



AQUIND Limited

AQUIND INTERCONNECTOR

Draft Statement of Common Ground
(Onshore) Between Aquind Limited and
Environment Agency

Agreed Draft

The Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010, Rule 8(1)(e)

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1. INTRODUCTION AND PURPOSE

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1.1. This Statement of Common Ground ('SoCG') relates to an application made by AQUIND Limited to the Planning Inspectorate under section 37 of the Planning Act 2008 ("Act"). The application was made on 14th November 2019 and accepted on 12th December 2019. The SoCG has been prepared with the Environment Agency ('EA') to show where agreement has been reached with AQUIND Limited ('the Applicant') during the pre and post Development Consent Order ('DCO') application consultation and in the course of the DCO Examination.
- 1.1.1.2. This SoCG has been prepared by the Applicant and EA, collectively referred to in this SoCG as 'the parties', in respect of the onshore components of the Proposed Development; where onshore components comprise of activities within the onshore extent of the Order Limits only (above Mean Low Water Springs). A separate SoCG has been prepared by the Applicant and EA in respect of the marine aspects of the Proposed Development (below Mean High Water Springs).
- 1.1.1.3. This draft reflects the status of discussions between the parties at Deadline 1. Throughout this document points of agreement and disagreement between the parties are clearly indicated. Points that are not agreed will be the subject of ongoing discussion wherever possible to resolve or refine the extent of disagreement between the parties.
- 1.1.1.4. The purpose and possible content of SoCGs is set out in paragraphs 58-65 of the Department for Communities and Local Government's guidance entitled "Planning Act 2008: examination of applications for development consent" (26 March 2015). Paragraph 58 of that guidance explains the basic function of SoCGs:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*
- 1.1.1.5. This SoCG comprises a record of agreement which has been structured to reflect topics of interest to EA on the AQUIND Interconnector DCO Application

(‘the Application’). Topic specific matters agreed, not agreed and actions to resolve between the parties are included and presented in a tabular form.

- 1.1.1.6. Due to the proposed Converter Station site located above a groundwater Source Protection Zone 1 and aquifers from which local public water supply is provided, a number of points in this SoCG refer also to the involvement of Portsmouth Water (‘PW’) who are the responsible authority for the public water supply and with whom the parties have worked closely with throughout the process. A separate SoCG is being worked on by the Applicant with PW.

1.2. THE DEVELOPMENT

- 1.2.1.1. This SoCG relates to an application made by the Applicant to the Planning Inspectorate (‘PINS’) under the Planning Act 2008 (‘Act’).

- 1.2.1.2. The draft DCO is referred to as the AQUIND Interconnector DCO. The DCO, if granted, would authorise the Applicant to carry out the following work (‘the Development’), as well as associated development:

- High Voltage Direct Current (‘HVDC’) marine cables;
- HVDC underground cables;
- Converter station
- High Voltage Alternate Current (‘HVAC’) cables; and
- Fibre optic data transmission cables and associated infrastructure.

2. CONSULTATION

- 2.1.1.1. The parties have been engaged in consultation since the inception of the Proposed Development. Early correspondence dates back to Q1 2018 with significant consultation also occurring between May 2019 and October 2019.
- 2.1.1.2. A summary of recent key meetings and correspondence between the parties can be found in Table 2.1:

Table 2.1 – Summary of Key Correspondence between the parties

Date	Form of Contact	Summary
28/03/2018	Meeting	<ul style="list-style-type: none"> Initial engagement pre-development of PEIR with initial discussion over the general flood risk environment. Discussion in relation to the Ground Investigation undertaken to inform the Proposed Development PEIR and ES.
17/07/2018	Various (Flood Risk)	PEIR Flood Risk Advice.
18/06/2019	Meeting (Converter Station Engineering)	<ul style="list-style-type: none"> Indicative converter station site layout and arrangement of buildings and electrical equipment was presented and discussed. Site constraints and their impact on locating the compound was discussed. Potential source of contamination within converter station along with proposed mitigations discussed and agreed in principle. Temporary and permanent site surface drainage system discussed and agreed in principle. Sustainable drainage including filter drains, infiltration drains, infiltration swales, detention basin, infiltration basin and soakaway system discussed and agreed in principle.

Date	Form of Contact	Summary
		<ul style="list-style-type: none"> • Karst features along with treatment strategy was discussed with both PW and EA and agreed in principle. • Foul drainage system was discussed and agreed in principle. • Oily water drainage and oil containment discussed and agreed with both PW and EA in principle. <p>Site investigation findings and foundation solution was discussed and agreed in principle.</p>
23/07/2019	Meeting (Flood Risk Workshop)	<ul style="list-style-type: none"> • Workshop to discuss the Proposed Development. • Expected Surface Watercourse Crossings. • Proposed Construction Principles in relation to flood risk and surface water quality. <p>Minutes of Meetings, as agreed with the EA can be found in Appendix 1</p>
23/07/2019	Meeting (Groundwater Workshop)	<ul style="list-style-type: none"> • Workshop discussed temporary dewatering. • Discharges to surface water and groundwater: environmental permits. • Groundwater emergence within a trench would need to be considered on a case by case basis depending on the volumes encountered and may require temporary dewatering consent. • Some discussions on what provisions are anticipated to manage groundwater in HDD pits and/or open trenching, so as not to increase flooding off-site. • ES would set out principles for the management, however the specific measures taken forward at each location would be

Date	Form of Contact	Summary
		contractor led and developed post planning through a permit.
23/07/2019	Meeting (Water Framework Directive Workshop)	<ul style="list-style-type: none"> • Workshop to discuss the Proposed Development. • Presentation given on each watercourse crossing in relation to WFD quality elements and potential impacts. • Discussion relating to potential impacts. • Discussion relating to WFD mitigation measures set for the potentially impacted WFD water bodies. • Discussion relating to the EA's expectations with regard to WFD mitigation and contribution to biodiversity net gain. • Discussion relating to proposed Construction Principles in relation to WFD.
02/09/2019	Meeting (Converter Station Engineering)	<ul style="list-style-type: none"> • PW and EA comments discussed. <p>WSP proposal in response to PW and EA comments were discussed and agreed.</p>
11/09/2020	Meeting	<p>Proposed site level and associated Earthworks methodology discussed.</p> <p>Construction water management and earthwork water management discussed.</p> <p>Generic method statement and its table of contents discussed.</p>
11/09/2020	Meeting	<p>Proposed site level and associated Earthworks methodology discussed.</p> <p>Construction water management and earthwork water management discussed.</p>

Date	Form of Contact	Summary
		Generic method statement and its table of contents discussed.
Various (email and calls)	Various (Flood Risk)	<ul style="list-style-type: none"> • Agreement of Flood Risk Workshop Minutes of Meeting. • Agreement of proposed principles for (tidal) flood risk management at Optical Regeneration Station.
Various (email and calls)	Various (Converter Station Optioneering)	<ul style="list-style-type: none"> • Agreement of Aquifer contamination Workshop Minutes of Meeting. • Various correspondence with PW and EA during design development of the preliminary drainage strategy drawings and report.

2.2. SUMMARY OF TOPICS COVERED BY THE STATEMENT OF COMMON GROUND

2.2.1.1. The following topics discussed between the Applicant and the EA are commented further in this SoCG:

- Environmental Statement (“ES”) Chapter 19: Groundwater (App-134)
 - Baseline and Methodology
 - Predicted Impacts
 - Mitigation
 - Converter Station Area
 - Onshore Cable Corridor
 - Landfall
 - Chapter 19 Supplementary Assessments (Technical Appendices)
 - Appendix 19.2: The Hydrogeology of Kings Pond and Denmead Meadows
 - Supplementary Karst Report

- Onshore Outline Construction Environmental Management Plan ('OOCEMP') (APP-505) which has been updated (APP-505 Rev 002)
- Residual Effects
- ES Chapter 20: Surface Water Resources and Flood Risk (APP-135)
 - Baseline and Methodology
 - Predicted Impacts
 - Mitigation
 - Converter Station Area
 - Onshore Cable Corridor
 - Landfall
 - Chapter 20 Supplementary Assessments (Technical Appendices)
 - Appendix 20.2: Onshore Water Framework Directive
 - Appendix 20.3: Watercourses Summary
 - Appendix 20.4: Flood Risk Assessment & Flood Risk Assessment Addendum
 - OOCEMP (APP-505), which has been updated (APP-505 Rev 002)
 - Residual Effects
 - ES Appendix 3.6: Converter Station Surface Water Drainage and Aquifer Contamination Mitigation Strategy (APP-360) which has been updated and now forms Appendix 7 to the updated OOCEMP (APP-505 Rev 2), referred to as Appendix 7 of the OOCEMP (APP-505 Rev 002) hereafter
 - Surface Water Drainage
 - Foul Water Drainage
 - Oil Containment and Oily Water Drainage
 - SuDS and Water Quality System
 - Temporary Surface Water Management
 - Foundation Design
 - OOCEMP (APP-505), which has been updated (APP-505 Rev 002)

- 2.2.1.2. For the avoidance of doubt, matters not covered in this SoCG in relation to the onshore elements of the Proposed Development have not been discussed between the parties as they have not been raised by the EA.

3. AGREEMENTS

3.1. ES CHAPTER 19: GROUNDWATER & ASSOCIATED APPENDICIES

Table 3.1 – Groundwater

Ref.	Description of matter	Current Position	RAG
Baseline & Methodology			
EA 3.1.1.1	Area of Study - Groundwater	The area of study identified in section 19.1.2 of ES Chapter 19 Groundwater (APP-134) is agreed.	Agreed
EA 3.1.1.2	Baseline - Groundwater	The baseline environment identified in section 19.5 of ES Chapter 19 Groundwater (APP-134) is agreed.	Agreed
EA 3.1.1.3	Assessment Methodology – Groundwater	It is agreed that section 19.4 of ES Chapter 19 Groundwater clearly outlines the approach to creating the baseline and assessing impacts of the development.	Agreed
Predicted Impacts			
EA 3.1.2.1	Groundwater	It is agreed that the predicted impacts as set out in section 19.6 of ES Chapter 19 Groundwater clearly outlines the impacts following embedded mitigation measures.	Agreed
Mitigation - Converter Station Area			
EA 3.1.3.1	Watching Brief (karst dissolution features)	<p>It is agreed that a watching brief should be kept during construction for karst dissolution features when any cable trench excavation work is undertaken in the Source Protection Zone 1 (SPZ1), and this is to be secured in the Surface Water Drainage and Aquifer Contamination Mitigation Strategy (appended to the updated Onshore Outline Construction Environmental Management Plan (APP-505 Rev002)) to be submitted to the ExA by Deadline 1. This is also covered in the Addendum to ES Chapter 19 Groundwater.</p> <p>The requirement for the submission of construction environment management plans in relation to all works, which accord with the OOCEMP, is secured via Requirement 15 (Construction environmental management plan) to the draft DCO (APP-019).</p> <p>In addition, the EA have stated that they need to consider further whether securing compliance with the Aquifer Contamination Mitigation Strategy via it being an appendix to the OOCEMP, which is in turn a Requirement, is sufficient or whether a specific Requirement(s) would be more direct/preferable approach given the highly sensitive nature of the Converter Station site.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
EA 3.1.3.2	Karst Dissolution Features	<p>Control of surface water drainage and drainage within the ground is to be carefully considered during detailed design to avoid increasing the risk of dissolution, with ground stabilisation and treatment by grouting as the preferred solution in-line with CIRIA C574, to minimise influence of grouting on the SPZ1.</p> <p>It is proposed to use a grout mix, of suitable composition, control and cure time to be approved in consultation with the EA (and PW), for the purposes of ground stabilisation (as per paragraph 1.1.3.13 of Surface Water Drainage and Aquifer Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002)). The submission of this information is secured via Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019).</p> <p>Further karst feature may be discovered during construction. Where such findings occur the risk of impact will be managed through a risk assessment and construction management plan which shall be submitted to and approved by the relevant local planning authority in consultation with the EA and PW, in accordance with Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019).</p>	Agreed
EA 3.1.3.3	Oil Containment and oily water drainage	<p>It is accepted that the information on the Converter Station design is submitted in outline for detailed approval post grant of the DCO. This will include the final design of the oily water drainage and size of dump tank(s) which will be defined during detailed design of the system in accordance with the details within Section 4 (Oil Containment and Oily Water Drainage) of the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>The design will be fully developed and submitted to the EA and PW for review and agreement in accordance with paragraph 4.3.3.8 of the Surface Water Drainage and Aquifer Contamination Strategy and secured in Requirement 15 of the draft DCO (APP-019).</p>	Agreed
EA 3.1.3.4	Foundation Design	<p>The extent of existing ground conditions and proposed foundation was discussed and agreed in principle with the EA (and PW) at a meeting on 18/06/2019. Considering the ground conditions encountered, piling is identified as the likely foundation design to be utilised subject to detailed design development post consent of the DCO. The use of pre-cast driven piles are likely to be one of the design options that will have the lowest impact on the chalk aquifer and restrictions set by PW around the SPZ1 designation.</p> <p>The foundation solution will be required to be in accordance with the details within Section 7 (Foundation Solution) of the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002), which is secured in Requirement 15 of the draft DCO (APP-019).</p>	Agreed
Mitigation - Onshore Cable Corridor – General			
EA 3.1.4.1	Dewatering	<p>Dewatering permits may be required during construction as high groundwater levels are likely to be encountered at points along the cable route during trench excavation works. Dewatering permits may therefore be required (unless an exception applies). Permits will be applied for at the relevant time. ES Chapter 19 in Section 19.6.1.4. states that “the water management permitting, licenses</p>	Agreed

Ref.	Description of matter	Current Position	RAG
		and agreements will be completed by the appointed contractor, with the quantities of groundwater management determined at the detailed design stage.”	
EA 3.1.4.2	Watching Brief (karst dissolution features)	It is agreed that a watching brief should be kept for karst dissolution features when any cable trench excavation work is undertaken in the SPZ1, and this is to be secured in an update to the OOCEMP to be submitted at Deadline 1 of the Examination. The requirement for the submission of construction environment management plans in relation to all works, which accord with the OOCEMP, is secured via Requirement 15 (Construction environmental management plan) to the draft DCO (APP-019).	Agreed
Mitigation - Onshore Cable Corridor – HDD works			
EA 3.1.4.3	Presence of mud engineer and use of inert drilling fluids	To ensure drilling fluids do not break out into the groundwater environment nor groundwater seeps into the bore, a mud engineer will be present at all times during the HDD drilling process to monitor drilling fluid viscosity, density, annular pressure, solids contents, filter cake quality and total mud volume and thereby ensuring the filter cake remains intact and that drilling fluid is not lost to the ground and that groundwater does not seep into the bore annulus. In addition, a review of the proposed drilling fluid and inert polymers will also be completed before ground is broken. All drilling fluids, including polymers, will be Centre for Environment Fisheries and Aquaculture Science (Cefas) rated products (OOCEMP Section 6.2.5.5).	Agreed
EA 3.1.4.4	Avoidance of karst dissolution features in the Chalk	The scheme design in the first instance ensures that the trenchless construction avoids karst dissolution features (in the Chalk) as much as possible. At HDD-5 (Kings Pond), the drilling will be kept in the overlying Lambeth Group only. The contractor will ensure that when drilling HDD-5 there will always be at least a 5m standoff between the proposed HDD alignment and the Chalk (OOCEMP Section 6.2.5.7).	Agreed
EA 3.1.4.5	Briefing drill crew on SPZ1 sensitivity, monitoring fluid pressures, identifying karst features and watching brief presence	The drilling team will also need to be briefed on the environmental sensitivity of the SPZ1 and the importance of identifying karst dissolution features prior to work commencing and during the works. They will need to monitor the fluid pressures and observe for significant pressure drops throughout the works. A significant pressure drop would indicate that loss of fluid, potentially to fractures/dissolution features, may be occurring. A watching brief will also need to be implemented to identify any elements of karst dissolution features at any time during the works (OOCEMP Section 6.2.5.8).	Agreed
EA 3.1.4.6	Temporary pause of drilling in the event a karst dissolution feature is detected. Notification of EA.	Should [karst dissolution] features be detected, drilling will be paused temporarily, until the Engineer on site can determine the most suitable course of action for mitigation, from a catalogue of actions already agreed with PW and the EA. A number of actions can be taken to seal the area of loss, for example increasing the drilling fluid viscosity or introducing a cement grout. Real time	Ongoing

Ref.	Description of matter	Current Position	RAG
		downhole annular pressure monitoring should be completed to allow for these observations. The exact pressure change parameters and procedures to evaluate mitigation would need to be agreed with EA (and PW) at detailed Design Stage. The EA (and PW) will also be notified immediately of any loss of drilling fluid. Once the risk from the dissolution feature has been satisfactorily mitigated (i.e. to no risk of contamination), works will then resume (OOCEMP Section 6.2.5.9).	
EA 3.1.4.7	Inclusion of sheet piled walls toes into the Chalk to reduce groundwater ingress. Sump pumping from base of pits.	The launch and receptor pits for the HDD-4 (Farlington Railway Crossing (Trenchless)) will include perimeter sheet piled walls toed into the Chalk to reduce groundwater ingress from the superficial River Terrace Deposits. Groundwater seepage at the base of the pits could occur and this will be sump pumped during operation. The potential consents and permits required to manage this water will be completed by the appointed contractor. The method of discharge has yet to be determined. The groundwater collected will either be discharged back to ground, to surface water, sewer, disposed of off-site or a combination of these methods. If the water is to be discharged to ground, a surface waterbody or sewer then a discharge consent(s) may be required. The permitting process will be completed by the contractor, after detailed design, once a dewatering and discharge management methodology has been agreed upon. The appointed contractor will be responsible for acquiring the relevant consents and adhering to the conditions of said consents. Any contaminated water would require off-site disposal (OOCEMP Section 6.2.5.10).	Agreed
EA 3.1.4.8	Dewatering quantities to be determined at detailed design	The required groundwater dewatering quantities for HDD-4 pits will be determined at detailed design. The designer must ensure the discharge quantities are accurate or conservative to ensure no flood risk will be increased due to surplus groundwater encountered during construction (OOCEMP 6.2.5.11).	Agreed
EA 3.1.4.9	Cleaning of drilling equipment	All drilling equipment will be checked and cleaned before use. This will prevent cross contamination (OOCEMP 6.2.5.12).	Agreed
EA 3.1.4.10	Use of Filter Cake to prevent cross-contamination of groundwater bodies	Drilling through alternative geologies can transfer existing contamination from one source to another. Drilling can also generate fines which can increase sediment in the water column, creating turbidity contamination. The Filter Cake will prevent the mobilisation of contaminants from one groundwater body to another, as the cake 'self-seals' as the drilling progresses. Therefore, no cross contamination is anticipated. Following the embedded mitigation measures the drilling fines and fluids will be contained in the drilling cake, preventing contamination from spreading between sources and drilling fines entering the local groundwater receptors (OOCEMP 6.2.5.13).	Agreed
EA 3.1.4.11	Presence of flexible hose pump at breakout compound	To ensure surface breakout is not lost to the environment a flexible hose pump will be contained at the exit compound site so breakout fluid can be retained on site. A sufficiently sized Intermediate Bulk Container or similar will be stored on site to store such a breakout (OOCEMP 6.2.5.14).	Agreed

Ref.	Description of matter	Current Position	RAG
Mitigation - Onshore Cable Corridor – Onshore Cable Route Trench Excavation Works			
EA 3.1.5.1	Dewatering for trench construction	The required groundwater dewatering quantities for trench construction will be determined at detailed design. The designer must ensure the discharge quantities are accurate or conservative to ensure no flood risk will be increased due to surplus groundwater encountered during construction. This applies to all sections (OOCEMP 6.4.3.2).	Agreed
EA 3.1.5.2	Catalogue of detailed descriptions of mitigation measures in the event an unexpected karst dissolution feature is discovered during cable trench excavation works in Sections 1, 2 and 3.	<p>Sections 1, 2 and 3 have been identified as areas which may contain dissolution features. Previous investigations suggest a very low likelihood of encountering such features. Such features would represent potential contaminant transport pathways (directly to public water abstractions) and have been raised as a concern by the EA (and PW). Although no dissolution features have been identified within the Order Limits for Sections 1, 2 and 3, there may be features present which are as yet unidentified (OOCEMP 6.4.3.3).</p> <p>A catalogue of detailed descriptions of mitigation measures will be agreed with PW and the EA prior to construction of Sections 1, 2 and 3. A list of possible measures has been included in OOCEMP Section 6.4.3.4.</p>	Ongoing
Mitigation - Landfall			
EA 3.1.6.1	Requirement for dewatering/abstraction license	The excavations proposed in the superficial River Terrace Deposits, Storm Beach Deposits and Wittering Formation will likely intercept groundwater meaning trench construction will require groundwater dewatering. The detailed Design Stage will consider groundwater seepage rates into the proposed trenches and inform upon whether an abstraction licence and/or a discharge consent will be required (Chapter 19 Groundwater, Section 19.6.4.57).	Agreed
Appendix 19.3: The Hydrogeology of Kings Pond and Denmead Meadows			
EA 3.1.7.1	Possible presence of karst dissolution features around Kings Pond, vulnerability of PW sources and control of activities in Denmead Meadows	<p>The conceptual model developed by the BGS indicates that karst is likely to be present in low-lying areas around Kings Pond. Groundwater sources (boreholes and springs) are vulnerable to contamination from surface when:</p> <ul style="list-style-type: none"> • There is no overlying geology; • The water table is close to surface; • The groundwater catchment is small; and • Groundwater flow paths are short. 	Agreed

Ref.	Description of matter	Current Position	RAG
		These are characteristics of karst aquifers and it follows that the Bedhampton and Havant springs are vulnerable to contamination. Therefore, project activities in the area of Denmead Meadows need to be carefully controlled (see OOCEMP Section 6.4.3.).	
Supplementary Karst Report			
EA 3.1.8.1	Proposed mitigations for impacts related to karst dissolution features	The Supplementary Karst Report proposed mitigation measures for dealing with impacts related to the presence of karst dissolution features. These have been carried over into the OOCEMP (see Section 6.4.3. Groundwater).	Agreed
Onshore Outline Construction Environmental Management Plan			
EA 3.1.9.1	OOCEMP comments	<p>During the Relevant Representation process the EA made various comments with regards to the OOCEMP (APP-505), which include:</p> <ol style="list-style-type: none"> 1. Limited reference to groundwater (in particular SPZ1, and ES Groundwater Position Statements) 2. Piling Works Risk Assessment 3. Listed receptors 4. Spill management procedure 5. Permits 6. Drilling fluid losses <p>WSP has reviewed the comments and has updated the OOCEMP accordingly and forms part of the updated OOCEMP (APP-505 Rev 002). Instances where the OOCEMP has been amended to address these issues has been detailed in the EA Relevant Representation response.</p>	Ongoing
Residual Effects			
EA 3.1.10.1	Residual effects - groundwater	It is agreed that section 19.8 and Table 19.7 of ES Chapter 19 Groundwater clearly identifies the residual effects of the Proposed Development.	Agreed

3.2. ES CHAPTER 20: SURFACE WATER RESOURCES AND FLOOD RISK & ASSOCIATED APPENDICIES

Table 3.2 – Surface Water Resources and Flood Risk

Ref.	Description of matter	Current Position	RAG
Baseline and Methodology			
EA 3.2.1.1	Area of Study - Surface Water Resources and Flood Risk	The area of study identified in section 20.1.2 of ES Chapter 20 Surface Water Resources and Flood Risk (APP-135) is agreed.	Agreed
EA 3.2.1.2	Baseline – Surface Water Resources and Flood Risk	The baseline environment identified in section 20.5 of ES Chapter 20 Surface Water Resources and Flood Risk (APP-135) is agreed. It is also agreed that the identified sensitive receptors in section 20.6 have been adequately identified.	Agreed
EA 3.2.1.3	Assessment Methodology – Surface Water Resources and Flood Risk	It is agreed that section 20.4 of ES Chapter 20 Surface Water Resources and Flood Risk clearly outlines the approach to creating the baseline and assessing impacts of the development in line with advice from the EA (in section 20.3 and Appendix 20.1).	Agreed
Predicted Impacts			
EA 3.2.2.1	Predicted Impacts – Surface Water Resources and Flood Risk	It is agreed that the predicted impacts as set out in section 20.7 of ES Chapter 20 Surface Water Resources and Flood Risk clearly outline the impacts following embedded mitigation measures.	Agreed
Mitigation - Converter Station Area			
EA 3.2.3.1	Surface Water (Construction)	(Additional mitigation) Principles of temporary surface water run-off management during construction are detailed within the Surface Water Drainage and Aquifer Contamination Mitigation Strategy, Appendix 7 to the OOCEMP (APP-505 Rev 002). For further detail refer to Table 3.3.	For Information – Refer to Table 3.3 for further detail.
EA 3.2.3.2	Surface Water (Operation)	(Embedded mitigation) Principles of the surface water drainage strategy are provided in Section 2 of the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002). For further detail refer to Table 3.3.	For Information – Refer to Table 3.3 for further detail.
Mitigation – Onshore Cable Corridor			
EA 3.2.4.1	Watercourse Crossings (Construction)	(Embedded & additional mitigation) The principles for Main River watercourse crossings are detailed in ES Appendix 20.3 (Watercourses Summary) (APP-308), section 20.7 (embedded mitigation) and 20.9 (mitigation and enhancement) of ES Chapter 20 and are replicated within section 5.8 of the OOCEMP (APP-505). These principles are supported by the EA, see EA 3.2.11 onwards.	Agreed

Ref.	Description of matter	Current Position	RAG
	Works within Flood Zone 2 & 3 (Construction)	(Embedded & additional mitigation) The principles for works located within Flood Zone 2 and Flood Zone 3 are detailed in section 6 of the Flood Risk Assessment (APP-439) and as supplemented by the FRA Addendum, section 20.7 (embedded mitigation) and 20.9 (mitigation and enhancement) of ES Chapter 20 and are replicated within section 5.8 of the OOCEMP (APP-505). These principles are supported by the EA, see EA 3.2.7.1 onwards.	Agreed
EA 3.2.4.2	Works Adjacent/ Under Flood Defences (Construction)	(Embedded & additional mitigation) The principles for works within 8 meters of a fluvial watercourse/ flood defence and 16m of a tidal watercourse/ flood defence and works crossing under flood defences are detailed in section 6 of the Flood Risk Assessment (APP-439) and as supplemented by the FRA Addendum, section 20.7 (embedded mitigation) and 20.9 (mitigation and enhancement) of ES Chapter 20 and are replicated within section 5.8 of the OOCEMP (APP-505). These principles are supported by the EA, see EA 3.2.7.1 onwards.	Agreed
Mitigation - Landfall			
EA 3.2.5.1	Tidal Flood Risk Management – ORS (Operation)	(Embedded & additional mitigation) In-built tidal flood risk mitigation for the Optical Regeneration Station(s) (“ORS”), which is located within the tidal Flood Zone 3 extent following an update to the Flood Map for Planning in January 2020, is detailed within the Flood Risk Addendum. The in-built tidal flood risk mitigation measures presented within the Flood Risk Assessment (APP-439) are now supplemented by those within section 4 of the FRA Addendum. These principles are supported by the EA, see EA 3.2.7.1 onwards.	Agreed
Appendix 20.2: Onshore Water Framework Directive			
EA 3.2.6.1	Onshore Water Framework Directive	Based on the principles in ES Appendix 20.3 (Watercourses Summary) and Section 5.7 of the OOCEMP (APP-505) it has been agreed that the Main River watercourse crossings would not have a significant impact upon Water Framework Directive features.	Agreed
Appendix 20.3: Watercourses Summary			
EA 3.2.7.1	Main River Watercourse Crossing	The principles for Main River watercourse crossings are detailed in ES Appendix 20.3 (Watercourses Summary) (APP-308), section 20.7 (embedded mitigation) and 20.9 (mitigation and enhancement) of ES Chapter 20 and are replicated within section 5.8 of the OOCEMP (APP-505). Where: Use of HDD supported on open watercourses, including crossing of: <ul style="list-style-type: none"> a) Soake Farm East (Main River) [WC.02] – Kings Pond (HDD) HDD-5; b) Broom Channel (Transitional/ Tidal Watercourse) [WC.13] – Langstone Harbour (HDD) HDD-3. 	Agreed

Ref.	Description of matter	Current Position	RAG
		<p>Use of open trench supported over culverts, including crossing of:</p> <ul style="list-style-type: none"> a) Old Park Farm (Main River) [WC.04] – Carriageway Culvert; b) North Purbrook Heath (North) (Main River) [WC.09] –Carriageway Culvert; and c) Great Salterns Drain (Main River) [WC.14] –Carriageway Culvert. <p>These principles are supported by the EA and are detailed within the OOCEMP. Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan, in accordance with the OOCEMP, therefore securing the principles for Main River watercourse crossings.</p>	
Appendix 20.4: Flood Risk Assessment & Flood Risk Assessment Addendum			
EA 3.2.8.1	Flood Risk Assessment & Flood Risk Assessment Addendum	<p>The Flood Risk Assessment (APP-439) is now supplemented by the FRA Addendum, of which the assessment methodology including consideration of climate change, on and off site impacts and proposed mitigations relevant to the tidal and fluvial environment which is supported by the EA. Proposed inbuilt design measures and other mitigation measures and included within the Design and Access Statement and OOCEMP.</p> <p>Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan, in accordance with the OOCEMP, and Requirement 6 (Detailed design approval) of the draft DCO (APP-019) requires the design of the Proposed Development to be in accordance with the Flood Risk Assessment measures therefore securing the principles within the Flood Risk Assessment and Flood Risk Assessment Addendum.</p>	Agreed
Onshore Outline Construction Environmental Management Plan (APP-505)			
EA 3.2.9.1	Surface Water Resources & Flood Risk Management (Construction)	<p>Whilst the permitting process will be completed after detailed design the general principles in relation to the surface water resources and flood risk environment as per ES Appendix 20.3 (Watercourses Summary) (APP-308), ES Chapter 20 Surface Water Resources and Flood Risk (APP-135), Appendix 20.2 (Onshore WFDa) (APP-438) have been embedded into the OOCEMP (APP-505) and are acceptable in principle to the EA.</p> <p>Recommended mitigation measures relevant to ES Chapter 20 Surface Water Resources and Flood Risk are detailed within the OOCEMP. Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan, in accordance with the OOCEMP, therefore securing the measures for Surface Water Resources & Flood Risk Management during construction.</p>	Agreed
EA 3.2.10.1	Flood Risk Management (Operation)	Principles for flood risk management for inclusion within the Health and Safety File during operation are provided within the Flood Risk Assessment (APP-439) and as supplemented by the FRA Addendum, ES Chapter 20 Surface	Agreed

Ref.	Description of matter	Current Position	RAG
		<p>Water Resources and Flood Risk (APP-135), Appendix 20.2 are embedded in paragraph 4.1.3.16 of the OOCEMP (APP-505) and acceptable in principle to the EA.</p> <p>Recommended mitigation measures relevant to ES Chapter 20 Surface Water Resources and Flood Risk are detailed within the OOCEMP. Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan, in accordance with the OOCEMP, therefore securing the measures for Flood Risk Management during construction.</p>	
EA 3.2.10.2	Environmental Permits/Licences Overview	<p>It is agreed that Environmental Permitting (under the Environmental Permitting (England and Wales) Regulations 2016) is separate to, and in addition to any grant of DCO consent.</p> <p>Whilst the permitting process will be completed after detailed design the general principles in relation to the surface water resources and flood risk environment as per the Flood Risk Assessment (APP-439) and as supplemented by the FRA Addendum, ES Appendix 20.3 (Watercourses Summary) (APP-308), ES Chapter 20 Surface Water Resources and Flood Risk (APP-135), Appendix 20.2 (Onshore WFDa) (APP-438) which have been embedded into the OOCEMP (APP-505) are considered acceptable in principle to the EA.</p> <p>Whilst the EA cannot guarantee approval of permits until all permit application information, with full details of the proposed construction methodology, has been submitted; the Applicant and EA are in agreement of the general principles to be adopted to ensure there is unlikely to be any impediment to a permit/exemption being provided to enable construction of the Proposed Development.</p> <p>These principles will be used as the basis to ensure that the predicted impacts are managed to reduce any residual effects.</p> <p>Consents or exemptions are expected to be required for the following consents/ permits:</p> <ul style="list-style-type: none"> a) Temporary dewatering consent; b) Flood risk activities permit – environmental permits; and c) Discharges to surface water and groundwater: environmental permits. <p>Activities expected to require the above noted additional permits and consents are summarised below:</p> <ul style="list-style-type: none"> a) Temporary and/ or permanent works within 16 m and 8 m of a tidal and fluvial Main River or toe of associated flood defences; b) Temporary and/ or permanent works within the tidal and fluvial flood plain; c) Temporary and/ or permanent works through, under or above a Main River watercourse; and d) Temporary and/ or permanent works requiring temporary dewatering of surface water or groundwater. <p>Where appropriate, and where Environmental Permits are required, as detailed in the Other Consents and Licences document (APP-106), detailed information for the relevant Environmental Permitting will be submitted to the EA for</p>	Agreed

Ref.	Description of matter	Current Position	RAG
		<p>review and approval and should follow the construction principles outlined within section 5.8 of the OOCEMP (APP-505).</p> <p>The requirement to obtain relevant approval or exemption of Environmental Permits from the EA are detailed within the OOCEMP. Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan and approval or exemption of Environmental Permits, in accordance with the OOCEMP, therefore securing the requirement to obtain approval or exemption of Environmental Permits prior to works in these locations.</p>	
Residual Effects			
EA 3.2.11.1	Residual effects – surface water resources and flood risk	It is agreed that section 20.10 and Table 20.12 of ES Chapter 20 Surface Water Resources and Flood Risk (APP-135) is agreed.	Agreed

3.3. CONVERTER STATION SURFACE WATER DRAINAGE AND AQUIFER CONTAMINATION MITIGATION STRATEGY

Table 3.3 – Converter Station Surface Water Drainage and Aquifer Contamination Mitigation Strategy

Ref.	Description of matter	Current Position	RAG
3.3.1 Karst Feature			
EA 3.3.1.1	Known Karst Features	<p>Following conductivity and resistivity geophysical survey three karst feature were identified within Converter Station Area. Two of them are within proposed Converter Station option B(i) and B(ii) and the other located approximately 500m southeast of the Converter Station option B. Following the geophysical survey, the features were further investigated for infilling by cone penetration testing (CPT), the CPT indicated the karstic features to be (naturally) infilled with a Grade D Chalk. If the nature of infilling material requires proving, further sample collections will be required or agreement with relevant authority will be sought to confirm that the CPT data sufficiently supports the interpretation. This should be reviewed at detailed design stage to inform any required mitigation measures.</p> <p>The control of surface water drainage and drainage within the ground shall be carefully considered during detailed drainage design by the Contractor to mitigate increasing risk of dissolution of bedrock and formation of karstic features. It was agreed by EA that, following further investigation by the Contractor, if necessary, ground stabilisation and treatment by grouting will be the preferred solution. To minimise influence of grouting on the SPZ1, the Contractor in accordance with CIRIA C574 shall propose a ground mix that is of a suitable composition, control and cure time to responsible local authority for review and comment (in consultation with the EA and PW).</p>	Agreed
EA 3.3.1.2	Proposed site platform level and	The indicative proposed 84.80m AOD and 85.10m AOD site platform level and finished building level respectively were calculated from the recommendation of the flood risk assessment and, the site-specific initial cut and fill study:	Agreed

Ref.	Description of matter	Current Position	RAG
	Earthworks Design Approach	<ul style="list-style-type: none"> To ensure the platform level lies within Structureless Chalk to minimise impact on the SPZ1. To make allowance within structureless chalk for installation of below ground services such as drainage, low-voltage ('LV') and high-voltage ('HV') cable ducts, drawpits and trenches. To Maximise retention of the excavated material on site to minimise offsite disposal and a lower environmental impact. The preliminary ground investigation data supports the proposed platform level and below ground services lie within the Structureless Chalk. To mitigate the risk of Aquifer contamination, the bulk earthwork shall remain within the Structureless Chalk. The Contractor shall review and, if necessary, shall adjust the proposed Converter Station platform level at the detailed design stage to suit the design requirement of the below ground services such as LV and HV ducts and draw pits and drainage to ensure all excavations will remain within the structureless chalk and the structured chalk will not be exposed. This requirement shall be reflected in the Contractor earthwork management plan which will be prepared in consultation with the responsible local authority. To ensure the building height will not exceed the parameter envelope assessed, an AOD threshold 111.10 meters is provided for the Converter Station and Telecommunications Building Parameter Plan 2.6 Converter Station and Telecommunications Buildings Parameter Plans Option B(i) and Option B(ii), [APP-012] which is required to be complied with in accordance with DCO Requirement 5. Amendments would be made to roof profile design to address any refinement to the site level for the Converter Station and ensure the building height does not exceed the parameter envelope assessed. 	
EA 3.3.1.3	Unknown Karst Features	The Contractor shall monitor the ground during bulk earthwork for any unknown and unidentified karst features. As part of site bulk earthwork management and sequencing of work, the Contractor shall develop a risk assessment methodology in consultation with the responsible local authority (in consultation with the EA and PW) as a basis for notifiable and un-notifiable karst features to use during bulk earthwork. The Contractor shall follow an agreed communication protocol for any identified features (to be specified in the OOCEMP). The Contractor shall prepare and submit information relating to the karst features including, but not limited to, exact location, type and agreed method of treatment as a record to the Employer and the responsible local authority, EA and PW at the end of the bulk earthwork. In general, the expectation is to treat karst features same as EA 3.3.1.1.	Ongoing
3.3.2 Existing known underground services			
EA 3.3.2.1	Existing underground services (Surface and Foul drainage)	There are no known record of existing foul drainage network and surface water drainage network with the Converter Station Area or in close proximity.	Agreed
3.3.3 Floor Risk Management			
EA 3.3.3.1	Flood Risk – Converter Station	Pluvial flood risk is to be managed via the submission and approval of written details pursuant to Requirement 12 of the draft DCO (APP-019), which is required to accord with the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002). Section 2 of that strategy covers the principles as discussed and agreed with PW and Hampshire County Council Lead Local Flood Authority ('HCC LLFA').	Agreed

Ref.	Description of matter	Current Position	RAG
		It is agreed that these principles are acceptable to the EA with reference to the proposed drainage principles discussed hereafter in relation to protection against aquifer contamination.	
3.3.4 Drainage			
EA 3.3.4.1	Surface Water Drainage System – Converter Station	<p>There is no record of any known existing surface water drainage sewer network within the Converter Station Area or in close proximity to the Order Limits.</p> <p>The principles of the surface water drainage design have been discussed and agreed with the EA and PW and are included in sections 2.4 to 2.9 of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>Written details regarding the surface water drainage will be submitted to and approved by HCC LLFA in consultation with PW in accordance with Requirement 12 to the draft DCO (APP-019).</p>	Agreed
EA 3.3.4.2	Foul Drainage System – Converter Station	<p>There is no record of any known existing foul drainage network within the Converter Station Area or in close proximity to the Order Limits.</p> <p>The principles of the foul water drainage design have been discussed and agreed with the EA and PW and are included in section 3 of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>The design will be fully developed in accordance with section 4 of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002). Written details regarding the foul water drainage will be submitted to and approved by HCC LLFA in consultation with PW in accordance with Requirement 12 to the draft DCO (APP-019).</p>	Agreed
EA 3.3.4.3	Oily Water Drainage System – Converter station	<p>The principles of the oily water drainage design have been discussed and agreed with the EA and PW and are included in section 4 of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>It is accepted that the information on the Converter Station design is submitted in outline for detailed approval post grant of the DCO. This will include the final design of the oily water drainage and size of dump tank(s) which will be defined during detailed design of the system and form part of Requirement 6 (Detailed design approval) of the draft DCO (APP-019) in accordance with the details within Section 4 (Oil Containment and Oily Water Drainage) of the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p>	Agreed
EA 3.3.4.4	Active fire suppression system	<p>Following explained to EA and PW and has been added to the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>Once the project specific site layout has been developed by the Contractor, a detailed and comprehensive fire risk assessment and fire strategy report for the converter station compound including buildings and all site infrastructure/assets will be undertaken by the Contractor. This will include determination of fire compartmentation, fire suppression requirements, fire detention and appropriate fire rating of all buildings and equipment on site. The Contractor shall be required to interface with and seek the approval of the local fire authority, relevant statutory authorities, third parties and local authorities in relation to fire risk and mitigation and will comply with all relevant legislation and building regulation requirements. Subject to the outcome of the detailed fire risk assessment a fire active suppression system may be designed and installed on site. The size of the transformer bund will be determined based on volume of the oil in Transformer and water from active fire suppression system as well as appropriate factor of safety. In the event of a catastrophic failure, oil and potential water from the active fire suppression system will permeate through a flame trap into the oil drainage system through a cast in ductile iron (or an appropriate alternative material) U-bend syphon flame trap into underground oil containment where the oil and water will be stored and empty manually when it is safe to do so.</p>	Agreed

Ref.	Description of matter	Current Position	RAG
		The flame trap, manholes and pipes forming the interconnecting drainage system between the transformer bunds and the dump tank will be a closed free flowing gravity system capable of accommodating oil and water at temperature of 80°C at a rate of 7000 litres per minute. The pipework will be therefore designed to be capable of taking the suitable design flow rate. The route of the pipework will be continuing, closed system with shortest possible length with minimal vertical and horizontal deviation. 4 hours fire resistance will be provided to all pipework within the defined fire damaged zone. This will be generally best achieved by direct burring the pipework at suitable depth from finished converter station site level.	
3.3.5 SuDS and Water Quality System			
EA 3.3.5.1	Sustainable Drainage and Water Quality System	Surface water from oil containment areas and oily water areas will be directed through the proprietary system of an oil separator, with the use of SuDS to further reduce the hydrocarbon concentration of water discharged from the oil separator, prior to discharge via a soakaway to groundwater. The detailed design of these features will be in accordance with the description provided in the associated construction detail within Section 5 and the design drawings contained within Appendix 1 of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002) (drawing reference AQD-WSP-OS-UK-DR-D-200140-141 & AQD-WSP-OS-UK-DR-D-200140-141). Written details regarding the surface water drainage will be submitted to and approved by HCC LLFA in consultation with the PW in accordance with Requirement 12 to the draft DCO (APP-019).	Agreed
EA 3.3.5.2	Pollution Prevention Principles	Pollution prevention principles, as set out in the Surface Water Drainage and Aquifer Contamination Mitigation Strategy report, deal with the different liquids and fuels on site that can contaminate the Aquifer if infiltrated directly/indirectly into the ground were discussed and agreed. For further information, please refer to the updated version of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002) and secured under requirement 15 of the dDCO (APP-019).	Agreed
EA 3.3.5.3	Infiltration test	Infiltration survey to be undertaken to validate drainage design assumptions.	Ongoing
3.3.6 Temporary Surface Water Management			
EA 3.3.6.1	Temporary Surface Water Management	Temporary surface water run-off management during construction has been discussed and agreed in principle by the EA (and PW). Information in this regard is included in Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002), which requires the Applicant to develop a temporary surface water run-off management strategy including construction methodologies to ensure risk of flooding and contamination is controlled via appropriate mitigation measures. Recommended mitigation measures are detailed within the OOCEMP. Requirement 15 (Construction environmental management plan) of the draft DCO (APP-019) requires the submission of a construction environment management plan, in accordance with the OOCEMP, therefore securing the measures for temporary management during construction.	Agreed
EA 3.3.6.2	Temporary Car Park	The principles of the temporary car park design and associated surface water drainage to mitigate risk of contamination to the aquifer was discussed at the meeting on 05.08.2020. Design notes and indicative drawing will be submitted to PW and EA for review and comment. The information will be added to the updated version of the Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002) and secured under requirement 15 of the dDCO (APP-019)	Ongoing

Ref.	Description of matter	Current Position	RAG
3.3.7 Foundation Design			
EA 3.3.7.1	Foundation Design	<p>The extent of existing ground conditions and proposed foundation was discussed and agreed in principle with the EA (and PW) at a meeting on 18/06/2019. Considering the ground conditions encountered, piling is identified as the likely foundation design to be utilised subject to detailed design development post consent of the DCO. The use of pre-cast driven piles are likely to be one of the design options that will have the lowest impact on the chalk aquifer and restrictions set by PW around the SPZ1 designation.</p> <p>The foundation solution will form part of Requirement 6 Detailed design approval of the draft DCO (APP-019) and will be required to be in accordance with the details within Section 7 (Foundation Solution) of the Surface Water Drainage and Aquifer Contamination Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p>	Agreed
EA 3.3.7.2	Piling Risk Assessment.	<p>Draft Piling Risk Assessment issued to PW and EA on 1 July 2020 as an appendix 6 to Surface Water Drainage and Aquifer Contamination Mitigation Strategy Appendix 7 to the OOCEMP (APP-505 Rev 002).</p> <p>The design will be fully developed by the Contractor. Project specific piling risk assessment will be submitted to and approved by HCC LLFA in consultation with PW and the EA in accordance with Requirement 12 to the draft DCO (APP-019).</p>	Ongoing
Onshore Outline Construction Environmental Management Plan (OOCEMP)			
EA 3.3.7.1	Mitigation	<p>The EA are yet to review the updated OOCEMP, which within its appendices includes the updated Surface Water Drainage and Aquifer Contamination Mitigation Strategy which is subsequently secured as part of the updated OOCEMP (APP-505 Rev 002) by Requirement 15 of the dDCO (APP-019).</p>	Ongoing

4. SIGNATURES

Ref.	Environment Agency	Aquind (the Applicant)
Signature		
Printed Name		
Title		
On behalf of	Environment Agency	Aquind Limited
Date		

