



The Planning Act 2008

East Anglia ONE North (EA1N)  
East Anglia TWO (EA2)  
Offshore Wind Farms  
[Planning Inspectorate References: EN010077 and EN010078]

**Post hearing submission on Issue Specific Hearing 16 (ISH16), Session 2**

Submitted for Deadline 11 (07 June 2021) by

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## Introduction

We observed ISH16 via the Live Event Video Stream and noticed that the Applicants seemed reluctant to answer questions addressed to them by ExA about surface water flood risk in the proximity of the Aldringham River Hundred.

The Applicants have previously stated that they selected the Aldeburgh Road, River Hundred as the cable route crossing place in 2018 (or earlier) suggesting that it is the only feasible place for its cable route to cross the Aldeburgh Road, Aldringham in order to reach Friston.

We were horrified at ISH16 to realise that the Applicants have not made an assessment of the potential for surface water flooding in Gipsy Lane and at Riverwood (just a few metres downstream of the proposed river and road crossing places) either then or during the subsequent three years.

The Applicants have not provided an outline design of surface water management in this Environment Agency designated Risk Category 3 area already suffering inundations of fluvial and surface water flooding. Consequently it appears the Applicants have given no particular thought to mitigation.

## Our notes on the ISH16 Session 2 regarding flood risk during construction (Cable Route)

ExA asked why Applicants had not provided the Appendix to the Outline CoCP requested by ExA after ISH11. This Appendix was to have provided further information on their plans for managing flood risk during construction, including a worst case assessment and analysis and the impact on watercourses and drainage systems impacted.

The Applicants responded saying that with regard to the cable route they had decided to defer this until post consent.

ExA asked then in that case how the Applicants could possibly know that there would be sufficient space within the Order Limits to accommodate all the necessary flood management measures. ExA asked in particular about where the cable route working width narrows, for example at the Hundred River crossing. The Applicants avoided the question, referring instead to Important Hedgerow reduced width crossing places elsewhere along the cable route, where the width is reduced from 32m to 16.1 m for a very short length of only one or two metres either side of the hedging.

ExA later asked once again how surface water would be managed at the Hundred River crossing, being a much longer section (than at Important Hedgerows) and where therefore there might not be enough space before it widens out again .

Once again the Applicants ignored the question regarding Surface Water choosing instead to refer to the Outline Watercourse Crossing Method. This document describes a proposed bypass design to redirect the river's flows during construction of open cut trenching across the Hundred River itself, but it does not address surface water flooding risks.

The Applicants did eventually respond to the question posed by ExA, referring to the specification within the Draft DCO of a widened cable corridor adjacent to east and west river banks, extending 40m both east and west of the river. On the east side beyond the 40m buffer and on higher ground this would revert to a 32 metres width.

To the west of the river beyond a 100m buffer<sup>(a)</sup>, the Applicants said that the width would be reduced to 16.1m per project and stated they would be able to use the same 40m buffer area to manage excess surface water if necessary. <sup>(a)</sup>We suspect the Applicant mis-spoke and should have referred again to a '40m buffer'.

ExA has requested at ISH16 an Outline Plan of Surface Water Management Measures for an example section of the cable corridor in order to reassure the Local Authorities that there would be sufficient room for 'worst case' Surface Water Management within the constrained lengths of the cable route.

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<sup>(a)</sup> Draft DCO Rev 06 PART 3 Requirements specifies in section12. Detailed design parameters onshore (17) (f) that : 'where the cables cross the woodland to the east of Aldeburgh Road the working width of the onshore cable route must not exceed 16.1 metres between Aldeburgh Road and the point 40 metres from the western bank of the Hundred River'.

## Flood Risk in Gipsy Lane, Aldringham

We enclose a copy of the Environment Agency Flood Risk Map submitted with our Written Representation at Deadline 1. The level of water in the Hundred River is generally deceptively low. However, following a period of rainfall, the river can overflow its banks and has been known to reach within 10m of properties in Gipsy Lane. There are also believed to be uncharted underground watercourses / aquifers in this area.

According to <https://routecalculator.co.uk/elevation>, the altitudes within Cable Corridor at the proposed Cable Crossing above sea level are approximately as follows:

- 3m at River Hundred itself
- 3-10m along the 90m of alleged 'wet woodland' between river bank and Aldeburgh Road (4m at the midpoint)
- 10m at Aldeburgh Road
- 12-13m at woodland to west of Aldeburgh Road

The altitude at the first house in Gipsy Lane (Riverwood) is only 5m.

We can report that there is a history of surface water inundation in Gipsy Lane from water accumulating in Aldeburgh Road, both through excessive rain and on 27 July 2019 following a mains water leak at 4am on the woodland within the Order Limits on the woodland to west of the Aldeburgh Road. On each of these occasions, a large mass of water has poured down Gipsy Lane and entered property at Riverwood and a massive amounts of silt washed off the land on west side of Aldeburgh Road has blocked a road drain near the entrance of Gipsy Lane. A few representative photographs of the aftermaths of the 27 July 2019 incident are enclosed with this submission.

We are concerned that the Applicants has not assessed the risk of such flooding being repeated as a consequence of its construction of haul roads etc and from trenching works across the river and in particular at the 16.1m constrained widths:-

- west of the Aldeburgh Road where ground level is **8 m higher than Gipsy Lane** and where old and leaky water mains are installed underground
- along the 50m length of the cable route Order Limits between Aldeburgh Road and the 40m buffer area west of the Hundred River

Additionally, the Applicant seems not to have assessed the increased permanent risk of surface water flood through permanent removal of Willow and Alder trees within the buffer zone that at present help provide a defence in mitigating fluvial flooding down stream at Gipsy Lane. The de-vegetation would be permanent but the Applicants have not suggested any longer term post construction mitigation of seasonal flooding. There has also been no suggestion of drainage for seasonal overtopping, or ensuring river bank support to compensate for riverside loss of Alder and Willow.

### We submit that:

1. The Applicants were negligent in not assessing the risk of surface water flooding during selection of the Aldeburgh Road Cable Route crossing point.

2. The Example Outline Plan of Surface Water Management Measures requested by ExA at ISH16 should be provided to Suffolk County Council as soon as possible before Deadline 12 and should address the Cable Route Section(s) within Works Nos 19 and 20 that includes the Aldringham River Hundred Area and land within 125 metres to east and west of the river. That would seem to us to be the most complex area in this respect along the entire cable route and also is the section already most subject to surface water flooding. It should take account of the topography and relative elevation / altitude of the land at appropriate points within the Order Limits and potentially affected properties within 150m to the south-east of the order limits in Gipsy Lane.

### Enclosures

1. Environment Agency Flood Risk Map
2. Map prepared for ASI2 - the main features in Aldringham village
3. Photographs of surface water flooding in Gipsy Lane in July 2019
  - i) At Riverwood in Gipsy Lane, following excessive rain on 21/7/2019
  - ii), iii), iv), v) The aftermath in Gipsy Lane of surface water floods following water mains leak within Order limits on west side of Aldeburgh Road

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