



SPR EA1N and EA2 Projects

Response to Comments on Letters from the Department of Business Energy and Industrial Strategy dated 20th December 2021

Interested Parties: Ian & Mary Shipman

PINS Refs: 2002 4363, 20024361, 2002 3179 and 20023176

Date: 31st January 2022

Introduction

1. We have lived in Friston for nearly 30 years and witnessed many flooding events, particularly since 2015 when heavy and intense rainfall has become much more common. Our home is only a few feet from the Friston Main River, into which the Applicants intend to discharge surface water.
2. Our house is also adjacent to [REDACTED] which receives flood water from the fields to the east, where the Applicants plan to locate their haul road and cable route. We have experienced internal flooding in our house on several occasions during more recent years and are particularly concerned as we would be impacted by run-off from the proposed locations of both the substation site and the onshore cable route.

Participation

3. We have participated in the pre-application consultation phases held by SPR and also in the Examination process, including making the following submissions on flooding:-

Deadline 1 - Written Representation [REP1-261]

Deadline 5 – Post hearing submission including submission of oral case [REP5-143]

Deadline 12 – Flooding in Friston [REP12-104] and Video of Flooding on 18 June 2021 [REP12-105]

4. Throughout the process from the Consultation phases, the Applicants have failed to take proper account of representations made to them on the flooding issues in Friston. As early as 19 July 2019, at a meeting with David Walker of SPR, we urged him to send a water engineer to Friston to evaluate the ability of the main watercourse to accept surface water from the proposed site. Matt Williams, Flood & Water Engineer of Suffolk County Council, had suggested we asked for this meeting, which he said he would also attend. David Walker initially agreed to this proposal but within two weeks, SPR rejected having such a meeting. As a result, no evaluation of the Friston Main River or the culvert in the centre of the village has been undertaken by the Applicants. This is a serious deficiency in the Application and is of great concern to those of us who live here.

Question 8 of BEIS letter of 20 December 2021 – Flood Risk

5. The Applicants' attention to flooding issues in general has been scant and certainly surface water flooding was not considered in its site selection process, despite the feedback given by residents during the consultation phases when other locations, with a lesser flood risk, were being considered. The RAG Assessment (APP-443) relied upon by

the Applicants as a tool for site selection only refers to pluvial flooding and not to surface water flooding.

6. Neither has there been any proper or full evaluation of the inevitable increased risk of flooding during the construction period. No considered proposals are in place for dealing with flood water from the haul road, where it enters the substation site, whose only route for disposal to a watercourse is via Grove Road to the Friston Main River, which in turn will also be receiving surface water from the substation site. This is a disaster in the making. We include below photographs of the field to the east south of Grove Wood and the discharge into Grove Road.



Field south of Grove Wood (proposed location of haul road/cable route)



Grove Road looking North

7. We would refer the Secretary of State to the video we submitted at Deadline 12 [REP12-105]. <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-005376-DL12%20-%20Ian%20and%20Mary%20Shipman%20-%20Flooding%20in%20Friston.mp4> which clearly demonstrates the volume and force of water discharged down Grove Road in times of heavy rain. Grove Road is turned into a river at least twice a year and floods multiple times a year.
8. The haul road/cable route is proposed to cross Grove Road in the same location as the source of this flooding. Due to the haul road's proposed construction of loose aggregate type material, it is inevitable that the turbidity of the surface water discharge will increase with multiple daily vehicle movements accessing the site over what could potentially be an 8-10 year construction period, when cumulative impact with other projects is properly taken into account.
9. All of the surface water from Grove Road is discharged into the Friston Main River at the junction of Grove Road and Church Path, where the Main River enters a culvert. This is the same river into which all surface water from the substation site is planned to be discharged. Below is a photograph of this junction where it can be seen that turbid flood water from multiple directions is being discharged.



Entry to culvert at junction of Grove Road and Church Path

10. The Applicants are now planning no less than 10 detention basins on the substation site during the construction period, which they say are over 1M deep but fail to specify what depth. As they claim that this will double the return period from 1 in 15 years to 1 in 30 years, it is assumed this will be a significant increase in depth. This raises many safety issues to people, animals and wildlife.
11. The plan within the OCoCP (REP12-022, Appendix 2, Figure 3) shows all these basins linking together and discharging into the Friston Main River. No details are given on how sediment will be removed from this discharge, which is a critical factor during the construction period.
12. The Friston River culvert has been recently surveyed (November 2021) on behalf of the Environment Agency using CCTV. The survey shows that the concrete culvert, which is 384M long, is already suffering from siltation, is cracked in places and has a wooden pallet within it. The Applicants have not undertaken any survey or assessment of this culvert to verify that it is adequate to accept run-off from both the haul road and substation site simultaneously or how further silt and debris would be prevented from entering the watercourse.
13. In their response to the SoS's questions of 2nd November, the Applicants refer at paragraph 8 to a *"shallow surface water flow route (comprising approximately 4cm of water depth during a 1 in 100 year storm)"*. This is entirely incorrect and can only have been erroneously concluded from a desk-top survey. The location they are referring to is a functional watercourse forming a network of drainage ditches across the fields north of the village.
14. This ditch is at least 1.5M deep and 3M across at the top and regularly conveys water east-west across the proposed NG substation site. In times of heavy rain, the ditch diverts water into a storage basin, which will also be removed due to the proposed permanent access road.

(Photo over)



East-west ditch running through NG substation site

15. The Applicants do not even appear to have surveyed their proposed site with any degree of accuracy. How they could have missed this important watercourse is incomprehensible, nor have they assessed any other surface water ditches which connect into this drainage system from the north.
16. SPR have not assessed the ability of the Friston Main River to accept the run-off from the substation site in combination with run-off from outside their order limits. They merely state that they will be able to control the run-off to the existing Greenfield Rate, without having even identified what that rate is.
17. Further SPR say that they will divert the “*shallow surface water flow route*” (or in fact drainage ditch) towards the north, without taking into account that this would be uphill. This is either incompetence or a complete lack of concern for the effects of their proposals.
18. What is the case is that, having failed to take account of surface water flooding during their site selection, the Applicants are now attempting to impose an unproven and inadequately considered construction drainage system onto an unsuitable site, which is already a source of flooding to the village of Friston.

19. The Applicants spent much time in the Examination defending their position that they did not need to consider cumulative impact with other proposed projects (National Grid Ventures' Nautilus & Eurolink, NGET's Sealink 1 and 2, North Falls etc) which propose to connect at Friston, should the NG substation be consented. SPR stated that there was insufficient information available to enable a Cumulative Impact Assessment to be carried out and NG avoided being present in the Examinations altogether, when they must have had knowledge of these projects, four of which are within their own group of companies.
20. However, since the Examination was extended by 3 months and BEIS have extended the decision period, the information on these coming projects is now very well-known. Nautilus has already held a non-statutory consultation locally and Sealink will be meeting with Friston Parish Council in February. All these projects would necessitate extensions to the new NG substation in Friston, with consequent adverse effects on drainage and flooding due to the larger impermeable areas combined with further congestion and activity on the site.
21. The additional projects would also extend the construction period in Friston to possibly 8 – 10 years. SPR are at best offering to design to a 1 in 30 year storm event based on a construction period of a maximum of 5 years for EA1N, EA2 and the NG substations. Suffolk County Council have proposed a 1 in 100 event, undoubtedly in consideration of the existing flood risk in Friston. Given that any or all of the additional projects could commence their own construction within the 5 year period, then the 1 in 100 event is far more appropriate. However, the congested and constrained site is unlikely to accommodate this return period, which is again a consequence of the failure of the Applicant to consider surface water flooding during site selection.

Question 7 in relation to badgers

22. As previously stated, we have lived in Friston for nearly 30 years and regularly walk over the proposed site using the historic Footpath 6, sadly also planned to be lost to the development. We have been aware for many years of the [REDACTED]
23. There is no evidence that the Applicants took any account of the presence of badgers in their site selection. No mention of the badgers is made in their RAG assessment, where only designated sites are considered and not any specific species.
24. In April 2021 the Applicants began intrusive "Ground Investigation Works" on the site consisting of trial trenching for archaeology, borehole and infiltration testing. They elected to carry out these works in the breeding season when there were ground-nesting birds such as skylarks on the site. It was not until after the works were completed around September 2021, [REDACTED]
[REDACTED]
Whether the badgers will return now the works have ceased is unknown.

25. Badgers prefer sandy soils which are easy to dig and this is the case with the existing location of the setts which are on the south/east side of the proposed development. Soils on the mid and northern part of the site are of clay, which badgers find less attractive and are likely to go elsewhere.
26. Natural England have asked that the Applicants provide an artificial sett but it would appear that to date a location has not been identified. This raises the question of where on the substation site could an artificial sett be provided during the construction period? Looking at the Works Plan (APP-011, Sheet 7) there would appear to be no land on the substation site available and in any event it is very unlikely that badgers would accept living on a busy and noisy construction site with artificial lighting. The Applicants have failed to properly consider this.

Conclusion

27. The Applicants completely failed to consider both surface water flooding and the presence of badgers on the substation site in their site selection process. This is now causing issues at this very late stage of the decision-making process, leaving SPR to desperately find a solution. They have however again failed to propose any viable answers to these problems, largely due to the constrained nature of the site and the pre-existing elevated flood risk to Friston.
28. National Grid are attempting to establish a new connection hub by stealth in this beautiful part of the Suffolk Coast. Both these applications by SPR include a new NG substation yet NG have declined to take part in the Examination process despite requests from the ExA to do so.
29. NG companies are actively promoting the Nautilus, Eurolink and Sealink projects intended to connect in Friston, when no Cumulative Impact Assessments have been carried out within these current Applications. No doubt this explains why NG did not attend the Hearings in the Examination as it was not in their interest to disclose information on these other projects. This is deplorable and the way in which connection offers are made by National Grid in the CION process should be thoroughly investigated by Government.