



30 November 2021

Secretary of State
Department for Business, Energy & Industrial Strategy
1 Victoria Street
London
SW1H 0ET

By email only:

EastAngliaOneNorth@planninginspectorate.gov.uk
EastAngliaTwo@planninginspectorate.gov.uk

IP Registration identification numbers
20024016 (EA1N)
20024017 (EA2)

Dear Secretary of State,

**SCOTTISH POWER & NATIONAL GRID – EAST ANGLIA ONE NORTH AND
EAST ANGLIA TWO**

I refer to the letters from Gareth Leigh, Head of Energy Infrastructure Planning,
dated 2 November 2021 and his clarification note dated 17 November 2021.

Please find attached my comments as requested.

Regards,

William R. Halford

CC : enquiries@environment-agency.gov.uk (for the attention of Mr Martin Barrell)

30 November 2021



IP Registration identification numbers - 20024016 (EA1N) and 20024017 (EA2)

SCOTTISH POWER & NATIONAL GRID – EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO

Introduction

- 01 This is a response to the letter from Gareth Leigh, Head of Energy Infrastructure Planning at BEIS of 2 November 2021 and his clarification note dated 17 November 2021 published on the projects' PINS portals. This submission relates to paragraph 3 (Flood Risk) and a request by the Secretary of State that all relevant flood events are considered.

Background

- 02 I submitted a representation *Post Hearing submission on Issue Specific Hearing 16*¹ at Examination Deadline 11, raising flood risk during construction along the Cable Route close to my home in [REDACTED] and as such has NPPF Flood Risk Vulnerability Classification: 'More Vulnerable'. The house is located within the river bed of the formerly much wider Hundred River, only 18 metres from Flood Zone 3b (the Functional Floodplain) and just 60 metres south and down stream from works proposed at the Hundred River and Aldringham Road cable route crossings. Figure 12.24 on page 272 of Suffolk Coastal and Waveney District Councils' Level 1 Strategic Flood Risk Assessment April 2018² and the Environment Agency online 'Flood Map For Planning' for IP16 4GL illustrate the flood risk level.
- 03 My chief concern has been that the Applicants had not properly evaluated the risk that the existing level of flood risk at my home may be significantly increased during their construction work on the Cable Corridors and / or during Open/Cut crossing of the Hundred River watercourse.
- 04 The Environment Agency and Local Authorities made no comment, but I believe them to be unaware of the true frequency of previous pluvial and fluvial inundations at or close to the property. Although the Hundred River itself routinely floods several times each year following heavy rainfall, those events are not generally reported since to the best of my knowledge they have not so far encroached beyond outbuildings such as garages.
- 05 Pluvial flooding of Gipsy Lane is a frequent event but only reported to Suffolk County Council when it is clear that Highway drains are blocked with silt. The Highway Drains in Aldeburgh Road near the entrance to Gipsy Lane are ineffective. They do not drain into the Hundred River and do not appear to have been designed to empty into any other drainage system.
- 06 The Parish Council does not maintain a historical record of flooding incidents.

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005327-DL11%20-%20William%20Halford%20and%20Jane%20Rossin%20D11%20Post%20Hearing%20Submission%20on%20ISH16.pdf>

² https://eastsuffolk.inconsult.uk/gf2.ti/f/1006178/53414725.1/PDF/-/D23_Strategic_Flood_Risk_Assessment_Level_1_April_2018_reduced.pdf

History of recent flooding events reported in Gipsy Lane, Aldringham

Fluvial flooding

- 07 The Hundred River has overflowed its banks several times each year following heavy rain, flooding areas of garden but since 2011 has not reached our buildings.

Pluvial / Surface Water Flooding

- 08 21 July 2019 – this was a major overnight inundation of water into Gipsy Lane following a water mains leak on west side of Aldeburgh Road, within EA1N and EA2 Order Limits and coincidentally where the cable route crossing is planned. Water entered the garage to a depth of approximately 90 mm causing damage and loss of power to the house.

Reported to:

Essex and Suffolk (Northumbrian Water) and

Suffolk County Council: Problem Reports 00248662 00248669 & 00248694 (2019-07-25)

Photos were submitted at Deadline 11³:

- 09 18 June 2021 - Surface water flooding in Gipsy Lane following rainfall on 18 June 2021. Drain blockages on the east side of Aldeburgh Road were contributors. Excess water flowed down Gipsy Lane which was flooded to several inches. It also entered residential gardens and my garage.

Reported to:

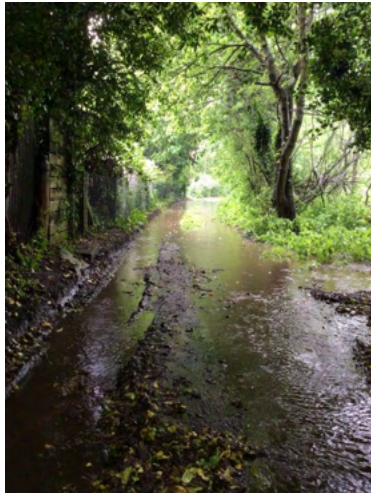
Suffolk County Council: Problem Report 00324640 (19/06/2021)

Gipsy Lane at low point (direction south)



³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005326-DL11%20-%20William%20Halford%20and%20Jane%20Rossin.pdf>

Gipsy Lane (direction north)



Gipsy Lane at junction with Aldeburgh Road



Re: The Applicants' East Anglia ONE North Offshore Windfarm Appendix 20.3 Flood Risk Assessment⁴

10 At Deadline 12, the Applicants included this document in their response to my Deadline 11 representation. I highlight in *italics* the following extracts regarding this location and its environs :

- *'Mapping information provided by Suffolk County Council - Lead Local Flood Authority indicates that there have been a number of flooding incidents around Aldringham and Coldfair Green, including 'a Flooded road in July 2017 along the B1122'*
- *'A review of other sources of flooding in the Level 1 SFRA and from mapping information provided by Suffolk County Council (Suffolk County Council 2018a and b)*

indicates that there have been reports of highway flooding in 2014, 2016 and 2017 along the onshore cable route in the vicinity of Aldringham and Knodishall Common’.

- *‘Although the majority of the onshore cable is at low risk of fluvial flooding, one key location, to the east of the B1122 Aldeburgh Road and south of Aldringham, where the onshore cable route intersects an area of Flood Zone 2 and 3 i.e. as it passes under the Hundred River the onshore cable route intersects the area of increased flood risk associated with the watercourse crossing’.*
 - *‘Around Coldfair Green and Aldringham there is an area showing an increased Potential for groundwater flooding to occur at surface’ and there is ‘Potential for groundwater flooding of property situated below ground level’. Therefore, the onshore cable route may be at risk of flooding from groundwater in this location’.*
 - *‘The Environment Agency’s Long Term Flood Risk Information map (Environment Agency undated) (Figure 20.3.3) indicates that surface water flooding within proximity of the onshore cable route is primarily related to the Hundred River and is similar to the fluvial flood extent of the watercourse’.*
 - *‘Whilst undertaking the watercourse crossing ‘the construction area may be at risk of flooding, as well as posing a potential risk of increased flooding elsewhere. An open cut technique will be utilised to cross the watercourse. In this location, it will be necessary to ensure that flow along the watercourse is maintained and there is no increase in flood risk as a result of the temporary works’.*
- 11 No note is made of any risk of surface water inundation into Gipsy Lane from the Applicants’ proposed construction activity on land to the west of Aldeburgh Road which is at least 2 metres higher in altitude than Gipsy Lane.
- 12 The Applicants admit that development located within Flood Zone 3 should pass an Exception Test and that a Sequential Test is required in Zone 3b, but go on to say *‘it is considered that the Exception Test is not applicable’*, arguing that *‘subterranean development will only be at potential risk of flooding during the construction phase and that following construction the temporary construction elements will be removed and land returned to its present state’*. There is no evidence that either test was applied at or near the Aldeburgh Road cable corridor crossing.

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001292-6.3.20.3%20EA1N%20ES%20Appendix%2020.3%20Flood%20Risk%20Assessment.pdf>

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005188-ExA.AS-29.D11.V4%20EA1N%20Outline%20Watercourse%20Crossing%20Method%20Statement.pdf>