



Response to: BEIS Document EN10078 dated 20th December 2021
Interested Party Identification 20024089 & 20024090, 20023648 & 20023049
Relevant Representation Nos RR-804 & RR805

Dear Sirs,

1. On 20th December 2021, the Secretary of State for Business, Energy & Industrial Strategy (BEIS) invited further comments on selected aspects of the Scottish Power Renewables DCO Submission for East Anglia ONE North Ltd and East Anglia TWO Ltd. These aspects are:

- Offshore Ornithology
- Great Crested Newt
- Flood Risk
- Marine Licence

2. This note addresses solely the perceived shortcomings in the Applicant's response dated 30th November 2021, and apply equally to EA1(N) and EA2 substations and the National Grid substation. Reference is made by the Applicant to the Outline Operational Drainage Management Plan (OODMP): it is unclear whether this document has been updated in the intervening period since July 2021.

3. It is now almost 4 years since SPR (the Applicant) revealed its intention to site 3 large substations on the northern edge of the village of Friston. These, if built, will result in permanent damage to the local rural landscape and loss of recreational access to footpaths.

4. At the first "public consultation", (more accurately a didactic delivery!), SPR presented a Red, Amber, Green (RAG) matrix to justify the choice of Friston, which failed completely to even acknowledge the existence of the flood risk to parts of Friston as a result of *pluvial* run-off from the intended site after a period of heavy rain. This risk of flooding is judged at about 1:10 per year, although to our knowledge as residents, flooding has occurred twice in the past 10 years. The prospect of increased rainfall due to climate change can only increase the risk of flooding.

5. SPR chose the site at Friston on the basis of it being a Flood Zone 1 area, ie the risk of *fluvial* flood event being <1:1000, which is to be expected, given that it lies some 5 km from the nearest river/tidal section of water and some 20 metres above it! The Applicant has made repeated attempts to mollify the concerns of local residents that the construction of the substations will not lead to the increased risk of flooding in the village, and failed to acknowledge that the choice of the site was flawed from the outset. The OODMP provides little comfort as the prospective SuDs ponds appear to be sized to within a few cubic metres of the maximum requirement, itself based upon limited statistical information regarding rainfall and flow prediction modelling techniques – [see OODMP footnote 4].

6. Since the date of the original RAG assessment, National Grid Ventures has indicated its intention to utilise the proposed NGTE Friston substation to service the 'Nautilus' interconnector and a further interconnector link between the Sizewell area and Kent (Sealink) is contemplated. [Note: "Sizewell", in the parlance of energy companies has been used as a euphemism for Friston. These infrastructure proposals and extensions to existing windfarms pose yet further pluvial flood risks to an already fragile landscape and should be viewed by BEIS within the context of cumulative impact.

7 There follows a detailed appraisal of the Applicant's response to BEIS dated 30th November 2021.



Detailed Response to SPR Document EA1N-DGR-ENV-REP-IBR-000002 & EA2N-DGR-ENV-REP-IBR-000002 – dated 30th November 2021

Para	Subject	Response
1 & 2	Intro	N/C
3	Invitation by SoS to comment on changes to NPP Framework SoS Flood Risk Assessment in light of Climate Change EA to address sufficiency of Surface Water and Drainage Management Plan in light of recent flood events in Friston	
4		SPR to make clear “...time of Application..”
5	Site Selection	Applicant continues to defend site selection based on RAG Assessment (APP-443) The RAG was not carried out with full cognizance of the pluvial flood risk to Friston: the decision to pursue the DCO Application was thus deeply flawed from the outset
6	The site selection process had regard to ...[various policy documents]	Note: Applicant does not state conformity!
7	Statement that the onshore substations are on land with <0.1% probability of annual river flood	Scarcely surprising given that the substations are to be sited at the 20 metre AMSL contour. Most of the area between Friston village and the coast is below this level
8	Indicates that Applicant’s was cognizant of the risk of shallow surface water flow at the substation site	Applicant concentrated on the flood risk to the substation site but failed to recognise the surface water / pluvial flood risk to Friston when down selecting the proposed site as a being suitable for an industrial scale development: all subsequent efforts to allay the concerns of local residents may be viewed as <i>“flocinaucinihilpilification” [see Chambers English Dictionary]</i>
9	SCC Flood Records	The Applicant’s statement regarding flood incidents in Friston as having “low priority” [supplied by SCC] and “not in proximity to the substation site”, wrongly conveys the impression that the development site and its approaches should be viewed as low risk.
10	Flood Event in Friston 19 th November 2019	N/C
11	Flood Event in Friston 19 th November 2019	The Applicant’s statement again wrongly conveys the impression that the flooding event was wholly unrelated to rainfall over the intended development site.
12	Operation of the Projects Outline Operational Drainage Management Plan (OODMP)	This response draws to the attention of the SoS to following paragraphs within the OODMP as cited (REP13-020), which reinforce the contention that inadequate attention was paid by the Applicant to pluvial flood risk at Friston as part of the site selection process. <i>53. Subsequent information received from the LLFA (19th November 2019) has indicated that more recent surface water flooding events (occurring in October 2019) has affected the area around Friston.</i>



		<p>54. <i>There is a known (variable) risk associated with surface water flooding in proximity to the onshore substation and National Grid infrastructure.</i></p> <p>55. <i>The Product 4 data package (Annex 1 of Appendix 20.3 Flood Risk Assessment) obtained from the Environment Agency does not indicate any records of flooding in the location of the onshore substations or the National Grid infrastructure. The Environment Agency indicate, in their Product 4 data package, that although there are no records of flooding, this does not mean that it has not been subject to flooding, only that no flooding has been reported to them in this location.</i></p>
13	Catchment Hydraulic Model	No evidence is presented to confirm validity of this model in the context of the proposed development site and the drainage of the watercourse through Friston to its entrance to the river Ore/Alde at Ham Creek (tidal)
15	Flood Risk	The paragraph makes the bold statement that there will be no risk of flooding to the substation infrastructure and no increased risk of flooding to surrounding area and Friston.
16 & 17		N/C
18 et seq	As stated in Section 2.1 above, flooding within Friston primarily results from surface water flow from a number of sources unrelated to the onshore substation and National Grid infrastructure locations.	This passage and those that follow suggest that flooding in Friston is largely unrelated to the pluvial impact on the site chosen for the substation, which is not the case. The most recent flood was the result of turbid run off from fields close to the centre of Friston and exacerbated by run off from the site proposed for the substations, (on older OS maps identified as Friston Moor). The effect of heavy rainfall on fields disturbed by large numbers of farm animals (pigs) showed the fragility of local topsoil. This combination of effects does not seem to have been addressed by the Applicant. There is an existential risk of similar run-off where the proposed haul road crosses Grove Road and where the fields on either side of Grove Road are above road level. Lacking ditches, with the flood water descending unimpeded to the B1121.
31 to 36	Climate Change	N/C
37	Outline Code of Construction Practice	N/C
39 to 44	Surface Water and Drainage Management During Construction	<p>The Applicant fails to acknowledge 2 important factors regarding potential flood risk from construction activity:</p> <ol style="list-style-type: none"> 1. Most of the construction activity will take place on farm land that has hitherto enjoyed a covering of vegetation that reduces the risks from turbid pluvial run-off. The construction area is generally elevated a few metres above public roads and nearby habitation, and hence some form of containment is required. 3. Assuming that the 1 in 10 year storm event level is truly random, then simple statistics suggest that probability of a flood event occurring during the construction period is 40% <p>In the light of recent flooding in Friston full precautions against run off from all areas subject to soil disturbance</p>



		should be mandated on the basis of a 10% per year risk of major storm event
45 to 48	SuDS 1.0 metre water depth and possible increase	<p>These paragraphs do not indicate the actual total SuDS water storage capacity, although this may be inferred obliquely from the OODMP</p> <p>There is much concern by local residents that a leak or failure of this containment feature could result in the sudden release of a large volume of rainwater in a short space of time and one which could not be safely contained within the downstream drainage channels.</p> <p>It should be noted that the SuDS appear to be located at the 15 metre contour whilst the areas of risk in Friston are largely at the 10 metre contour.</p>
49	Code of Construction Practice	N/C
50	Summary	<p>The statement that “<i>the surface water flow that feeds flooding events within the village of Friston primarily comes from a number of locations unrelated to the onshore substations and National Grid infrastructure locations</i>” is an oversimplification of the situation. The proposed site is elevated by about 10 metres above the centre of Friston and contributes significantly to capture area of the watercourse through Friston. Whilst the SuDS may “buy time” during a storm event, they remain an existential threat to the village should the containment wall/dam fail.</p>