

The Great Grid Upgrade

Sea Link

Preliminary Environmental Information Report

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Part 5

Chapter 5 Water Framework Directive Screening
Assessment

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5.5 Water Framework Directive Screening Assessment

5.5.1 Introduction

Project Overview

5.5.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia to accommodate additional power flows generated from renewable and low carbon generation in addition to new interconnection with mainland Europe.

Suffolk Onshore Scheme

5.5.1.2 The proposed Suffolk Onshore Scheme would comprise of:

- A connection from the existing transmission network via the proposed Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed by the Proposed Project.
- A high voltage alternative current (HVAC) underground cable of approximately 1.7 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station up to 26 m high plus external equipment (such as lightning protection and railings for walkways) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

5.5.1.3 The proposals in Suffolk have been developed for Proposed Project as a standalone project, but also include opportunities to co-locate infrastructure for up to two further projects at the converter station, cable corridors and the landfall location.

Offshore Scheme

5.5.1.4 The proposed Offshore Scheme includes three distinct components, which are summarised below:

- Suffolk landfall: This is the area where the cable route transitions between the marine and terrestrial environment in Suffolk. This is located between the settlements of Aldeburgh and Thorpeness. Trenchless installation techniques are proposed here to reduce disturbance to the intertidal environment;

- Marine HVDC cable route: This is the cable route from the landfall in Suffolk to the landfall in Kent. The marine HVDC cable route is up to 130 km in length; and
- Kent landfall: this is the area where the cable route transitions between the marine and terrestrial environment in Kent, located in the Pegwell Bay area to the south of the settlement of Cliffsend. Trenchless installation techniques are proposed here to reduce disturbance to the intertidal environment.

Kent Onshore Scheme

5.5.1.5 The proposed Kent Onshore Scheme would comprise of:

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 2 km to a new converter station (below).
- A 2 GW HVDC converter station, up to 26 m high plus external equipment (such as lightning protection and railings for walkways), near Minster. A new substation would be located immediately adjacent.
- Removal of approximately up to 1 km of existing HVAC overhead line, and installation of approximately 2.25 km of new HVAC overhead line from the substation near Minster and the existing Richborough to Canterbury overhead line.

5.5.1.6 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation, compensation, and enhancement (which could include hedgerow creation, native tree planting or funding local wildlife groups). The construction phase will involve various temporary construction activities including overhead line diversions, working areas for construction equipment and machinery, site offices, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs).

Purpose of this Document

5.5.1.7 The Water Environment (Water Framework Directive [WFD]) (England and Wales) Regulations 2017 (as amended) (Ref 5.5.1) implemented the WFD (Ref 5.5.2) in England and Wales. Under Section 2 of the European Union (Withdrawal) Act 2018 (Ref 5.5.3), the 2017 Regulations continue to have effect in domestic law following the UK's withdrawal from the European Union.

5.5.1.8 The WFD sets objectives for all waterbodies classified under the WFD, with an overarching requirement for these waterbodies to reach at least 'good' status (or potential) by 2015. This date has been extended to 2027 for many waterbodies, where it was recognised that reaching the 2015 target would bring disproportionate burdens.

5.5.1.9 A WFD Screening Assessment identifies WFD waterbodies that have the potential to be impacted by specific project activities, targeting those waterbodies and activities that require further assessment. Waterbodies and project activities that would not compromise WFD compliance are screened out. This document sets out the Water Framework Directive (WFD) Screening Assessment relevant to the Proposed Project. For convenience, this version of the WFD Screening Assessment report constitutes

Part 5 Chapter 5 of the PEIR alongside other reports that cover the entire Proposed Project such as the Habitats Regulations Assessment.

5.5.1.10 The draft Order Limits, which illustrate the boundary of the Proposed Project, are illustrated on **Figure 1.1.1 Draft Order Limits**. The WFD Screening Assessment covers the area within the Suffolk Onshore Scheme and the Kent Onshore Scheme, in addition to considering waterbodies up to 1 nautical mile off the coast at the landfall areas, in line with the Environment Agency's feedback to EIA Scoping. The Suffolk Onshore Scheme Boundary is illustrated on **Figure 1.1.2 Suffolk Onshore Scheme Boundary**, whilst the Kent Onshore Scheme Boundary is illustrated on **Figure 1.1.3 Kent Onshore Scheme Boundary**.

5.5.1.11 This chapter should be read in conjunction with:

- **Volume 1, Part 1, Chapter 4, Description of the Proposed Project;**
- **Volume 1, Part 2, Chapter 3, Ecology and Biodiversity;**
- **Volume 1, Part 2, Chapter 5, Water Environment;**
- **Volume 1, Part 2, Chapter 6, Geology and Hydrogeology;**
- **Volume 1, Part 3, Chapter 3, Ecology and Biodiversity;**
- **Volume 1, Part 3, Chapter 5, Water Environment;**
- **Volume 1, Part 3, Chapter 6, Geology and Hydrogeology;**
- **Volume 1, Part 4, Chapter 2, Physical Environment;** and
- **Volume 1, Part 4, Chapter 3, Benthic Ecology.**

5.5.1.1 This chapter is supported by the following appendices:

- **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice (CoCP);**
- **Volume 2, Part 1, Appendix 1.4.D, Crossings Schedule;**
- **Volume 2, Part 1, Appendix 1.4.F, Outline Schedule of Environmental Commitments and Mitigation Measures;**
- **Volume 2, Part 2, Appendix 2.6.A, Preliminary Contamination Risk Assessment;** and
- **Volume 2, Part 3, Appendix 3.6.A, Preliminary Contamination Risk Assessment.**

5.5.1.2 This chapter is supported by the following figures:

- **Volume 3, Figure 5.5.1 WFD Waterbodies.**

5.5.2 Scoping Opinion and Consultation

5.5.2.1 There has been no specific engagement with stakeholders regarding the approach to this WFD Screening Assessment.

5.5.2.2 A Scoping Report (Ref 5.5.4) for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 and a Scoping Opinion (Ref 5.5.5) adopted by PINS, on behalf of the Secretary of State (SoS) was received on 1 December 2022.

Table 5.5.1 sets out the comments raised in the Scoping Opinion by stakeholders and how these have been addressed in this WFD Screening Assessment.

Table 5.5.1 Comments raised in the Scoping Opinion

Stakeholder Comment	Response
<p>EA: We welcome the reference to a Water Framework Directive (WFD) Screening Assessment, the scope of which will be agreed with the relevant stakeholders but will include all those WFD waterbodies with the potential to be affected. We note that ‘the assessment will identify how the Project design will avoid waterbody deterioration, as well as any other mitigation necessary’. We consider preventing waterbody deterioration as the minimum requirement and would like the assessment to additionally consider ways that waterbody enhancements can be made through the Project design.</p>	<p>Sections 5.5.4 and 5.5.6 include proposed measures to prevent waterbody deterioration for each of the development activities screened into the assessment. Reference to design features and mitigation measures are outlined here. During future stages of the WFD assessment, opportunities for the Project to deliver waterbody enhancements will be explored in consultation with the Environment Agency.</p>
<p>Natural England: For activities in the marine environment up to 1 nautical mile out at sea, a Water Framework Directive (WFD) assessment is required as part of any application. The ES should draw upon and report on the WFD Screening Assessment considering the impact the proposed activity may have on the immediate water body and any linked water bodies. Further guidance on WFD assessments is available here: https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters.</p>	<p>Section 5.5.3 outlines that offshore elements of the Project to 1 nautical mile have been screened into the scope of the WFD screening assessment. These waterbodies are characterised in Section 5.5.6, which also considers the potential for proposed project activities to impact on these offshore waterbodies.</p>

5.5.2.3 There has been no change to the proposed scope of the assessment since the Scoping Opinion was received.

5.5.3 Approach and Methodology

5.5.3.1 The WFD Screening Assessment has been carried out in accordance with the following good practice guidance documents:

- Planning Inspectorate Advice Note 18: The Water Framework Directive (Ref 5.5.6); and
- Water Framework Directive assessment: estuarine and coastal waters (Ref 5.5.7).

- 5.5.3.2 The Advice Note describes three stages of WFD assessment, namely screening, scoping and impact assessment. This report covers stage 1 screening, for the Onshore elements of the Project.
- 5.5.3.3 The offshore elements of the Project up to 1 nautical mile have been screened into stage 2 (scoping) on the basis of stakeholder feedback described in Section 5.5.2.
- 5.5.3.4 A WFD Screening Assessment identifies WFD waterbodies that have the potential to be impacted by specific project activities, targeting those waterbodies and activities that require further assessment. Waterbodies and project activities that would not compromise WFD compliance are screened out of the assessment.
- 5.5.3.5 The screening assessment has followed several steps, which are described below.

Step 1 – Defining the ZOI and Screening Waterbodies

- 5.5.3.6 This step of the screening assessment defines the Zone of Influence (ZOI) of the Proposed Project and identifies which WFD coastal, surface water and groundwater waterbodies are present within the ZOI. Those waterbodies are screened to focus further stages of assessment only on those waterbodies having potential to deteriorate or fail to reach their objective status because of activities associated with the Proposed Project.

Zone of Influence

- 5.5.1.3 The ZOI of a project is determined by considering the distance between waterbodies and the proposed construction, operation and decommissioning activities as well as the hydrological connectivity of waterbodies to these project activities. Waterbodies that are not considered to have the potential to be impacted, due to lack of direct or indirect connectivity, or due to distance, are screened out of the assessment at this stage.
- 5.5.3.7 The ZOI for this screening assessment has been defined to include land within 500m of the draft Order Limits, extending to 1 nautical mile from the Projects two landfall locations. This ZOI is justified based on technical knowledge of similar schemes and has been set following consideration of the distance over which the potential for WFD waterbody deterioration could reasonably be expected to occur. It has been defined to reflect the surrounding water environment and is sufficient for the inclusion of all potentially affected waterbodies. The ZOI is illustrated in **Figure 5.5.1 WFD Waterbodies**.

Surface Waterbodies - Screening

- 5.5.3.8 As described in Table 5.5.2 and Table 5.5.8, surface waterbodies within the Kent ZOI would be crossed by both overhead line and underground cable sections of the Proposed Project, and surface waterbodies within the Suffolk ZOI would be crossed by underground cable sections. Temporary watercourse crossings would be necessary to provide a haul route for movement of construction plant and personnel along the working area. The waterbodies would also receive discharges and temporary and/or permanent drainage.
- 5.5.3.9 **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice (CoCP)** contains a suite of control and management good practice measures to reduce the environmental effects of construction activities. On completion of the construction

phase, landform (and watercourse crossings) would be reinstated to its current standard.

Groundwater Bodies – Screening

5.5.3.10 The groundwater bodies within the two ZOI (Table 5.5.3 and Table 5.5.9) have been screened out for the following reasons:

- The Proposed Project has a very small footprint in the context of the groundwater body (land enclosed by the draft Order limits covering less than 1% of the total area of the waterbody) and interactions with the waterbody would be limited. Excavation works to create the underground cable sections would be near surface, with a typical excavation depth of around 1.5m and trench width of approximately 2.5m, and therefore generally are not anticipated to intercept groundwater (outlined in **Volume 1, Part 1, Chapter 4, Description of the Proposed Project**).
- Deeper excavations would be confined to localised areas, for example, if piled foundations are required for pylons at the Friston substation, Saxmundham converter station or Suffolk colocation converter stations (Suffolk), or Minster Converter Station and Substation (Kent), or at trenchless crossings and landfalls. These works would be undertaken in accordance with Commitment GH02 in the Outline CoCP which commits the appointed Contractor to undertaking a Foundation Works Risk Assessment (FWRA) to reduce the risk of mixing of aquifer bodies through the creation of new flow pathways, and GH08 which sets out a protocol for dealing with unexpected contamination if encountered. These measures would help to safeguard groundwater flow paths and quality and reduce the potential for breakouts of drilling muds. It is also noted that, the preliminary contamination risk assessments that have been undertaken for the Kent and Suffolk Onshore Schemes (**Volume 2, Part 2, Appendix 2.6.A, Preliminary Contamination Risk Assessment** and **Volume 2, Part 3, Appendix 3.6.A, Preliminary Contamination Risk Assessment**), have identified generally a very low/low risk of contamination to be present within the draft Order Limits.
- In accordance with commitment GH07, any dewatering would be undertaken in accordance with EA guidance and if required an Environmental Permit. Therefore, discharge of heavily silted or otherwise contaminated waters to the ground, during construction or operation of the Proposed Project, is not anticipated.
- With regard to the potential for changes to groundwater levels and/or recharge rates from the introduction of impermeable surfaces, the proposed Friston substation, Saxmundham converter station and Suffolk colocation converter stations (Suffolk), and Minster Converter Station and Minster Substation (Kent) are located on Tidal Flat Deposits which are generally low permeability clays, therefore the effect on recharge is likely to be negligible. In addition, commitment W06 states that any new surfacing will be permeable surfaces where ground conditions allow. Hardstanding elsewhere within the draft Order Limits will be confined to permanent access tracks, and as these will be a much smaller area the impact on groundwater recharge is also expected to be negligible.
- During construction, temporary effects would be avoided or reduced by the commitments made within **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice (CoCP)**.

- 5.5.3.11 Potential for minor and localised effects on groundwater quality and flows are reported in **Volume 1, Part 2, Chapter 6, Geology and Hydrogeology** for Suffolk and **Volume 1, Part 3, Chapter 6, Geology and Hydrogeology** for Kent. This assessment concludes that the good practice measures set out within **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice (CoCP)** would avoid any likely significant effects. It is therefore concluded that the Proposed Project does not have the potential to cause further deterioration of the current Poor status of the Waveney and East Suffolk Chalk and Crag (Suffolk) or East Kent Tertiaries (Kent) groundwater bodies, and these waterbodies are screened out of the assessment.

Coastal Waterbodies - Screening

- 5.5.3.12 Works at the two landfalls, extending to 1 nautical mile from the two landfall locations, would be carried out as part of the Offshore Project, therefore relevant coastal waterbodies have been screened into the assessment due to the potential for physical change and effects on other quality elements.
- 5.5.3.13 During construction, impacts that could affect the marine environment and marine receptors would be controlled and reduced by the commitments included within **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice**.

Step 2 - Collating Baseline Data

- 5.5.3.14 This stage of the screening assessment comprises collating baseline data to characterise those waterbodies that have been screened in at Step 1. Data is reported in Section 5.5.4 and Section 5.5.6.
- 5.5.3.15 The WFD waterbodies that have been screened into the assessment at Stage 1 are described along with their current WFD status, their specific objectives and any mitigation measures in place or planned are detailed. The information has been taken from the Anglian River Basin Management Plan (RBMP) (Ref 5.5.8) for Suffolk, the South East Basin Management Plan (Ref 5.5.9) for Kent and the Environment Agency's Catchment Data Explorer website, Cycle 3 data, (Ref 5.5.10). Data has also been obtained from onshore ecology site walkover surveys undertaken in summer 2023, when a photographic record and field notes of baseline conditions were recorded, and from the Projects marine surveys, which to date have comprised geophysical and bathymetric surveys and surveys of benthic ecology (Ref 5.5.11MMT (2022) South East Anglia Link Marine Survey, Geophysical & Environmental Survey England – SE coast September - October 2021.).

Step 3 – Screening Proposed Project Components and Activities

- 5.5.3.16 Step 3 of the screening assessment identifies the relationships between the components of the Proposed Project, and the activities needed to construct and operate these, and screened in WFD waterbodies. Any components and activities with the potential to influence the screened in waterbodies are screened in for further assessment.
- 5.5.3.17 The Suffolk Onshore Scheme, illustrated on **Figure 1.1.2 Suffolk Onshore Scheme Boundary**, consists of the following main components:

- Friston substation and associated overhead line modifications or a connection into and works within the consented Friston substation as consented by Scottish Power Renewables (SPR);
- Underground High Voltage Alternating Current (HVAC) connection from the proposed Friston substation to the proposed Saxmundham Converter Station Site;
- Saxmundham Converter Station; and
- A High Voltage Direct Current (HVDC) underground cable from the proposed Saxmundham Converter Station to the Suffolk landfall.

5.5.3.18 The Kent Onshore Scheme, illustrated on **Figure 1.1.3 Kent Onshore Scheme Boundary** consists of three main components:

- HVAC connection, via a new approximately 1 km section of double overhead line, from the existing Richborough to Canterbury 400 kV overhead line to the proposed Minster 400 kV substation and Minster Converter Station;
- A compound comprising Minster 400 kV substation and Minster Converter Station; and
- HVDC underground cable from the proposed Minster Converter Station to the Kent landfall in Pegwell Bay.

5.5.3.19 The works within the coastal environment, illustrated on **Figure 1.1.4 Offshore Scheme Boundary**, consist of the following main components:

- Suffolk landfall: This is the area where the cable route transitions between the marine and terrestrial environment in Suffolk. This is located between the settlements of Aldeburgh and Thorpeness;
- Kent landfall: this is the area where the cable route transitions between the marine and terrestrial environment in Kent, located in the Pegwell Bay area to the south of the settlement of Cliffsend; and
- Marine HVDC cable route: This is the cable route from the transition joint bay (TJB) at the landfall in Suffolk to the TJB at the landfall in Kent.

5.5.3.20 To facilitate construction of these permanent components there will also be several temporary components, such as construction compounds and haul routes and activities such as soil stripping, excavations and drainage works.

5.5.4 Water Framework Directive Screening Assessment – Suffolk Onshore Scheme

Step 1 – Screening Waterbodies

5.5.4.1 Within the Suffolk onshore ZOI, there are several WFD surface and groundwater bodies that are managed under the Anglian River Basin Management Plan (Ref 5.5.8). These are described in Table 5.5.2 and Table 5.5.3 of this chapter respectively. These tables also provide details of the hydrological relationship between each water body and the Proposed Project.

Table 5.5.2 WFD Surface Waterbodies within the ZOI – Suffolk Onshore Scheme

Waterbody Name (WFD Waterbody ID)	Hydrological Relationship to the Project
Hundred River (GB105035046260)	<p>This waterbody flows through land within the draft Order Limits and would be crossed by an overhead line section of the Project. The watercourse is also crossed in two locations, by Snape Road (AIL and AIL cable drum routes) and Aldeburgh Road (AIL cable drum route), however these are existing road bridges so no additional watercourse crossings would be required. Where the watercourse discharges at the coast, in the colocation scenario it will be crossed by a section of three underground cables, likely using trenchless technique. The construction compound at the landfall would be located within the catchment of this waterbody, however outside of the floodplain of the river (as defined by Flood Zone 3).</p> <p>During operation of the project there would be no discharges to the waterbody and no other interactions with it.</p>
Fromus (GB105035045980)	<p>This waterbody flow through land within the north-western extent of the draft Order Limits and would be crossed by an overhead line section of the Project. The watercourse is crossed in two locations, by Farnham Road (Abnormal Indivisible Load (AIL) cable drum route) and Church Hill (access route mobilisation and trenchless works), however these are existing road bridges so no additional watercourse crossing would be required. The Suffolk and Saxmundham converter stations lie within the catchment of this waterbody, however they are not within the floodplain of the watercourse.</p> <p>During operation of the project there would be no discharges to the waterbody and no other interactions with it.</p>
Alde & Ore (GB520503503800)	<p>Comprising a network of watercourses, this waterbody flows through land within the draft Order Limits. The watercourse has an extensive floodplain (as defined by Flood Zone 3) which is crossed in two locations by the AIL cable drum route and the AIL and Suffolk access mobilisation routes.</p> <p>During construction and operation of the project there would be no discharges to the waterbody and no other interactions with it.</p>

Table 5.5.3 WFD Groundwater Bodies within the ZOI – Suffolk Onshore Scheme

Waterbody Name (WFD Waterbody ID)	Hydrological Relationship to the Project
Waveney and East Suffolk Chalk and Crag groundwater body (GB40501G400600).	Underlies land within the draft Order Limits of the Suffolk Onshore Scheme

5.5.4.2 For Suffolk, The Hundred River and Fromus surface waterbodies described in Table 5.5.2 have been screened into the WFD assessment, given the variety of Project

interactions with them, including new temporary crossings and new discharges of construction worksite and operational drainage. There would therefore be a range of construction activities in their riparian corridors and operational above ground infrastructure would also be located within their catchments. The Project activities are screened in Section 5.5.4. The Alde & Ore surface waterbody has been screened out of the WFD assessment.

5.5.4.3 Within the Suffolk ZOI, there is one coastal waterbody, the Suffolk Coastal Waterbody (GB650704510000). Details of the Proposed Project works within the marine environment are presented in **Volume 1, Part 1, Chapter 4, Description of the Proposed Project**.

Step 2 – Collating Baseline Data

Hundred River Waterbody

5.5.4.4 The Hundred River waterbody, is a river that is designated as heavily modified and achieves an overall Moderate status, limited by its biological and physico-chemical quality elements. Its chemical status is Fail, because of mercury and its compounds and Polybrominated diphenyl ethers (PBDE), which have been used in the manufacture of a wide range of products, including plastics. Table 5.5.4 below presents a summary of Cycle 3 data, as well as field notes recorded during an ecology walkover survey undertaken in June 2023.

Table 5.5.4 Baseline Data for Hundred River Waterbody

WFD Waterbody ID	GB105035046260
Length (km)	11.07
Catchment Area (km ²)	26.10
Overall status	Moderate
Ecological status	
- Biological quality	Bad
- Hydromorphology	Supports Good
- Physico-chemical	Moderate
- Specific pollutants	High
Chemical status	
- Priority substances	Good
- Other pollutants	Does not require assessment
- Priority hazardous substances	Fail

Field Notes:

No info from ecology for Hundred River.

Fromus Waterbody

5.5.4.5 The Fromus waterbody, shown in Image 5.5.1, is a river that is designated as heavily modified and achieves an overall Poor status, limited by its biological and physico-chemical quality elements, namely dissolved oxygen. Its chemical status is Fail, because of mercury and its compounds and Polybrominated diphenyl ethers (PBDE), which have been used in the manufacture of a wide range of products, including plastics. Table 5.5.5 below presents a summary of Cycle 3 data, as well as field notes recorded during an ecology walkover survey undertaken in June 2023.

Table 5.5.5 Baseline Data for Fromus Waterbody

WFD Waterbody ID	GB520704004700
Length (km)	13.28
Catchment Area (km ²)	34.57
Overall status	Poor
Ecological status	
- Biological quality	Poor
- Hydromorphology	Supports Good
- Physico-chemical	Moderate
- Specific pollutants	High
Chemical status	
- Priority substances	Good
- Other pollutants	Does not require assessment
- Priority hazardous substances	Fail

Field Notes:

Steep vegetated banks, channel width 1m (approximated).

Banks of earth vegetated with mature line of trees.

Low flows with exposed stoney bed.

Banks of earth with scrub, tall herbs, mature oak trees, and Himalayan balsam.

Adjacent SI grassland with variety of vegetation.



Image 5.5.1 (left) River Fromus, and right) Fromus Waterbody Floodplain

Step 3 - Screening Proposed Project Components and Activities

- 5.5.4.6 Table 5.5.6 below details the components of the Suffolk Onshore Scheme and their relationship to the screened-in waterbodies where relevant. Project activities that are not considered to have the potential to cause waterbody deterioration nor prevent implementation of any measures to achieve target objectives, are screened out at this stage. This screening assessment has been informed by the preliminary water environment impact assessment presented in **Volume 1, Part 2, Chapter 5 Water Environment**.
- 5.5.4.7 Table 5.5.6 makes reference to the proposed good practice measures that are detailed in the Outline CoCP by their ID codes e.g. GG15. Full details of the measures are provided in **Volume 2, Part 1, Appendix 1.4.A Outline Code of Construction Practice (CoCP)**.

Table 5.5.6 Screening of Project Components and Activities – Suffolk Onshore Scheme

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
Construction Phase		
Pollution risk associated with general construction activities.	Adoption of good practice measures to prevent pollution (GG15, GG17, GG18), including in an emergency scenario (GG23). Measures to manage worksite runoff/drainage (GG16) and biosecurity (B04), as well as commitments regarding re-instatement (GG08).	Screened out – given the implementation of the measures in the Outline CoCP, general construction would have negligible impacts on the screened-in waterbodies.

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
Construction works in the floodplain of the Fromus and Hundred (for temporary access)	Temporary haul routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be removed at the end of the construction phase and the ground surface will be reinstated to pre-project levels. No construction materials should be stored within Flood Zone 3 (W06).	Screened out – given the implementation of the measures in the Outline CoCP, and the small footprint of the works, temporary works in FZ3 of the Stour would have negligible impacts on the screened-in waterbodies.
Construction of foundations	Design and construction of foundations in accordance with Foundation Works Risk Assessment (GH02) and informed by ground investigations (GH01).	Screened out - given the implementation of the good practice measures proposed, this activity would have negligible impacts on the screened in waterbodies.
Soil stripping, handling and storage resulting in silted runoff to waterbodies and changes to runoff rates/patterns	Management, storage and reinstatement of soils in accordance with good practice (AS01).	Screened out - given the implementation of the measures in the Outline CoCP, this activity would have negligible impacts on the screened-in waterbodies.
Establishment and use of construction compounds, with associated pollution risks from receipt of site drainage and potential for physical disturbance of riparian corridors	Compounds located to avoid encroaching into floodplains and riparian corridors. Adoption of good practice for construction compound establishment and use (GG15, GG16, GG17). Suitable surface water and foul water drainage provision (GG16).	Screened out - given the implementation of the measures in the Outline CoCP, general construction would have negligible impacts on the screened-in waterbodies.
Construction works in, over, under or adjacent to waterbodies to create crossings for construction access, with effects on hydromorphology (physical change), flow regimes and water quality	Undertaking works in accordance with relevant consents / permits (W01). Temporary crossing design in accordance with good practice (W02, W04). Retaining riparian vegetation and natural substrates through temporary crossing structures (W03).	Screened in - this development activity carries some risk of causing deterioration (albeit temporary) of waterbody status and is taken forward to Stage 4 for further consideration.

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
Construction works in, over, under or adjacent to waterbodies for cable trenching with potential effects on water quality associated with soil strip and drilling muds breakout risks	Undertaking works in accordance with relevant consents / permits (W01). Use of trenchless crossing techniques suited to local ground conditions (W10). Open cut crossings following good practice techniques (W02).	Screened in - this development activity carries some risk of causing deterioration (albeit temporary) of waterbody status and is taken forward to Stage 4 for further consideration.
Operation and Maintenance		
General maintenance activities	Maintenance activities would include visual and physical inspections plus testing, repairing and replacing substation and converter station equipment as necessary. Overhead line sections would be inspected annually from the ground or by helicopter to check for visible faults or signs of wear. Maintenance activity along the proposed cable routes would generally be limited to non-intrusive inspections and cable repairs. Any works involving breaking ground would be subject to similar environmental safeguards as described for construction.	Screened out – negligible risk of causing deterioration of waterbody status.
Drainage discharges from Friston substation, Saxmundham converter station (including colocation)	Surface water drainage managed using sustainable drainage systems (SuDs) in accordance with policy and guidance requirements of the Lead Local Flood Authorities (W12).	Screened out – given the implementation of the SuDs, operational drainage discharges would have negligible impacts on the screened-in waterbodies.

5.5.5 Water Framework Directive Screening Assessment – Offshore Scheme

Step 1 Screening Waterbodies

- 5.5.5.1 Within the ZOI of the Offshore Scheme, there are two WFD waterbodies. These are managed under the Anglian River Basin Management Plan (Suffolk) and South East

River Basin Management Plan (Kent). As noted in Section 5.5.4, both of these waterbodies have been screened in to the assessment.

Step 2 – Collating Baseline Data

- 5.5.5.2 The Suffolk coastal water body (Water Body ID: GB650503520002) within which the Suffolk Landfall is located is classified as achieving Moderate Overall Status, with Moderate Ecological Status and Fail Chemical Status. The water body is failing to achieve good status because of high concentrations of dissolved mercury containing compounds, and Polybrominated diphenyl ethers (PBDE).
- 5.5.5.3 The Kent Landfall is located within the Stour (Kent) Water Body (Water Body ID: GB520704004700). This water body is classified as Moderate Overall Status, with Moderate Ecological Status and Fail Chemical Status and is failing to achieve good status for the same reasons as described above.
- 5.5.5.4 Further baseline information for these coastal waterbodies can be found **Volume 1, Part 4, Chapter 2, Physical Environment** and **Volume 1, Part 4, Chapter 3, Benthic Ecology**.

Step 3 – Screening Proposed Project Components and Activities

- 5.5.5.5 Table 5.5.7 below details the components of the Offshore Scheme and their relationship to the screened-in waterbodies where relevant. This screening assessment has been informed by the preliminary assessments presented in **Volume 1, Part 4** of the Preliminary Environmental Information Report.
- 5.5.5.6 Table 5.5.7 makes reference to the proposed good practice measures that are detailed in the Outline CoCP by their ID codes e.g. GG15. Full details of the measures are provided in **Volume 2, Appendix 1.4.A Outline Code of Construction Practice (CoCP)**.

Table 5.5.7 Screening of Project Components and Activities – Offshore Scheme

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
Construction Phase		
Increased suspended sediment concentration (SSC) levels, resulting from disturbance of the seabed due to construction activities	At both landfall sites, trenchless techniques will be used to minimise the impact of sediment disturbance in the intertidal zone during cable installation.	Screened in - this development activity carries some risk of causing deterioration (albeit temporary) of coastal waterbody status and is taken forward to Stage 4 for further consideration.
Disturbance of potentially contaminated sediment causing alteration of water	Sensitive routing and siting of infrastructure and temporary works to avoid areas of known contamination.	Screened in - this development activity carries some risk of causing deterioration (albeit temporary) of coastal

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
quality and habitat/species smothering effects.	Commitments made within Volume 2, Part 1, Appendix 1.4.F, Outline Schedule of Environmental Commitments e.g GM01.	waterbody status and is taken forward to Stage 4 for further consideration.
Changes to coastal morphology at landfalls due to installation of the cables, including trenchless drilling operations, excavation of the exit pits and changes to the nearshore wave regime and sediment transport patterns due to the presence of nearshore cable protection measures.	At both landfall sites, trenchless techniques will be used to minimise the impact on seabed sediments. Minimum depth of lowing (DOL) to the top of the cable is 0.5 m (MPE02).	Screened out – negligible risk of causing deterioration of waterbody status.
Direct loss of subtidal benthic habitats and species due to placement of hard substrates on the seabed	Cable protection materials will be selected to match the environment (BE04)	Screened out – negligible risk of causing deterioration of waterbody status.
Introduction and spread of Invasive Non Native Species	BE01, BE02, BE03, LVS01	Screened out - based on the adherence to best practise guidelines and mitigation measures in line with international standards, any impact from the introduction and spread of INNS is considered to pose a negligible risk of causing deterioration of waterbody status
Underwater noise impacts due to Project activities e.g UXO clearance, route preparation, cable installation and project related vessel movement	MM01	Screened in - taken forward to Stage 4 for further consideration, informed by detailed underwater noise assessment.
Decommissioning		

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Scoped In/Out of Stage 4
Increased suspended sediment concentration (SSC) levels during cable removal	Where cables are decommissioned by removal, they may need to be pulled or excavated from the seabed and pulled back through the trenchless solution conduit. The impact of the excavation process will be no greater than that for the construction phase.	Screened out – given the cables would be removed through the already constructed trenchless conduit, the risk of causing deterioration of waterbody status is negligible

5.5.6 Water Framework Directive Screening Assessment – Kent Onshore Scheme

Step 1 – Screening Waterbodies

- 5.5.6.1 Within the Kent ZOI, there are several WFD surface and groundwater bodies that are managed under the South East River Basin Management Plan (Ref 5.5.9). These are described in Table 5.5.8 and Table 5.5.9 of this chapter respectively. Table 5.5.8 and Table 5.5.9 (below) also provide details of the hydrological relationship between each waterbody and the Proposed Project.

Table 5.5.8 WFD Surface Waterbodies within the ZOI – Kent Onshore Scheme

Waterbody Name (WFD Waterbody ID)	Hydrological Relationship to the Project
Stour (Kent) (GB520704004700)	This waterbody flows through land within the Kent Onshore Scheme Boundary and would be crossed by an overhead line section of the Proposed Project. There would be no physical disturbance to the river channel/riparian corridor during construction of the overhead line. However, a temporary crossing of the watercourse would be needed to facilitate access for construction materials and plant. There is potential for the crossing, as well as parts of a temporary haul road, to be constructed within the floodplain (as defined by Flood Zone 3) of the river. During operation of the Proposed Project there would be no discharges to the water body and no other interactions with it.
Monkton and Minster Marshes (GB107040019621)	Comprising of a network of watercourses, this waterbody flows through land within the Kent Onshore Scheme Boundary and would be crossed by an underground cable section of the Proposed Project. Culvert crossings are proposed for the construction haul road at approximately twelve locations, as outlined in Volume 2, Part 1, Appendix 1.4.D, Crossing Schedule: K/WA/0036, K/WA/0037, K/WA/0038, K/WA/0039, K/WA/0042, K/WA/0043, K/WA/0044, K/WA/0046, K/WA/0047, K/WA/0048, K/WA/0049, K/WA/0050. There are also two

Waterbody Name (WFD Waterbody ID)	Hydrological Relationship to the Project
Stoneless Stream*	<p>construction compounds within the catchment, which would discharge drainage to the waterbody. The proposed Minster Converter Station and Substation would also be located within the catchment of this waterbody. Operational drainage discharges from the converter station and substation to the waterbody are proposed.</p> <p>This waterbody is a tributary of Minster Stream and flows through land within the Kent Onshore Scheme Boundary and would be crossed by an underground cable section of the Proposed Project, using a trenchless technique. Two discharges of construction phase drainage are proposed via two new outfall structures and two construction compounds would be located in close proximity to the waterbody.</p> <p>During operation of the Proposed Project there would be no discharges to the water body and no other interactions with it.</p>

*this watercourse does not have a WFD waterbody ID, however is located within the same operational catchment as the Monkton and Minster Marshes, therefore effects will be assessed cumulatively.

Table 5.5.9 WFD Groundwater Bodies within the ZOI – Kent Onshore Scheme

Waterbody Name (WFD Waterbody ID)	Hydrological Relationship to the Project
East Kent Tertiaries (GB40702G501600)	Underlies the whole of the draft Order Limits associated with the Kent Onshore Scheme and would therefore be crossed by both overhead line and underground cable sections, as well as temporary and permanent access routes, and Minster Converter Station and Substation.

5.5.6.2 For Kent, all of the surface waterbodies described in Table 5.5.8 are screened into the WFD assessment, given the variety of Proposed Project interactions with them. There would therefore be a range of construction activities in their riparian corridors and operational above ground infrastructure would also be located within their catchments.

Step 2 – Collating Baseline Data

Stour (Kent) Waterbody

5.5.6.3 The Stour (Kent) waterbody, shown in Image 5.5.2, is a transitional waterbody that is designated as heavily modified and achieves an overall Moderate status, limited by its biological and physico-chemical quality elements. Its overall chemical status is Fail, because of mercury and its compounds and Polybrominated diphenyl ethers (PBDE), which have been used in the manufacture of a wide range of products, including plastics. Table 5.5.10 below presents a summary of Cycle 3 data, as well as field notes recorded during an ecology walkover survey undertaken in summer 2023.

Table 5.5.10 Baseline Data for Stour (Kent) Transitional Waterbody

WFD Waterbody ID	GB520704004700
Surface Area (km ²)	5.1
Overall status	Moderate
Ecological status	
- Biological quality	Moderate
- Hydromorphology	Supports Good
- Physico-chemical	Moderate
- Specific pollutants	High
Chemical status	
- Priority substances	Good
- Other pollutants	Good
- Priority hazardous substances	Fail

Field Notes:

Shallow grassy banks, channel width of between 3m and 7m (approximated).
 Banks of earth, vegetated with dense shrubs, grass, occasional trees and abundant herbs.
 Channel mostly clear of vegetation, some grasses extending out from the banks.



Image 5.5.2 (left) and (right) Stour (Kent) Transitional Waterbody

- 5.5.6.4 Reasons for this waterbody not achieving Good status are reported as sewage discharges, poor agricultural and rural land management practices, and physical modifications.
- 5.5.6.5 Objectives for the waterbody are to achieve Good status for biological quality elements by 2027. However, a low confidence in achieving this objective is noted, due to disproportionate expense. Recovery of chemical status to Good by 2063 is also set as an objective.

Monkton and Minster Marshes

5.5.6.6 The Monkton and Minster Marshes waterbody, shown in Image 5.5.3, is a surface waterbody that is designated as heavily modified and achieves an overall Moderate status, limited by its biological and physico-chemical quality elements. Its overall chemical status is Fail, because of mercury and its compounds and Polybrominated diphenyl ethers (PBDE), which have been used in the manufacture of a wide range of products, including plastics. Table 5.5.11 below presents a summary of Cycle 3 data, as well as field notes recorded during an ecology walkover survey undertaken in June 2023.

Table 5.5.11 Baseline Data for Monkton and Minster Marshes Waterbody

WFD Waterbody ID	GB107040019621
Length (m)	4.99
Catchment Area (km ²)	18.09
Overall status	Moderate
Ecological status	
- Biological quality	Moderate
- Hydromorphology	Supports Good
- Physico-chemical	Moderate
- Specific pollutants	High
Chemical status	
- Priority substances	Good
- Other pollutants	Does not require assessment
- Priority hazardous substances	Fail

Field Notes:

Steep sided banks, channel width of between 1m and 2m.

Banks of earth, vegetated with grasses, thick shrubbery and occasional trees.

In-channel vegetation comprising occasional grasses and vegetation debris.



Image 5.5.3 (left) and (right) Minster Stream, part of the Monkton and Minster Marshes WFD Waterbody

5.5.6.7 Reasons for this waterbody not achieving Good status are reported as sewage discharges, poor agricultural and rural land management practices, and physical modifications for land drainage.

5.5.6.8 Objectives for the waterbody are to achieve Good ecological status by 2027. However, a low confidence in achieving this objective is noted, due to disproportionate expense. Recovery of chemical status to Good by 2063 is also set as an objective.

Stonelees Stream

5.5.6.9 This watercourse does not have a WFD waterbody ID, nor specific objectives or status data. However, the watercourse is located within the same operational catchment as the Monkton and Minster Marshes waterbody. The effects of screened in Proposed Project activities on this watercourse will therefore be assessed cumulatively with those on the Monkton and Minster Marshes waterbody.

Kent North Coastal Waterbody

5.5.6.10 Baseline information for the Kent North coastal waterbody can be found within **Part 4 Chapter 2 Physical Environment**.

Step 3 – Screening Proposed Project Components and Activities

5.5.6.11

5.5.6.12 Table 5.5.12 Screening of Project Components and Activities – Kent Onshore Scheme below details the components of the Kent Onshore Scheme and their relationship to the screened-in waterbodies where relevant. Proposed Project activities that are not considered to have the potential to cause waterbody deterioration nor prevent implementation of any measures to achieve target objectives, are screened out at this stage. This screening assessment has been informed by the preliminary water environment impact assessment presented in **Volume 1, Part 3, Chapter 5 Water Environment**.

5.5.6.13

5.5.6.14 Table 5.5.12 makes reference to the proposed good practice measures that are detailed in the Outline CoCP by their ID codes e.g. GG15. Full details of the measures are provided in **Volume 2, Part 1, Appendix 1.4.A, Outline Code of Construction Practice (CoCP)**.

Table 5.5.12 Screening of Project Components and Activities – Kent Onshore Scheme

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Screened In/Out of Stage 4
Construction Phase		
Pollution risk associated with general construction activities.	Adoption of good practice measures to prevent pollution (GG15, GG17, GG18), including in an emergency scenario (GG23). Measures to manage worksite runoff/drainage (GG16) and biosecurity (B04), as well as commitments regarding re-instatement (GG08).	Screened out – given the implementation of the measures in the Outline CoCP, general construction would have negligible impacts on the screened-in waterbodies.
Construction works in the floodplain of the Stour (for temporary access)	Temporary haul routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be removed at the end of the construction phase and the ground surface will be reinstated to pre-project levels. No construction materials should be stored within Flood Zone 3 (W06).	Screened out – given the implementation of the measures in the Outline CoCP, and the small footprint of the works, temporary works in FZ3 of the Stour would have negligible impacts on the screened-in waterbodies.
Construction of foundations	Design and construction of foundations in accordance with Foundation Works Risk Assessment (GH02) and informed by ground investigations (GH01).	Screened out – given the implementation of the good practice measures proposed, this activity would have negligible impacts on the screened in waterbodies.
Soil stripping, handling and storage resulting in silted runoff to waterbodies and changes to runoff rates/patterns	Management, storage and reinstatement of soils in accordance with good practice (AS01).	Screened out – given the implementation of the measures in the Outline CoCP, this activity would have negligible impacts on the screened-in waterbodies.
Establishment and use of construction compounds, with associated pollution risks from receipt of site drainage and potential for physical	Compounds located to avoid encroaching into floodplains and riparian corridors. Adoption of good practice for construction compound establishment and use (GG15, GG16, GG17). Suitable surface	Screened out – given the implementation of the measures in the Outline CoCP, general construction would have negligible impacts on the screened-in waterbodies.

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Screened In/Out of Stage 4
disturbance of riparian corridors	water and foul water drainage provision (GG16).	
Construction works in, over, under or adjacent to waterbodies to create crossings for construction access, with effects on hydromorphology (physical change), flow regimes and water quality	<p>Undertaking works in accordance with relevant consents / permits (W01).</p> <p>Temporary crossing design in accordance with good practice (W02, W04).</p> <p>Retaining riparian vegetation and natural substrates through temporary crossing structures (W03).</p>	Screened in – this activity carries some risk of causing deterioration (albeit temporary) of waterbody status and is taken forward to Stage 4 for further consideration.
Construction works in, over, under or adjacent to waterbodies for cable trenching with potential effects on water quality associated with soil strip and drilling muds breakout risks	<p>Undertaking works in accordance with relevant consents / permits (W01).</p> <p>Use of trenchless crossing techniques suited to local ground conditions (W10).</p> <p>Open cut crossings following good practice techniques (W02).</p>	Screened in – this activity carries some risk of causing deterioration (albeit temporary) of waterbody status and is taken forward to Stage 4 for further consideration.
Operation and Maintenance		
General maintenance activities	<p>Maintenance activities would include visual and physical inspections plus testing, repairing and replacing substation and converter station equipment as necessary.</p> <p>Overhead line sections would be inspected annually from the ground or by helicopter to check for visible faults or signs of wear. Maintenance activity along the proposed cable routes would generally be limited to non-intrusive inspections and cable repairs. Any works involving breaking ground would be subject to similar environmental safeguards as described for construction.</p>	Screened out – negligible risk of causing deterioration of waterbody status.
Drainage discharges from Minster converter station and substation	Surface water drainage managed using sustainable drainage systems (SuDs) in accordance with policy and guidance requirements of the	Screened out – given the implementation of the SuDs, operational drainage discharges would have

Development Activity	Proposed Measures to Prevent Waterbody Deterioration	Screened In/Out of Stage 4
	Lead Local Flood Authorities (W12).	negligible impacts on the screened-in waterbodies.

5.5.7 Conclusions

- 5.5.7.1 This WFD screening assessment concludes that due to the nature of the Proposed Project including the Suffolk and Kent Onshore Schemes, both during construction and operation, there is limited potential for project activities to cause future deterioration of WFD waterbodies. In addition, implementation of future measures to improve their status would not be prevented. Temporary effects during construction would be avoided or extensively reduced by implementing the good practice measures, contained within **Volume 2, Part 1, Appendix 1.4.A Outline CoCP**.
- 5.5.7.2 The project will also require consent for main river and ordinary watercourse crossings, in the form of Flood Risk Activity Permits (main rivers) and ordinary watercourse consent, which would be secured under the Environmental Permitting Regulations and Land Drainage Act.
- 5.5.7.3 Two surface waterbodies and a small number of project activities have been screened into the WFD assessment for the Suffolk Onshore Scheme, and three surface waterbodies and a small number of Proposed Project activities have been screened into the Kent Onshore Scheme WFD assessment. These will be assessed at Stage 4. Stage 4 will comprise preliminary assessment of the screened-in components of the Proposed Project, against the WFD elements that make up the overall WFD status of screened in waterbodies. The Stage 4 assessment will be reported in the Environmental Statement.
- 5.5.7.4 Two coastal waterbodies within 1 nautical mile of the two landfall sites, and a number of project activities have been screened into the WFD assessment for the Offshore Scheme and will be assessed at Stage 4. The WFD screening assessment concludes that due to the nature of the Proposed Project and the Offshore Scheme, both during construction and operation there is limited potential for project activities to cause future deterioration of coastal waterbodies. Temporary effects during construction would be avoided or extensively reduced by implementing the good practice measures, contained within **Volume 2, Part 1, Appendix 1.4.A Outline CoCP**.

5.5.8 References

- Ref 5.5.1 Her Majesty's Stationery Office (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations. Available at: <https://www.legislation.gov.uk/ukxi/2017/407/contents/made> [Accessed 7 June 2023]; and Her Majesty's Stationery Office (2019). The Floods and Water (Amendment etc.) (EU Exit) Regulations. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents> [Accessed 17 July 2023]
- Ref 5.5.2 European Commission (2023) Water Framework Directive. Available at: https://environment.ec.europa.eu/topics/water/water-framework-directive_en [Accessed 9 August 2023]

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Ref 5.5.5 Planning Inspectorate Scoping Opinion Proposed Sea Link December 2022 [online] <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020026/EN020026-000027-EN020026-Scoping-Opinion.pdf>

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Ref 5.5.7 Environment Agency (2016) Water Framework Directive assessment: estuarine and coastal waters. Available at: <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters> [Accessed 25 July 2023]

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Ref 5.5.10 Environment Agency (2023) Catchment Data Explorer. Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment> [Accessed: 17 July 2023]

Ref 5.5.11 MMT (2022) South East Anglia Link Marine Survey, Geophysical & Environmental Survey England – SE coast September - October 2021.

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