

Written Representations – Mr Michael Lewis
PINS Ref:
EA1N – AFP128 and EA2- AFP130

I am opposed to the Applicant's EA1N and EA2 proposals to site a substation complex at Friston. I am in favour of a balanced energy power strategy which includes a green technology component. As a matter of general principle substations associated with offshore wind farms should be sited offshore or on brownfield sites on or near the coast.

I was one of the independent contributors at the online Open Floor Hearing of Friday 9th October. I found the experience to be daunting I was totally unfamiliar with the technology and needed help, compromising my self-isolation Covid 19 regime.

One of my concerns is the issue of **flooding at Friston:**

(a) As it affects me personally – a private matter dealt with separately

(b) As it will affect the village

Another is **Archaeology and Heritage issues**

The Applicant (SPR) plans to build two retaining tanks to hold water which will fall on their proposed substation complex (concrete does not absorb water) and then pipe this water under Church Road/Lane when it is safe to do so into the Friston water course. Of crucial importance is that **SPR have conceded that their original proposals will affect the surface water management system of the village**, (hence their attenuation initiative). Clearly we need to have precise data facts: size, location, pipe volume etc. **The Applicant's current and future proposals must be reviewed and independently verified**, particularly so if they plan to expand the complex on the site. Both villagers and the Planning Inspectorate need to know this!

There are all too many examples of attenuation schemes proposed by contractors/builders that are cosmetic and technically flawed. A classic example concerns building on flood plains. Note the Hydrological Survey commissioned by Suffolk County Council **did not consider SPRs plans to build a concrete substation complex at Friston** yet these plans were in existence at the time of the survey.

Friston Water Course (FWC)– current system.

In my presentation at the Open Floor Hearing, in order to explain the FWC system, I described the topography of Friston as a giant elongated shallow bowl. The bowl being on a North/South axis with the proposed substation complex being situated on the North Eastern side, well within the rim of the bowl but not anywhere near the bowl's Northerly rim. The lowest point in this section proceeds to the village via a cart track Southward past Orchard Bank, crosses Church Road/Lane to an open ditch to the centre of the village. This latter section was also a cart track dug out approximately 50 years ago. From the centre, via a culvert system, it proceeds down Low Road, reverting to another open ditch to a field where water pools. The excess can escape via a weir and tunnel under the

A1094 at the Firs Farm location. What happens next is unknown but it must discharge into the River Alde in the Long Reach section. Precise information is unavailable because this location is within the grounds of a private estate not accessible to the general public.

One presumes the Hydrological Study did not investigate this further because they observed that the tunnel was dry. They did observe that the last ditch section was badly overgrown.

Friston has always been subject to flooding. The topography of the area dictates this and the certainty of recurrence. Flooding has always been evident in periods of heavy rain over a prolonged period and/or short violent rainstorms. For long periods, especially in the summer months, the drainage system is completely dry. What is often not appreciated is that surface water proceeds to the village from all points of the compass, even from the South. It is true the bulk of the flow is usually on the North/South axis, but the most severe events (spate conditions) occur when the water flow origin is multidirectional.

The Management of Flooding.

The frequency and severity of these events are unknown and therefore, most importantly, our ability to manage them in the future is a matter of pure speculation. This is because there are too many variables at play. It is true we cannot predict the weather, we never could. Meteorologists now recommend a review of all flood prevention plans in view of the phenomenon of global warming. Some of the variables are assumptions:

1. The existing system is subject to regular maintenance – not so.
2. The existing (blotting paper effect) of the land is a constant – not so.
3. That there are no new factors currently exist or are planned which could change the dynamics of the system – not so.

It is evident we cannot be sure of any of the above. The reality is that the management of the Friston flooding problem is, and has been, **totally reactive and uncoordinated**, often, in my view, an initiative at one point has shifted a problem further downhill to another area.

The history of water management in Friston has been one of constant changes and modifications usually after a severe flooding event. Then a period of inactivity until the next event see Annex A

Hydrology Report please see Annex B Friston Surface Water Study

I am mindful that after the severe flooding episode of October 2019 the County Council commissioned a surface water/flooding report, which was produced in May 2020 with observations and recommendations.

Although I believe it was a competent piece of work, undertaken by competent professionals, I have considerable reservations about it. These reservations include:

- The use of technical jargon, length and lack of clarity in general
- The use of language and phrases such as “the Friston River”, “the start point of the river”, “the Ford”, and later in the report “the Friston river is

therefore predominantly 'ephemeral in nature', " does not inspire confidence in the reader especially anyone with local knowledge.

My main problem with the report is not in terms of what it said, but rather what it **did not say** (eg Scottish Power substation), or **could not say** (contamination of surface water and foul water systems). Note that some properties still have cess pits and are therefore not connected to the sewage system. The Report concluded that the flooding risk is considered to be low, both in terms of ground water and tidal flooding. The reference to tidal flooding is absolutely obvious however I disagree with the comments re ground water for all the reasons stated in this Written Representation.

In consideration of the impact of the flooding/contamination issue, one should bear in mind the under-reporting/insurance factor. After an event and subsequent claim, a householder may find they become uninsurable or 'high risk' and subject to higher premiums, some conclude it is better to say and do nothing. thus protecting their insurance premiums plus house values in the event of a future house sale.

Archaeology

Friston and its wider environs is littered with archaeology: finds from the Neolithic period to the present day, including: flint scrapers, workers tools, Bronze age artifacts include pottery roof tiles, spindle whorls, Tumuli, boat burials, an Anglo-Saxon cemetery and a Bronze Age cemetery etc. I think the pooling area of the Friston watercourse and the area of land to the Alde are well worth investigating further.

The Earliest people here would have been nomadic hunter-gatherers rather than settlers. However because Friston possessed fresh water, abundant wildlife plus land suitable for agriculture and animal husbandry, settlers could, and did, arrive here. The key element here is, of course, access to the sea via the Alde river, less than 1.5 miles away from the centre of Friston. Ancient peoples always came by sea and river to settle, trade, conquer, plunder and, in the case of the Vikings and Romans, for human trafficking/slave trade. The name 'Friston' is thought to be related to 'Friesland', an area in the modern North Netherlands probably extending into Germany and Denmark.

We know that the A1094 was flooded approximately 70 years ago, presumably the reason for the culvert being built. Subsequently the culvert was subject to a powerful spate flood which threatened buildings at Firs Farm. There is a strong likelihood that archaeology will be found at these locations (both inorganic and organic in the anaerobic marshy conditions). It would be a great shame if we risked another spate flooding event to destroy this, particularly because we have no idea what effect the proposed SPR substation site will have on the Friston water course.

We are proud to be living in an area designated 'the Heritage Coast'. If the issues I have raised are not our heritage I do not know what is, nor do I suspect do the residents of Aldeburgh, Thorpness and Orford because it is their heritage too.

Recommendation: – that the Examining Authority undergo a further site visit to walk the land in terms of flooding, a desk top exercise will not suffice, to consider:

- Giving particular attention to the site of the Applicant's substation complex and any future expansion/development
- The requirement for a new hydrological study incorporating the Applicant's substation project particularly the concrete footprint and the cumulative effect of other projects at the site in the public domain
- The cessation of all tinkering with private flood prevention measures
- An archaeological survey of the low-lying marsh areas
- Joint foul and surface water investigation related to, and in conjunction with, the hydrological study mentioned above incorporating a chemical and bacterial analysis of surface water run off (health hazards including agrichemicals and animal and human waste)
- An impact study on the possible effects on electrical and communication technology. Note electrical systems failed in the floods of October 2019.

References: My references are sparse to say the least-

1. 'A Short History of a Suffolk Village' – Clarissa Thomas ISBN 0.9537-596-0-1
2. Personal observations made whilst walking around the village
3. Conversations with older villagers who have lived and worked in Friston for, in some cases, for 50 – 70 years.

Annex A: Examination of Flooding Variables

1. The system is not well maintained. The top section from Church Road/Lane was re-dug with a shovel to a depth of approximately 1ft about three years ago and the spoil was placed on the banks. The whole section should be trimmed and cleared approximately once per year, but more often this has been less frequent, the spoil is not taken away, but is also left on the banks – (gravity does the rest as it simply falls back in again!).
2. The absorbance capacity of fields. Changes of agricultural practices from cattle pasture to arable – negative change. Lack of contour ploughing – negative change. Bigger fields – loss of hedges and associated ditches – negative change. Pig farming – soil compaction – negative change. Turfing – loss of topsoil – negative and continuing change.
3. New factors. Scottish Power Renewables Substation site – almost certainly large – negative change. The uncoordinated building of dyke drains and bunds – uncertain effects ie may transfer problems from one area to another. On a micro scale, modification of gardens may have the same effect.

Annex B: Friston Surface Water Study
<FristonSurfaceWaterStudy-TechnicalReport2.0.pdf>