drains land to the north-west of the Onshore ECC and the OnSS area. The reach of the watercourse immediately downstream of the ECC has some Flood Zone 3 flood risk associated with it. EA modelling does not extend to the upper reaches of Tenpenny Brook, within the ECC, and some minor fluvial risk along the watercourse corridor may be present during extreme events.
- 6.7.40 There have not been any recorded historical flood events noted by the EA within the hydrology, hydrogeology and flood risk study area.



FLOOD RISK FROM OTHER SOURCES

- 6.7.41 The EA data indicates that a part of the floodplain of Holland Brook upstream of Clacton Road is potentially susceptible to flooding in the event of a reservoir failure under a 'dry day' scenario when the river is at normal levels. This area does not extend to land within the hydrology, hydrogeology and flood risk study area. The EA 'wet day' scenario map indicates that Holland Brook floodplain upstream of its estuary; the most downstream section of Picker's Ditch; Kirby Brook extending through Holland Haven Marshes SSSI site, are all susceptible to reservoir failure flooding. Sections of these areas are within the onshore landfall site.
- 6.7.42 Given that the Holland Haven SSSI Marshes covers the coastal section of the Onshore ECC, it is reasonable to determine that it is unlikely there will be formal, below ground, drainage infrastructure controlling surface runoff from these areas. Due to the presence of the wetland, during a rainfall event surface water is expected to infiltrate and provide natural attenuation before following the topographical slope into open drainage ditches/ streams or the main watercourse networks.
- 6.7.43 All areas discussed as being potentially at risk of coastal flooding are located within areas served by EA Flood Alerts and Flood Warning System, for potential fluvial and/or tidal flood events.
- 6.7.44 Surface water flood risk mapping provided by the EA's Long Term Flood Risk mapping service shows areas of the Onshore ECC that are potentially at risk of flooding. These areas generally align with surface water features discussed above and any risk is limited to the immediate corridor of existing watercourses during more extreme events. Some isolated areas of ponding are predicted for more extreme 0.1% AEP rainfall events which correspond to localised low topographical points within open ground.
- 6.7.45 The low-lying land at Holland Haven Marshes is shown to potentially be at risk of surface water flooding, with some potential for an overland flow pathway into the marshes from the B1032 Main Road to the south.
- 6.7.46 Other sources of flood risk are considered within the assessments at Volume 5, Report 5.3.1: Onshore ECC FRA and Volume 5, Report 5.3.2: OnSS FRA.

FLOODPLAIN SENSITIVITY

6.7.47 Sensitivity has been assigned to the floodplains within the hydrology, hydrogeology and flood risk study area, as defined in Table 6.10.

WATER QUALITY

6.7.48 Envirocheck reports and information received from the EA and Tendring District Council have been used to inform the following section on water quality, discharge consents and water abstractions.



RIVER WATER QUALITY

- 6.7.49 Under the Anglian river basin district RBMP (EA 2016), which was produced in accordance with the requirements of the WFD, the monitored watercourses and water bodies within the river basin area have been grouped into management catchments which are made up of smaller water body catchments. Each water body is classified based on assessment of monitored data for ecological criteria (possible categories of 'high'; 'good'; 'moderate'; 'poor'; or 'bad') and chemical criteria (possible categories of 'good'; or 'fail'), with an overall status classification based on these assessments.
- 6.7.50 The water body catchments assessed as part of the RBMP and which are within or immediately downstream of the hydrology, hydrogeology and flood risk study area include:
 - Holland Brook moderate ecological status and good chemical status (excluding ubiquitous, persistent, bioaccumulative, toxic substances [uPBTs]);
 - Wrabness Brook good ecological status and good chemical status (excluding uPBTs); and
 - Tenpenny Brook moderate ecological status and good chemical status (excluding uPBTs).

COASTAL/ TRANSITIONAL WATER QUALITY

6.7.51 The coastal waters are also monitored as the Essex coastal water body, the Colne transitional water body and the Stour transitional water body, all of which have moderate ecological status and good chemical status (excluding uPBTs).

BATHING WATER QUALITY

- 6.7.52 The EA is responsible for monitoring bathing waters in England. Monitoring locations in close proximity to the hydrology, hydrogeology and flood risk study area include:
 - > Walton;
 - > Frinton;
 - > Holland;
 - > Clacton; and
 - > Clacton Beach Martello Tower.
- 6.7.53 The classification of the identified Bathing Waters, reported between 2017 and 2021, are presented below. Data for 2020 is missing due to lack of monitoring during Covid restrictions.

Table 6-7 Bathing Water status classification (EA, 2022)

| Name | Classification | | | | | |
|----------------|----------------|-----------|-----------|------|-----------|--|
| Name | 2017 | 2018 | 2019 | 2020 | 2021 | |
| Walton | Good | Good | Excellent | - | Good | |
| Frinton | Good | Good | Good | - | Good | |
| Holland | Excellent | Excellent | Excellent | - | Excellent | |
| Clacton | Excellent | Excellent | Excellent | - | Excellent | |
| Clacton Beach | Good | Good | Good | _ | Good | |
| Martello Tower | 0000 | 0000 | 0000 | | 0000 | |



6.7.54 These results mean that the waters meet the criteria for the stricter UK guideline standards of the rBWD.

GROUNDWATER QUALITY

- 6.7.55 Under the Anglian RBMP the monitored groundwater bodies within the river basin area have been grouped into management catchments. Each groundwater body is classified based on assessment of monitored data for quantitative criteria (possible categories of 'good' or 'poor') and chemical criteria (possible categories of 'good'; or 'poor'), with an overall status classification based on these assessments.
- 6.7.56 There is a single groundwater catchment assessed as part of the RBMP which is within or immediately downstream of the hydrology, hydrogeology and flood risk study area. This is the Essex Gravels water body associated with superficial geology beneath the study area.
 - > The water body has poor overall status with good quantitative status and poor chemical status.

POLLUTION CONTROL AND POLLUTION INCIDENTS

- 6.7.57 Envirocheck Reporting has identified active integrated pollution and control measures for the following:
 - Stuart Davis Limited, Hiskeys Farm, Spratts Lane, Little Bromley, Manningtree, CO11 2PR;
 - Recycled In Ardleigh Limited, Martells Quarry Landfill Site, Slough Lane, Ardleigh, CO7 7TU; and
 - Wix Farms Poultry Ltd, Kellys Farm, Clacton Road, Horsley Cross, Manningtree, Essex, CO11 2NZ.
- 6.7.58 The recording of pollution incidents within the Envirocheck reporting details pollution incidents to controlled waters and details from the substantiated pollution incident register. Pollution incidents to controlled waters have been recorded at numerous locations within the study area. All incidents recorded are isolated incidents over 20 years old and as such are not considered significant. The substantiated pollution incident register details more recent incidents to air, land and to water. The severity of these incidents' ranges from minor to significant. The detailed reports relating to water are listed below.
 - A 'significant' incident to water on 15 July 2014 at irrigation ponds to the north of Park Farm on Hilliards Road (TM 10704 26514);
 - A 'significant' incident to water on 23 July 2004 at a pond at Glebe Barn on Church Road (TM 12023 25206);
 - A 'significant' incident to water on 23 May 2005 on a stream (tributary of Holland Brook) at Thorpe Hall, south of Thorpe-le-Soken (TM 18213 21839);
 - A 'significant' incident to water on 06 November 2005 on a stream (tributary of Hamford Water) at a sewage works to the north west of Kirby-le-Soken (TM 21960 22344);
 - A 'significant' incident to water on 13 October 2009 on Kirby Brook (tributary of Holland Brook) in Holland Haven Country Park (TM 21992 17552); and
 - > A 'major' incident to water on 30 July 2018 on Holand Brook at the sluice outfall to the coast (TM 21938 17287).

ONSHORE WATERCOURSES, NEAR-SHORE COASTAL WATERS AND THE COLNE AND STOUR TRANSITIONAL WATERS SENSITIVITY

6.7.59 Sensitivity has been assigned to all watercourses, near-shore coastal waters, transitional waters and groundwater as defined in Table 6.10.

DISCHARGE AND ABSTRACTION CONSENTS

DISCHARGES

6.7.60 Environment Agency data indicates a number of licenced discharge consents across the Tendring district. These include discharges for agriculture, trade and public and private treated effluent.

ABSTRACTIONS

6.7.61 Table 6-8 and Figure 6-5 shows permitted abstractions recorded within 2 km of the hydrology, hydrogeology and flood risk study area. Table 6-9 and Figure 6-5 show the registered private water supply users within the hydrology, hydrogeology and flood risk study area.

Table 6-8: Permitted Abstractions

| Licence | Holder | Location | Source | Use |
|-----------------|--|--------------|------------------|----------------------------------|
| 8/36/18/*G/0042 | BEALES, 27 HARWICH ROAD, ARDLEIGH | TM06383044 | Groundwater | Spray Irrigation - Direct |
| 8/36/18/*G/0049 | ALLIN, WELL AT 55 HARWICH RD, LAWFORD | TM07303062 | Groundwater | Spray Irrigation - Direct |
| 8/36/18/*G/0050 | BOWER, TUBE WELL, HARWICH RD, LAWFORD | TM07253081 | Groundwater | Spray Irrigation - Direct |
| 8/36/18/*G/0051 | R J MURFITT & C F ROWLAND, 59 HARWICH ROAD, LAWFORD | TM07383084 | Groundwater | General Farming & Domestic |
| 8/36/18/*G/0051 | R J MURFITT & C F ROWLAND, 59 HARWICH ROAD, LAWFORD | TM07383084 | Groundwater | Spray Irrigation - Direct |
| 8/36/18/*S/0038 | E HALSALL & SONS LTD, RESERVOIR GOODHALL FM, ARDLEIGH | TM067307 | Surface Water | Spray Irrigation - Anti Frost |
| 8/36/18/*S/0038 | E HALSALL & SONS LTD, RESERVOIR GOODHALL FM, ARDLEIGH | TM067307 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*G/0091 | E SCHWIER & SONS LTD, WELL B BRADFIELD HALL | TM1335029330 | Groundwater | General Farming & Domestic |
| 8/36/19/*G/0091 | E SCHWIER & SONS LTD, RES BRADFIELD HALL, MANNINGTREE | TM1310429287 | Groundwater | Spray Irrigation - Direct |
| 8/36/19/*G/0125 | COOPER BROS (WIX) LTD, CROSSMANS FARM 1, WIX | TM140281 | Groundwater | Spray Irrigation - Direct |
| 8/36/19/*G/0125 | COOPER BROS (WIX) LTD, CROSSMANS FARM 2, WIX | TM140283 | Groundwater | Spray Irrigation - Direct |
| 8/36/19/*G/0132 | D MCNAIR LTD, DICKLEY HALL, MISTLEY | TM122293 | Groundwater | Spray Irrigation - Direct |

| Licence | Holder | Location | Source | Use |
|-----------------|---|--------------|------------------|-------------------------------|
| 8/36/19/*G/0133 | E SCHWIER & SONS LTD, 10 JET WELLS AT BRADFIELD HALL | TM1293529064 | Groundwater | Spray Irrigation - Direct |
| 8/36/19/*G/0133 | E SCHWIER & SONS LTD, 10 JET WELLS AT BRADFIELD HALL | TM1293529064 | Groundwater | Spray Irrigation - Storage |
| 8/36/19/*G/0136 | LENNOX, STACIES FARM, MISTLEY | TM104295 | Groundwater | Spray Irrigation - Direct |
| 8/36/19/*S/0053 | E SCHWIER & SONS LTD, BRADFIELD HALL (MOAT) | TM1318229299 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0053 | E SCHWIER & SONS LTD, BRADFIELD HALL (RES) | TM1325828267 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0053 | E SCHWIER & SONS LTD, BRADFIELD HALL (MOAT) | TM1318229299 | Surface Water | Spray Irrigation - Storage |
| 8/36/19/*S/0066 | LENNOX, R STOUR STACIES FARM 2, MISTLEY | TM108302 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0066 | LENNOX, R STOUR STACIES FARM 3, MISTLEY | TM109302 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0107 | D MCNAIR LTD, TRIB OF RIVER STOUR AT DICKLEY HALL, MISTLEY | TM114297 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0124 | COOPER BROS (WIX) LTD, TRIB WRABNESS BROOK RES 1- WIX | TM140281 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0124 | COOPER BROS (WIX) LTD, TRIB WRABNESS BROOK RES 2 -WIX | TM140283 | Surface Water | Spray Irrigation - Direct |
| 8/36/19/*S/0147 | E SCHWIER & SONS LTD, TRIB. OF WRABNESS BROOK | TM13372936 | Surface Water | Spray Irrigation - Storage |
| 8/37/25/*G/0064 | Dedham Vale Farms, BADLEY HALL FARM, ARDLEIGH | TM0709128918 | Groundwater | General Farming & Domestic |

| Licence | Holder | Location | Source | Use |
|-----------------|---|--------------|-------------|----------------------------------|
| 8/37/25/*G/0108 | J G A & S C Lyon, WELL AT MORANTS FARM, ARDLEIGH | TM06802690 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0143 | D C WILLIAMSON LTD, OLD SHIELDS FARM 2, ARDLEIGH | TM069285 | Groundwater | Spray Irrigation - Anti Frost |
| 8/37/25/*G/0143 | D C WILLIAMSON LTD, OLD SHIELDS FARM 1, ARDLEIGH | TM069286 | Groundwater | Spray Irrigation - Anti Frost |
| 8/37/25/*G/0143 | D C WILLIAMSON LTD, OLD SHIELDS FARM 2, ARDLEIGH | TM069285 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0143 | D C WILLIAMSON LTD, OLD SHIELDS FARM 1, ARDLEIGH | TM069286 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0172 | T & R FAIRLEY FARMS PARTNERSHIP, NORMANS/CATTSGREEN FMS, MISTLEY | TM079284 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0191 | Dedham Vale Farms, B/H, BADLEY HALL, ARDLEIGH | TM0704028908 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0210 | BOXFORD (SUFFOLK) FARMS LTD, MORROW LANE FARM, ARDLEIGH | TM061284 | Groundwater | Spray Irrigation - Anti Frost |
| 8/37/25/*G/0210 | BOXFORD (SUFFOLK) FARMS LTD, MORROW LANE FARM, ARDLEIGH | TM061284 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0236 | TABOR FARMS LTD, WELL AT ARDLEIGH | TM080294 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0251 | AULD, 18 COGGESHALL ROAD, ARDLEIGH | TM05923017 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0252 | POULTER, 19 OAKTREE CORNER, ARDLEIGH | TM05983006 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0256 | Craft Nurseries Limited, CRAFT NURSERIES AT LAWFORD | TM0654030240 | Groundwater | Spray Irrigation - Direct |

| Licence | Holder | Location | Source | Use |
|-----------------|---|--------------|-------------|---------------------------------|
| 8/37/25/*G/0256 | Craft Nurseries Limited, CRAFT NURSERIES AT LAWFORD | TM0654030240 | Groundwater | Trickle Irrigation - Direct |
| 8/37/25/*G/0258 | Wallings Nursery Limited, BOREHOLE A 38 HARWICH ROAD | TM0671930328 | Groundwater | General Use |
| 8/37/25/*G/0258 | Wallings Nursery Limited, BOREHOLE B 38 HARWICH ROAD | TM0672630368 | Groundwater | General Use |
| 8/37/25/*G/0258 | Wallings Nursery Limited, BOREHOLE A 38 HARWICH ROAD | TM0671930328 | Groundwater | Spray Irrigation - Storage |
| 8/37/25/*G/0258 | Wallings Nursery Limited, BOREHOLE B 38 HARWICH ROAD | TM0672630368 | Groundwater | Spray Irrigation - Storage |
| 8/37/25/*G/0258 | Wallings Nursery Limited, BOREHOLE A 38 HARWICH ROAD | TM0671930328 | Groundwater | Trickle Irrigation - Storage |
| 8/37/25/*G/0275 | Ashdown Nursery, BOREHOLE AT 84 HUNGERDOWN LANE | TM0778030136 | Groundwater | General Farming & Domestic |
| 8/37/25/*G/0275 | Ashdown Nursery, BOREHOLE AT 84 HUNGERDOWN LANE | TM0778030136 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0275 | Ashdown Nursery, BOREHOLE AT 84 HUNGERDOWN LANE | TM0778030136 | Groundwater | Trickle Irrigation - Direct |
| 8/37/25/*G/0279 | SOLANUM RIGG LTD, 89 HUNGERDOWN LANE, LAWFORD | TM07993027 | Groundwater | General Farming & Domestic |
| 8/37/25/*G/0279 | SOLANUM RIGG LTD, 89 HUNGERDOWN LANE, LAWFORD | TM07993027 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0279 | SOLANUM RIGG LTD, 89 HUNGERDOWN LANE, LAWFORD | TM07993028 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0281 | BOXFORD (SUFFOLK) FARMS LTD, 4 TUBEWELLS, BADLISS HALL | TM066297 | Groundwater | Spray Irrigation - Direct |

| Licence | Holder | Location | Source | Use |
|-----------------|--|--------------|------------------|--------------------------------|
| 8/37/25/*G/0283 | HALSALL, PARK FARM, ARDLEIGH | TM05502810 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0296 | Fryer, CHARITY FARM, LAWFORD | TM0842231174 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*G/0296 | Fryer, CHARITY FARM, LAWFORD | TM0842231174 | Groundwater | Trickle Irrigation - Direct |
| 8/37/25/*G/0336 | S & G WOOLDRIDGE, ABBOTSFIELD ARDLEIGH | TM060293 | Groundwater | Spray Irrigation - Direct |
| 8/37/25/*S/0045 | ROBINSON, BADLEY HALL, RESERVOIR | TM088264 | Surface Water | Spray Irrigation - Direct |
| 8/37/25/*S/0045 | ROBINSON, BADLEY HALL, TENPENNY BROOK | TM090270 | Surface Water | Spray Irrigation - Direct |
| 8/37/25/*S/0186 | T W SALMON & CO, RES ON TRIB OF TENPENNY BROOK | TM079268 | Surface Water | Spray Irrigation - Storage |
| 8/37/25/*S/0197 | T W SALMON & CO, RESERVOIR ON TENPENNY BROOK | TM074272 | Surface Water | Spray Irrigation - Direct |
| 8/37/25/*S/0234 | A Lochore & Son, HOLLIES FIELD, GT. BROMLEY | TM061272 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*G/0037 | Parkers Nurseries Limited, BRADEWICK NURSERY, THORPE | TM1900021900 | Groundwater | General Farming & Domestic |
| 8/37/26/*G/0037 | Parkers Nurseries Limited, BRADEWICK NURSERY, THORPE | TM1900021900 | Groundwater | Spray Irrigation - Direct |
| 8/37/26/*G/0055 | HENRY FAIRLEY & SON LTD, PARK FARM, MISTLEY NO 2 | TM102258 | Groundwater | Spray Irrigation - Direct |
| 8/37/26/*G/0055 | HENRY FAIRLEY & SON LTD, PARK FARM, MISTLEY NO 1 | TM104259 | Groundwater | Spray Irrigation - Direct |

| Licence | Holder | Location | Source | Use |
|-----------------|--|--------------|------------------|-------------------------------|
| 8/37/26/*G/0080 | T W SALMON & CO, LITTLE BROMLEY HALL, LT. BROMLEY | TM090281 | Groundwater | Spray Irrigation - Direct |
| 8/37/26/*G/0091 | A H BROWN FARMS, LODGE FARM, GREAT HOLLAND | TM209190 | Groundwater | Spray Irrigation - Direct |
| 8/37/26/*G/0092 | John Jiggens Limited, TEN WELL POINTS-HEMPSTALL FARM | TM124273 | Groundwater | Spray Irrigation - Storage |
| 8/37/26/*S/0008 | A H BROWN FARMS, HOLLAND BROOK AT DAIRY HOUSE FARM, GT. HOLLAND | TM197186 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0011 | DAY, YEW TREE FARM, THORPE LE SOKEN | TM152244 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0017 | T Fairley and Sons Limited, TRIB HOLLAND BK, LT. BROMLEY | TM102284 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0054 | JAMES FAIRLEY & SONS (FARMS) LTD, THE LODGE, TENDRING - RES ONE | TM154251 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0054 | JAMES FAIRLEY & SONS (FARMS) LTD, THE LODGE, TENDRING - RES TWO | TM157252 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0067 | T & R FAIRLEY FARMS PARTNERSHIP, HOLLAND BROOK AT NEW HALL FARM | TM1162427978 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0069 | JAMES FAIRLEY & SONS (FARMS) LTD, WOLVES HALL, TENDRING | TM147252 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0073 | A LAWRENCE & SONS, DAIRY HOUSE FARM, LT CLACTON | TM191196 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0074 | A H BROWN FARMS, DAIRY HOUSE FARM, GT HOLLAND | TM204185 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0083 | JIGGENS, TRIB HOLLAND BK, HORSLEY CROSS | TM129268 | Surface Water | Spray Irrigation - Storage |

| Licence | Holder | Location | Source | Use |
|---------------------|---|--------------|------------------|---------------------------------|
| 8/37/26/*S/0086 | R E GILES & SONS, SLADBURY'S FARM, GT CLACTON | TM20011814 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0087 | JAMES MACDONALD FARMS (BEAUMONT), TRIB OF HAMFORD WATER | TM183254 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0088 | A LAWRENCE & SONS, TRIB OF HOLLAND BROOK | TM207200 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0090 | JAMES FAIRLEY & SONS (FARMS) LTD, TRIB TENDRING BK, TENDRING | TM148249 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0095 | A DAVIDSON & SON LTD, TENDRING BROOK AT WIX | TM158267 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0102/R01 | A H BROWN FARMS, KIRBY BROOK AT LARGES FARM | TM2235919930 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0103/R01 | GEORGE WRIGHT FARMS, POINT 1-HOLLAND BROOK AT HILL FARM, TENDRING | TM1351524272 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0103/R01 | GEORGE WRIGHT FARMS, HOLLAND BROOK AT HILL FARM | TM1351524272 | Surface Water | Spray Irrigation - Direct |
| 8/37/26/*S/0105 | H D COBBALD & SONS LTD, POINT 1-HOLLAND BROOK AT HILL FARM, TENDRING | TM1351524272 | Surface Water | Spray Irrigation - Storage |
| 8/37/26/*S/0107 | HENRY FAIRLEY & SON LTD, TRIB OF HOLLAND BROOK AT WOOD BARN GT BROMLEY | TM10402528 | Surface Water | Spray Irrigation - Storage |
| AN/036/0019/025 | D MCNAIR LTD, RELIEF CHANNEL AT DICKLEY HALL FARM | TM1141130246 | Surface Water | Spray Irrigation - Storage |
| AN/037/0025/031 | BOXFORD (SUFFOLK) FARMS LTD, WELL POINT A AT NEW HOME FARM, ARDLEIGH | TM0664729254 | Groundwater | Trickle Irrigation - Storage |
| AN/037/0025/035 | T W SALMON & CO, TENPENNY BROOK AT LITTLE BROMLEY | TM0863627394 | Surface Water | Spray Irrigation - Storage |

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| Licence | Holder | Location | Source | Use |
|-----------------|--|--------------|------------------|-------------------------------|
| AN/037/0026/006 | T & R FAIRLEY FARMS PARTNERSHIP, HOLLAND BROOK AT NEW HALL FARM | TM1162427978 | Surface Water | Spray Irrigation - Storage |
| AN/037/0026/010 | STRUTT & PARKER (FARMS) LTD, TRIBUTARY OF HAMFORD WATER | TM1863122557 | Surface Water | Spray Irrigation - Storage |
| AN/037/0026/011 | STRUTT & PARKER (FARMS) LTD, BEAUMONT BROOK AT BEAUMONT BRIDGE | TM1847223834 | Surface Water | Spray Irrigation - Storage |
| AN/037/0026/012 | Parkers Farms, TRIBUTARY OF HAMFORD WATER | TM2138422060 | Surface Water | Spray Irrigation - Storage |
| AN/037/0026/015 | JAMES FAIRLEY & SONS (FARMS) LTD, WOLVES HALL, TENDRING | TM1552925128 | Surface Water | Spray Irrigation - Storage |
| AN/037/0026/016 | Frinton Farm Partners, KIRBY BROOK AT FRINTON ON SEA | TM2277619921 | Surface Water | Spray Irrigation - Storage |

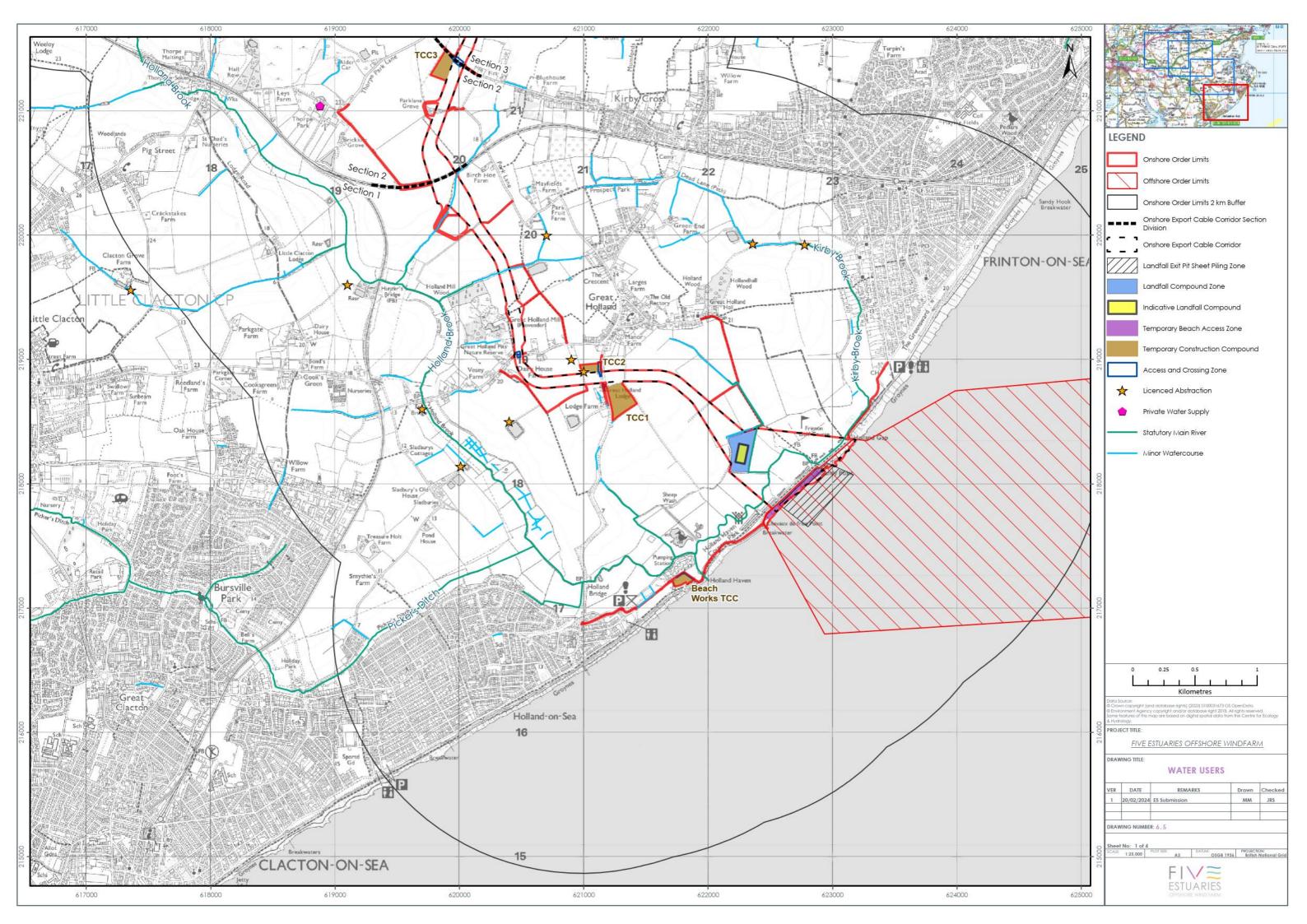
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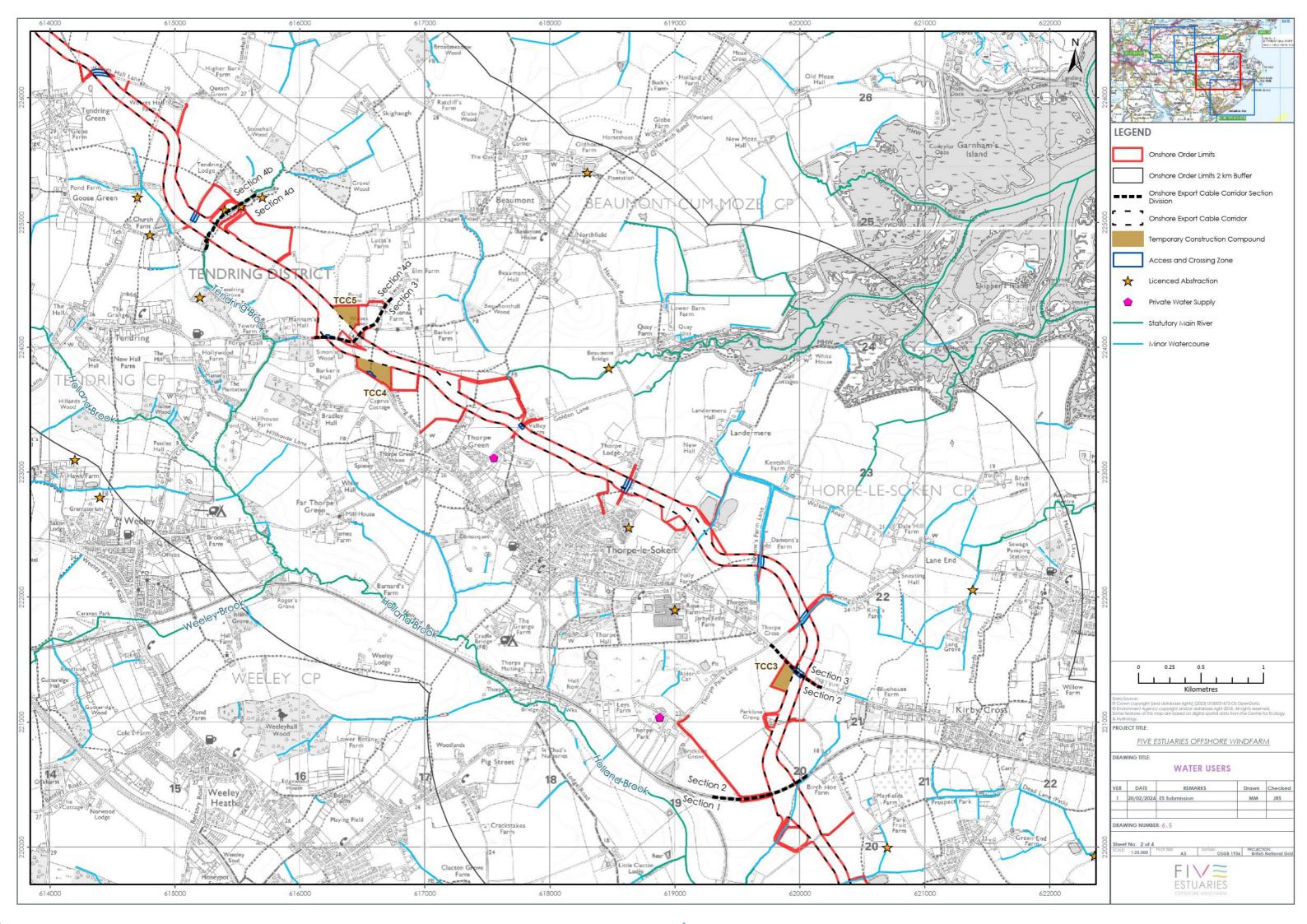
Table 6-9: Registered Private Water Supplies

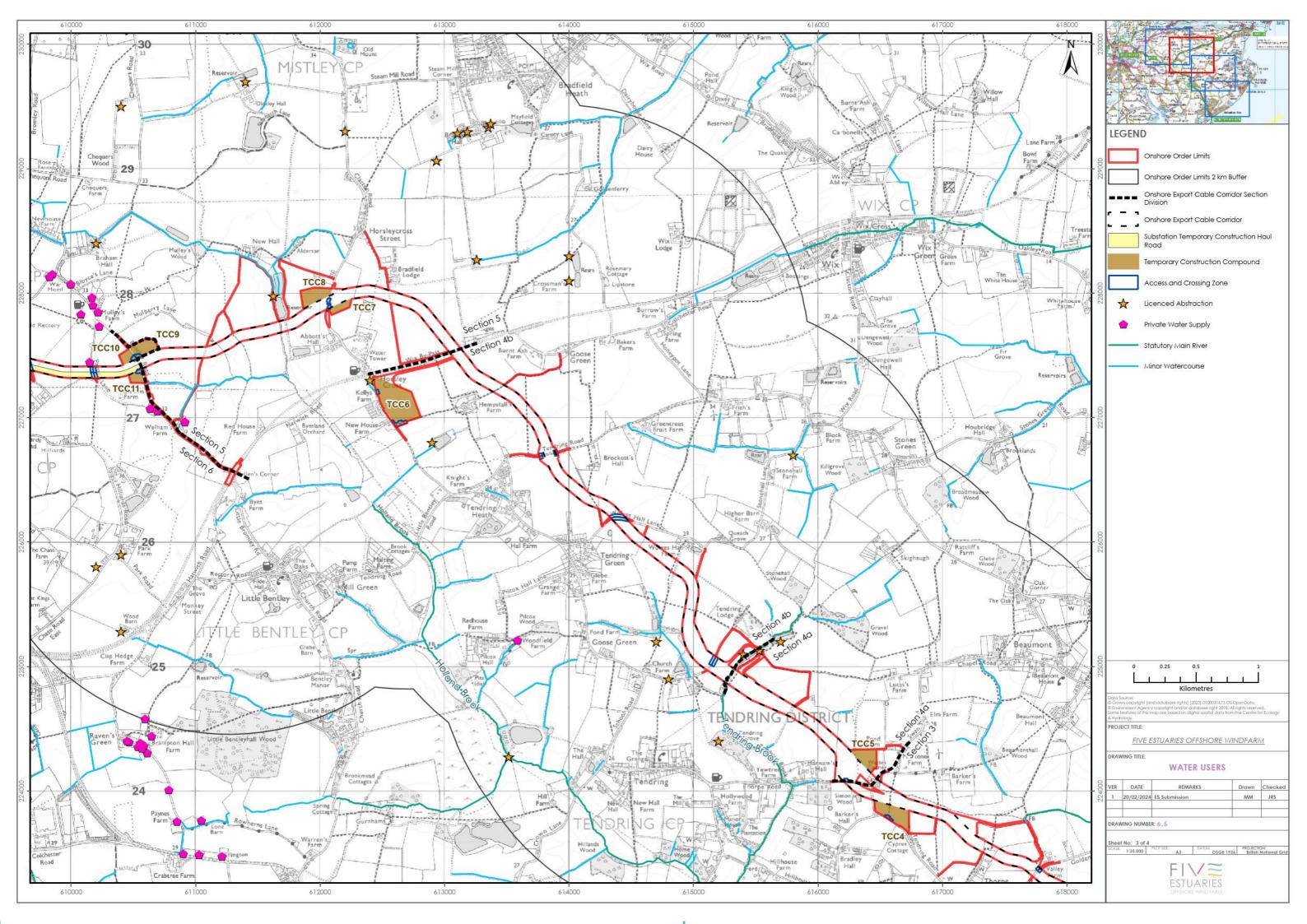
| Registered User | Supply Type | Location | Source | Use |
|---|-------------|--------------|----------|------------|
| Jennings Farm House | Reg 10 (SD) | TM08802855 | Borehole | Domestic |
| Mulberry Lodge | Reg 10 (SD) | TM08752857 | Borehole | Domestic |
| Grove Cottage | Reg 10 (SD) | TM10072783 | Borehole | Domestic |
| Mulleys Cottage | Reg 10 (SD) | TM10172790 | Well | Domestic |
| The Haven | Reg 10 (SD) | TM09992807 | Borehole | Domestic |
| Barlon House | Reg 10 (SD) | TM08682741 | Borehole | Domestic |
| 1 Church Road | Reg 10 (SD) | TM09842815 | Borehole | Domestic |
| Little Bromley Hall | Reg 10 (SD) | TM09192791 | Borehole | Domestic |
| The Old Rectory | Reg 10 (SD) | TM09482775 | Borehole | Domestic |
| Crabtrees | Reg 10 (SD) | TM10222773 | Borehole | Domestic |
| Paynes Cottage | Reg 10 (SD) | TM10142744 | Borehole | Domestic |
| The Coach House | Reg 10 (SD) | TM09102800 | Borehole | Domestic |
| Broom Knolls | Reg 10 (SD) | TM07733148 | Well | Domestic |
| Humberlands | Reg 10 (SD) | TM07513124 | Well | Domestic |
| Badley Hall | Reg 10 (SD) | TM09042681 | Borehole | Domestic |
| Brookside | Reg 10 (SD) | TM08462634 | Well | Domestic |
| Woodside | Reg 10 (SD) | TM09492707 | Borehole | Domestic |
| Bottle House | Reg 10 (SD) | TM07442759 | Well | Domestic |
| Coppice View | Reg 10 (SD) | TM07782737 | Borehole | Domestic |
| 2 New Memorial | Reg 10 | TN 400000040 | Devekele | Demestic |
| 3 New Memorial | (Shared) | TM09822813 | Borehole | Domestic |
| Welhams Farm | Reg 10 | TM40040000 | Derehala | Domostia |
| Craigus | (Shared) | TM10912696 | Borehole | Domestic |
| Oakwood | Reg 10 (SD) | TM10632707 | Well | Domestic |
| Orchard Cottage | Reg 10 (SD) | TM10692705 | Well | Domestic |
| Red Tiles | Reg 10 (SD) | TM10592457 | Well | Domestic |
| The Haywain | Reg 9 | TM10162796 | Borehole | Commercial |
| Woodfield Farm | Reg 10 (SD) | TM13582520 | Borehole | Domestic |
| Dypaca | Reg 10 (SD) | TM17552311 | Well | Domestic |
| Thorpe Park Farm, 5 Thorpe Park Cottages | — Reg 10 | | | |
| 1 Thorpe Park Cottages | (Shared) | TM18872103 | Borehole | Domestic |
| 2 Thorpe Park Cottages | | | | |

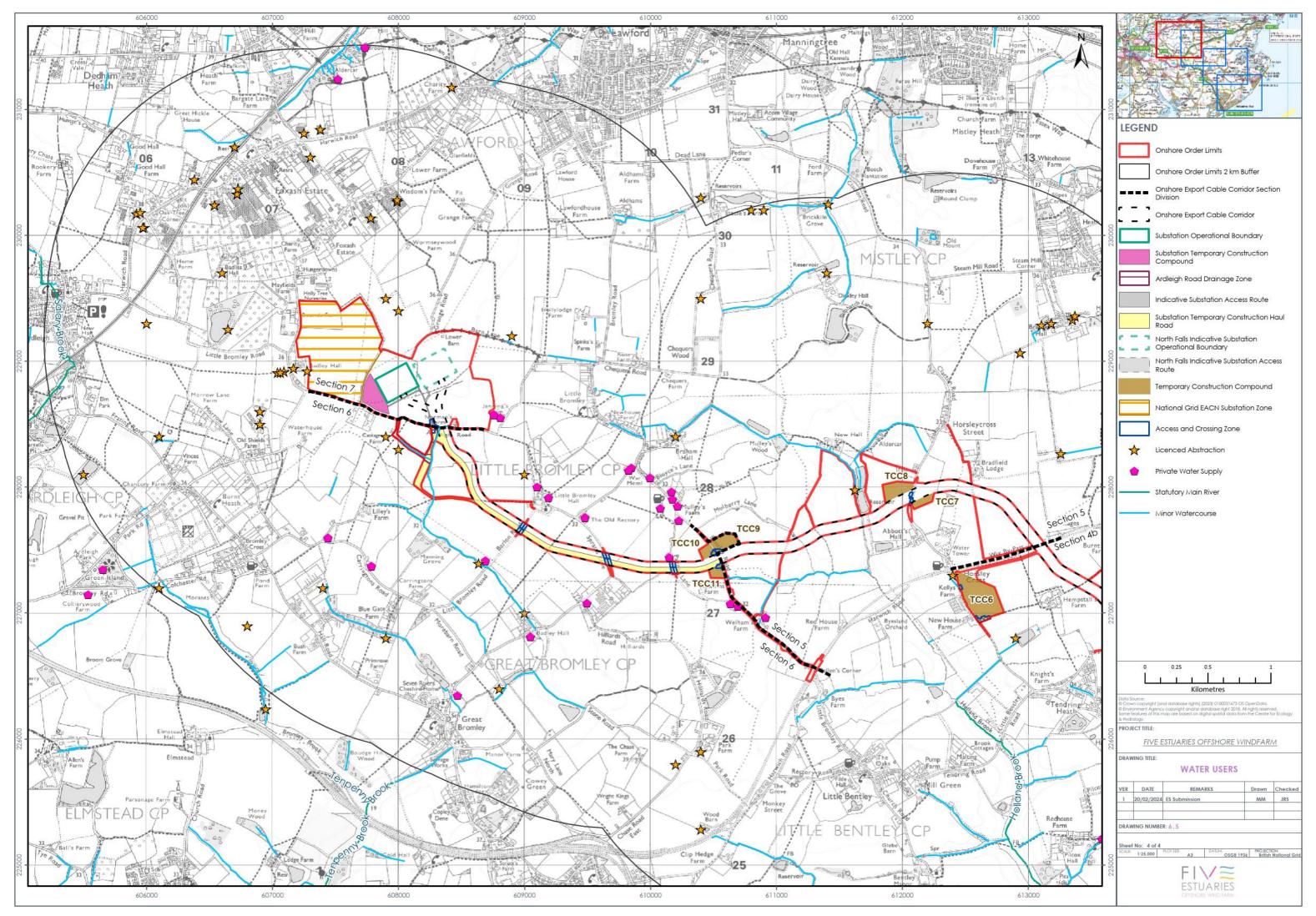


| Registered User | Supply Type | Location | Source | Use |
|------------------------|-------------|------------|--------|----------|
| 3 Thorpe Park Cottages | | | | |
| 4 Thorpe Park Cottages | | | | |
| Thorpe Park Cottage | | | | |
| Thorpe Park House | | | | |
| Mulleys Farm | Reg 10 (SD) | TM10212784 | Well | Domestic |









TEMPORAL CHANGE

- 6.7.62 Future climate change has the potential to have an impact on tidal, fluvial and surface water flood risk through the anticipated increase in sea level, river flows and levels and rainfall intensity.
- 6.7.63 The sea levels during extreme events along the coast close to the landfall site, as provided by the EA, are detailed in the Onshore ECC FRA, provided at Volume 5, Report 5.3.1. This includes the 0.5% AEP (1 in 200 chance annually) and the 0.1% AEP (1 in 1,000 chance annually) events.
- 6.7.64 The risk of tidal flooding to the land behind the defences has been considered and assessed for the construction phase and the defences are considered adequate to provide protection to this land for this phase of the development. The cables and transition joints are all designed to be submersible and considered resilient to floodwater. During operation the installed cable would be buried underground and is not considered to be vulnerable to flooding. It is noted in the SMP that for the landfall reach of coastline, the current defence line will be held until 2055. From this point a dual policy of either managed realignment or hold the line will be adopted. VE will ensure design of the cable route from landfall inland is cognisant of the potential for managed realignment towards the end of the design life of the onshore cable. Design of the Transition Joint Bay (TJB) will take into account the potential for increased flood risk towards the end of design life for the structure.
- 6.7.65 The recommended national climate change allowances for peak river flow for the Combined Essex Management Catchment peak river flow allowances suggest a 38% increase in peak river flow intensity up to the 2080s epoch (2070 2115), as defined by the EA, which would be appropriate for the proposed lifespan of VE. Increased peak river flow would potentially increase the frequency, extent or depth of flooding associated with fluvial flood events. Based on an assessment of the location and topography of the Onshore ECC and OnSS the extent and shape of the present-day fluvial floodplain and the distance of the Onshore ECC and OnSS to fluvial watercourses, it is considered unlikely that fluvial flood risk would increase over the lifetime of the VE.
- 6.7.66 The recommended climate change allowance for peak rainfall intensity has been set for the Combined Essex Management Catchment (DEFRA 2022). Peak rainfall intensities used in the assessment are increased in line with this guidance, using the Central allowance for the 1% AEP event in the 2050s epoch (2022 to 2060) for the temporary works, and using the Central allowance for the 1% AEP event in the 2070s epoch (2061 to 2125) for the permanent works. This means a consideration of a 20% increase in peak rainfall intensity for the construction phase and a consideration of a 25% increase in rainfall intensity for the operational phase.

THE ONSHORE ECC AND SUBSTATION

- 6.7.67 Full details of the Onshore ECC, OnSS and all associated infrastructure are included in Volume 6, Part 3, Chapter 1: Onshore Project Description.
- 6.7.68 Baseline surveys and data review for the hydrology, hydrogeology and flood risk study area includes the land within the Order Limits with a buffer of 2 km to account for any potential hydraulic conductivity.



6.7.69 Collection and presentation of baseline information for the hydrology, hydrogeology and flood risk study area will allow flexibility to make changes to the preferred cable route within the ECC as assessment and design options evolve.

BASELINE SENSITIVITY

6.7.70 Based on Table 6.4 sensitivity values have been assigned to potential receptors, as presented in Table 6.10. Overall, the inland watercourse receptors range in sensitivity from **low** to **high**; the near-shore coastal waters of the North Sea are considered to have a **medium** sensitivity; and the floodplain within the hydrology, hydrogeology and flood risk study area is considered to be of a **low** sensitivity.

| Receptor | Value (Sensitivity) | Justification |
|---------------------------------------|------------------------|---|
| Holland Brook | High | The river flows into Holland Haven Marshes SSSI. |
| Kirby Brook | High | The river course flows across the Holland Haven Marshes SSSI. |
| Tendring Brook | Medium | A smaller river which does not cross through protected sites, but is a tributary which flows into Holland Brook and SSSIs. |
| Beaumont Cut | High | The watercourse flows through Hamford Water National Nature Reserve. |
| Tenpenny Brook | Low | Discharge consents indicate that this watercourse is a discharge point for sewerage. |
| Various smaller drains and streams | | Not assessed for ecological or chemical quality status under River Basin Management Plan/ WFD; Small watercourses of local importance. |
| Thames group bedrock | Negligible | Unproductive aquifer. |
| Superficial deposits | Medium | Groundwater is potentially present, perched in superficial deposits underlying the Onshore ECC. Groundwater bodies are classed as Secondary aquifers (Secondary A or Secondary B). |

Table 6.10: Sensitivity values for potential receptors



| Receptor | Value (Sensitivity) | Justification |
|--|------------------------|---|
| Areas of floodplain within the study area | Low | Large proportion of the study area is within Flood Zone 1, i.e. outside of the tidal and fluvial floodplain; The tidal and fluvial floodplain within the study area is located on land uses which are undeveloped with few buildings. There are no urbanised areas within the areas of floodplain that are within the study area. All land uses are 'less vulnerable'; The tidal and fluvial floodplain within the study area is relatively wide and accommodates a large volume of water relative to the volume potentially displaced/increased by the proposed onshore infrastructure. It is considered to have a low sensitivity in terms of changes in flood levels and floodplain shape. |
| Near-shore coastal waters of the North Sea | Medium | Assessed water body under River Basin Management Plan/ WFD. Coastal waters are classified as good for chemical status and moderate for ecological status. Bathing water quality at the coastline is classified as good to excellent. |
| Transitional coastal waters (Colne and Stour) | High | Estuaries have international environmental designation. Assessed water body under River Basin Management Plan/ WFD. Transitional waters are classified as good for chemical status and moderate for ecological status. Bathing water quality at the Colne estuary is classified as excellent. |
| Water abstractions | Medium | A number of groundwater and surface water abstractions for agricultural and domestic uses. |

EVOLUTION OF THE BASELINE

6.7.71 The baseline will evolve over a period of time regardless of the VE development. The most significant change with regard to hydrology, hydrogeology and flood risk will be due to climate change and the impact of this change on hydrological regimes and flooding. Guidance is provided by UK Government, as referenced in Section 6.7.62 to 6.7.66, with regard to the anticipated changes in rainfall intensity, peak river flows and increases in sea levels and coastal action. These climatic changes and subsequent impacts are predicted to take place based on national and global modelling.



- 6.7.72 The landfall area is covered by the SMP Management Unit C for Tendring Peninsula. More specifically the area falls within the Policy Development Zones for Holland-on-Sea (PDZ C2) and Clacton-on Sea (PDZ C3). The SMP states that for PDZ C2 the current line will be held until 2055 with little or no change to the current baseline in terms of coastal flood defence protection until this time. From 2055 this will change to a dual policy of either managed realignment or hold the line. For PDZ C3 the policy is to hold the line of current defences throughout the life of the proposed development.
- 6.7.73 It is assumed that the EA will continue to work towards improvements in WFD classification for water bodies within the hydrology, hydrogeology and flood risk study area. This work may include strategies which would see physical geomorphological changes to existing surface water features; changes in local land use to improve chemical water quality of runoff reaching monitored water bodies; and/ or other schemes such as ecological improvement projects which could impact on existing surface water quality.

6.8 **KEY PARAMETERS FOR ASSESSMENT**

- 6.8.1 The MDS criteria identified in Table 6.11 have been selected as those having the potential to result in the greatest effect on an identified receptor or receptor group. These criteria have been selected from the details provided in the onshore project description (Volume 6, Part 3, Chapter 1: Onshore Project Description). Effects of greater significance are not predicted to arise should any other development scenario, based on details within the project design envelope, to that assessed here be taken forward in the final design scheme.
- 6.8.2 The following section identifies the MDS in environmental terms, defined by the project design envelope. This is to establish the maximum potential impact associated with the project. It should also consider any designed-in mitigation.



| Potential effect | Maximum Adverse Scenario Assessed | Justification |
|---|---|---|
| Construction | 1 | |
| Onshore ECC Increase in flood risk or change in water quality | For the assessment presented in this chapter, the MDS for the onshore ECC is approximately 60 m wide where open trenching will be used (38 m for scenario 2 and 3). Where trenchless techniques such as HDD are used along the ECC, the width will need to increase to approximately 90 m (45 m for scenario 2 and 3), but slightly wider widths are required at the major crossings such as the railway and Tendring Brook. In general a 90 m wide ECC has been defined which for the open trench sections gives some flexibility for micro- routing for archaeology or other ecological features found during pre-construction surveys. In route section 6 and 7 the Onshore ECC is slightly wider (72 m for scenario 1 and approximately 50 m for scenario 2 and 3) as a dedicated haul road is incorporated to allow for construction traffic access to the onshore substation. The Onshore ECC is up to 22 km in length with installed cable lengths of up to 24.5 km from landfall to the National Grid EACN substation have been considered in the assessment to allow for micro-routing. | The MDS includes the maximum number of cables anticipated and assumes disturbance throughout the Onshore ECC area, therefore the greatest area of land disturbance. Open trenching as a crossing option for smaller watercourse crossings has been considered to represent the greatest potential for change to surface |
| | Cables will be installed in ducts, with installation undertaken in sections. | hydrology and effect on water quality. |
| | Twelve TCC locations along the Onshore ECC, comprising 7 main / larger TCCs; 3 minor TCCs; 1 minor sized TCC for marshalling of substation traffic; and 1 minor beach access compound. | |
| | Trenched crossing of smaller watercourses (see crossing register provided in Volume 6, Part 6, Annex 6.1.1: Crossing Register. | |
| OnSS | The OnSS will include the footprint of the substation infrastructure and development platform (including landscaping). | The MDS includes the maximum development footprint (temporary and |

Table 6-11: Maximum Design Scenario for the project.



| Potential effect | Maximum Adverse Scenario Assessed | Justification | |
|--|---|--|--|
| Increase in flood risk or change in water quality | One TCC work area is included to accommodate offices, welfare facilities, car parking, workshops and storage areas. Indicative maximum TCC area of 37,500 m ² is assumed for the substation TCC. | permanent) and therefore the largest possible area of disturbance to surface water features. | |
| HDD (or alternate trenchless crossing works) | HDD (or alternative trenchless crossing technique) crossings required for larger surface watercourses; key roads; ecological features and some utility crossings. | HDD (or other trenchless crossing) techniques present a risk of indirectly contaminating surface watercourses or groundwater where they are hydraulically connected with surface runoff caused by spillages and the movement of excavated earth/ sediments. | |
| Increase in flood risk or change in water quality | HDD TCCs would be located at each end of the crossing, requiring an associated TCC, either with permeable surfacing or suitable drainage where non permeable surfacing used. | | |
| Landfall Increase in flood risk or change in water quality | HDD (or alternative trenchless crossing technique) will be used from landfall to cross the coastal flood defence line and Kirby Brook watercourse. | The MDS includes the maximum number of cables anticipated at landfall and therefore, the maximum working corridor required. | |
| | Temporary access will be required which may cross flood defence infrastructure. | A number of access options for landfall are included in the MDS. | |
| Operation | | | |
| OnSS Increase in flood risk | Permanent area of the OnSS footprint assumes an Air Insulated Switchgear (AIS) substation which has the greater footprint of 280 m x 210 m, plus an operational access road. | The MDS for flood risk at the OnSS requires the largest footprint for design resulting in the largest possible area of disturbance and largest potential for impermeable ground cover. | |
| OnSS Routine maintenance works affecting | Routine maintenance of the OnSS. | The MDS for water quality of main watercourses during operation is that chemicals and oils would | |



| Potential effect | Maximum Adverse Scenario Assessed | Justification | | |
|--|---|--|--|--|
| surface watercourses | Permanent onshore cables will be buried (apart from joint bay access points). | be used in the routine maintenance of OnSS. The Onshore ECC provides potential lateral pathways for water flow which could indirectly affect water quality. | | |
| Decommissioni | ng | | | |
| OnSS Change to flood risk | Removal of the OnSS including any areas of hardstanding. No decision has yet been made regarding the final approach to decommissioning for other infrastructure (buried cables, TJB's, etc.) as it is recognised that industry best practice, rules and legislation change over time. The detail and scope of decommissioning works will be determined by the relevant | The MDS for flood risk on the surrounding environment during decommissioning is the removal of the OnSS. The change in surfacing and removal of attenuation storage associated with the OnSS could affect flood risk as it would take the natural environment a period of time to re- establish itself to provide natural attenuation. | | |
| OnSS Works affecting surface watercourses | legislation and guidance at the time of decommissioning and will be agreed with the regulator with a decommissioning plan provided. | The MDS for water quality of watercourses during decommissioning is the removal of the OnSS. The onshore ducts remaining in situ provides potential lateral pathways for water flow which could indirectly affect water quality. | | |
| Cumulative Effects | | | | |
| Effects on the water environment during construction | Overlap of construction phase with construction of nearby developments including capital programme schemes in the area. | Overlapping construction phases would be the period of highest risk to the water environment, due to receptors being affected by more than one project. | | |
| Effects on flood risk during operation | Combined effect of increased areas of hardstanding | Combined effects of increased hardstanding could lead to increased potential for runoff. | | |



6.9 MITIGATION

- 6.9.1 The mitigation contained in Table 6.12 are mitigation measures or commitments that have been identified and adopted as part of the evolution of the project design of relevance to hydrology and flood risk, these include project design measures, compliance with elements of good practice and use of standard protocols. Where the assessment determined significant effects accounting for mitigation, further measures may be required, which are presented as additional mitigation. Table 6.14 presents additional mitigation measures. These have typically been put forward where:
 - > An effect is significant in EIA terms, even with mitigation, but additional mitigation measures are available to reduce the level of effect; or
 - Mitigation has been proposed but has not yet been agreed with regulators, stakeholders, etc. or it is unproven.
- 6.9.2 The mitigation includes measures such as design changes and applied mitigation which is subject to further study or approval of details; these include avoidance measures that will be informed by pre-construction surveys, and necessary additional consents where relevant. The composite of standard and applied mitigation measures apply to all parts of the VE development works, including pre-construction, construction, O&M and decommissioning.



| Parameter | Mitigation measures |
|--|---|
| General | |
| | Careful routing of the Onshore ECC to avoid main rivers. |
| Project Design and Route Selection | Design of key crossing points (sea defence structures, main rivers, non-main and ordinary watercourses, roads, utilities etc.), including the use of HDD (or other alternative trenchless crossing techniques), to avoid key areas of sensitivity. |
| Construction | |
| Code of Construction Practice (CoCP) | The CoCP (Application Document 9.21) is included as part of the DCO application. The CoCP includes measures to control the impacts of watercourse crossings and crossings beneath flood defences. |
| | The design of the OnSS may result in the construction of low permeability surfacing, increasing the rate of surface water runoff from the site. A surface water drainage scheme is required to ensure the existing runoff rates to the surrounding water environment are maintained at pre-development rates. An outline surface water drainage scheme is provided as part of the OnSS FRA. |
| Surface Water Drainage | The detailed (post-consent) design of the surface water drainage scheme would be based on a series of infiltration/soakaway tests carried out on site and the required attenuation volumes will be outlined in the supporting OnSS FRA. The tests will be undertaken prior to construction and in accordance with the BRE Digest 365 Guidelines in order to determine the suitability of ground for accepting a drainage discharge. |
| | Construction of the onshore OnSS will require temporary management of surface water during construction. Control measures will be included within the CoCP to minimise the risk of water pollution. |
| | Construction of the Onshore ECC will require temporary management of surface water along the route. Control measures will be included within the CoCP to minimise the risk of water pollution. |
| Flood Risk | Cable trenching, construction haul roads and construction site accesses which cross surface watercourses will require measures to ensure that the water quality and flow rates are unaffected either directly or indirectly. These measures will be secured as part of the CoCP. |

Table 6-12: Mitigation relating to hydrology, hydrogeology and flood risk.



| Parameter | Mitigation measures |
|-------------------------|---|
| | The Onshore ECC and the construction haul roads will be designed to minimise land take and to avoid, where possible, impacts on existing drainage networks and features. |
| | The CoCP requires that flood response awareness and procedures will be included in the principal contractor's emergency response planning where there are works near to or within a flood zone or area of residual risk existing from coastal flood defence failure. This plan would include a procedure for evacuation of personnel and the securing or relocating sensitive equipment and/ or materials stored in bulk. |
| | The onshore TCC and construction access and haul roads would comprise, where practical, permeable gravel overlying a permeable geotextile membrane of an appropriate standard. |
| | Where required and practical, drainage would be installed either side of the Onshore ECC to ensure existing land drainage flow regimes are maintained. |
| | Surface water flowing into the trenches and work areas during the construction period will be pumped via settling tanks or ponds to remove sediment and potential contaminants, before being discharged into local ditches or drains via temporary interceptor drains. Where topographic or hydraulic gradients on site are significant, cable trenches will include a hydraulic break (bentonite or natural clay seals) to reduce flow rates along trenches and hence reduce local erosion. |
| | Any field drainage intercepted during the cable installation will either be reinstated following the installation of the cable or diverted to a secondary channel through agreement with the appropriate stakeholders. |
| | Any stockpiles along the cable route will have gaps to allow surface water runoff to pass through. |
| Pollution Prevention | Areas at risk of spillage, such as vehicle maintenance areas and hazardous substance stores (including fuel, oils and chemicals) will be bunded and carefully sited to minimise the risk of hazardous substances entering drainage systems or local watercourses. Additionally, the bunded areas will have impermeable bases to limit the potential for migration of contaminants into groundwater following any leakage/spillage. Bunds used to store fuel, oil etc. will have a 110% capacity. |



| Parameter | Mitigation measures |
|---------------|--|
| | Any refuelling of machinery or washout of concrete transportation vehicles will be undertaken within designated areas, located a minimum of 10 m from surface water features, where spillages can be easily contained. |
| | Machinery will be routinely checked to ensure it is in good working condition to reduce the risk of leaks. |
| | Any tanks and associated pipe work containing oils and fuels will be double skinned and be provided with intermediate leak detection equipment. |
| | A spill procedure will be documented, and spill kits kept in the vicinity of potentially hazardous materials storage areas. |
| | Disturbance to areas close to watercourses will be reduced to the minimum necessary for the work. |
| | Excavated material will be placed in such a way as to avoid any disturbance of areas close to the banks of watercourses and to prevent spillage into water features. Stockpiles will be located a minimum of 10 m from surface water features where practicable. |
| | Use of sediment fences along watercourses when working in close proximity, to prevent sediment being washed into watercourses. |
| | Covers will be used by lorries transporting materials to/ from site to prevent releases of dust/ sediment to watercourses or drains. |
| | If applicable, storage of stockpiled materials should be covered when not in use to prevent materials being dispersed by wind or rainfall runoff. |
| | Any visual/ olfactory signs of contamination encountered during excavation should be reported and investigated. |
| | A briefing will be included within the site induction highlighting the importance of water quality, the location of watercourses and pollution prevention measures. |
| | Drainage works to be constructed to relevant statutory guidance. |
| Best Practice | All construction work will be undertaken in accordance with the CoCP, which will be secured as part of the DCO. The CoCP will be drafted having consideration of good practice guidance including, but not limited to: |
| | Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors CIRIA (C532) (CIRIA 2001); and |
| | > CIRIA – SuDS Manual (C753) (CIRIA, 2015b). |



| Parameter | Mitigation measures |
|-----------------|---|
| Operation | |
| General | The OnSS would contain potential pollutants which could include cooling oils, lubricants, fuels, greases, etc. The design, maintenance and operation of the facility would follow good practice in line with the prevailing guidance and legislation with regard to measures such as the storage and management of potentially polluting substances, emergency spill response procedures, clean up and control of any potentially contaminated surface water runoff and routine inspection to prevent or contain leaks of any pollutants. Suitably sized and stocked spill kits, relevant to the chemicals being stored or used, will be kept in the vicinity of potentially hazardous materials storage areas. |
| Decommissioning | |
| General | Decommissioning practices will incorporate measures similar to the construction phase, to prevent pollution and increased flood risk. These measures will include emergency spill response procedures, control of surface water and clean up and remediation of any contaminated soils. Exposed cables ducts will be sealed with an appropriate waterproofing material to mitigate flood risk or creation of preferential flow pathways. |
| | Decommissioning will be undertaken in accordance with relevant guidelines at the time of decommissioning and will include measures to protect the water environment. |

6.10 ENVIRONMENTAL ASSESSMENT: CONSTRUCTION PHASE

- 6.10.1 The impacts of the onshore construction of VE have been assessed on hydrology, hydrogeology and flood risk in the onshore study area. The impacts are assessed against the MDS in Table 6.11.
- 6.10.2 A description of the potential effect on hydrology, hydrogeology and flood risk receptors caused by each identified impact is given below. In general, the environmental effects arising from the construction of the project are temporary, as they only occur during the construction phase.
- 6.10.3 The Onshore ECC FRA (Volume 55, Report 3.1: Onshore ECC FRA) and the OnSS FRA (Volume 5, Report 3.2: OnSS FRA) each assess the effects of flood risk on the temporary works areas associated with the construction phase and demonstrate how the significance of these effects can be reduced to an acceptable level through best practice and mitigation measures.
- 6.10.4 The groundwater risk assessment (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment) reviews all groundwater users within the study area and informs the assessment of potential impacts relating to groundwater.

CABLE ROUTE INSTALLATION

IMPACT 1: GENERATION OF TURBID OR POLLUTED RUNOFF WHICH COULD ENTER THE WATER ENVIRONMENT

- 6.10.5 Several sections of the Onshore ECC involve or require crossing a Main River or ordinary watercourses or drainage ditches, as shown in Figure 6-2 and listed in the Crossing Schedule (Volume 6, Part 6, Annex 6.1.1). Along its route, the Onshore ECC passes through land within the tidal floodplain, at landfall in inland at Holland Haven Marshes, which is afforded protection by the coastal sea wall defences. The Onshore ECC also passes through fluvial flood zones associated with the immediate corridor of Tendring Brook and Holland Brook. Assessment of impact relating to HDD (or other trenchless crossing techniques) is discussed below from paragraph 6.10.56.
- 6.10.6 Landfall HDD (or other trenchless crossing technique) exit pits may be located within the intertidal zone or the shallow subtidal zone. Depending on the final methodology and location, it may be necessary to install temporary sheet piled exit pits to prevent water intrusion to provide a dry working area and to retain drilling fluid (bentonite). Assessment of impact relating to Landfall construction is discussed below from paragraph 6.10.87.
- 6.10.7 Volume 9, Report 9.21: CoCP identifies that contractors will require a flood response plan (or similar) to ensure that procedures are in place in the event of a flood warning or the onset of flooding during the construction phase. Through measures such as the ceasing of works, relocation or securing of sensitive equipment and/ or materials and evacuation of workforce personnel, the CoCP will reduce the likelihood of construction activities resulting in incidents detrimental to water quality occurring in the event of flooding and reduce the magnitude of the impact of any such incidents.
- 6.10.8 The CoCP also includes measures to control runoff from the construction works. This could include, for example, sediment fences when working in proximity to open watercourses, containment of storage areas and treatment of any runoff from work areas or water from dewatering of trenches. Such measures would prevent the potential reduction in water quality associated with increased sediment loading affecting nearby tidal waters, fluvial watercourses or drainage ditches during cable route construction works, especially during excavations or earthwork activities.
- 6.10.9 The CoCP includes requirement for any refuelling of machinery or washout of concrete transportation vehicles to be undertaken within designated areas. These areas will be located a minimum of 10 m from surface water features, where any spillages can be easily contained.
- 6.10.10 Stockpiling of excavated materials during earthworks would be temporary and would only be permitted in designated areas. Designated stockpile areas would be a minimum of 10 m from any open watercourse features. The potential for contaminants contained within the stockpiled materials to be leached into water bodies, resulting in a reduction in the quality of the receiving waters, would be reduced through the implementation of mitigation, discussed in Section 6.9, and mitigation measures proposed within the CoCP.



- 6.10.11 The mitigation measures discussed at Section 6.9 includes the implementation of spill procedures and use of spill kits. These measures together with appropriate drainage measures and containment will minimise the potential for any reduction in water quality associated with spills or leaks of stored oils/ fuels/ chemicals or other polluting substances migrating into nearby water bodies.
- 6.10.12 The potential presence of ground contamination and the potential for this to migrate into underlying groundwater and resulting effects on the quality of water receptors is considered in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use.
- 6.10.13 For watercourses, it is predicted that any impact on water quality from the ECC construction works would be direct through pollution from spills and of an intermittent nature and of short duration.
- 6.10.14 The sensitivity of onshore watercourse receptors ranges from **low** to **high**. Given the mitigation in place and that any direct pollution from spills would be small, the magnitude of impacts to watercourses directly draining the ECC and substation search areas (Holland Brook, Kirby Brook, Tendring Brook and smaller tributaries and ditches) is deemed to be **low**. The magnitude of impact to watercourses downstream of the Order Limits is deemed to be **negligible**. The significance of effect is therefore considered to be **minor adverse** for watercourses directly draining the ECC and substation search areas and **minor adverse** or **negligible** for watercourses downstream of the Order Limits. There are no significant effects predicted in EIA terms.
- 6.10.15 For the near shore coastal water body and the Colne and Stour transitional water bodies, the impact on water quality from the ECC construction works would be direct (landfall works only) and indirect (via onshore watercourses discharging to the coast or estuarine environments) and of an intermittent nature and of short duration.
- 6.10.16 The sensitivity of the near shore water body is **medium** and the transitional water bodies are **high**. Potential for water quality impacts from shore works is **negligible** as any excavations will only have potential to mobilise sands and any direct pollution from spills will be very small relative to the receiving environment.
- 6.10.17 The mechanism for water quality impacts on the near shore coastal water body and transitional water bodies from inland works will be indirect, via watercourses. These watercourses will reduce any potential impacts from sediment entrainment and spills through settlement and dilution respectively.
- 6.10.18 The magnitude of impact with controls in place is assessed to be **negligible**. The significance of effect on near shore coastal water is therefore considered to be **minor adverse**, which is not significant in EIA terms.

IMPACT 2: CHANGES TO SURFACE WATER RUNOFF PATTERNS WHICH COULD AFFECT FLOOD RISK IMPACT

6.10.19 Spills of bulk materials such as concrete or entrainment of stockpiled material from excavations during cabling works could result in watercourses or drainage ditches becoming restricted or blocked. This could impact flow regimes and could result in an increase in fluvial flood risk.



- 6.10.20 Implementation of the mitigation measures discussed at section 6.9 and further measures which will be proposed within the CoCP, would reduce the likelihood of construction activities resulting in spillage incidents occurring and will ensure that there is very limited chance of stockpiled material becoming entrained and entering watercourses. This would reduce the magnitude of impact of any such incident.
- 6.10.21 Large stockpiles of excavated/ construction materials could block overland flow of surface water during heavy rainfall events and could also affect the routing and extent of fluvial flood risk from main rivers or tidal flood risk. This could result in changes to existing surface water hydrology and an increase in surface water flood risk.
- 6.10.22 The laying of temporary surfacing material for the working area (which includes the corridor in which the haul road, cable trenches, excavated material and equipment are located) could result in a reduction in the permeability of the ground and therefore an increase in surface water flood risk.
- 6.10.23 These effects would be mitigated through the appropriate siting of stockpiles, provision of gaps to allow passage of surface water and development of a drainage strategy. Therefore, the effects of construction on surface water flood risk would be largely mitigated through the measures proposed within the CoCP.
- 6.10.24 The Onshore ECC crosses main rivers, ordinary watercourses and drainage ditches along its route. At any watercourse crossing there will be potential for the construction works associated with the crossing to increase fluvial flood risk through altering the existing hydrological regime.
- 6.10.25 The CoCP specifies mitigation measures including the principal contractor having emergency and contingency plans for flooding incidents which may affect the works. The CoCP specifies the need for a minimum cover depth between the top of ducts and hard bed level of the watercourse being crossed.
- 6.10.26 Overall, it is predicted that the impact on flood risk from construction of the Onshore ECC (including crossing of watercourses) would be direct and of an intermittent nature and of short duration.
- 6.10.27 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would, therefore, be **negligible**, which is not significant in EIA terms.

IMPACT 3: POTENTIAL FOR DAMAGE TO FLOOD DEFENCES OR SURFACE WATER DRAINAGE INFRASTRUCTURE

6.10.28 The Onshore ECC crosses assets defined by the EA as flood defences on the coastline at landfall, and along the embankments of Kirby Brook, Holland Brook and Tendring Brook. Trenchless crossing techniques will be used to cross existing flood defences and EA Main River channels along the Onshore ECC. At any crossing point there will be potential for the construction works associated with the crossing to damage or alter the nature of the flood defence, potentially increasing flood risk.



- 6.10.29, As applicable, agreement consent will be sought from the EA to undertake works crossing, or within 8 m of flood defences or Main Rivers or within 16 m if it is a tidal main river. Trenchless crossing activities would be undertaken in accordance with the conditions of any agreement given or consent granted which would be specified to ensure that construction does not result in damage to existing assets. This will include specifying the minimum cover depth between the cable duct and the base of the defence or the hard bed level of the watercourse being crossed
- 6.10.30 Overall, it is predicted that the impact on flood risk from construction of the Onshore ECC would be direct and of an intermittent nature and of short duration.
- 6.10.31 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would, therefore, be **negligible**, which is not significant in EIA terms.

IMPACT 4: POLLUTION OR DISRUPTION OF FLOW TO GROUNDWATER THROUGH GROUND EXCAVATIONS OR PILING

- 6.10.32 As confirmed in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use, there are no known point sources of contamination within the study area, however, on a precautionary basis, there is the potential for limited contamination to exist as a result of previous land uses, including agriculture and the use of nitrogen-based fertilisers. Any contamination is likely to be localised in its extent given the sources of contaminants and the characteristics of the underlying geology.
- 6.10.33 Whilst there is the potential for the construction of the cable trenches and the installation of ducts to introduce a pathway for contaminants, the permeability of the underlying strata is likely to limit the migration of potential contaminants. Across the Onshore ECC, the underlying bedrock does not contain significant quantities of groundwater and is considered unproductive as an aquifer. Some areas of the site are underlain by superficial deposits of Sand and Gravels which contain localised shallow groundwater. Excavations for the cable route will be shallow (up to 2 m depth) and as a result, groundwater is unlikely to be encountered. Any groundwater seepage is likely to be minor and it would be managed in accordance with controls set out in the CoCP.
- 6.10.34 A groundwater risk assessment (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment) has been carried out to assess the potential for impact from the proposed Onshore ECC cable installation works and all associated works which involve earthwork excavations, such as road widening activities. The risk assessment identifies a number of licenced groundwater abstractions and PWS sources which will require further detailed assessment post consent and where required, will be subject to groundwater monitoring.
- 6.10.35 Overall, it is predicted that the magnitude of impact on shallow groundwater will be low and direct, and of short duration. The sensitivity of the shallow groundwater receptor is considered to be medium (bedrock groundwater sensitivity is negligible). Given the sensitivity of the superficial deposits, the effect will, therefore, be minor adverse, which is not significant in EIA terms.

ONSHORE SUBSTATION CONSTRUCTION

IMPACT 1: GENERATION OF TURBID OR POLLUTED RUNOFF WHICH COULD ENTER THE WATER ENVIRONMENT

- 6.10.36 As set out for the Onshore ECC works above, implementation of the mitigation measures discussed in Section 6.9 and the measures proposed within the CoCP would reduce the likelihood of construction activities associated with the OnSS resulting in incidents detrimental to water quality occurring. The proposed measures would include controls to prevent the potential reduction in water quality associated with increased sediment loading (including potentially contaminated sediment) entering nearby fluvial watercourses or drainage ditches during construction works, especially during excavating works.
- 6.10.37 The CoCP includes requirement for any refuelling of machinery or washout of concrete transportation vehicles to be undertaken within designated areas. These areas will be located a minimum of 10 m from surface water features, where any spillages can be easily contained.
- 6.10.38 Materials excavated during construction works would be stockpiled temporarily in designated areas. All designated stockpile areas would be a minimum of 10 m from any open watercourse features. The potential for contaminants to be contained within the stockpiled materials that could be leached into nearby fluvial watercourses or drainage ditches is not considered likely as contaminated land from pre-existing ground conditions has been effectively ruled out of assessment in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use, as no contamination sources have been identified at the OnSS. Where practical, where soil is to be stored for over 6 months it will be covered to minimise erosion or allowed to re-vegetate naturally.
- 6.10.39 The mitigation measures discussed at Section 6.9 includes the implementation of spill procedures and use of spill kits on site. This should prevent any potential reduction in water quality associated with spills or leaks of stored oils, fuels or chemicals used during the construction works migrating into nearby watercourses or drainage ditches.
- 6.10.40 The potential presence of ground contamination and resulting effects on the quality of water receptors is considered in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use.
- 6.10.41 Overall, it is predicted that the impact on water quality would be direct and of an intermittent nature and of short duration. The sensitivity of the receptors (receiving watercourses within the vicinity of either of the two substation search areas) is **low** to **medium** and the magnitude of impact is deemed to be **low**. The significance of effect would, therefore, be **minor adverse**, which is not significant in EIA terms.

IMPACT 2: CHANGES TO SURFACE WATER RUNOFF PATTERNS WHICH COULD AFFECT FLOOD RISK

6.10.42 Spills of bulk materials such as concrete or entrainment of stockpiled material from excavations during OnSS construction could result in watercourses or drainage ditches becoming restricted or blocked. This could impact flow regimes and could result in an increase in localised fluvial flood risk.



- 6.10.43 Implementation of the mitigation measures discussed at Section 6.9 and measures which are proposed within the CoCP, would reduce the likelihood of construction activities resulting in spillage incidents occurring and will ensure that there is very limited chance of stockpiled material becoming entrained to potentially enter watercourses. This would reduce the magnitude of impact of any such incidents.
- 6.10.44 Large stockpiles of excavated/ construction materials could block overland flow of surface water during heavy rainfall events and result in changes to existing surface water hydrology and an increase in surface water flood risk.
- 6.10.45 The laying of temporary surfacing material for access roads, TCC areas and any designated stockpile areas could result in a reduction in the permeability of the ground and therefore lead to an increase in surface water flood risk. The small-scale nature of the construction works in relation to the overall size of the groundwater aquifer means there is negligible potential for impact on groundwater levels.
- 6.10.46 These effects would be mitigated through the appropriate siting of stockpiles, provision of gaps to allow passage of surface water and development of a drainage strategy. Therefore, the effects of construction on surface water flood risk would be largely mitigated through the measures proposed within the CoCP.
- 6.10.47 The OnSS construction area (including land for access road options) may disturb existing surface water drainage features (ordinary watercourses) which may require diversion.
- 6.10.48 Any diversion or alteration to existing watercourse features would need to ensure that works do not result in an increase in flood risk. The final design of the OnSS will consider mitigation measures including emergency and contingency plans for flooding incidents which may affect the works.
- 6.10.49 The proposed OnSS search areas are of a low risk of fluvial (and tidal) flooding. The activities carried out during construction phase would not impede floodplain flows arising from a tidal or fluvial flood event or reduce floodplain storage.
- 6.10.50 It is predicted that the impact on flood risk in this regard would be direct and of an intermittent nature and of short duration. The sensitivity of the receptor (the fluvial floodplain is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.
- 6.10.51 TCC area(s) would be used during construction of the OnSS. This would be in addition to the land required for the OnSS and they would be used to store plant, materials and equipment whilst construction is being undertaken. No TCC would be located within the floodplain.
- 6.10.52 Overall, it is predicted that the impact on flood risk from the TCC areas would be direct and of an intermittent nature and of short duration. The sensitivity of the receptor (the fluvial floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.

IMPACT 4: POLLUTION OR DISRUPTION OF FLOW TO GROUNDWATER THROUGH GROUND EXCAVATIONS OR PILING

- 6.10.53 There is potential for a piled foundation being required as part of the OnSS design, subject to post-consent ground investigations. The OnSS is in agricultural land and there is no record of any potentially contaminative land use on this part of the site. Therefore, the probability of contamination to groundwater is considered to be low. Overall, it is predicted that the impact on groundwater quality will be direct and of a continuous nature and of short duration.
- 6.10.54 A groundwater risk assessment (Volume 6, Part 6, Annex 6.6.1: Groundwater Risk Assessment) has been carried out to assess the potential for impact from the proposed OnSS works. The risk assessment does not identify any licenced groundwater abstractions or PWS source which could potentially be impacted by the proposed OnSS construction phase works.
- 6.10.55 The sensitivity of the groundwater receptor is considered to be **medium** (bedrock groundwater sensitivity is negligible) and the magnitude is deemed to be **negligible**. The effect will, therefore, be **negligible** which is not significant in EIA terms.

HORIZONTAL DIRECTIONAL DRILLING (HDD) WORKS

IMPACT 1: GENERATION OF TURBID OR POLLUTED RUNOFF WHICH COULD ENTER THE WATER ENVIRONMENT

- 6.10.56 As set out for the Onshore ECC works above, implementation of the mitigation measures discussed at Section 6.9 and the measures proposed within the CoCP would ensure that the potential for incidents detrimental to water quality occurring is minimised and would reduce the magnitude of the impact of any such incidents.
- 6.10.57 The CoCP includes the requirement for the principal contractor to have an emergency flood response plan in place when working in a flood zone 2/3. This will ensure that procedures are in place in the event of flooding during any HDD (or other trenchless crossing technique) activity. In the event of a flood warning being received for an area where trenchless crossing works are taking place, any activity would be stopped and where possible, all sensitive equipment or plant would be relocated from the risk area and material secured. Workforce personnel would be evacuated from the work area until any such warning was over. These measures will reduce the likelihood of construction activities resulting in incidents detrimental to water quality occurring in the event of flooding and reduce the magnitude of the impact of any such incidents.
- 6.10.58 The CoCP includes requirement for any refuelling of machinery or washout of concrete transportation vehicles to be undertaken within designated areas. These areas will be located a minimum of 10 m from surface water features, where any spillages can be easily contained.



- 6.10.59 Materials excavated during initial excavations or during trenchless crossing works would be stockpiled temporarily in designated areas. All designated stockpile areas would be a minimum of 10 m from any open watercourse features where practicable. The potential for contaminants contained within the stockpiled materials that could be leached into nearby fluvial watercourses or drainage ditches is not considered likely as contaminated land from pre-existing ground conditions has been effectively ruled out of assessment in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use, as no contamination sources have been identified along the route. If required and where practical, where soil is to be stored for over 6 months it will be covered to minimise erosion or allowed to re-vegetate naturally.
- 6.10.60 The potential presence of ground contamination and resulting effects on the quality of water receptors is considered in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use.
- 6.10.61 The proposed measures would include controls to prevent the potential reduction in water quality associated with increased sediment loading (including potentially contaminated sediment) and with spills or leaks of oils, fuels or chemicals used during the trenchless crossing works migrating into nearby fluvial or tidal watercourses or drainage ditches during construction works, especially during excavation earthworks and management of spoil from drilling.
- 6.10.62 Controls within the CoCP (Application Document 9.21) will be implemented to prevent any potential release of drilling fluid (bentonite) to the water environment. Site investigation prior to works, monitoring during works and appropriate contingency plans and response equipment will be included in the plan.
- 6.10.63 For the near shore coastal water body and the Colne and Stour transitional water bodies, the impact on water quality from the trenchless crossing works would be indirect (via onshore watercourses discharging to the coast or estuarine environments) and of an intermittent nature and of short duration. The sensitivity of the near shore water body is **medium** and the transitional water bodies are **high**. Potential for water quality impacts from shore works is **low** as any excavations are likely to only have potential to mobilise sands and any direct pollution from spills will be very small relative to the receiving environment.
- 6.10.64 The mechanism for water quality impacts on the near shore coastal water body and transitional water bodies from inland HDD activity will be indirect, via watercourses. These watercourses will reduce any potential impacts from sediment entrainment and spills through settlement and dilution respectively.
- 6.10.65 The magnitude of impact with controls in place is assessed to be **negligible**. The significance of effect on near shore coastal water is therefore considered to be **minor adverse**, which is not significant in EIA terms.
- 6.10.66 For inland watercourses the impact on water quality from the trenchless crossing works would be direct and of an intermittent nature and of short duration.



- 6.10.67 The sensitivity of the receptors ranges from low to high. Given the mitigation in place and that any direct pollution from activities would be small, the magnitude of impacts to watercourses directly draining the inland trenchless crossing areas (Holland Brook, Kirby Brook, Tendring Brook and smaller tributaries and ditches) is deemed to be low. The magnitude of impact to watercourses downstream of the Order Limits is deemed to be negligible. The significance of effect on inland watercourses would, therefore, be minor adverse for watercourses directly draining the trenchless crossing work areas and minor adverse or negligible for watercourses downstream of the Order Limits. These are not significant effects in EIA terms.
- 6.10.68 The trenchless crossing proposed for landfall and the coastal defences is assessed under Section 6.10.80 onwards. For crossings where trenchless crossing techniques may be used, land use is primarily agricultural, and no land uses with potential sources of contamination in the vicinity of the trenchless crossing works have been identified. However, the potential for localised contaminants as a result of runoff from the adjacent road or work areas has been considered.

IMPACT 2: CHANGES TO SURFACE WATER RUNOFF PATTERNS WHICH COULD AFFECT FLOOD RISK

- 6.10.69 Spills of bulk materials such as concrete or entrainment of stockpiled material from excavations or spoil from drilling during trenchless crossing works could result in watercourses or drainage ditches becoming restricted or blocked. This could impact flow regimes and could result in an increase in fluvial flood risk.
- 6.10.70 Implementation of the mitigation measures discussed at Section 6.9 and further measures which are proposed within the CoCP, would reduce the likelihood of construction activities resulting in spillage incidents occurring and will ensure that there is very limited chance of stockpiled material becoming entrained and entering watercourses. This would reduce the magnitude of impact of any such incident.
- 6.10.71 Large stockpiles of excavated/ construction materials could block overland flow of surface water during heavy rainfall events and result in changes to existing surface water hydrology and an increase in surface water flood risk.
- 6.10.72 The laying of temporary surfacing material for the trenchless crossing working areas could result in a reduction in the permeability of the ground and therefore an increase in surface water flood risk. The small-scale nature of the construction works in relation to the overall size of the groundwater aquifer means there is negligible potential for impact on groundwater levels.
- 6.10.73 These effects would be mitigated through the appropriate siting of stockpiles, provision of gaps to allow passage of surface water and development of a drainage strategy. Therefore, the effects of construction on surface water flood risk would be largely mitigated through the measures proposed within the CoCP.
- 6.10.74 The proposed trenchless crossing works will be used to cross existing flood defences and a number of Main River channels along the ECC. At any watercourse crossing there will be potential for the trenchless crossing works associated with the crossing to increase fluvial flood risk through altering the existing hydrological regime.
- 6.10.75 Overall, it is predicted that the impact on tidal and fluvial flood risk from trenchless crossings would be direct and of an intermittent nature and of short duration.



- 6.10.76 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.
- 6.10.77 Trenchless crossing compounds would be used during the construction phase, which would be used to store plant and equipment whilst works are being undertaken. There is potential for the landfall TCC to be located within the fluvial or tidal floodplain and therefore a FRA for these elements has been produced (Volume 5, Report 5.3.1: Onshore ECC FRA).
- 6.10.78 The FRA identifies appropriate mitigation measures to ensure that the flood risk associated with the landfall TCC is minimised to an acceptable level, including a flood warning service in the event of a potential flood threat to the area in which the TCC is located.
- 6.10.79 Overall, it is predicted that the impact on flood risk associated with Trenchless crossing landfall TCC would be direct and of an intermittent nature and of short duration.
- 6.10.80 The sensitivity of the receptor (fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.

IMPACT 3: POTENTIAL FOR DAMAGE TO FLOOD DEFENCES OR SURFACE WATER DRAINAGE INFRASTRUCTURE

- 6.10.81 The Onshore ECC assets defined by the EA as flood defences on the coastline at landfall, and along the embankments of Kirby Brook, Holland Brook and Tendring Brook. At any crossing point there will be potential for the construction works associated with the crossing to damage or alter the nature of the flood defence, potentially increasing flood risk.
- 6.10.82 Construction activities would be undertaken in accordance with measures set out in the CoCP to ensure that construction does not result in damage to any flood defences. This will specify the need for a minimum cover depth between the cable and the defences being crossed.
- 6.10.83 Overall, it is predicted that the impact on flood risk from construction of the Onshore ECC would be direct and of an intermittent nature and of short duration.
- 6.10.84 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would, therefore, be **negligible**, which is not significant in EIA terms.

IMPACT 4: POLLUTION OR DISRUPTION OF FLOW TO GROUNDWATER THROUGH GROUND EXCAVATIONS

- 6.10.85 Where groundwater is encountered it will be sensitive to accidental spillages and runoff from the trenchless crossing works. Measures in the CoCP to control the storage and use of materials and chemicals would be implemented, which would limit the magnitude of impact.
- 6.10.86 The magnitude of the impact would be **low** to **negligible**. The sensitivity of the shallow groundwater receptor is considered to be **medium** (bedrock groundwater sensitivity is **negligible**). Given the sensitivity of the superficial deposits, the effect will, therefore, be **minor adverse** to **negligible**, which is not significant in EIA terms.

LANDFALL WORKS

IMPACT 1: GENERATION OF TURBID OR POLLUTED RUNOFF WHICH COULD ENTER THE WATER ENVIRONMENT

- 6.10.87 As set out for the Onshore ECC works above, implementation of the mitigation measures discussed at Section 6.9 and the measures proposed within the CoCP will reduce the likelihood of construction activities resulting in incidents detrimental to tidal water quality occurring and reduce the magnitude of the impact of any such incidents. Potential impacts to water quality associated with the 'offshore' construction works, from mean high water springs to the array, will be mitigated through measures set out in Volume 6, Part 2, Chapter 3: Marine Water and Sediment Quality.
- 6.10.88 The proposed measures would include controls to prevent the potential reduction in water quality associated with increased sediment loading (including potentially contaminated sediment) entering nearby tidal waters during excavation works or trenchless crossing activities.
- 6.10.89 Stockpiling of materials during earthworks would be temporary and would only be permitted in designated areas. The potential for contaminants contained within the stockpiled materials or associated with spills or leaks of stored oils, fuels or chemicals becoming mobilised into tidal waters, would be reduced through the implementation of mitigation, discussed at Section 6.9 and mitigation measures proposed within the CoCP.
- 6.10.90 Should a tidal flood event associated with extreme sea levels occur whilst construction works are in progress, there is the potential for overtopping of local coastal defences and for stored materials (e.g., stockpiled soils and excavated material) to be mobilised by the floodwaters and washed into coastal waters, potentially resulting in a reduction in local tidal water quality.
- 6.10.91 The CoCP includes measures such as contractors having a flood response plan to ensure that procedures are in place in the event of flooding during the construction phase. Through measures such as the ceasing of works, relocation or securing of materials and evacuation of workforce personnel, the CoCP reduces the likelihood of construction activities resulting in incidents detrimental to water quality occurring in the event of flooding and will reduce the magnitude of the impact of any such incidents.
- 6.10.92 The potential volume and concentration of any contaminated water entering tidal waters as a result of construction activities is considered to be low compared to that of the receiving tidal waters. The mitigation measures discussed at Section 6.9 and included within the CoCP (Application Document 9.21) includes the implementation of spill procedures and use of spill kits. These measures will minimise the potential for any reduction in water quality associated with breakout of drilling fluid (bentonite), spills or leaks migrating into tidal waters.
- 6.10.93 No potential sources of contamination have been identified from former land uses at landfall and therefore, the probability of mobilising existing contaminants in the vicinity is considered unlikely.



- 6.10.94 The onshore cable would be installed by HDD (or other trenchless crossing technique) under the sea defences and Holland Haven Marshes. A Landfall TCC would be established within the landward side of the landfall zone. The TJB will be constructed within this compound, which is likely to incorporate a storage area for fuels and chemicals. A further working area may be located near the exit pit works within the beach area. As a result, there is the potential for contaminants to be released as a result of accidental spillage or inappropriate storage.
- 6.10.95 The mechanism for water quality impacts on the near shore coastal water body from inland trenchless crossing activity will be direct or via watercourses.
- 6.10.96 The sensitivity of the near shore water body is **medium**. Potential for water quality impacts from shore works is **negligible** as any excavations are likely to only have potential to mobilise sands and any direct pollution from spills will be very small relative to the receiving environment. The significance of effect on near shore coastal water is therefore considered to be **minor adverse**, which is not significant in EIA terms.
- 6.10.97 The sensitivity of the watercourse receptors within the landfall area (Holland Haven Marshes) or close to landfall range from **low** to **medium** and the magnitude of impact is deemed to be **low**. The significance of effect on watercourses would, therefore, be **minor adverse**, which is not significant in EIA terms.

IMPACT 2: CHANGES TO SURFACE WATER RUNOFF PATTERNS WHICH COULD AFFECT FLOOD RISK

- 6.10.98 The laying of temporary surfacing material for the landfall haul road, temporary beach access road (if required), TCC and any designated stockpile area could result in a reduction in the permeability of the ground and therefore an increase in surface water flood risk. The increase in surface water runoff volume arising on the impermeable areas is likely to be relatively minor and would discharge directly to tidal waters. The effect of these works on flood risk is assessed in more detail in the FRA (Volume 5, Report 5.3.1: Onshore ECC FRA).
- 6.10.99 Overall, it is predicted that the impact on surface water flood risk would be direct and of an intermittent nature and of short duration.
- 6.10.100 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.
- 6.10.101 Export cables will be installed by trenchless crossing techniques, passing beneath the coastal flood defences. The potential impact from impairment of the coastal defence structure would result in an increase in tidal flood risk.
- 6.10.102 Overall, it is predicted that the impact on tidal flood risk would be direct and of an intermittent nature and of short duration.
- 6.10.103 The sensitivity of the receptor (the fluvial and tidal floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.

IMPACT 4: POLLUTION OR DISRUPTION OF FLOW TO GROUNDWATER THROUGH GROUND EXCAVATIONS OR PILING

- 6.10.104 For the landfall trenchless crossing, the underlying superficial geology is of **low** sensitivity, however the quality of the groundwater is likely to be affected with elevated levels of salinity, which may reduce its importance/ sensitivity. The implementation of the CoCP would control the storage and use of fuels and chemicals within the landfall TCC and therefore reduce the likelihood of contamination occurring. Any risk of increased salinity to groundwater will be localised and small.
- 6.10.105 It is predicted that the magnitude of impact of trenchless crossing mobilising contaminants at the landfall crossing will be **low**, direct and of a continuous nature and of short duration. The sensitivity of the groundwater receptor is considered to be **medium**. The effect will, therefore, be **minor adverse**, which is not significant in EIA terms.

6.11 ENVIRONENTAL ASSESSMENT: OPERATIONAL PHASE

- 6.11.1 The impacts of the operation and maintenance of VE have been assessed on hydrology, hydrogeology and flood risk in the onshore study area. The impacts arising from the operation of the project are detailed in Table 6.11 above, along with the MDS against which each operational phase impact has been assessed.
- 6.11.2 A description of the potential effect on hydrology, hydrogeology and flood risk receptors caused by each identified impact is given below.
- 6.11.3 The Onshore ECC FRA (Volume 5, Report 5.3.1: Onshore ECC FRA) and the OnSS FRA (Volume 5, Report 5.3.2: OnSS FRA) assess the effects of flood risk on the permanent infrastructure associated with the operational phase and demonstrate how the significance of these effects can be reduced to an acceptable level through mitigation measures.

ONSHORE SUBSTATION

IMPACT 5: CHANGES TO SURFACE WATER DRAINAGE AT THE ONSHORE SUBSTATION LOCATION

- 6.11.4 The development of the OnSS and permanent access route would result in an increase in impermeable surfacing. The maximum footprint of the substation compound would be 280 m by 210 m. The majority of the compound would remain permeable. Through the introduction of impermeable surfacing associated with the substation building and access track, there is a potential increase in surface water flood risk due to the greater volume and rate of runoff arising from reduced infiltration potential to ground. The small-scale nature of the reduced infiltration potential in relation to the overall size of the groundwater aquifer means there is negligible potential for impact on groundwater levels.
- 6.11.5 Appropriate surface water drainage would be implemented to mitigate against this potential risk. Surface water drainage measures would be implemented to ensure that runoff from the site is managed and restricted to approved rates, thereby not increasing surface water flood risk. A range of feasible SuDS techniques could be used to achieve this, e.g., infiltration features or surface water detention areas.



- 6.11.6 The OnSS search areas are within Flood Zone 1, i.e. outside of the tidal and fluvial floodplain There would be no effect on the fluvial or tidal floodplain (and therefore no effect on flood risk) associated with the substation during the operational phase.
- 6.11.7 Overall, it is predicted that the impact on flood risk to the site would be direct and of a continuous nature and of medium to long duration.
- 6.11.8 The sensitivity of the receptor (the floodplain) is considered to be **low** and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **negligible**, which is not significant in EIA terms.
- 6.11.9 The OnSS would contain potential pollutants which could include cooling oils, lubricants, fuels, greases, etc. The maintenance and operation of the facility will include routine inspection to prevent or contain leaks of any pollutants from the substation, thereby mitigating against the potential for these contaminants to migrate into the local drainage ditch network and cause a reduction in water quality.
- 6.11.10 Overall, it is predicted that the impact on water quality would be direct and of a continuous nature and of medium to long duration.
- 6.11.11 The sensitivity of the receptors (watercourses and groundwater) is considered to range from **low** to **medium** in the vicinity of the substation search areas and the magnitude of impact is deemed to be **negligible**. The significance of effect would therefore be **minor adverse** or **negligible**, which is not significant in EIA terms.

PERMANENT CABLE ROUTE INFRASTRUCTURE AND TRENCHLESS CROSSINGS

- 6.11.12 The onshore cable would be buried underground. Full restoration of land above the cables would be included in the construction phase, ensuring that the former land use is retained.
- 6.11.13 Following construction, the trenchless crossing work areas would be restored, with the former land use retained. The only permanent features on the surface of the Onshore ECC would be the jointing bays, which would be buried.
- 6.11.14 Adequate surface water drainage measures would be implemented during the construction phase to mitigate against this potential risk by ensuring that runoff from the access routes is restricted to acceptable rates or passes to tidal waters, thereby not increasing surface water flood risk.

IMPACT 6: GENERATION OF TURBID RUNOFF WHICH COULD ENTER THE WATER ENVIRONMENT

- 6.11.15 The significance of effects associated with the temporary impacts on water quality would be **minor adverse** or **negligible**, as assessed in the construction phase detailed above, which is not significant in EIA terms.
- 6.11.16 Post-decommissioning, the long-term effects of the decommissioned VE are described below.
- 6.12 ENVIRONMENTAL ASSESSMENT: DECOMMISSIONING PHASE
- 6.12.1 During the decommissioning phase, the impacts on hydrology, hydrogeology and flood risk will be similar to those assessed for the construction phase. Good practice measures (similar to those identified within the CoCP) would be employed during decommissioning and would be agreed with statutory authorities at the time of decommissioning through a decommissioning plan.



DECOMMISSIONING OF CABLE INFRASTRUCTURE

6.12.2 With respect to the buried onshore cables, these would be left in place during decommissioning. Allowing the cables to remain in place is considered an acceptable option with minimal environmental impact. TJBs may be removed, depending on agreements reached with the regulatory authorities and landowners in place at the time. Removal of TJB structures would return the site to its pre-development state. The MDS in terms of potential effects is therefore for the jointing bays to remain in place.

DECOMMISSIONING OF ONSHORE SUBSTATION

- 6.12.3 It is anticipated that the OnSS would be gradually dismantled on site with certain infrastructure removed for recycling or reuse. Following this, the area is likely to be remediated and restored.
- 6.12.4 The decommissioning works may involve removal of some or all of the impermeable hard-standing surfacing and restoration of the permeable greenfield land present prior to construction. This action would result in the surface water flood risk being returned to its pre-development state. Specific decommissioning requirements and potential concerns with regards to hydrology, hydrogeology and flood risk would be discussed with the relevant statutory consultees at the time.

6.13 ENVIRONMENTAL ASSESSMENT: CUMULATIVE EFFECTS

- 6.13.1 The cumulative impacts of the onshore elements of VE have been assessed on hydrology, hydrogeology and flood risk receptors in the study area. A list of other major developments has been compiled for the onshore assessment of cumulative effects, which includes other projects that are considered likely to be present in the area of the onshore works once VE is operational, or where there may be some overlap in respective construction phases and in decommissioning if appropriate. This is included within Volume 6, Part 1, Annex 3.1: Cumulative Effects Assessment Methodology.
- 6.13.2 In assessing the potential cumulative impacts for VE, it is important to consider that other projects that are currently proposed may or may not be taken forward for development. To build in some consideration of certainty (or uncertainty) the projects and plans discussed above have been allocated into 'Tiers' reflecting their current status within the planning and development process.



Table 6-13: Description of Tiers of other developments considered for cumulativeeffect assessment.

| Tiers | Development Stage | | | |
|--------|--|--|--|--|
| Tier 1 | Projects under construction. | | | |
| | Permitted applications, whether under the Planning Act 2008 or other regimes, but not yet implemented. | | | |
| | Submitted applications, whether under the Planning Act 2008 or other regimes, but not yet determined. | | | |
| Tier 2 | Projects on the Planning Inspectorate's Programme of Projects where a Scoping Report has been submitted. | | | |
| | Projects under the Planning Act 2008 where a PEIR has been submitted for consultation. | | | |
| | Projects on the Planning Inspectorate's Programme of Projects where a Scoping Report has not been submitted. | | | |
| Tier 3 | Identified in the relevant Development Plan (and emerging Development Plans with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited. | | | |
| | Identified in other plans and programmes (as appropriate) which set the framework for future development consents/ approvals, where such development is reasonably likely to come forward. | | | |

6.13.3 The projects and plans selected as relevant to the assessment of impacts to onshore hydrology, hydrogeology and flood risk are based upon an initial screening exercise undertaken on a long list. Each project, plan or activity has been considered and scoped in or out on the basis of effect–receptor pathway, data confidence and the temporal and spatial scales involved. The projects and plans selected are included in Table 6-14.

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| Development type | Project | Status | Data confidence assessment/ phase | Tier |
|-----------------------------|---|-------------|---|--------|
| Energy | North Falls Offshore Wind Farm (OWF) EN010119 | Pre-consent | High data confidence – PEIR application submitted and S42 responses issued. Application to be submitted in 2024 (PINS)Onshore cable route through Tendring District. | Tier 2 |
| Electricity Transmission | Norwich to Tilbury Reinforcement Project and associated East Anglia Connection Node substation | Pre-consent | High data confidence - Application is expected to be submitted to the Planning Inspectorate Q4 2024 (PINS) Part of the application boundary is located on land adjacent to Lawford National Grid Substation, Little Bromley. | Tier 2 |
| Industrial | General industrial and storage buildings 22/01047/FUL | Approved | Medium data confidence - sourced from Tendring District Council. The site is located at Horsley Cross to the west of the B1035 which forms the ECC boundary for a TCC. Three new buildings, new access and highway works, parking and servicing and hard and soft landscaping are proposed to the west of existing buildings adjacent to Holland Brook. | Tier 1 |
| Commercial | Commercial units 22/01042/DETAIL | Approved | Medium data confidence - sourced from Tendring District Council. The site is located at Horsley Cross to the south and west of the DCO boundary for a TCC. Seven new commercial buildings are proposed adjacent to Holland Brook. | Tier 1 |

Table 6-14 Projects considered within the hydrology, hydrogeology, and flood risk cumulative effect assessment.

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| Development type | Project | Status | Data confidence assessment/ phase | Tier |
|--------------------------|--|-------------------|--|--------|
| Energy | Solar energy scheme 20/01580/NACON | Deemed Consent | Medium data confidence - sourced from Tendring District Council The site is located to the west of the ECC on land beyond the EACN. Proposed Solar Energy Scheme | Tier 1 |
| Mixed use development | 280 residential units, commercial and education 22/00979/DETAIL | Pre-consent | Medium data confidence - sourced from Tendring District Council. The site is located to the north of Weeley, approximately 1.8 km west from the ECC. Mixed use development including 280 homes, offices, land for a new primary school, railway footbridge, attenuation basins, open space, play equipment and associated infrastructure. | Tier 1 |
| Energy transmission | Battery Energy Storage System 21/02070/FUL | Approved | Medium data confidence - sourced from Tendring District Council. The site is located on land to the west of Lawford substation, adjacent to the grid connection land within the ECC. Construction and operation of a 50MW Battery Energy Storage System. | Tier 1 |
| Energy transmission | Buried electrical cabling 21/01058/OHL | Deemed Consent | Medium data confidence - sourced from Tendring District Council The site is located to the west of Kirby-le-Soken, approximately 1.7 km south-east of the ECC. Proposed removal of several spans of high voltage overhead electricity network. | Tier 1 |

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| Development type | Project | Status | Data confidence assessment/ phase | Tier |
|---------------------|---|-------------|--|--------|
| Energy | Solar energy scheme 21/00393/EIASCR | Pre-consent | Medium data confidence - sourced from Tendring District Council The site is located within and to the west of the ECC on land between the rail line branches to Clacton-on-Sea and Frinton-on-Sea. Proposed Solar Energy Scheme | Tier 2 |
| Residential | 58 residential units 23/00365/FUL | Pre-consent | Medium data confidence - sourced from Tendring District Council The site is located to the East of Little Clacton on Holland Road, approximately 2.1 km south-west of the ECC. 58 residential dwellings. | Tier 2 |
| Residential | Retirement housing 17/01988/FUL | Approved | Medium data confidence - sourced from Tendring District Council. The site is located on the B1032 in Kings Cross approximately 1.7 km to the south-east of the ECC. Residential development providing 41 dwellings for over 55s including apartments and houses; parking and landscaping. | Tier 1 |
| Residential | 16 residential units 22/01746/FUL | Pre-consent | Medium data confidence - sourced from Tendring District Council The site is located in Kirby Cross, approximately 2.0 km to the north-east of the ECC. Proposed residential development | Tier 2 |



NORTH FALLS OFFSHORE WIND FARM

- 6.13.4 In accordance with the provisions of NPS EN-5 to seek to develop co-ordinated solutions for onshore grid connections, VE has been working with NF on a co-ordinated solution to reduce the overall environmental and community impacts of the proposals. The project includes almost fully overlapping, or combined Onshore ECCs and a co-located site for the OnSS to the west of Little Bromley. It is proposed the two projects' ducts will be installed adjacent to each other within the corridor. The level of co-ordination between the two projects has led to a higher degree of understanding and interactions with the North Falls proposals that can be used within the CEA than would be normal for other developments at a similar stage in the planning process.
- 6.13.5 Due to the independent timescales for each project, three delivery scenarios have been developed (details of each scenario can be found within Volume 6, Part 3, Chapter 1: Onshore Project Description). For the purposes of the cumulative assessment of VE and North Falls, the worst case delivery scenario, with VE and North Falls projects proceeding to construction on different timescales (more than 3 years apart) has been assumed. This would require a slightly different haul road route and re-establishment of TCC areas.

NORWICH TO TILBURY REINFORCEMENT PROJECT

- 6.13.6 In order for VE to connect to the National Grid, the proposed National Grid Norwich to Tilbury Reinforcement Project and the associated East Anglia Green Connection (EACN) substation must be operational. National Grid has defined a construction and operational zone within which their EACN substation will be situated. This is adjacent to the VE OnSS zone.
- 6.13.7 Despite its stage in the planning process, due to VE's reliance on this project for its connection to the National Grid, it has been given detailed consideration and treated with more certainty than other projects at similar stage in the planning process in the CEA. To assist with the assessment, it has been necessary to make assumptions as to the siting, scale, form and construction of the project, particularly the EACN substation. These assumptions have been checked and agreed to be appropriate and reasonable by National Grid. For the purposes of the cumulative assessment of VE and National Grid Norwich to Tilbury Project, the worst case delivery scenario, with limited co-ordination has been assessed for the direct and indirect impacts.

CUMULATIVE EFFECTS

NORTH FALLS OFFSHORE WIND FARM

6.13.8 For the assessment of cumulative effects arising from the Onshore ECC, all three delivery scenarios (Volume 9, Report 30: Co-ordination Document) will be very similar in respect of the cumulative effects of NF OWF and VE OWF, as the same amount of below ground works will be required for the installation of the cable for each. Delivery scenario 3 with the projects undertaken more than three years apart, would require a slightly different haul road route and re-establishment of TCC areas. As such delivery scenario 3 is considered to be a worst case for direct effects.



- 6.13.9 The NF OWF Onshore ECC will follow the same alignment as the VE OWF. The installation of the ducting works for both projects are assessed as the standalone VE project above. Therefore, it is considered that undertaking the installation of ducting independently would not give rise to any additional cumulative effects. However through delivery scenario 3 there is potential for the haul roads and TCC's to be reinstated for the second project at a later date for cable installation. This has the potential for effects on the same receptors as those affected by Project 1. As all potential effects relating to the water environment are controlled at source with no discernible change to hydrological or hydrogeological regimes following the construction phase, there would be no potential for cumulative effect from the two schemes progressing independently.
- 6.13.10 The OnSS for both projects (VE and NF) will be co-located within adjacent OnSS areas, with the VE OnSS being the western of the two proposed substations. For the purposes of the cumulative assessment, two substations located within the same area have the potential to have effects on the same water environment receptors within their footprint and construction areas and downstream of the OnSS. The cumulative effects of the NF OnSS will have a higher potential magnitude of impact to downstream water features; however the design incorporates a combined surface water drainage strategy to manage runoff and this means there would be no cumulative effect from development of both schemes.

EAST ANGLIA CONNECTION NODE

6.13.11 The proposed search area for the EACN Substation lies within the proposed Order Limits to ensure that cabling to connect the VE OnSS to the EACN substation can take place as part of the DCO. The EACN substation will be located to the west of Grange Road. Construction activities associated with the EACN substation have the potential to have effects on the same water environment environmental receptors as those located within the VE OnSS and the northern extent of the Onshore ECC as it connects to the EACN substation. As all potential effects relating to the water environment are controlled at source with no discernible change to hydrological or hydrogeological regimes following the construction phase, there would be no potential for cumulative effect from the development of VE and the EACN substation.

TOWN AND COUNTRY PLANNING APPLICATIONS

- 6.13.12 Temporary surface water drainage will be provided for all TCC areas during the construction phase to control the rate of runoff and to ensure there is no significant effect on water quality in downstream watercourses. The development of new buildings at Horsley Cross (22/01047/FUL) will incorporate management of surface water runoff. As the location of the three buildings is immediately adjacent to Holland Brook it is not anticipated that there will be any direct interaction between the two projects or any cumulative effects.
- 6.13.13 The development of new commercial units at an industrial area to the west of Horsley Cross (22/01042/DETAIL) will incorporate management of surface water runoff. The location of the buildings is immediately adjacent to Holland Brook and it is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.



- 6.13.14 Proposed installation of a 500 MW solar photovoltaic (PV) generating site (20/01580/NACON) will benefit from a system to control surface water runoff from impermeable surfaces on the site. The land here and within the adjacent EACN substation search area is within the headwaters of Tenpenny Brook and runoff control can be achieved independently. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.
- 6.13.15 The proposed residential development to the north of Weeley (22/00979/DETAIL) is remote from the ECC and is on the opposite side of Holland Brook to the ECC. The residential scheme will benefit from a system to control surface water runoff from the site for the life of the development. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.
- 6.13.16 Temporary surface water drainage will be provided for all grid connection areas during the construction and operational phase of VE to control the rate of runoff and to ensure there is no significant effect on water quality in downstream watercourses. The development of a Battery Energy Storage System on land adjacent to Lawford substation (21/02070/FUL) will benefit from a system to control surface water runoff from the site. The land here and within the adjacent EACN substation search area is within the headwaters of Tenpenny Brook and runoff control can be achieved independently. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.
- 6.13.17 The removal of high voltage overhead electricity spans at Thorpe-le-Soken (21/01058/OHL) is remote from the ECC and will not involve works that could potentially impact on the water environment. It is not anticipated that there will be any direct interaction between the two projects or any cumulative effects.
- 6.13.18 Temporary surface water drainage will be provided for all ECC works (including trenchless crossings) during the construction phase of VE to control the rate of runoff and to ensure there is no significant effect on water quality in downstream watercourses. The proposed solar energy scheme within and to the west of the ECC, on land between the rail line branches to Clacton-on-Sea and Frinton-on-Sea (21/00393/EIASCR), will benefit from a system to control surface water runoff from the site.
- 6.13.19 The proposed residential development to the east of Little Clacton (23/00365/FUL) is remote from the ECC and is on the opposite side of Holland Brook to the ECC. The residential scheme will benefit from a system to control surface water runoff from the site for the life of the development. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.
- 6.13.20 The proposed residential development in Kirby Cross (17/01988/FUL) is remote from the ECC and is not in the Holland Brook catchment. The residential scheme will benefit from a system to control surface water runoff from the site for the life of the development. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.
- 6.13.21 The proposed residential development to the north of Kirby Cross (22/01746/FUL) is remote from the ECC and is not in the Holland Brook catchment. The residential scheme will benefit from a system to control surface water runoff from the site for the life of the development. It is not anticipated that there will be any direct interaction between the two projects nor any cumulative effects.



- 6.13.22 Given the timing of proposed construction activities for the projects detailed in Table 6-14, the scale of developments, their proximity away from the ECC and the requirements to control potential detrimental effects of any development on flood risk and water quality, no significant cumulative hydrology, hydrogeology and flood risk effects arising during the construction phase of these new developments are likely. All other onshore projects are noted to be beyond the study area or are in separate hydraulic catchments to the onshore ECC.
- 6.13.23 Furthermore, it is expected that the onshore elements of VE would not have any impact on the measures that other developments within the vicinity of the onshore works would need to incorporate during the construction phase to prevent detrimental hydrology, hydrogeology or flood risk effects elsewhere.
- 6.13.24 Other than the projects discussed above, many of the receptors potentially affected by the onshore elements of VE are different to those potentially affected by the projects considered in Volume 6, Part 1, Annex 3.1: Cumulative Effects Assessment Methodology. In cases where the receptors are the same, the relative location and distance of the other projects to VE mean that there is no significant hydraulic connectivity between them and therefore no potential for cumulative effects.

FURTHER MITIGATION AND FUTURE MONITORING

6.13.25 No further mitigation or monitoring measures are considered necessary, except insofar as good construction practice involves matters like land or watercourse restoration in aftercare and if necessary remedial works to achieve desired standards.

6.14 CLIMATE CHANGE

- 6.14.1 The main considerations of climate change on the Hydrology, Hydrogeology and Flood Risk assessment are the potential changes to sea levels, storm surges and rainfall patterns over time. Climate change is predicted to result in warmer and wetter winters and hotter and drier summers but also with increased occurrence of extreme weather events and a general increase in sea water levels.
- 6.14.2 The information provided in this section will be drawn upon and summarised in Volume 6, Part 4, Chapter 1: Climate Change. As outlined in Volume 6, Part 4, Chapter 1: Climate Change, the operational phase of VE would enable the use of renewable electricity which would result in a positive greenhouse gas impact, resulting in a significant beneficial effect.

EFFECT OF CLIMATE CHANGE ON THE LOCAL ENVIRONMENT

- 6.14.3 The onshore ECC and OnSS areas are on land that is currently used for agriculture with some more limited natural woodland and grassland areas. The agricultural land is generally managed with drainage present within fields and at field boundaries and irrigation during drier periods. The farming practices will continue and will adapt as required to moderate the effects of drought and flooding, preventing a notable change to landscape character.
- 6.14.4 At landfall the areas inland from the coast are protected from flooding by coastal defences. Effects from sea level rise, especially during storms, have the potential to increase the pressures on the defences and without upgrades, inland areas will be at an increased risk of flooding during extreme tidal events.



EFFECT OF CLIMATE CHANGE AND THE PROJECT ON THE LOCAL ENVIRONMENT

- 6.14.5 The proposed development incorporates a new surface water drainage system to manage rainfall runoff from impermeable areas of the OnSS. The design of the drainage system incorporates an allowance for climate change to rainfall patterns over the lifespan of the development and will ensure that there is no change to the local hydrology or flood risk.
- 6.14.6 During construction of the onshore ECC and the OnSS, the measures described below have been designed into the project. The approach to construction will be managed through principles set out in Volume 9, Chapter 21: CoCP. These measures include management of soil and earthwork activities, management of rainfall runoff in construction areas and principles for reinstatement. Reinstatement will be key to ensuring that the land remains resilient to future changes in rainfall runoff from climate change.

6.15 INTER-RELATIONSHIPS

- 6.15.1 This chapter has considered the effect of the onshore elements of VE on groundwater and surface water quality and flood risk in relation to the proposed onshore infrastructure. Effects on geology are considered in Volume 6, Part 3, Chapter 5: Ground Conditions and Land Use. Effects on offshore water quality are considered in Volume 6, Part 2, Chapter 3 Marine Water and Sediment Quality.
- 6.15.2 The potential for effects of VE to result in consequential effects on receptors would be controlled by the measures set out in this chapter. The effects identified within this chapter are predicted to be **minor adverse** or **negligible**. None of these effects would be significant in EIA terms. Given the localised nature of the effects, there is not considered to be potential for significant inter-related effects on any offshore receptors.
- 6.15.3 Impacts on water quality arising from spillages or leaching of potentially polluting material may result in contamination of the ground through pollutants being mobilised to ground in water. With the implementation of the mitigation measures detailed in this chapter, the effect on groundwater would be **negligible**.
- 6.15.4 Impacts on the volume of sediment entering watercourses or coastal waters arising from excavation of ground materials during drilling or trenching may result in increased sedimentation of water bodies. With the implementation of mitigation measures detailed in this chapter, the effect on surface water or near shore coastal waters would be **negligible**.
- 6.15.5 There are not considered to be any significant inter-related effects between offshore and onshore parts of VE in terms of hydrology, hydrogeology and flood risk.

6.16 TRANSBOUNDARY EFFECTS

6.16.1 The likely effects of VE would be localised. It is not considered likely that there would be any trans-boundary effects in relation to hydrology, hydrogeology or flood risk. This has been agreed through scoping (Table 6.2).



6.17 SUMMARY OF EFFECTS

- 6.17.1 The potential hydrological and hydrogeological receptors in the study area comprise the tidal and fluvial floodplain; various watercourses; including Main Rivers and ordinary watercourses or drains; the near-shore tidal waters of the North Sea; and underlying groundwater bodies. These receptors vary in their environmental sensitivity from low to high.
- 6.17.2 The assessed magnitude of the various identified impacts of the onshore elements of VE on water quality and flood risk varies from **minor adverse** to **negligible**. Overall, through the implementation of mitigation measures, including those specified in the CoCP, it is considered that the likely overall effect of the onshore elements of VE on water quality and flood risk throughout the construction, operation and decommissioning of VE is **not significant** in EIA terms.

| Description of effect | Effect | Additional mitigation measures | Residual effects |
|---|--------------------------------|---|--------------------------------|
| Construction | 1 | 1 | |
| Onshore ECC installation: Impact 1: Generation of turbid or polluted runoff which could enter the water environment | Minor adverse or Negligible | None in addition to mitigation within the CoCP | Minor adverse or Negligible |
| Onshore ECC installation: Impact 2: Changes to surface water runoff patterns which could affect flood risk | Negligible | None in addition to mitigation within the CoCP | Negligible |
| Onshore ECC installation: Impact 3: Potential for damage to flood defences or surface water drainage infrastructure | Negligible | None in addition to mitigation within the CoCP | Negligible |
| Onshore ECC installation: Impact 4: Pollution or disruption of flow to groundwater through ground | Minor adverse | None in addition to mitigation within the CoCP and onshore ECC FRA | Minor adverse |

Table 6-15: Summary of effects.



| Description of effect | Effect | Additional mitigation measures | Residual effects |
|--|--------------------------------|--|--------------------------------|
| excavations or pilling | | | |
| OnSS construction: Impact 1: Generation of turbid or polluted runoff which could enter the water environment | Minor adverse | None in addition to mitigation within the CoCP | Minor adverse |
| OnSS construction: Impact 2: Changes to surface water runoff patterns which could affect flood risk | Negligible | None in addition to mitigation within the CoCP | Negligible |
| OnSS construction: Impact 4: Pollution or disruption of flow to groundwater through ground excavations or pilling | Negligible | None in addition to mitigation within the CoCP and OnSS FRA | Negligible |
| Trenchless crossing works: Impact 1: Generation of turbid or polluted runoff which could enter the water environment | Minor adverse or Negligible | None in addition to mitigation within the CoCP | Minor adverse or Negligible |
| Trenchless crossing works: Impact 2: Changes to surface water runoff patterns which could affect flood risk | Negligible | None in addition to mitigation within the CoCP | Negligible |
| Trenchless crossing works: Impact 3: Potential for damage to flood defences or surface water drainage infrastructure | Negligible | None in addition to mitigation within the CoCP | Negligible |
| Trenchless crossing works: Impact 4: | Minor adverse to Negligible | None in addition to mitigation within the | Minor adverse to Negligible |



| Description of effect | Effect | Additional mitigation measures | Residual effects |
|---|--------------------------------|--|--------------------------------|
| Pollution or disruption of flow to groundwater through ground excavations or pilling | | CoCP and onshore ECC FRA | |
| Landfall installation: Impact 1: Generation of turbid or polluted runoff which could enter the water environment | Minor adverse | None in addition to mitigation within the CoCP | Minor adverse |
| Landfall installation: Impact 2: Changes to surface water runoff patterns which could affect flood risk | Negligible | None in addition to mitigation within the CoCP | Negligible |
| Landfall installation: Impact 4: Pollution or disruption of flow to groundwater through ground excavations or pilling | Minor adverse | None in addition to mitigation within the CoCP | Minor adverse |
| Operation | - | 1 | |
| OnSS: Impact 5: Changes to surface water drainage at the Onshore Substation location | Minor adverse to Negligible | None required | Minor adverse to Negligible |
| Decommissioning | | | |
| Impact 6: Generation of turbid or polluted runoff which could enter the water environment | Minor adverse or Negligible | None required | Minor adverse or Negligible |

6.18 **REFERENCES**

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