

# TEXT\_Sizewell\_ISH11\_Session2\_14092021

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00:16

Hello, and welcome back to this issue specific hearing number 11. I'd like to now move on to a discussion about non potable water. Although before I do that, Mr. Kean, did you have your hand up before the German This is something he wanted to say in conclusion.

00:38

So thank you. I didn't want to say I didn't look then. Moving on. Item agenda three, whether or not my client and I could be released, but it doesn't say sounds like you're still on on tour. Is that right?

00:58

We are still on to non potable water. Yeah. But yes, once we've done item two, by all means, Mr. King, thank you very much. Okay. The water supply strategy, Rep. 7036 sets out the approach for supply of non potable water. I would like to hear interested parties have any comments they wish to make at this stage concerning the approach to non potable water supply. And I think we've already heard Miss Bateman for task mention about I think what she was talking about the small bits of water from reusing treated sewage water was about non potable water. But if there are any IPAs want to make any further comments about a non potable water supply? Please, could you raise your hands? It's been

01:55

Yeah. Hi. I just wanted to ask something about the, or there's a bit of an echo. Yeah, thank you. I just wanted to ask something about the reusable the Firstly, the percentages that are being claimed for reusing water. And the applicant seems to be claiming quite high levels of reuse, reusing and recycling water. And I wonder what that was based on. Because a lot of the language that is used to describe it seems quite aspirational, you know, and quite vague, that doesn't seem to be very definite. So I wanted to know what will happen if those levels of recycling are not achieved, because obviously, then the amount of freshwater that is needed is going to go right up. And I also want it to know about the water that is going to be used from the treatment works is going to be used for things like dust suppression. Well, what are the what effect will that have on the environment? What chemicals etc, are there in that water? Because, you know, that's not made clear, either. Because Because it seems to me that, you know, if you've got sort of water with chlorine or whatever, if you're going to spray all over the environment that's gonna have quite big effect. And yeah, I definitely want to know where the figures came from. Were they were they based on Hinkley figures? Are they entirely aspirational or what? And I think that might be for now, I've probably got another question. here from Mr. Collins, please.

03:41

Yes, thank you very much. Paul Collins, mid level stakeholder group, seven nice Rouge Parish Council and stop sighs We'll see. That goes back again, to exactly where the non potable water is going to come from. We know there's a reservoir, which has been added to the the plans. And the idea that both

water from foul water which you just mentioned, will perhaps be used as part of that supply. But also there is a, as they mentioned in their latest document, an abstraction from the new cut, which will no longer be used. It's currently used for irrigating farmland within the development area. And whether that is now considered to be sufficient to actually do what is quite a lot of dust suppression and various other activities for this material. Thank you. Thank you, Mr. Collins. Mr. Philpott, you

04:44

want to respond on those two? And so I'll check with Mr. Rose, but I suspect that detailed questions or technical questions of that sort would probably best dealing within writing rather than asking Mr. Rose to respond on those matters, but I just checked with him whether that's right.

05:03

JOHN rose for the applicant. I think that's right. I'm not sufficiently expert to answer them here but I thought they were with respect. They were good questions and we will certainly respond to them in our written submission.

05:17

Thank you, Mr. Rhoades. That concludes item two. And with that, can I just say for Mr. Keens benefit that he can leave at this point? Thank you. Moving on to item three, the main developments site flood risk. The first point I want to raise is about a read Mr. scars deadline seven submissions, which are rep 71, nine and 220. An earliest submissions concerning the adequacy the flood risk assessment, with respect to coastal flooding, with particular reference to the vulnerability of the sidewall damage offshore bank and its implications for the flood risk assessment. And Mr. Scar can't be here but take it we have already submissions, and he will be watching this live stream. And we'll make comments and deadline eight with particular reference to the flood risk assessment. I'd like to hear first from the Environment Agency, please.

06:35

Hi, so Cameron's get from the Environment Agency. Sorry, could you possibly just read say the question again? Thanks.

06:43

Mister Mister scars deadline, seven submissions and his earliest submissions relate to the vulnerability of the sizewell dunnage offshore bank and its stability. And its implications for wave heights, I think in particular, and thus, the implications for the coastal flooding in the flood risk assessment is not the coastal geomorphology. I want to talk about here. It's about whether or not you feel the the flood risk assessment is robust in this respect.

07:15

I said my my understanding is that we feel it is however, I'd like to bring in my colleague, Sarah Palmer, who is a flood risk engineer. If she can answer that particular question, she will otherwise we can provide the detail in writing if that's okay. Yes, indeed.

07:35

Good morning, sir. Sarah Palmer for the Environment Agency. I'm afraid I can't answer the detail about the modelling of the bank and how that relates to the flood risk assessment. I know that my coastal geomorphology colleagues have looked into this and I believe they were content with how it was modelled, but I can't provide the details to you. But I do believe they were content, how it was represented within the flood risk assessment.

07:58

Thank you could potentially asked if he Suffolk Council have anything to add here.

08:09

Isabella tuffle for a separate counsel. We don't have anything to add. So we defer to the EA on this matter.

08:15

Thank you. On that basis, is there any other IPS who want to Mr. roelens?

08:24

Yes, thank you, Adam rowland's. On behalf of the RSPB and Suffolk Wildlife Trust. I just like to note with regard to the the flood risk assessment in the environment agencies written representations. They'd noted the potential increase in flood depth in the one in 200 year annual probability flood event, and they'd noted that the size was the company had intended to mitigate the increased flood risk by securing landowner consent. And we did note that in our deadline free submission rep 307. For that we are the landowner so RSPB are the landowner of a large area of that affected area, and that we had not been approached with regard to consent. for that. I can now confirm that the applicant has recently approached us with regard that issue we have requested further detail from them and that detail is awaited. But that issue is still outstanding in terms of landowner consent for that increased flood risk in that area. We will put that in our Thank you Mr. Rowland. Mr. Wilson

09:52

thank thank you Chris Watson on behalf of task I have a query about tour are concerned about the timeline used in the And risk assessments, is this appropriate time to raise that? Sorry, I can't hear you. Sorry.

10:08

Sorry, in a similar way, the last comment. That's actually about what I was talking about here was a particular issues that Mr. Skoll raised about the size world on its bank. And then we're going to move on to any other comments about main development site flood risk assessment. So you can make the point now, but when I do move on to it, there's obviously no need to reiterate it

10:30

negative. I mean, we do share this the scars concerns and help the damage sysvol Bank. But what the point I wanted to make was that we're concerned about references in some of the flood risk assessments. And with regard to the, the timeline, and basically, in Sorry, I've just got to find my notes.

10:56

In August 2020 tasks receives a written response from the Office of nuclear regulation in respect to the query task raised concerning the likely lifetime of the dryer fuel store at size we'll see particularly in relation to the nuclear decommissioning authorities technical note, which said that we drive your store canisters containing EPR fuel assemblers and maximum burn up level that would need 140 years to call sufficiently to be considered safe to place into into a repository has no formal application to be made at that time for the size of C drive fuel store, the O nr provided a written response basically, based on the situation at Hinkley Point and, and basically, the the odnr said that the length of time spent fuel was expected to remain on site. It's a B, they believed that a programme of mixing fuel ascenders with different burn up levels and the cooling period could be shortened in the expectation Mrs. e o and RS expectation was that it would need a period of cooling for 55 to 60 years post end of operation and for it to be sufficient to put into a drive into repository. So if the size we'll see if and it's a big if based on the length of time, okay autoinflammatory all EPR reactors have been under construction, we assume an operational start data 2035 60 years of operation takes us to 2095 further 60 years for calling Texas to 2155. The DNR said it will take up to 10 years to transfer the fuel off site. So that takes us to 2165 before commissioning can really take place. As the applicant has submitted a detailed assessment of decommissioning in the DCR application. Let's assume it takes 30 years to fully decommission to basically arrive at the end of the 22nd century before the site would be safe to abandon back to nature. And this is to be remembered that this time I'm assuming is one that there is a GDF into which then fuel can actually get to be transferred. And this is by no means a certainty and to the fuel can be called an averaged faster rate than the NDA originally assessed. And there must be some doubt about this. Given There is currently no experience and the behaviour of the high burn up spent fuel from EPR reactors anywhere in the world. The aforementioned timeline is at odds with the applicants comments in rep five 120 in appendix j Paris 2.3 point one three dash 14, page 1218, where it stated that in respect of the flood risk assessment for the triple si crossing, the crossing will will remain safe up to 2140. And after that, activities will be related to non nuclear decommissioning requirements, and the occupation of the site will be non essential. This statement from the applicant is worrying for for two main reasons. One because it totally contradicts the oh and asked advice to TAs from regarding the timeline for dealing with spent fuel and therefore how long the site has to be kept safe. And to because of the risk of the marine flooding post to that part of the main development site that's occupied by the triple si crossing task to not have the expertise in coastal geomorphology but endorser concerns expressed by others, such as next car and Bill Parker refer to shortfalls in the applicant's modelling that under assess the possibility of C breaching the sea defences to the north of the site. Due to such reasons as more strong. storm surges occurrences after the impacts of climate change, arriving from a prevailing northeast direction of greater force wave heights due to the saddle between the damage strikes, sizable banks and the potential loss of the protective features of the tiny sizable banks, which obviously is your point that you're you raised initially. Also the the sandbars and also not modelling storms of sufficient force and task note that the applicant has attempted to address these apparent shortcomings in their date some of their D deadlines seven submissions, and we welcome Sam responses from knowledgeable interested parties on these matters act dechlorinate. And just to conclude, the recent Cliff falls at thought NASA short distance South the size of site once again, highlighted the vulnerability of the Suffolk coast and how easy it is to underestimate the power of the sea. And overestimate overestimate man's ability to hold the sea back. potentially catastrophic consequences have overestimated the effectiveness, the size will cease flood protection measures

mean in toss opinion, that a precautionary approach needs to be taken. And a recommendation that size will soon be refused permission should be made to the Secretary of State. Thank you, sir.

15:57

Thank you. Thank you, Mr. Wilson. Mr. Philpott? I mean, if the minute returned to Mr. scars issue. I've heard from an Environment Agency and you will your team will have read his deadline seven submissions and other ones. Is there anything you want to say on that subject about the vulnerability of flies rolled on its bank with its implications for the flood risk assessment and the wave height?

16:25

So I'm going to pass that question over to Mr. James Hansen, who's from a calm sat here on my ride, he'll deal with questions in relation to flood risk, and he can pick up that point.

16:41

Thank you, James Hansen for the applicant. The I think there are kind of three elements in there, the first, first one related to Mr. Carr scars, submissions. And this is something that we've picked up in, I think, some detail in our response to x q twos. And that was a CG point two point 10. And, in fact, there are two things that we are looking at one of one of those relates to the coastal geomorphology. And that might be something that would be better, answered by others, you know, that Mike, my colleagues, and perhaps even this afternoon, in terms of the flood risk assessment, what we have done, and we've done this consistently throughout the assessment is to actually take a precautionary approach here. So we actually take a conservative view, and we on looked at work to understand whether or not the the daanish banks, whether they're, you know, irrespective and without prejudice about whether what the findings of other other reports are, but whether they were removed or whether they were not removed, in the context of the fra to understand what would be the worst worst case scenario. And actually, the the work that we looked at, showed quite clearly that the the fra would benefit in its conservatism by actually assuming that the, the worst sorry that the worst case for the fra is with. Sorry, I've just had a little dry. Let me try another run at that again, please. So, so one might assume that the fra, if the bank was in place, that that would actually have an energy as the dissipation. Actually, as it turns out for the fra conversely, that's true. So so the having the bank in place, in terms of fra assessment actually gives you a more conservative outcome in terms of understanding what coastal overtopping is at the high coastal defence feature. So that's actually the approach that we've taken there. So in the will then be a reference to how is that addressed in the coastal geomorphology. In effect, both studies have taken the worst case scenario and applied it. So it's a sort of non is a without prejudice approach. And we take we assume the worst and apply that and that's how we've gone about and that's how the assessment has taken place. That work has obviously been shared with the Environment Agency. And I hope that the comments from the Environment Agency a few moments ago will give some confidence that actually they've review that in some detail on thoroughly and find that the the finding sound

19:52

Thank you. I think Mr. scars submitted a fair amount of evidence about how his opinion differs, I think I don't know whether it'd be. I mean, I appreciate what you've just said and appreciate what's been submitted, I don't know whether you might find it beneficial to have a meeting with the school or arrange a discussion with Mr. Scott, and see if you can come near it together, then.

20:16

But I can take that away. And we can, we can see if that is possible, if what you have in mind is to try and agree, some sort of statement of common and uncommon ground. So that at least insofar as you and the secretary of state needs to take a view on that outstanding dispute, you understand exactly what is in dispute, and and hopefully that will narrow it down a little. I'll take that away, but I can understand how that might be of assistance. Thank you. And so just on the coastal geomorphology element of that, as Mr. Hansen was alluding to, we do have this afternoon session on that topic, and we'll have Dr. Tony dolphin available. So if there are specific questions about that element, we'll have someone on hand who can help you with those this afternoon.

21:09

Thank you. Moving on to the rest of the development, the main development site flood risk assessment. You just heard some other outstanding concerns. I'd like to hear any. And Mr. Sorrell, you've got your hand up. Can you hear from Mr. Fuller? Oh, please. Mr. Fuller, you're on mute.

21:39

I do apologise, sir. Good morning. Very shortly, I'd just like to I haven't heard anything with reference to something that was reported in the times on last Friday, which may be relevant in this case. That is the evidence given by Mr. McGuire, who is a volcanologist at University College London, at the British Science Festival, where he was raising the issue of the fit the effect of ice lost in Greenland is resulting in earth crust rising in the region, increasing the risk of severe sizing activity. And there is an example I will I will save time, I will send you a written thing with this with the attachment, essentially raising the possibility within the next 100 years of a tsunami coming across the North Sea. And the parallel he was reaching was a historic example. Which by the time it reached from Greenland to Scotland, it was about 20 feet high. And it the water travels up to 20 miles inland. I just want to draw that attention I hadn't heard this referred to in any of the previous discussions, and I just think perhaps it ought to just be looked at. Thank you very much indeed. I will

22:55

send you the Thank you Mr. Soto. Could I hear from Councillor Marion wolf please?

23:03

Good. Good morning. Maryanne wolf from laced and calm sighs well, Town Council, and this is quite a minor issue compared with the ones we've been talking about. But it is something which which laced in has raised in their relevant representation which is about flooding in Valley Road in Lewiston, which is already susceptible to flash flooding. So I read chapter 10 of the flood risk main development site flood risk assessment and point 5.2. It says that the risk of extra risk of flooding caused by the developments on that on the site of the east of the in Eastlands industrial estate is, is going to be addressed by using permeable surfaces on the car park and the caravan site. But I couldn't find any information about the new railhead that will be there and the sidings where the trains will be unloaded and the hgvs loaded for onward travel to the construction sites. And so I'm concerned whether that part of the development would result in an increased risk of flooding in Valley Road, though, thank you. Thank you. Can I hear from Mr. Bedford please?

24:39

Thank you. So microbead for Suffolk County Council. I think there is an issue I have to say I've just so I'm just getting a mixed message as to whether actually this is an issue that's better raised under the next agenda item because I think it doesn't relate directly to the main development side. fr I think it's a point in relation to one of the associated development site. fra, so I apologise sir. I'll come back.

25:09

Thank you. Okay. I don't see her hands up. So Mr. Philpott, do you want to respond to those?

25:15

And say yes, I say far as Mr. sutherlands point about tsunami. I'll ask Mr. Hansen, whether he has already answered that to hand. But otherwise, I suggest we respond in writing once we've seen the article in the newspaper in question. And then Councillor wolf raised a specific point about the impact of flooding in relation to one part of the main development site on planning in Valley Road. And I'll ask Mr. Hanson, whether he's able to deal with that or whether he would provide a an answer in writing.

25:58

Sorry, to interrupt the results to the point from Mr. Wilson about the timeline and why

26:02

Yes, so that the question Mr. Wilson's question about the timeline, as I understand it, was to do with response at hand for me LNR, about the likely lifetime of the dry fuel store. So again, on the same basis, I'll ask Mr. Hansen, whether he's able to deal with that now, or whether there's any element of that that needs to be taken away.

26:33

Thank you, James Hansen for the applicant. So taking these probably in some room verse order, but the order in which they arrived. So in relation to the question raised by Mr. Wilson, about the the timeline for the storage of spent fuel, I just want to be very clear about what the f RA, has, has assumed f ra has all of our work in terms of flood risk assessment on the main development side has taken 2140 as the point at which all all, spent fuel will have been removed from the site. And that's quite clear that that's specified in in the application than fra meats sits alongside and in terms of that timeline. I think in terms of the the specific points about the individual elements, it's not something I can answer. But potentially we could draw together a response to that is give a little bit more clarity about the timeframe for the those individual elements, and perhaps all the thinking is find it.

27:36

May I ask you a question? If your fra is on the basis that the spent fuel and so on will be removed by 2140? How are you securing that?

27:51

So I suspect that's not a question. Mr. Hanson is going to be able to answer I shall agree to take that away. And we'll come back to in writing. And I would say by way of Prelude, however, that in terms of

whether or not it needs to be secured, there is a distinction to be drawn between assumptions that are made for the purposes of assessment. And though those elements which need to be secured for the purposes of EIA, we have put in quite detailed submissions about that in writing, I won't say without going back and checking what the position is in relation to this one. But one would need to consider that in terms of whether it needs to be secured. And if so then the question arises where, but we'll come back to in writing on that.

28:49

Thank you in terms of the next question that had come up from Mr. Mr. Sadler, all around this article by the archaeologist and ice loss in Greenland and seismic event. I see in terms of seismic qualification, there's probably others better than me to actually kind of provide a response on that. But it forms part of the and I'm just talking about seismic, at this moment, it performs part of the scope of the design for the hard coastal defence feature. So just to give a little bit of assurance there, but I think the question perhaps more related to tsunami, and how tsunamis may form and whether or not the design is considered that and actually, yes, it has. And again, we we've had at least I think two questions in examining authority questions in relation to this. And it forms part fundamentally fourth part of the safety case so it doesn't feel mostly part of the fra but actually it is does form part of the design driver for the Hardcastle defence feature. So we might be able some point to point you towards some information that Helps helps kind of provide an understand that. Thank you. And there was a Valley Road, there wasn't the Yes. So in terms of in terms of Valley Road, the the the concerns that Councillor wolf raise are well known well understood. The well belser hands of water management plan would have been formed part of our discussions with the county councillors lead local flood authority rather than the outset of this work. And in terms of providing the right level of attenuation, actually that that is addressed in Appendix B, to rep five 120, which is the technical note which deals with and it's called the ACA there, but for that, that's otherwise known as the Le IE site. And that sets out our drainage strategy and sets out the the the way in which that drainage is dealt with, includes the trackside drainage, and it includes the basin at the west side of the site and demonstrates that the capacity of that system is more than equal to the store events which is designed.

31:25

Thank you. I see two more hands up. Mr. Bedford, your hands still up.

31:38

Thank you so much. So thank you. So Michael Bedford, Suffolk County Council. So first of all, an apology. It was me that was getting my wires crossed, we do have a point that does relate to the main development side. And so apologies for the inconvenience of taking therefore out of turn, can I bring in Mr. Matt Williams, who is the flood and water engineer for the county council, and it relates to a specific issue concerning bridleway 19 and lovers lane, and the question of whether or not flute pluvial pluvial flooding has been properly or adequately assessed. So if I bring in Mr. Williams, please.

32:24

Thank you, Mr. Bedford, Matt Williams, Suffolk County Council. The question we have is that the rightaway 19 realignment is proposed to be at currently a level above the one in 100 and climate change fluvial flood event. It is not at the moment above the one in 100 and climate change pluvial that

surface water flood event. Now there has been some detailed work at this location undertaken by Suffolk County Council as part of the laissent surface water management plan. There is detailed mapping available that has been provided to the applicant in June 2019 and again in July 2021. But at the moment, as we understand it right away 19 would still be at surface water flood risk for the one and 140% climate change and we we do not support that proposal.

33:20

Thank you, Mr. Williams. I see a hand up from Mr. scared. Thank you, sir. Come and get from the Environment Agency.

33:33

Just before we left, leave the main development site that's gonna be useful just to whether we could could summarise the kind of minor areas of concern and we start left. Okay. Yes. So I'd like to bring in my colleague, Sarah Palmer. That's right.

33:56

Good morning, sir Sarah Palmer for the Environment Agency. We just wanted to clarify that in terms of the main development site and coastal flood risk. Only outstanding issue is regarding the increase in offsite flood risk tank traps in the event of the nought point 5%, one in 200 annual probability coastal overtopping flood event in the year 2090. So, there would be an opportunity 0.2 metre increase in flood depth on land owned by the RSPB in this flood event. Although the land is already at risk of flooding to 1.5 metres, so the total depth of flooding would increased 1.7 metres as a result of development. We do understand that the applicant are in discussions with the RSPB regarding the acceptability of this and we haven't heard anything back from the applicant to date as to what the outcome of that is. We're also aware that there's some small areas of land that would become a risk of flooding that aren't presently at risk of flooding in that same event for naught point 5% in the year 2090. So these are small areas of have been the edge of the floodplain that we've become at risk of flooding. to a depth of about 0.05 metres or 50 millimetres. So again, we understand that the applicant is in discussion with the individual landowners regarding the acceptability of this increase flood risk to this land. In terms of mitigation, obviously, em one 5.7. point one seven requires the applicant to mitigate the increase in flood risk to an acceptable level. So at the minute, there's the flood storage area proposed and like amended the design of the triple design crossing to reduce that impact on flood risk. We have asked them to clarify if there's anything else they could do, or why not, you know, if that is all they're doing, and why. And they have supplied us with a document regarding this, but it was yesterday, and we probably haven't had the chance to look at it in detail. position is, but if that did meet our requirements as to why there's nothing more that can be done. And if not, then a permission was not provided for all of those increased areas of flood risk, then we consider that it would be up to the decision maker to determine whether the these increases in flood risk are acceptable. And in one 5.7 point, one, seven. And that's the only outstanding issue that we have, sir, for the main development site, coastal flooding. Thank you. Mr. Phillpotts, would you like to respond to those points?

36:16

And so yes, so I've got two points that I'm going to ask Mr. Hanson to respond to the first was a specific point by Suffolk County Council about bridleway 19 and the level of risks there. And then secondly, so

far as environmental agency is concerned, there were some minor areas of concern. As I understand it, there are essentially two points. One that there is a small increase in the flood depth on land owned by the IRS PB where we've heard discussions are ongoing between the applicant and the RSPB. And then secondly, some small areas where there was I think it was said 15 millimetres of flooding, weather isn't flooding at the moment. There was also a reference to a document that we provided to the Environment Agency we did, which is considering so unless you want Mr. Hanson to deal with that I was just going to wait and see what the Environment Agency had to say about it. So if I can ask Mr. Hanson to deal with the other points that I've raised.

37:32

Thank you, Mr. James Hansen for the applicant. Yeah. And just to say, of course, this was the same point that Mr. Rowland from the RSPB put forward earlier on in the in the discussion so we have indeed engage with the RSPB and provided a note that is a summary of the effects. In fact, what the Environment Agency asked us to do was to sort of drill down into the fra look at it from the perspective of land holding, and then engage with RSPB with that sort of that further analysis and that's what and that's certainly what what we've done. And we are seeking confirmation that the increased flood depth is accepted by the RSPB. You know, our our view certainly is that in the context of the significant baseline flooding that will be taking place, that the the extra over flood depth on top of that is not significant. We do acknowledge that there is a very small amount of additional increase in extent, just to give that some sort of description, we're talking about very small pockets of few meeting metres across which are added to the fringes of what is already a flooded area, where again, as as stated by others, the characterization of that is up to five or six centimetres of depth. In in those small pockets. They're non contiguous. It's not a large area. It is it's not a continuous area, either. But obviously, you know, we are engaging with RSPB and keen to see confirmation that it's accepted by them continue to do so. The the I think the only other point then just to pick up here and now relates to the bridleway 19 level for that raised bride away at lovers lane. And, you know, certainly we have considered the service water management plan for leisten as part of our study, so certainly confirm that the flood risk assessment looks at all forms of Flooding is required to do so and therefore looks at pluvial flooding as part of the assessment. We there appears to be a bit of a difference of opinion as to what what flooding event will necessarily take for them in our you know, we're certainly looking at a focus there on the fluvial flood risk. And certainly we've used that as a guide in order to understand what would be the right level to set that bridle, bridleway at it feels then just at the moment that there's a little bit of a mismatch of the line about what seems to be the appropriate level. And you know, I think probably would be the better thing to do rather than necessarily kind of play it out here. And now is is to kind of engage again with Suffolk County Council on that particular issue is a is a relatively small point, I think in the in the design approach. We think that the fluvial flood level is is the more appropriate but are willing to continue to engage with Suffolk County on that issue?

41:08

No, I think that's a sensible approach. Thank you. I see no other hands up on a main development cycle address. So move on to the other development site flood risks. And I'll start with the size roll size well link road flood risk assessment. I know there are still outstanding concerns with respect to the information provided. And I would like to hear from Firstly, the Environment Agency, whether about their outstanding concerns.

41:39

Thank you, sir. Cameras get from the Environment Agency, I will pass to my colleague Sarah Palmer will give you a quick summary of where we're at with that one.

41:53

Thank you. Good morning, sir. Sarah Palmer from employment agency. Again, in terms of size worldlink. Road fra, we previously had an outstanding issue regarding increases in flood debts upstream of some of the crossings. And it has not been clarified that the majority of these are within the site development boundary itself was one area upstream of crossing six that appeared to be outside of the site development boundary and increased flood depths. However, the applicant has since clarified and provided some information to show that this was actually a mapping error. And that actually the water remained in channel in that flood event and didn't go out of banks, and therefore there wasn't an actual increase in flood risk. And we have had a look at this. And we do agree with the applicant on that occasion. So we don't have any outstanding issues besides running code. Thank you very much. Suffolk County Council. Thank you. So microbead Pacific Health Council.

43:00

So we didn't have any issues, particularly we wanted to raise on this aspect. But obviously, if there were any matters that you wanted to raise all those were happy and Mr. Williams will be able to assist you as appropriate.

43:15

Now, it was principally to hear whether you still had any outstanding concerns. Mr. Bedford, thank you. Could I also hear if the Suffolk internal drainage board have any outstanding issues?

43:34

Good morning, sir. Yvonne Smith for the Suffolk internal drainage board. No, we do not we defer to the EIA and the If in this matter.

43:43

Thank you very much. In that case, I'll hear for if there are any other interested parties want to raise any issues on the size welding crude flood risk assessment. Edwina Galloway, please.

44:04

I just wish you to note that residents on for the road are still expressing concern that they feel that the flood risk

44:14

analysis is inadequate from their point of view. I think they would appreciate seeing more information. Thank you, Miss Galloway. Mr. Philpott. Could you respond to that?

44:28

Sir, I'm not sure there's much one can say that. I hear that they're still concerned they'd like more information. But it's it's such a generalised point that unless there's anything specific to respond to about specific allegations of inadequacy, we could engage with those but at the moment, I'm not sure there's anything I can ask Mr. Hanson to

44:49

deal with okay. Perhaps if they do have any outstanding concerns, they can detail them a deadline eight and you could respond to them then. Thank you. Okay, moving on to the other development associated development sites. I think in this case, I just like to hear if any interested parties have issues about the flood risk assessments of any of the other associated development sites.

45:19

am not seeing any hands up at all on a resume. So, I'll move on to item five, which is the draining strategy, which is rep 7017. And I understand that the applicant deadline five submitted a number of technical notes, rep five 120, including their main development site, water management zone summary, the ACA draining strategy, technical note. And I wondered whether there was any IPS I wanted to raise issues on any of the submissions at deadline five in this respect, and any outstanding concerns that aren't addressed through the deadline seven submission of the drainage strategy. So if Mr. Bedford please first.

46:21

Thank you, sir. Michael Bedford, Suffolk County Council. So yes, we do have some outstanding concerns, which in some respects, are potentially significant if they cannot be satisfactorily resolved, albeit that we would hope that further engagement and dialogue can lead to them being resolved. There are sort of two aspects if I can briefly address and then on the sufficiency of the information in the drainage strategies, I'll again turn to Mr. Williams. As as a preface, it's right to say that the drainage strategy as submitted at deadline seven, as a replacement for the outline drainage strategy, we are still in the process of reviewing the detail of that although we're apprised in the sense of the the overall, it's probably best if detailed comments appear in our written submissions after this session. But going to the as it were the overarching points, there is an issue about the technical notes and reports which are referenced in the drainage strategy. But not so far as we see adequately tied in so that the matters that they rehearse by way of information or background, don't then follow through into federally binding elements with the drainage strategy. So that when there is then the requirement, that the the drainage details under requirement five when they come forward, that they have to be in accordance with the drainage strategy. That's not in itself sufficient to tie those technical notes because of the way that they themselves are not adequately tied in to the to the drainage strategy. So it may be it's a drafting and presentation matter that I say further dialogue can resolve but at the moment, we're not contended that that information is adequately addressed and secured. And then the second wider point which relates to how requirement five works in relation to surface water drainage matters. And in In summary, there is a there is a disagreement, I'm afraid between the applicant and the county council as lead local flooding authority as to the identity of the discharging authority for surface drainage water matters. And at the moment, as you will have seen in terms of requirement five that is placed with a Suffolk Council. And whilst obviously we have very good working relations with the Suffolk Council, and we each of us have

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high respect for the competence of the other. We do think that in this circumstance on this particular rescue, that the proper home of the discharge authority should be the lead local floodwall authority. And if I can just briefly make some comments about that, first of all, so as you will know, section 120, subsection two, B of the 2008 Act gives the power to impose requirements which would involve in obtaining the approval from the secretary of state or any other person. That's the power, it's as wide as that so that you are not in a position similar to that Under the TCPA. In 1990. regime, where, as it were, the person who makes the decision, ie the local planning authority, is then almost invariably the person who discharges conditions, which are imposed by the local planning authority when they granted planning permission, the 2008 Act takes a different approach. And although it obviously gives that power to the Secretary state to be the discharging authority, that's extremely unusual. But he's otherwise states that the discharging authority can be any other person. And obviously, that includes the county council, as much as it includes, in particular instances, whether it's the Environment Agency, or any other entity. So that's the kind of the legal starting point. There is no specific guidance that we've been able to ascertain which bears directly on the issue. And so we suggest that it's a functional question really, for you, as to which body is best place to discharge the particular requirement, having regard to the relevant responsibilities of the various bodies that might be in the frame, and their technical expertise. And we say clearly, in relation to matters of surface water drainage, and flood risk, then the responsibilities and the expertise clearly lie with Suffolk County Council has the lead local flooding authority. We are aware and obviously in discussions the the point has, I think, been aired, that, obviously, flood risk and drainage are not as it were to be viewed as existing in isolation. And clearly there are other issues that need to be brought into account. For example, whatever is the particular drainage solution may have landscape implications, or it may have biodiversity implications. And so we fully understand that. But we do make the point that the county council is also well used, because of its wider role as a

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public authority, and particularly in its its wider role of a county planning authority, where it decides for itself, large scale development proposals as a planning authority, for example, new highways, new schools, and similar matters, were well used to as a bringing into account those other disciplines, whether it's landscape, whether its heritage, whether its biodiversity, we're making judgments, and we have obviously personnel within the account council with expertise to deal with those matters. So it would be we think, inappropriate to think that the county council is incapable of taking a broad view when balancing drainage and flood risk matters with other competing considerations. So we do think that we are competent, we do think that we are responsible, we also knows obviously, in terms of sheduled 23, paragraph worn brackets for of the latest draft decio. It's a it's not a point that's recently changed, but there is a a mutual provision there that where one body ESC is to be a discharging authority, they will consult with sec, and likewise, where SEC is to be a discharging authority, they will consult with BSE. So that's common across the piece. There are precedents from other DC to use for the local flood authority, or the County Council, which has that responsibility to be the discharging authority for flood risk and drainage matters. And I just give you three examples North Hampton gateway, which is 2019, Hornsey three from 2020 and the Southampton to London pipeline, which is 2020. So so we do think it's important. It is is probably also fair to say an issue that has been placed before the this Secretary state ie the sexual state for business in the context of the East Anglia, one

North and East Anglia to develop consent orders which, as you know, Sir, have had their examinations completed but have not yet had their decisions. We don't clearly know what the secular state may decide in relation to those issues. And you won't know I think by the end of your examinations, I'm afraid. The issue is still open to due consideration and discussion. So those were the, as it were the sort of technical procedural points on on documentation that I wanted to raise. And if I can then bring in Mr. Williams, to address you on where we see technical shortcomings in the adequacy of the information presented in the drainage strategy and supporting documentation. Thank you.

55:51

Mike Williams, Suffolk County Council. As per the agenda, I'll focus on sub item as the main development site, I won't stray into associate development, but we do have comments on that later. Firstly, a point on rep seven DASH 061. And specifically paragraph number two, point 19.1. Where it was promised that size vo c would provide us with additional calculations prior to issue specific hearing 11 for the ACA just to confirm we did not receive those, however, we did receive them for the main development site. Then moving on to the environmental statement, I just like to reference at hyphen 297 paragraph 19 point 5.5 which is the main development site s which states use of suds to prevent pollution of controlled waters, and too much Greenfield runoff rates within allowance for climate change. Now, that's their primary mitigation. Now just focusing on the first point of that prevent pollution of controlled waters. We've not seen any, any demonstration at all, or even any assessment of pollution mitigation for the main development site. Now, there's a slight compromise on that in that the ACA did have an assessment undertaken. However, the information used in that is incorrect. And the assessment was failed for parts of the site. Anyway, all the rest of the main development sites in the water management zones, they do not have any assessment at all. Now moving on to the calculations that I just mentioned, that we have seen for the main development site. Now they should tie together with the technical note that we received at rep five 120, Appendix D. They don't, the calculations don't match up. There are plan areas for each of the basins for the water management zones contained in rep five 120. And none of the calculations match the areas within that document. So we don't know what plan areas these basins should be, which is it's fairly critical because without knowing the plan area, we can't say with any certainty that mitigation can sit within the audit limits. We have also received some ground investigation results for the main development site from the applicant, which we were really grateful to receive. There's a whole range of data going back as far as 2014, and most recently 2021. Our understanding is the design that has been submitted as part of rep five 120 is based on information from 2014 to 2020. Now all of that information is obtained mainly through the use of borehole logs and what we know as falling head tests which are infiltration tests in a borehole. Now that information does not comply with the br 365 test methodology that Suffolk County Council require as per local guidance, or is promoted by national guidance that being serious suds manual. So the design is based on test results that we do not support. And it's not to a test methodology that we support. The 2021 tests are to that methodology. However, the results of those tests we can't really assign to anything because we don't have a plan of where those tests were undertaken. So unfortunately, they don't have any any merit or any weight at the moment. And as I say they're not being they've not been used to the design process as far as we're aware. Now, it's really important that the testing is done properly. We had this issue in the scottishpower decio hearing recently and there was no compromise on that Suffolk County Council are very clear all developments in Suffolk must undertake infiltration testing to be re 365 and that must be what is used for design.

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Then coming on to the next point now the plan areas of the basins the plan areas stated in the technical note are the plan areas at the top water level. Now that is not the top of the basin level because there is at least 300 millimetres of freeboard above the top water level. So the plan areas stated in a technical note which as I say do not add up to the calculation. are not the same, they are not the total plan area of the basin. So, we still do not have an appreciation there of what plan area these basins will take. Now, in addition to that, the calculations have discrepancies in them, the plan areas can vary by up to an increase of 3,719.9 metre square or they can decrease by 3,307.9 metre square so, a total variation of over 7000 metre squared which is quite a large variation. The problem with that is the side slopes are stated in rep one five of what rep five 120 Now, if your base area is increasing and your top area is decreasing, as is the case for some areas and is showing worst in water management zone six I believe, then your side slopes are changing and most likely increasing those instances which would be outside of the design criteria which is stated in rep five 120. In addition to that, there are swales, which are shown around different water management zones to capture water. Now these are not swales in the conventional sense of the term, and the journey strategy does say the old drainage would be designed in accordance with serious suds manual. Now the serious suds manual a swale is a maximum depth of 600 mil with some base width of two metres now some of these swales will be serving sites in excess of 20 hectares, they will be much larger than what we stated there, they will be more like interception ditches these will take a significant area of land, an area of land that we do not know we do not know the land required for the swales, unfortunately, and without knowing that we can't say that the land is available to instal this mitigation. Now coming back to pollution assessment to decide that pollution assessment has not been undertaken, the basins have to be designed in a manner that can deliver treatment. Now the serious such manual is very clear that for a one in one year rainfall event, water should not be any deeper than 100 mil in order to be considered to deliver a mitigation as per the simple index method which we can go into a bit further in our written response. And I'll save here today. So 100 mil for the one in one year rainfall event. And that corresponds to roughly a one metre depth during the one in 100 year rainfall event and climate change. To give you some indication of just how far away We are from there, the maximum water depth from the calculations we received was over two metres which was water management zone three, and the lowest was 1.306 metres which was water management zone one so both in excess of one metre. So we have serious concerns about just how mitigation would be delivered and whether these basins actually do deliver any pollution treatment whatsoever. If they don't, the fallback is then to use proprietary systems such as silt buses, which is not promoting the sustainable use of suds as per NPS n one. Now, calculations again, I'm afraid the inputs of the calculations are very important because the inputs obviously influence the outputs. This isn't something I'll go into too much detail on here we have an expert looking at these sporting points specifically and they will provide a written submission which will append to our submission deadline eight, but the CV values which is the volumetric runoff coefficient, and the percentage impermeable area values used by the applicant are challenged by sec. For example, the applicant considers roads are only 90% impermeable, that's asphalt roads. Now, it doesn't take much for anyone really to see that erode is generally 100% impermeable not 90%. Now, the knock on impacts this has is that the basins are not sized the correct catchment and the entire catchment of a basin is not considered in the model. So being the basin is then undersized and there are obviously knock on effects to that. But again, we will come on to that in our written response at deadline eight

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in terms of the ACA and the runoff rate from the ACA that has a bespoke runoff rate, we have not seen how that has been calculated. The runoff rate is  $q$  bar, which is the mean annual rainfall event which we support we support the use of discharge at  $q$  bar. However, there's different ways in which  $q$  up key bar can be calculated. And we have not agreed that. We also obviously don't have the calculations for the ACA. So we can't say with any certainty whether the draining strategy can fit or what any other issues there may be there, whether it delivers treatment, whether the design is as per we require, with particular reference to Valley Road where there's the existing surface water flood risk. We don't know what the proposals are there. That's a pump system. Pump systems as far as Suffolk County Council are concerned must have sufficient storage for if the pump failed for 24 hours. The only other site that signs obviously have proposed a pump system is the Wickham market Southern park and ride that doesn't have the storage for 24 hour pump failure. So I can only assume that the ACA site does not either. I'll then move on to half drain times, all basins must half drain within 24 hours of the critical return period. So that's one in 140% rainfall event that is so that they can take a further rainfall event. Failure to do so would obviously be considered an increase in flood risk. There are no basins other than I believe one which is for the Abbey Road rail basin, which does half drain within 24 hours. Now, a lot of the basins do have overflows into the CDO, or earlier, the tmo. Which we support that in principle, However, not all water management zones have access to the CDO, water management zones, four and five, I believe, and all of the ACA do not have access to that arrangement and therefore fail the half drain time test. The campus area, we have no drainage strategy for that at all, no information has been provided. Similarly, the operational drainage, no information has been provided on that either. So we can't comment on that at all. Some of the outfalls are also located outside of the order limits. And that is a point that the applicant doesn't consider to be of merit because it's within their land. But that might be the case in this instance, but there will be other locations for the ad sites where that is not the case, which I'll come on to again later. So as you can appreciate, there are quite a few points there. I've covered them briefly. We'll go over them in detail in our written submission deadline eight, but hopefully that gives you a flavour of just how far away We are from agreeing homogeneous strategy for for water management zones and the ACA.

1:06:49

Thank you. Can I hear from Yvonne Smith, please?

1:06:58

Good morning. Yes, Yvonne Smith for the Suffolk IDB. Firstly, I'd like to say that we support the comments of Mr. Williams for the SEC. We do have a slightly disagree on one point regarding the tmo and the CDO. So we're concerned that the discharge of surface water directly to the sea could affect the groundwater recharge in the area and in the triple si. And we are slightly concerned about the fact that the spine network would be used to support was effectively an inappropriate designed for the infiltration basins. In addition to that, so in Appendix E of rep five 120, it states that the size will drain when the size will drain is overtopped, then the tmo will be used. And I just like to point out that this is quite a marshy area. So it would be useful to know what exactly they mean by overtopped and how that would be defined. And also in that same document, as well as in discussions with the applicant. It has been stated that it's likely to be the EA, which will stipulate a suitable water level that would act as a

trigger point for the tmo. So when it will be switched on and off. And as yet I have not had confirmation from the EA that they're aware that they will be taking on this responsibility, which we believe is quite a large one. And another concern that we have is the realignment of the size well drain. So as yet we've had very limited information on this. For background information, the board has adopted this watercourse using its permissive powers. And this is to ensure that the drain is adequately maintained. Now with the realignment and the installation of a nuclear power plant that close to the watercourse. We're concerned that our access to the watercourse and therefore our ability to maintain it may be hampered. And if this isn't considered at this point, we believe that this may have two possible outcomes, one being that we have to maintain it from the western bank, which could have unforeseen environmental impacts because we need to go through the triple si to do so. Otherwise, if we were maintaining from the eastern side, this has not been considered at this point. So there may have to be changes to the layout of their plan, because we'd essentially be going through the the within the red line area, the red line boundary. We don't have any more comments at this point. Thank you.

1:09:31

Thank you very much. Could I hear from eastover Council please?

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Isabella to 440 Suffolk Council. So I just like to respond if I may to the point raised by Suffolk County Council in respect to the appropriate discharging authority under requirement five. The software Council's position is to strongly support the requirement as currently drafted which provides The East Suffolk should be the discharging authority. And they're just for brief reasons for May for saying that. The first is that as the local planning authority is perfect counsellors in managing technical input from a number of specialists authorities to say second is that there are a number of organisations that have an interest in this issue. And they're set out in requirement five, and they include the Environment Agency, natural England, the east, Suffolk IDB, as well as the county council as lead local flood authority. And there is potential for, in some instances, disagreements between those parties. You've just heard from the IDB about a small dispute between them and the county council. And we say that East Suffolk council are best place to reconcile those various interests. This was an issue that has been considered in the East Angular one and two examinations. And I know we don't have the decision on that yet. But the point discussed in that context was who was best placed to hold the ring was the way the examining authority put it. We say it's our to take account not just of drainage issues, but other factors that may be interrelated, such as landscape and ecology, and to balance those matters together. But third point is that require five addresses both surface and foul water damage. And it seems that the suggestion from the county council is that they be split up, they be responsible for discharging surface water drainage, leaving foul water drainage with a Suffolk Council. And we say it's right that those matters should be considered and discharged by single authority to ensure that the right drainage solution is secured across the site. And finally, we would just note that we are the enforcement authority responsible for securing compliance with the details that are approved. And we say that's a further reason why it should be us approving those details, of course, having regard to the consultation, responses of others, including the County Council. Thank you. Thank you very much, Mr. Fuller. Mr. Philpott? Indeed,

1:12:31

so what I was going to do, if I may, I will deal with the point about requirement five, and I'll deal with that first. And I'm then going to turn to Mr. Jeremy Jones from Atkins, who deals with drainage, he sat just beyond Mr. Hanson, this will be the first time that you've heard from him. And I'm going to ask him to pick up the technical points that have been raised now. So I'm not going to ask him to provide chapter and verse on every single issue, I suspect that that's not going to be of assistance to you. What I will ask him to do is to provide you with an overview of the position as we see it. With the ability, of course, to respond in detail in writing in due course, I hope that it's accepted

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that that is acceptable, because I'm aware there was a lot of detail in that. And we are well, you know, we are nearing the end of the examination. And it just highlights, there's quite a difference. Whether there is anything that

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I suspect and I'll ask Mr. Jones to deal with this, that part of it is not so much a difference on the technical details, but on the approach, because of course, this is an outline scheme, where the drainage is a matter that is effectively reserved through requirement five, and that there is a stair provided in requirement five, and paragraph three, that the details that have to be approved must be based on sustainable drainage principles and must be in accordance with the drainage strategy. But that is envisaging the details coming forward in due course, with principles and approach as set out now. And as I said, I don't want to steal Mr Jones's thunder, but I suspect that some of what we're dealing with is an attempt to pin down all the details. Now, rather than leave them in a situation where as you've heard, the county council would really like to deal with all these things itself. But instead at the mainland, it is envisaged that it will have an input to the decision. So that might help explain some of the impetus while it's trying to pin down a lot of detail. Now. If I turn against that background, to require And five, although you were taken to Section 122 B, there's no issue of law here. It's just a question of who is, as Mr. Bush it most appropriately placed to hold the ring between different parties who all have a legitimate interest, but who may come from slightly different perspectives. In relation to an issue where again, as Mr. Ferber said, drainage doesn't exist in isolation. There are balances to be struck in relation to particular areas and particular sites between the interest of drainage and other matters, whether they're ecological matters, whether they're landscape matters or design matters of various sorts. And therefore, without going through all of the reasons that Mr. forgave which we would endorse, we think it is right that he suffer Council is best placed as local planning authority to hold the ring on issues which ultimately require a planning balance to be struck. However, that there's one further point which I just want to draw attention to, in terms of the way that requirement five is structured. Because, as you were told a moment ago on behalf of a suffered counsel, there is a requirement for consultation with the Environment Agency. Effectively natural England is suffering internal drainage board lead local federal authority, which is Suffolk County Council, sewerage, Undertaker, and the drainage or authorities or range of bodies, then one must look also at paragraph two. Following approval, pursuant to paragraph one above, a Suffolk council shall provide details of the approved surface and foul water drainage system to Suffolk County Council. And no part of the authorised development may be commenced until the details of the approved management and maintenance arrangements and means of pollution control for that part have been endorsed by Suffolk County Council in its capacity as lead local flood authority and the drainage authority. So it's not simply

that they have a consultation role, and additional safeguard is provided for them in paragraph two. And so there's really no need I would suggest in those circumstances, for them to be the discharging authority in order to adequately to protect their interest. They're interested more than covered by what's there already. And I would suggest that both the examining authority and the Secretary of State can proceed on the basis that he suffered counsel will discharge his responsibilities appropriately. And it will therefore take proper account of anything that is said to it by the county council, or indeed the other bodies in exercising those functions. So that's what we say by way of explanation as to why requirement five is appropriately framed in the way that it is. So against that background. I'll then turn it over to Mr. Robot. Yes,

1:18:20

sorry. Just to interrupt you. I'm looking at requirement five, paragraph two as well, which looks to me as though the county have got a veto. Is that the way you mean?

1:18:34

So I'll have to take instructions and those you've drafted as to what's intended. But clearly, what one can see is that no part of your authorised government may be commenced until those details have been endorsed. And so although there is a obviously there's a dispute resolution mechanism, effectively indorsement and I'll take instructions on why it's why that use that that word is used. If endorsement doesn't come forward, then the prohibition kicks in. That's the way it's drafted.

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Yeah, I wasn't taking issue with a word because it looks to me as though they got a strong, very strong influence over

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a moment that that at the very least is the case. So So why it is necessary in those circumstances for them also to be the discharging authority. At the moment I I'm, I have to say, the applicant is unpersuaded of that. So So against that backdrop, I was going to then turn to Mr. Jeremy Jones to provide an overview response to the technical issues that have been raised.

1:19:42

Thank you, sir. Jeremy Jones, for the applicant. You are right. That was a very long list, and I'll do my best to try and give an overview of where we're at. And perhaps if I give some background to the approach that the drainage strategy is based on, in order to protect the receptors, particularly the triple si areas that we're dealing with here. And the main approach taken within the drainage strategy are originally the outline drainage strategy has been developed in line with industry guidance and best practice and sets about to mimic the way in which the site is behaving at the moment. Now, of course, when we come along and we start developing it, it's very difficult to do that. However, the suds approach allows you to take the water into what we call, firstly, local source control elements, which acts as your first point of trying to return the water to the place where it should be, which is the ground. And some of it will go to the ground, some of it will run off. And then as a point of protection against long term flooding in our case here 100 years, and to maintain and ensure that the water stays within the site, we take the water from those local source control elements into larger detention basins. Now

these are commonly referred to said structures. As part of that overall procession of the water through these different structures. The beauty of suds is that they give you an opportunity to clean the water of any sediments and so on that may be contained within them. And in general terms, that is the approach that's taken, but with a construction site of this size, you're going to have situations where it will be necessary to have things like concrete, batching, plants, other areas where you could have high pollutant loads. And in those cases, we can't rely on natural processes alone, in order to to mimic the these the existing situation and to in order to protect the environment. In those types of cases, we use additional measures, which Mr. Williams referred to as proprietary nations. Now, that's only done in the sense of when we feel that we have an extra requirement in order to avoid any any pollution. So within the entire strategy is fundamental that Firstly, protecting the environment so that we don't get flood runoff from it. And secondly, to ensure that we protect the environment for any from any pollutant loads and contaminants. What we then want to deal with is a whole host of detail of how we decided to do it. And that detail can be discussed. And we've provided a number of documents in technical notes suggesting were under pressure process by which that will be done in individual sites. And for example, le AI, the what's also termed the ACA. And they've been submitted in addition to the outline drainage strategy. Now, essentially what has happened since that is, as a result of the outline drainage strategy, which suggested indicative approaches in which we would manage the entire drainage strategy. We've certainly through the main development side, we've been able to develop the enabling works desired basic design. And the key thing about that is ensuring that we have enough land available in order that we can in order that we can set asides elements within the site.

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That has led to an update to the outline drainage strategy where we've removed the indicative suggestions that have been put in and replaced them with the proposals that would actually be used. We've also gone further than that and and take taken into consideration the comments of Suffolk County Council and other stakeholders and other information that has become available from site. Now, at the start of the discussion, Mr. Mr. Bedford suggested that the drainage strategy that has been submitted the deadlines and hasn't yet been considered, and we're and we will have to wait the outcome with that. And I would suggest that when when we do get the outcome of that there will be other queries, which we will need to respond to. But the majority of these of these queries are points of detail that we can cover during the course of the progression of the actual design. If I could take just one point, though, that that came up. And that was the question over infiltration testing. And this is an important point, because infiltration testing was carried out in 2014 2017, then more laterally in 2020. And most recently, in 2021, that the the the results of that are drafted at the moment, and we are awaiting final results on that. And and whilst it's we support the idea, and we've we've learned lessons in doing all of that testing, to use what Mr. Williams mentioned, BRK 365, it has to be seen in the light of what you're actually dealing with at the time. So you're talking on a major site like this about disruption to local farmers and communities and the sensitive environment. So when you go in and you go to design these, you're talking about a lack of adequate water resource to fill all of these pits with water. You have ground stability problems caused by the granular nature of the ground. Now the granular nature makes it good for acceptance of water. But it makes it more difficult for those types of tests. And you have some very long drainage drained down times in some locations. But most of all, why the the reasoning and why the difficulty in carrying out some of those tests is because of this granola nature causes the sides of these pits to collapse. And the way in which you measure the pit is to put a man in

the pit. And he measures the dimensions of the pit. So there's a real health and safety risk that you have to be careful when doing these these tests. Now, as I said earlier, we've learned all of this from the knowledge of the site and the knowledge that we've gleaned from the different parts of it. And in the most recent testing, we've come up with new ways of actually carrying that out. So that doesn't make the previous tests wrong. It just makes them the way that they had to be done at the time, because that was the necessity. And in general terms, the order of magnitude is similar to what we're experiencing from the latest stats. I think that's all I've got to say for now, I don't know whether I should say any more.

1:28:44

So that that provides both a overview I think because of the number and detail nature of the other technical points, it would probably be more helpful for you to have those set out in writing, whether in tabular form or otherwise, point and response. I mean, your hands if there are further questions you want to ask Mr. Jones, now he is here and obviously, you know, it would

1:29:08

it would help me but I have to say that what I heard Suffolk say it was a long list of things where there are in their mind discrepancies between what's submitted, you know, the plus and minus 3000 metres and the side width and the width and the size of swales. I don't want to get into that detail now. But I do think if they are correct, that there are discrepancies in what your submissions are, that at least needs to be addressed. And, you know, part of your submission on that point needs to be looking at those concerns about what's already been done.

1:29:44

Accept that point sir. And and we will actually undertake further collaboration and liaison with Mr. Williams to talk about those things. But I should say at this time, that the main characteristic that we wanted to be certain of is is one of space and ensuring that we had sufficient space. The exact details of things like the swales will be developed as a result of the drainage strategy during design. So it may be some time before we get to the point where we can actually confirm that.

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I think I understand that. But I think from that point of view, if there are discrepancies right now, you could find out, you know, correct those discrepancies, and at least you'll be somewhere nearer understanding, can it be done in the Lund available?

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Yes, but whether it can be done in the land that is available is Pritam, predominantly down to the detention basins. And the detention basins are there to protect against the 100 year storm. The swales are there for a different purpose, which is for local source control, and a conveyance method to those basins.

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I understand that I think the baseline point is you can iron out what are apparent, and I'm just saying apparent discrepancies in your assessments, or at least removes one element of the difference

between I take on board. When I noticed, Mr. Bedford, I don't want to get into a debate here about requirement five. But if you have something additional to say, other than you will make a submission a deadline at then I'll hear it.

1:31:30

Thank you. So it wasn't a debate point. It was just I wanted to, particularly in the light of the question raised by Mr. Brock about paragraph five, two, I just wanted to draw around that element of requirement five is limited to the ability of the county council to consider whether to endorse or not to endorse only the management, maintenance arrangements and the means of pollution control. In other words, the system that's been already approved by the District Council under that scenario is a given. So whatever the drainage solution is, is, is fixed. And this is only then dealing with what you might call the and salaries of management, maintenance and pollution control of that system. That's also a much narrower focus than the issue that we're raising it now. So that's the only point I would say, I quite accept that a lot more of this as a matter of detail for the written submissions and so on.

1:32:33

Thank you, Mr. Bedford. Miss Smith, do you want to make?

1:32:41

Yes, sorry, I'll be very quick. I'm just concerned that I may have overstated or complicated our opinion regarding the use of the tmo. So I just like to clarify that in the written representation that I will submit at deadline eight.

1:32:57

Absolutely. Thank you. Mr. Robot, do you want to make a response to them? No, sir,

1:33:03

there's nothing I need to respond to. It's right that to deals with the management and maintenance arrangements and means of pollution control for that part. So it covers part important parts of what is under five one. But it's right to say it isn't effectively creating a situation where there might be a stalemate on the overall matters that are quite properly for the judgement of one body, the local planning authority, taking account of SEC is where they've got particular interests, but they're given the the additional protection of two so I don't think there's any difference between as as to what it covers. What I say is that is entirely consistent with the overall justification for requirement I set out.

1:33:52

Thank you, Mr. Bill. Okay, it's now 23 minutes past one, so I suggest we adjourn for lunch till can we say about 10 plus two. So this hearing is adjourned.