



East Anglia ONE North and East Anglia TWO Offshore Wind Farms

Issue Specific Hearing 6: Draft DCO post hearing submission

From: **Ian & Mary Shipman** IP Nos: 2002 4363, 2002 4361, 2002 3179 and 2002 3176

3 February 2021

We write with considerable concern regarding the submissions made near the end of ISH6 in relation to Requirement 41 regarding drainage at the substation site. Counsel for ESC asserted that it should be the discharging authority for the site drainage as part of the overall landscape scheme. We strongly disagree with this position for the following reasons:-

1. We live adjacent to the Friston Watercourse and have experienced first-hand on many occasions the inadequacy of the drainage system and the frequency of flooding around, on and in our property. Suffolk County Council are the lead flood authority and have responded to our concerns in a timely and considerate manner. SCC also commissioned the BMT Flood Study Report of 2020 to better understand the source and causes of the flooding in the village.
2. It is imperative that SCC are able to assess the overall impact of the SPR and NG projects on the drainage system in Friston and this should be undertaken in a holistic way from the source at the substation site. SCC has the expertise to assess the infiltration rates at specific locations on the site and to evaluate the size and volume of any SUDs basins. SCC is also familiar with the Friston Watercourse and its limitations with regard to the conveyance of water.
3. East Suffolk Council has no such expertise and to argue that drainage should be part of the overall landscape plan, completely undervalues the seriousness of the flooding situation in Friston. Drainage should be a separate Work within the DCO and approval of any proposals should lie solely with Suffolk County Council.
4. Sadly, East Suffolk Council's position is of a political nature and we would support the submissions made by Councillor Marianne Fellowes of Aldeburgh Town Council in this regard. ESC only came into being in April 2019 with the joining together of Suffolk Coastal District Council and Waveney DC (which includes Lowestoft). ESC's change of position from 'objection' to 'neutral' came in the wake of relatively insignificant sums of compensation being offered to it by the Applicant.
5. It is acknowledged that Lowestoft suffers some level of deprivation and that it has benefitted to some degree from the EA1 project, however that benefit is unlikely to be increased with the addition of the EA1N and EA2 projects as the facility building and workforce will be re-utilised for the new projects. This was acknowledged by SPR following questions asked in an East of England Energy Group webinar held on 29th July 2020. East Suffolk Council must acknowledge the severe harm which the EA1N & EA2

projects will do to the former Suffolk Coastal District, including the threat of increased flooding to the village of Friston.

6. We concur with SCC that it should be the discharging authority for all forms of drainage and flooding in relation to these projects, including that of National Grid, and that it should remain the lead flood authority for this at all times in the future. With regard to the draft DCO, the drainage should be a separate Work and be taken out of Work No. 33 in Schedule 1 Part 1.
7. We also note that Work No. 33 also includes the formation of footpaths and access. Again the matter of Public Rights of Way and Highway issues are the responsibility of Suffolk County Council and SCC should therefore be the discharging authority in this respect. At present we note that it is proposed to hard-surface the new footpaths around the substation site, which we regard as inappropriate in a rural area. Friston faces wholesale destruction of its PRow network north of the village and it is imperative that Suffolk County Council remains in control of re-establishing footpaths in the best possible way for the future amenity of the village. This should include full and proper consultation with residents.

We wish to make it clear that these comments are *without prejudice* to our position that development consent should not be given to these projects, as the chosen onshore substation site is completely unsuitable for this purpose.

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