

The Secretary of State
Department for Business, Energy and Industrial Strategy
1, Victoria Street
LONDON
SW1H 0ET

Nicholas Winter

By email

30th January 2022

My Ref ID Nos: IP20023910 and IP20023912

Dear Secretary of State,

31 January 2022 Deadline Comments: PINS Ref: EA1N: EN010077 and EA2: EN010078

Thank you for inviting comments regarding Flood Risk and in respect of submissions for the 30th November 2021 deadline. I would like to comment on the flood risk to Friston and also on the question of cumulative impact, referred to in some of the 30th November 2021 deadline comments.

1. Flood Risk (and I refer here particularly to Friston)

I fully endorse the response by SASES for the 30th November deadline. SPR has made no proper study of flow through the "Friston River". This is not a river, but a small ditch running through sand and soil, overgrown for most of the year with vegetation. The banks are being eroded by water flow and rabbit burrows.

The ditch starts at the ford on Church Road and runs to the Chequers pub, running close to Church Path and skirting the village green. It then continues along Low Road, buried for the first couple of hundred yards before again becoming an open ditch in the second half of Low Road and then running down to the A1094 and the River Alde.

SPR has no proper historical local rainfall data and certainly has little idea of future rainfall given the uncertainty due to climate change. Anything they propose in relation to flooding in Friston can therefore be based on no more than a guess. We who live in Friston would like our property, and our lives, to depend on rather more than a guess, and especially not a guess made by SPR.

1.1. Para 11 in EA1N/EA2 response to 30th November Deadline: potential contribution of water from proposed SPR site to flooding

"Additionally, the study shows that flooding within Friston primarily results from surface water flow from a number of sources unrelated to the onshore substations and National Grid infrastructure locations.

This is further acknowledged by SCC and East Suffolk Council (ESC) within the Statement of Common Ground: East Suffolk Council and Suffolk County Council (REP12-070), where they agree that "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". (From EA1N/EA2 response)

The sources to which SPR is referring may or may not be correct for events within a limited time frame, but in general they are incorrect.

I have lived in Friston for over 30 years, [REDACTED]. I have therefore seen the ditch on most days and I have always taken an interest in whether there is water in the ditch but I have taken a more particular interest since SPR declared its intention of building the substations because of my concern over the increased flood risk to the village.

I agree that flooding in Friston is due to flow from multiple paths, these paths being drainage from the proposed SPR site and also from other fields from which water flows to the roads, then downhill to the Chequers pub where it enters the "Friston River" through drains.

From the ford in Church Road to the Chequers pub, the water in the "Friston River" is almost entirely from the proposed SPR site. From the Chequers pub downstream, the flow is a mixture of water from the proposed SPR site and other fields.

The relative importance of these different sources to the flow in the ditch in Low Road, and therefore to potential flood events there, depends on various factors but includes the crops or livestock in the fields, the direction of the ploughed furrows and the degree of saturation of the soil. I have also observed that the longer that a period of heavy rain continues, the greater the contribution to the flow in the "Friston River" from SPR's proposed site. This difference reflects the larger catchment area of the proposed SPR site, together with the greater distance the water has to travel compared with water from the other fields.

Contrary to SPR's November deadline response, their proposed substation site often makes a large contribution to the flow in the "Friston River". Water from the site drains via the track alongside Woodside Farm, across Church Road at the ford and into the "Friston River". Indeed, there is a footbridge over the ford where the outflow from the proposed site crosses Church Road, indicating the historical need for pedestrians to be able to cross the flowing water.

On 5th January 2021, it had rained hard much of the day. In the evening, I went out in the rain to look at the "Friston River". In Low Road, the water level was high, but fortunately the ditch had not burst its banks. At the Chequers I noticed that the water level in the ditch by Church Path was high and the water was fast-flowing, at that time much of the water in the ditch in Low Road was clearly due to the water flowing along the ditch by Church path, and therefore mostly from the SPR proposed site.

I walked up to the ford on Church road, where the flow of water over the road was spectacular and too fast to be waded due to the risk of being swept off my feet. I continued up the track by Woodside farm, now also a fast-running stream and took some video with my phone and the light from my flashlight.

Stills from the video clearly contradict SPR's claim that water from their proposed site makes little contribution to flooding, as seen in Figures 1 and 2 in which water is flowing rapidly down the track by Woodside farm and over the ford on Church road. Although on this occasion there was no flooding in Low Road, the water in the ditch there was high and the potential for flooding was evident.

The effects of high water flow in the "Friston River" are seen primarily at the road junction by the Chequers pub and nearby houses, and then along Low Road. The photos in Figures 3-6 illustrate the effects of high water flow in Low Road from a flood event in 1993 in which the Chases Lane end of Low Road and some adjacent properties were flooded.



Figure 1 5th January 2021, 7pm: farm track at Woodside Farm. Track is flooded with fast-flowing water from the proposed SPR site. Water was too deep for my wellingtons.



Figure 2 5th January 2021, 7pm: ford on Church Road where water from Woodside Farm crosses the road. A torrent of water is flowing into the "Friston River".



Figure 3 October 1993: Low Road looking North East towards the Chequers junction. See also Figure 4. Note water height at railing compared with Figure 4.



Figure 4 January 2022: Similar view as in Figure 3, recent photo in dry conditions.



Figure 5 October 1993: Low Road looking South-West. Again, compare flood water height against the railing with the photo in Figure 6 to see the water height.



Figure 6 January 2022: Similar view as in Figure 5.

In summary, from my own experience of living here for 30 years, SPR's claim in their November deadline submission that Friston is at low risk from flooding due to water from their proposed site is, in my view, nonsense.

Water from their proposed site does make a significant or major contribution to flow in Low Road, and this is before their site is rendered impermeable by a concrete surface. I appreciate they plan to mitigate the effects of this, but construction would take years and during this time Friston would be at increased risk.

Even when construction was completed, we could not consider ourselves safe from flooding. SPR's assurances are based on computer modelling and we have seen during the pandemic how useless computer modelling can be, with estimates of infections and deaths being wildly in error. As noted above, SPR's inputs to their model of future rainfall are purely guesses so even if the model itself works, if the inputs are wrong it will be a case of "garbage in, garbage out". The future of Friston may depend on this garbage.

2. Cumulative Impact

Some of the November deadline responses (eg: Tony Morley) expressed grave concerns about the Cumulative Impacts of the EA1N and EA2 projects, and the other projects that we know would follow. I fully endorse these concerns and would make the following additional comments.

SPR has not engaged with the problem of cumulative impact, variously saying there won't be any, or that there is insufficient information by which to assess it. This is evidently untrue. According to our MP, Dr Therese Coffey, the three substations proposed for EA1N, EA2 and NG will have a devastating effect on the East Suffolk environment and those who live here and those whose businesses depend on tourism.

Add in the additional effects of the other five confirmed projects in the pipeline: East Anglia One North Offshore Wind Farm (EA1N); East Anglia Two Offshore Wind Farm (EA2); Nautilus Interconnector; Eurolink Interconnector and Sea Link Interconnector, and the cumulative effects will clearly be massive.

It is widely believed that the SCD2 Interconnector, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm may follow.

Additionally, there is the proposed new Sizewell C nuclear power station that seems likely to be approved. At present, East Suffolk is a lovely, mainly rural area treasured by those who live here and by the visitors we welcome each year. The cumulative effects of Sizewell C and all the substation projects will render much of East Suffolk a massive construction site for decades and the rural nature of the area will be lost for ever, replaced by industrial infrastructure that will be visible for miles.

The objective of the EA1N and EA2 projects is to provide sustainable green energy for the UK. It is neither sustainable nor green to damage the fragile coastline of coralline crag, sand-based and already crumbling, near Thorpeness.

It isn't sustainable or green to dig multiple cable routes, running for approximately 9 km, cut through the protected Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the River Hundred, and the Sandlings SPA (Special Protected Area), all with consequent destruction of biodiversity.

It isn't sustainable or green to cover 100 acres at the mediaeval village of Friston with concrete for the substations; and that is just for the three EA1N, EA2 and NG substations. The additional five confirmed projects, and probably several others, will add to this already insupportable burden on the area.

SPR and NG have been "economical with the truth" from the outset. We were told there would be three substations. We were not told initially that these were the thin end of the wedge and there would be many others to follow.

Conclusion

In summary, the site selection process using RAG methodology was flawed (SASES November 2021 submission), we were deceived about the true scale of what was intended and the whole collection of projects will be devastating for the local environment and people. This is not green and would be a tragedy, especially as it is unnecessary.

It is unnecessary because, as SEAS says, for the onshore infrastructure it is clear there are more appropriate brownfield or industrialised sites or sites in need of redevelopment such as Bradwell or Grain, which are better aligned with the government's environmental policy.

I endorse the proposal of The Right Honourable Therese Coffey MP of a split decision, granting consent for the offshore infrastructure but in which the onshore is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or industrialised site.

Yours sincerely

N B Winter