

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 2 - 17 November 2020

Comments of Suffolk County Council as Lead Local Flood Authority

1. Comments on WRs

SASES Written Representation

GWP Consultants, Report on Flood Risk Impact of Scottish Power Renewables East Anglia Offshore Windfarm on Friston Village, 30/10/2020.

Having reviewed this report, it is apparent that it supports a lot of the points that SCC have already made and continue to make. SCC would like to comment on the below specific points contained within the report;

Paragraph/Section/ Drawing	Report statement	SCC Comment
Para 21	An initial review of the report by local residents has revealed the model has under-estimated the flood depths actually observed (see Appendix 2) for the calibration storm event at certain locations	<ul style="list-style-type: none"> The report states that the hydraulic model produced by BMT on behalf of SCC understates flood risk. This is based on photos contained in Appendix 2. These photos were available to our consultant as part of model development and thus, the model considers these flow paths and depths. Whilst we appreciate residents may feel the model underestimates flood risk, this has not been formally communicated to SCC as part of the consultation on the report, carried out via the Parish Council due to Covid-19 restrictions. The model utilised available evidence to represent a scenario supported by this evidence. This methodology is detailed in the model report with supporting information and analysis.
Para 52 ii	There has been no attempt to understand or quantify the existing and on-going flood risk in Friston Village and its limited drainage conveyance. Flood and sediment impact risk has only been assessed using 'percentage of catchment disturbed' values as a flood metric – this is entirely inadequate	This supports the point made in SCC Local Impact Report 11.28 – 11.30

Para 52 iv	The proposed flood mitigation measures have no proven design and have not proven they are achievable. The little detail provided indicates the flood mitigation measures are designed for the constructed operational site and not the larger Temporary Works construction disturbed areas.	This supports the point made in SCC Local Impact Report 11.19, 11.22 & 11.23
Section 9.3 iii	The use of catchment scale indicators to assess increase in flood risk and sediment mobilisation to Friston village is completely inadequate. There has been no technical assessment by the Applicant of the storm runoff flow conveyance through and across the village ditches, culverts and overland flowpaths	This supports the point made in SCC Local Impact Report 11.28 – 11.30
Para 62	The Applicant solely focuses on the attenuation of post development Peak flood flows back to predevelopment levels and does not consider Total flows. This is not only against government policy but is critical to flood risk reduction in locations which already have restricted flood flow conveyance and are already at flood risk. It is extremely difficult to reduce Total flows to pre-development levels without infiltration as a mitigation measure.	It has not been possible to assess this aspect to date due to the lack of information provided by SPR. SCC Local Impact Report highlights the ability of existing watercourses upstream of Friston to deliver interception of rainfall for regularly occurring storm events. The removal of watercourses and existing attenuation structures will add additional volumes of surface water requiring management in addition to this generated by new impermeable areas.
Para 63	The Applicant has also failed to consider the wider areas disturbed during construction works (see Appendix 4), and the longer residency times and lower discharge rates required for clarification of runoff water to remove excess turbidity. With elevated turbidity during construction	This supports paragraphs 11.16, 1.19 & 11.23 of SCC Local Impact Report

	works, ground infiltration will not be possible without clarification – this will require large settlement lagoons and infiltration basins, whose size has not been estimated and therefore it is not demonstrated there is sufficient area within the site.	
Drawing: SASESFRA2010-04-B	Surface Water Runoff Routes	This drawing provides a representation of key surface water flow paths based off high resolution LiDAR data. Whilst this provides a representation of potential overland flow routes, it does not accurately consider existing ordinary watercourses, with some notable errors. The Friston Surface Water Management Plan produced by BMT on behalf of SCC utilises more detailed information to provide a more accurate prediction of surface water runoff routes. This is not to detract from the point the drawing is trying to make, which is entirely valid & appropriate, but the drawing should be viewed in conjunction with other publicly available information.

2. Comments on responses to RRs

Not applicable.

3. Comments on LIRs

Not applicable.

4. Comments on any SoCG

SoCG with SCC submitted by SPR

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ESC position n/a	SCC position	Notes
LA-05.12							Applicants response in notes refers to outfall to Friston Watercourse. SCC wish to highlight that this approach has not been agreed and that infiltration must be prioritised with an outfall to the Friston watercourse only being utilised if infiltration is not possible or deemed to be inappropriate (e.g. if infiltration resulted in an increase in groundwater flood risk downstream).

5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.0.8		Outline National Grid Substation Design Principles Statement			<p>Para 12 -</p> <p>There are however a number of factors that could influence the maximum finished ground level, including:</p> <ul style="list-style-type: none"> • Surface water drainage design requirements, to ensure adequate surface water run-off from the National Grid substation and a suitable connection to the existing surface water drainage system at Church Road 	Assumes discharge to Main River in Friston, SCC LLFA maintain that infiltration should be prioritised unless infiltration is not possible or suitable.
1.7.13		Adoption and maintenance Paragraph 5.7.10 of NPS EN-1 states that the DCO or any associated planning obligations should make provision for the adoption and maintenance of any SuDs, including any necessary access rights to the property. It does not appear that such details have been included with the application. a) Do you take responsibility for maintaining the drainage for the lifetime of development and if so how is this secured and enforceable through the DCO? b) What would be the council's preferred adoption arrangements?			<p>The Applicants have committed to maintaining the Projects' site drainage system during the operation phase of the Projects. This is outlined in the Outline Operational Drainage Management Plan, which the Applicants will submit at Deadline 3. A new requirement will be included in the draft DCO (APP023) which requires the Operational Drainage Management Plan to be submitted to and approved by the relevant planning authority. This requirement will also provide that the Operational Drainage Management Plan must accord with the Outline Operational Drainage</p>	<p>Unclear who will be responsible for maintaining SuDS draining the access road and National Grid Substation that could be present for a longer period of time than the EA1N & EA2 sub-stations.</p> <p>To reiterate SCC LLFA's response at Deadline 1, SCC do not adopt SuDS.</p>

				Management Plan, and be implemented as approved.	
1.7.16		<p>Friston</p> <p>Several RRs express concerns relating to recent flooding events in Friston.</p> <p>a) Has any work been undertaken to identify drains within the site?</p> <p>b) What assessment has been made of the tributaries and drains in this vicinity, and how is it proposed to ensure that the construction and operation of the substation and associated infrastructure does not worsen the flooding in this area?</p>		<p>Extract: The Applicants refer to Agreement Statement LA-06 in the Applicants SoCG (ExA.SoCG-2.D1.V2) with the Councils. Flood events in the Friston area, resulting from overland flow, that occurred during late 2019 – early 2020 was a result of multiple flow paths and not a direct result of surface water runoff from land associated with the proposed site of the onshore substation or the National Grid infrastructure.</p>	<p>Regarding Agreement Statement LA-06 in the Applicants SoCG (ExA.SoCG-2.D1.V2), whilst it is agreed that the flooding in October 2019 was not a direct result of runoff from the proposed area of development, this does not mean there is not the potential for land associated with the proposed site of the onshore substation or the National Grid infrastructure to increase surface water flood risk in Friston.</p>

6. Comments on any additional information/submissions received by Deadline 1

Not applicable.

7. Comments on Post hearing submissions

Not applicable.

8. Responses to any further information requested by the ExA for this deadline

Not applicable.