



The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 12 – 28 June 2021

**Comments of Suffolk County Council as Lead Local Flood Authority**

## 1. Comments on responses to ExQ3

Ref	Question	SCC Response
R17QF.6	<p>Paragraph 140 of the OODMP [AS-125] states that additional inspection or maintenance works required on the Friston watercourse due to the projects will be addressed by way of an agreement with the Environment Agency prior to commencement of Work Nos 30 and 41.</p> <p>To SCC:</p> <ul style="list-style-type: none"><li>• Does this satisfy your concerns in relation to this matter and is there sufficient detail within the OODMP?</li></ul>	<p>SCC would expect this agreement to be entered into prior to Requirement 41 being discharged, but in principle, yes, this addresses our concern.</p>

## 2. Comments on the amendments to the previously issued RIES (if required)

2.1 Not applicable

### 3. Comments on any additional information/submissions received at D11

#### 3.1 Infiltration Test Results (May 2021), Version 01 (AS-129)

Para	SPR Statement	SCC Comment
9	<p>On full mobilisation of the onshore site investigation contractor to the substation site in May 2021, more comprehensive infiltration testing was undertaken (the May 2021 infiltration tests) which undertook three infiltration tests per location unless one of the following conditions have been met. Conditions a) to c) below ensure that, where infiltration rates are poor, the tests can be terminated within an appropriate time frame and in a consistent way between different test locations.</p> <p>a) The water level has dropped to 0.25m above base level (0.75mbGL);</p> <p>b) The water level has dropped by less than 50mm during the first 60 minutes of the test; or</p> <p>c) The test duration has exceeded 120 minutes.</p>	<p>For clarity, these three conditions were created by the Applicant and are not part of standard BRE 365 methodology. These conditions resulted in the early termination of infiltration tests that may have otherwise returned a suitable infiltration rate. As a result, the Applicant has extrapolated the results of their infiltration testing.</p>
14	<p>With the exception of TP017B (Test 1 and Test 2), all test results were extrapolated</p>	<p>Extrapolated test results are not in accordance with BRE 365 methodology. However, the test results obtained contain sufficient detail to determine the initial feasibility of infiltration at both of the proposed SuDS basin locations.</p>
16	<p>For the National Grid substation SuDS basin, the average infiltration rate is considered to be unsuitable for a feasible infiltration system to be adopted. Therefore, an attenuation design for this SuDS basin will be adopted at this location as agreed with the LLFA.</p>	<p>The lowest infiltration rates for the three test pits for the National Grid substations were 36mm/hr, 7mm/hr &amp; 26mm/hr. TP012B is considered an anomaly as results do not reduce with subsequent test runs. Even if the result from TP012B was considered acceptable, the extent of this higher infiltration zone is unknown and therefore cannot be relied upon for design purposes. The soil logs of both TP013B and TP014C exhibit silty properties. When assessing the infiltration rates alongside the soil logs, SCC LLFA are not content there is sufficient certainty that</p>

		infiltration will remain a practicable method of surface water disposal for the lifetime of the development, due to the low infiltration rates (which would likely be even lower if testing were completed without extrapolation) and the presence of fines. As such, SCC support an attenuation only design for the National Grid sub-station basin.
17	For the onshore substations' basin, the average infiltration rate of the lowest test result for TP015B, TP016B and TP017B is 49.3mm/hr. In order to take a conservative approach at this location, the Applicants have agreed a 40mm/hr infiltration rate with the LLFA for drainage calculations at this outline design stage of the Projects, and agreed with the LLFA to progress a hybrid SuDS basin (i.e. a combination of infiltration and attenuation) at this location.	The lowest infiltration rates for the three tests pits for the Project sub-stations were 63mm/hr, 35mm/hr & 50mm/hr. Only one of these three test pits soil logs recorded the presence of a silt material at depth (TP015B) and this was only described as 'slightly silty'. Given the testing was extrapolated, it was agreed with the Applicant to work off an average infiltration rate of 40mm/hr for design purposes. Whilst this rate could be viewed as acceptable for an infiltration only approach, SCC LLFA note there are no tests towards the northern edge of the indicative basin area illustrated in Appendix 3 and nearby TP330B failed to record an acceptable infiltration rate. This variability of soil properties will need to be assessed further at detailed design, but ultimately is unlikely to be reliable enough for an infiltration only approach, especially when considering the risk to the nearby village of Friston. As such, SCC LLFA support the proposal for a hybrid (infiltration & attenuation) solution for the Project sub-stations.
18	Post-consent, the infiltration rate of each SuDS basin will be verified by further BRE-365 compliant infiltration testing, the results of which will be used in the detailed design of the SuDS basins.	This is supported by SCC LLFA to verify the results of the May 2021 testing which included extrapolation. Future testing should be in full compliance with BRE 365 methodology.

### 3.2 Outline Operational Drainage Management Plan, Version 5 (AS-125)

Para	SPR Statement	SCC Comment
2	Based on this process, with the agreement of the LLFA, the Applicant has selected a hybrid infiltration and attenuation design for the onshore substations which will be taken forward to the detailed design phase, and an attenuation only design for the National Grid infrastructure.	SCC LLFA confirm agreement of this position
92	For the National Grid substation SuDS basin, the average infiltration rate is considered to be unsuitable for infiltration to be incorporated. Therefore, the Applicant proposes to adopt an attenuation only design for this basin, as agreed with the LLFA.	SCC LLFA confirm agreement of this position. For clarity, if groundwater levels/flood risk allows, the basin will remain unlined so some infiltration will be achieved. SCC intend to explore options with the Applicant at detailed design to marginally increase the invert level of the outfall to maximise the opportunities for the attenuation basin to deliver interception for small rainfall events through infiltration & evapotranspiration.
93	For the onshore substations SuDS basin, the average infiltration rate of the lowest test result for TP015b, TP016b and TP017b is 49.3mm/hr. In order to take a conservative approach at this location, the Applicant has agreed a 40mm/hr infiltration rate with the LLFA for drainage calculations at this outline design stage of the Projects (with storage for a 1 in 30 year return period (plus 40% for climate change)). It has been agreed with the LLFA to progress a hybrid SuDS basin (i.e. a combination of infiltration and attenuation) at this location.	For clarity, SCC have agreed the hybrid approach on the basis that infiltration is facilitated (using an infiltration rate of 40mm/hr and FoS of 10) for the 1:30+40% rainfall event. The 1:100+40% event is accommodated within the same basin, above the water level for 1:30+40%, but discharges through a positive outfall to Friston Main River at Qbar.
130 & 138		Regarding planting, these two paragraphs contradict one another. SCC agree with the approach stated in paragraph 130. This matter can be considered further at the detailed design stage with planting accommodated where possible if it can be demonstrated that this

		<p>will not inhibit the long term performance of the SuDS feature in question.</p> <p>SCC note paragraph 105 of AS-127 which acknowledges the removal of wet woodland from SuDS basins. This supports SCC's position above and suggests that paragraph 138 has remained in error.</p>
140	<p>Any additional inspection or maintenance works required on the Friston watercourse (Main River) due to the Project, will be addressed by way of an agreement with the Environment Agency prior to commencement of Work Nos 30 and 41. This is a common process for promoters of a wide range of developments which connect their surface water drainage to a main river. The Statement of Common Ground with the Environment Agency (REP8-124) will be updated to reflect this at Deadline 12.</p>	<p>This is acceptable to SCC.</p>
Table 6.2		<p>Figure given for 1:10+CC. I think this is in error as the volume provided is identical to the 1:100+CC volume given in Appendix 3.</p>
Section 7.3		<p>SCC would have liked to have seen this sensitivity test also undertaken for the discharge from the hybrid basin.</p>
Appendix 2		<ol style="list-style-type: none"> <li>1. SCC query the need for two outfall pipes and would expect one to be sufficient. SCC are however content for this to be confirmed as part of detailed design.</li> <li>2. SCC Highways to confirm acceptability of cover for proposed outfall pipe underneath Church Road.</li> </ol>
Appendix 5		<p>Revised location of existing natural depression is acceptable to SCC</p>

### **3.2.1 SCC Summary**

The OODMP submitted after Deadline 11 (AS-125) is generally agreeable to SCC, although we would encourage the Applicant to consider the points raised by SCC above and provide us with informal comments/additional information where requested, prior to Deadline 13. SCC would also request that the Applicant provides us with assurance that the proposed designs can sufficiently accommodate an additional 1:10+CC rainfall event after 24 hours, where half drain times exceed 24 hours. Whilst neither design is entirely reliant on infiltration, the principle that there is sufficient storage for a follow-on rainfall event is still applicable, regardless of the method of surface water disposal.

### 3.3 Outline Code of Construction Practice, Version 07 (REP11-015)

Para	SPR Statement	SCC Comment
158	Where relevant, the measures listed in Paragraph 150 above will apply to construction works within areas identified as having an increased risk of surface water flooding. The measures listed in Paragraph 150 will be captured within the final CoCP and accompanying surface water and drainage management plan secured by Requirement 22 of the draft DCO (document reference 3.1).	References made to 'Paragraph 150' – should this be Paragraph 157?
169	A Surface Water and Drainage Management Plan (SWDP), similar to the indicative plans referred to in Section 11.1.4.1,	Section 11.1.4.1 does not exist, not sure what this is meant to reference?
177	<p>The overall capacity of the basins shown on Figure 2, Appendix 2 has been calculated based on the worst-case scenario comprising the cumulative operational and construction footprints associated with the East Anglia TWO, East Anglia ONE North and National Grid substations, together with supporting infrastructure such as access roads and Construction Consolidation Sites (CCSs). The following assumptions have been made in calculating the required storage capacity:</p> <ul style="list-style-type: none"> <li>• A 1 in 15 year storm event return period (6.66% chance of occurrence);</li> <li>• No allowance for climate change, given the overall duration of the construction programme;</li> <li>• Attenuation only, with a rate of discharge no greater than the existing greenfield runoff rate (i.e. assumed that infiltration is not available);</li> </ul>	<p>SCC maintain that the use of a 1 in 15 return period rainfall event for design of construction phase surface water drainage represents an increase in surface water flood risk to the residents of Friston. We cannot support this approach. For example, in the event of a 1 in 30 rainfall event, the Applicants approach would be unable to retain the surface water volumes within the Order limits. This would not only represent an increase in surface water flood risk/flows downstream, but also associated pollution in the form of siltation which could be deposited on the public highway, private land and of course, within the Friston Main River, ultimately reducing its capacity and in turn, further increasing surface water flood risk within Friston.</p> <p>As previously stated, Chapter 20 of the Environmental Statement did not assess Human Receptors in Friston. Nonetheless, the residual impacts identified are all minor adverse, but this is entirely reliant on embedded mitigation. On the basis that this embedded mitigation</p>



	<ul style="list-style-type: none"> <li>• Impermeable surfaces were taken to be the operational infrastructure as per the Outline Operational Drainage Management Plan (an updated version will be submitted shortly following Deadline 11, document reference ExA.AS1.D11.5.V5) (totalling 123,250m<sup>2</sup> ) together with the CCSs for each of substations (totalling 57,550m<sup>2</sup> ) and the cable sealing end compounds (totalling 30,000m<sup>2</sup> ), totalling 210,800m<sup>2</sup> ; and</li> <li>• Temporary basin(s) depth of up to 1m (with additional 300mm freeboard). The final depth of the temporary basins will be subject to detailed design.</li> </ul>	<p>would not be designed for a 1 in 30 rainfall event, it is not possible to agree that the residual impacts would be minor adverse.</p> <p>SCC require a detailed breakdown of the impermeable surfaces accounted for as these do not align with the realistic worst-case scenario for the construction phase set out in Table 20.2 of the ES (APP-068).</p> <p>SCC agree that no climate change allowance is required for construction drainage &amp; that attenuation only is suitable for the construction phase due to the potential for suspended sediment to blind any infiltration surface. SCC also agree with the stated basin depths.</p>
178	<p>Table 11.1 presents the required and provided surface water storage volumes and corresponding attenuation basin dimensions associated with the three storm event return periods modelled.</p>	<p>Only one storm event return period has been modelled.</p>
186	<p>The following assumptions have been made in calculating the storage capacities required within a typical section of the onshore cable route:</p> <ul style="list-style-type: none"> <li>• A 100m-length section of the onshore cable route;</li> <li>• A 1 in 10 year storm event return period (10% chance of occurrence);</li> <li>• No allowance for climate change, given the overall duration of the construction programme (anticipated to be a maximum of 24-months for the onshore cables, comprised of shorter sub-periods for each section of the onshore cable route);</li> </ul>	<p>Assumptions agreed other than the use of a 1 in 10 rainfall return period, for the same reasons discussed above in response to paragraph 177. Whilst SCC acknowledge the risk is different along the cable corridor, the principle of increasing off site surface water flood risk and pollution is not something we can support.</p>

	<ul style="list-style-type: none"> <li>• Attenuation only, with a rate of discharge no greater than the existing greenfield runoff rate (i.e. assuming at this stage that infiltration is not available);</li> <li>• Impermeable surfaces within the onshore cable route working width were taken to be the temporary haul road and associated drainage ditch (5.5m wide), onshore cable trenches (1.8m (2 x 0.9m) wide), subsoil spoil piles (3.4m wide) and the surface water management area, equating to approximately 45% of the total area within the 100m-length section of onshore cable route; and</li> <li>• Temporary basin(s) design depth of up to 1m (with additional 300mm freeboard). The final depth of the temporary basins will be subject to detailed design.</li> </ul>	
189	Figure 3, Appendix 2 illustrates a surface water drainage scheme for a 1 in 15 year event.	Assume this should read ‘for a 1 in 10 year event’, based on the content of 11.1.6.1 and as shown on the Figure referenced?
Figure 2, Appendix 2 & Figure 3, Appendix 2	EA1N-EA2-DEV-DRG-IBR-001316 & EA1N-DEV-DRG-IBR-001317	<p>Notwithstanding SCC’s position stated above in response to paragraph 177, for the ExA’s benefit, SCC make the following comments on this Figure for a technical perspective;</p> <ul style="list-style-type: none"> <li>• The layout of the proposed basins and interconnecting pipework/swales seems logical</li> <li>• It is not possible to comment on whether the storage areas shown on this plan provide the required storage volumes stated in Table 11.1/11.2. No calculations or details on the basins have been provided to support the plan.</li> <li>• It is assumed these basins are designed for storage only and not for treatment as the settlement time required for suspended sediment is not mentioned</li> </ul>

### 3.3.1 Further SCC comments

As per the Applicants submission at ISH 11 & Deadline 8, *“the assessment of flood risk during the construction phase is carried out in accordance with the same policy and best practice guidance, as for the operational phase”* (REP8-096, para 27). On this basis and given the OODMP has been developed using the realistic worst-case scenario set out in APP-068 Table 20.2 for operation, the same should be done for construction.

SCC acknowledge the Applicants proposals to design construction surface water drainage for the substation sites to a 1:15 return period and 1:10 for the cable corridor. SCC maintain that this represents an increase in surface water flood risk to surrounding receptors, including, but not limited to, the village of Friston (despite this having not been assessed in the ES, which SCC maintains as a concern, as stated in our Local Impact Report, paragraph 11.26 (REP1-132)). SCC’s position is also set out in SoCG LA-05.07 (REP8-114), where the Applicant states *“the Applicants confirm that the approach to scope out human receptors from the assessment was due to the Applicants’ commitment to not increase flood risk downstream of the substation sites catchment from the discharge point to the Friston Watercourse”*. SCC would challenge the Applicants’ commitment to not increase flood risk downstream of the substation sites based on their proposed construction surface water drainage strategy.

Operational drainage is being designed for a return period of 1:100. SCC do not accept that the residents of Friston should be exposed to an increase in surface water flood risk during the construction phase, when compared to the operation phase or indeed, the present day greenfield.

NPS-EN1, paragraph 5.7.10 states *“for construction work which has drainage implications, approval for the project’s drainage system will form part of the development consent issued by the IPC. The IPC will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010”*.

SCC would suggest it is evident that construction work could have drainage implications in this instance, and as such, approval for the projects drainage system should form part of the development consent. SCC acknowledge that Schedule 3 of the Flood and Water Management Act 2010 has still not been implemented, however, we maintain that the core issue which this paragraph seeks to address, construction work which has drainage implications, must be adequately addressed. The closest thing to a national standard at this moment in time is DEFRA’s Non-Statutory Technical Standards for Sustainable Drainage Systems. This is what SCC seek to see applied to the construction phase, as previously stated in SCC’s Deadline 8 submission (REP8-176), Section 1, Response to Agenda Item 3. This states, *“SCC expect there to be no increase in offsite surface water flood risk up to and including the 1 in 100 year rainfall event during construction. The 1 in 30 year rainfall event must be retained within*

*the surface water system. Above ground flooding is permitted during the 1 in 100 year rainfall event, but must be retained within the Order Limits. This is as per the DEFRA Non-Statutory Technical Standards which have been applied to the operational phase". SCC maintain this position.*

By the Applicants logic, sub-station construction could be close to completion, with all sub-station impermeable areas constructed, accompanied by further construction phase impermeable areas (such as CCS's), yet this infrastructure would only be served by a surface water drainage system capable of coping with a 1:15 rainfall event. This is unacceptable to SCC.

SCC would highlight to the ExA that if consent were to be granted for either of the Applications, the decision maker should make it clear what return period they expect construction drainage to be designed for. SCC would recommend the decision maker clearly states which of the following three methodologies should be used;

- a.) Applicants position – 1:15 return period for substation site and 1:10 return period for cable corridor;
- b.) SCC position – 1:100 return period for construction phase; or
- c.) Alternative position to be determined by the decision maker;

Failure to do so could result in this conflict of positions carrying through to the discharge of requirements stage with no obvious pathway to a solution.

### 3.4 Applicants' Responses to Hearings Actions Points (ISH16 and ISH17), (REP11-082)

#### Response to Section 1.2, Table 1, Applicants' Response to Issue Specific Hearing 16 Actions

No.	SPR Statement	SCC Comment
6	<p>The Applicants have submitted an updated Outline Code of Construction Practice (OCoCP) (document reference 8.1) at Deadline 11 which now includes details of an indicative construction phase drainage scheme.</p>	<p>SCC's concerns remain regarding the mitigation of impacts during the construction phase, as per our response to the updated Outline Code of Construction Practice (REP11-015), see Section 3.3 of this response.</p>
7	<p>There are currently no prescribed standards for the provision of construction drainage. As the construction programme for the National Grid substation is up to 48 months, and up to 24 months for the onshore cable route, the Applicants consider use of the 1:100 year return period for construction run-off management to be excessive.</p> <p>The Applicants have updated the Outline CoCP (document reference 8.1) at Deadline 11 to include indicative details of construction drainage proposals using the 1:15 year return period at the National Grid substation and onshore substations locations and 1:10 year return period along the onshore cable route. Use of these return periods is considered appropriate as they would accommodate over three times the relevant construction programmes. Regarding the cable route, this is also in line with the recommendations of 'Control of water pollution from linear construction projects' (C649) (CIRIA, 2006), which suggests use of a 1 in 10 year return period.</p>	<p>See Section 3.3, and specifically Section 3.3.1 of this response for SCC's full position on this matter.</p> <p>SCC note that C649 (CIRIA, 2006) states <i>"select a probability of rainfall event that is appropriate to the construction timeframe and the risk of failure. A likely minimum design period for temporary works is once in 10 years, with an overspill contingency for greater events"</i>. SCC highlight that this should be viewed as a minimum and is applicable to the cable corridor only.</p> <p>SCC note that the difference between storage requirements for 1:100, when compared to 1:10 and 1:15, respectively. As per the applicants figures, this would present a 56% increase in storage volumes for the cable corridor and a 26% increase in storage volumes for the substations. However, no evidence has been provided to support these figures and the design assumptions are unknown. For example, above ground flooding, within the Order Limits, is acceptable (and indeed, would be expected for the construction phase) for rainfall events greater than 1:30, this would reduce the storage requirements and land take whilst still ensuring flood risk is not increased off site. It is also assumed that these figures do not account for an effective outfall, which would reduce the storage required.</p>

	<p>Regardless, the Applicants have also interrogated the Order limits regarding the 1:100 year return period and can confirm the following:</p> <ul style="list-style-type: none"> <li>• For construction of a 100m length of the cable route it would be necessary to provide 86.8m<sup>3</sup> of attenuation. As an example, this would require provision of a basin 27m in length, 8.4m in width and 1m depth every 100m (i.e. over one quarter of the cable route length would be dedicated to surface water management).</li> <li>• For construction of the National Grid substation and onshore substations it would be necessary to provide 16394m<sup>3</sup> of attenuation. For comparison, this represents an additional 3,728m<sup>3</sup> to that required for the 1:15 year return period as presented in section 11.1.5 of the updated Outline CoCP (document reference 8.1) submitted at Deadline 11. The Applicants consider this to be impracticable and unnecessary.</li> </ul>	
8	The Applicants will submit an updated Outline Operational Drainage Management Plan (OODMP) on Friday 11th June 2021 which will include the results of six full infiltration tests undertaken at the substation site.	See Section 3.1 of this response for SCC's position in relation to new infiltration testing results.
10	a. The Applicants have now completed further infiltration testing within the areas proposed for the sustainable drainage system (SuDS) basins at the National Grid substation and onshore substation locations. The OODMP is therefore being updated to reflect revised infiltration rates using a Factor of Safety of 10 (applied to the infiltration element only) as requested by Suffolk County Council. The updated OODMP will be submitted to the Examinations on Friday 11th June 2021.	<p>a. See Section 3.2 of this response for SCC position on revised OODMP</p> <p>b. Noted and yes, they are provided.</p> <p>c. New location noted and agreed, as per Section 3.2 of this response, SCC response to Appendix 5</p> <p>d. Noted. SCC are content.</p>

<p>b. Water levels will be shown on the cross-sections in the updated OODMP being submitted to the Examinations on Friday 11th June 2021.</p> <p>c. The Applicants are considering this as part of updating the OODMP and will confirm the outcome of this process within the document to be submitted to the Examinations on Friday 11th June 2021.</p> <p>d. The Applicants will enter into an agreement with the Environment Agency prior to commencement of Work Nos 30 and 41, which will address matters relating to any additional inspection or maintenance works required on the Friston watercourse (Main River). This is a common process for promoters of a wide range of developments which connect their surface water drainage to a main river. The Statement of Common Ground with the Environment Agency (REP8-124) will be updated to reflect this at Deadline 12.</p> <p>e. The Applicants will provide an updated concept design of the discharge arrangement within the OODMP on 11th June 2021. This concept design will be informed by ongoing discussions with Suffolk County Council.</p>	<p>e. SCC Highways to provide comment.</p>
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### 3.5 Written Summary of Oral Case ISH16 (REP11-083)

Para	SPR Statement	SCC Comment
28	Suffolk County Council's (SCC's) position is that sub-optimal construction phase surface water drainage infrastructure within the East Anglia ONE offshore windfarm project's onshore cable route, would be repeated on the Projects as the widths of the onshore cable routes are comparable.	SCC's concern is that the Applicants design parameters for the construction phase could present an increase in offsite flood risk compared to both the greenfield situation and the proposed operational strategy. See Section 3.3 of this response for more information.
32	These settlement/SuDS basin areas can be created as often as required within the onshore development area to reflect the ground conditions and nature of the works being undertaken.	This may be the case theoretically, but as per REP11—082, Section 1.2, Table 1, question 7, the Applicant only proposes construction phase drainage to accommodate 1:10 rainfall event along the cable corridor and 1:15 rainfall event at the sub-stations, with further provision being deemed 'excessive'.
34	The Applicants have also submitted further illustrations at Deadline 11 in response to hearing action point 6 (Applicants' Response to Hearing Action Points (ISH16 and ISH17) (document reference ExA.HA.D11.V1)). The precise detail of any mitigation to be adopted will inevitably be a matter that can only be confirmed as part of the detailed design.	SCC agree that the precise detail will be confirmed as part of detailed design. However, the design parameters must be agreed as part of the DCO process, to inform detailed design and to ensure that this mitigation is deliverable within the Order limits. See Section 3.3 of this response for more information.
36 & 37	<p>The construction works along the full onshore cable corridor have a proposed operational 'life' of two years; therefore, using a 1 in 5-year design event to size drainage conveyance would not be unreasonable.</p> <p>If any part of the Order land was deemed sensitive to flood risk during detailed design, then the design threshold could be increased to provide additional protection to 1 in 10-year as an example.</p>	Contradicts the position set out in the updated Outline Code of Construction Practice (REP11-015) which proposes a design standard of 1:10.
49	The Applicants have considered representations raised at previous hearings regarding the culverted solution	See SCC as Local Highways Authority response.



<p>proposed under Church Road. These include potentially limited space suitable road construction and the general detail around the inlet into the culvert. The Applicants have reviewed the concept design and consider that a buried piped outlet solution for the outfall from the National Grid and onshore substations SuDS basins. This could be accommodated under the existing road allowing approximately 150mm of cover which is permitted under the New Roads and Street Works Regulations subject to the agreement with the local highway authority, would not compromise existing services and would not require expansion joints on the road surface.</p>	
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**4. Responses to any further information requested by the ExAs for this deadline**

4.1 Not applicable