Nicholas Thorp [redacted]

30th January 2022

Submission - BEIS request for responses on Flooding & Ecology

IP ref EA1N: 20024417
IP ref EA2: 20024418

Dear Secretary of State,

Following responses published on 7th December 2021 and subsequent request by the Secretary of State issued 20th December 2021 for comments and responses I would like to concur with the submissions of Suffolk County Council and SASES specifically on flooding issues and the potential of EA1N & EA2s onshore development to greatly increase the risk of a significant flood event in Friston. SASES enlisted Clive Carpenter, Partner and Head of Water Resources at GWP Consultants to provide an independent report on Friston and flooding which was submitted during the examinations of EA1N & EA2 . As a Friston resident I urge you to read the report and SASES's submissions on flooding, as well as what was submitted to your request for further responses in December and at this additional consultation/feedback period.

Personal experiences of flooding in Friston

I live in Friston close to the water course/ditching to the north of the village. I have witnessed torrents of water flowing into the ditch from the fields to the north where SPR plans to build what will be a huge industrial complex. The Friston water course is not a river or a stream; it is little more than a ditch running through the village from north to south. This is joined in the middle of the village by other storm flows caused by water running off more fields on either side of Grove Road around the Church lane turning, flowing down the road into the centre of the village. I am informed much of the problem is the heavy clay below the top surface of the fields around Grove Wood, the water cannot get away fast enough and the current drainage system is breached whenever there is a significant amount of rain. This is illustrated by how SPRs archeology trenches, 75cm - 100cm deep, held water for days/weeks especially in those trenches along Grove road (see photographs Annex:1).

Flooding in the village has occurred numerous times as documented by SASES in their submission 18th November 2021. Luckily the majority of homes are spared flooding due to being elevated above the level of the flood water. A few homes situated to the east of the water course/ditch but in nearest proximity to the ditch suffer from repeated flooding.

SPR appears to have only carried out percolation testing post consultation & DCO examination. Residents here are worried that SPR has not been transparent on how the Friston site was selected or what assessments were made on flooding, as it seems only fluvial sources of flooding were considered (from rivers and waterways). As the main issue in Friston comes from surface water, SPRs work on flooding is not fit for purpose. The government's own flood mapping service shows

parts of Friston is Zone 3 and looking at an overlay of surface water flood issues you can clearly see the main issue is how water runs to the edge of the fields, then flows down through the ditching in Friston, too much water and the system is overwhelmed (see Annex 2). In simple terms flooding in the village is attributable run-off from the fields on which SPR proposes to build EA1N, EA2 substations and National Grid plans to build their grid connection facilities.

Please use the links below to watch video captured in January 2021 of evidence of water flowing off the fields Scottish Power propose to build substations on and down into the Friston ditch (water course):

[redacted]

SPR Response to BEIS request on Flooding - 007521-ExA.AS-2.SoSQ.V1 Applicants' Response

Site Selection 2.1 5/ states

"...The decisions made during site selection were based upon the analysis of data gathered from a range of sources, including primary data obtained during a series of specialist site surveys, and aided by the use of well-established appraisal tools to allow the clear and direct comparison."

However when questioned about RAG assessments and specifically on flooring issues at PIDs we were told that flooding assessments had been completed by desk based assessment. SPR representatives were not even aware that the fields they planned to build on were the main cause of historic flooding in the village. Equally worrying they were unaware that the governments own flood mapping showing parts of Friston as Zone 3.

SPRs Response 2.1, 7 states

"...In accordance with the guidance set out in both the NPS EN-1 and NPPF, the locations identified for the onshore substations and National Grid infrastructure are entirely within Flood Zone 1 and therefore on land that is at the lowest risk of fluvial flooding (defined as land which has a less than 1 in 1,000 annual probability of river flooding (<0.1%))."

Although 2.1 8/ SPR say

"...locations were also reviewed against the Environment Agency's surface water flood risk mapping and identified as being located in an area predominantly at very low risk of surface water flooding."

They appear to be looking just at the land on which they plan to build NOT attributing cause and consequence to the land on which they plan to build on.

2.1 11/ States:

"..Friston Surface Water Study (see section 3.6.1 of the OODMP (REP13-020)) confirms that there is no flood risk hazard to the onshore substation and National Grid infrastructure locations. 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"

I am no expert but this is completely misleading and wrong. If Suffolk County Council & East Suffolk Council are in agreement with SPR in a Statement of Common Ground, BEIS must fully investigate exactly what evidence was used and evaluated to corroborate this Statement of Common Ground. As other flood experts are not in agreement with what SPR says on flooding.

I live in the village and can tell you it is simply NOT accurate to say a major cause of flooding is not attributable to surface run-off associated with the proposed site. I have walked along these fields when water is running off into the pits, that then overflow allowing water to stream down the track and directly into the Friston ditching. **I am no expert but even I can look at flood mapping and the lay of the land and work out the issues of flooding as attributed to pluvial causes. It is clear to see that the land at Grove Wood is one of the main causes of flooding in Friston**.

If the Statement of Common Ground is untrue then you cannot take the subsequent proposals for SuDS and water management plans seriously as SPR is effectively in denial about the surface water issues on the land. The statement and assurances that their proposals will not increase flood risk to surrounding areas and specifically Friston are equally likely to be untrue.

I am by no means against offshore wind farm developments, however the way these prospects seek to bring power on shore is damaging and unacceptable. I am completely against developers being given the green light for inadequate onshore proposals. As Secretary of State for a Conservative government that says its priority is maintaining and growing protected land in the UK, we are simply not seeing this around the Suffolk Coast where you are quickly industrialising our AONB and countryside.

You have the final say on these proposals and I hope that you agree with the many many others that a split decision is the only acceptable conclusion. The offshore work can get a green light but onshore the developer should revisit how they intend to bring these connections onshore. Together with National Grid SPR must find a location where they can connect to the grid, providing a safe, least damaging connection point, where substations can be built that do not pose a serious risk to a village and homes.

Sincerely,

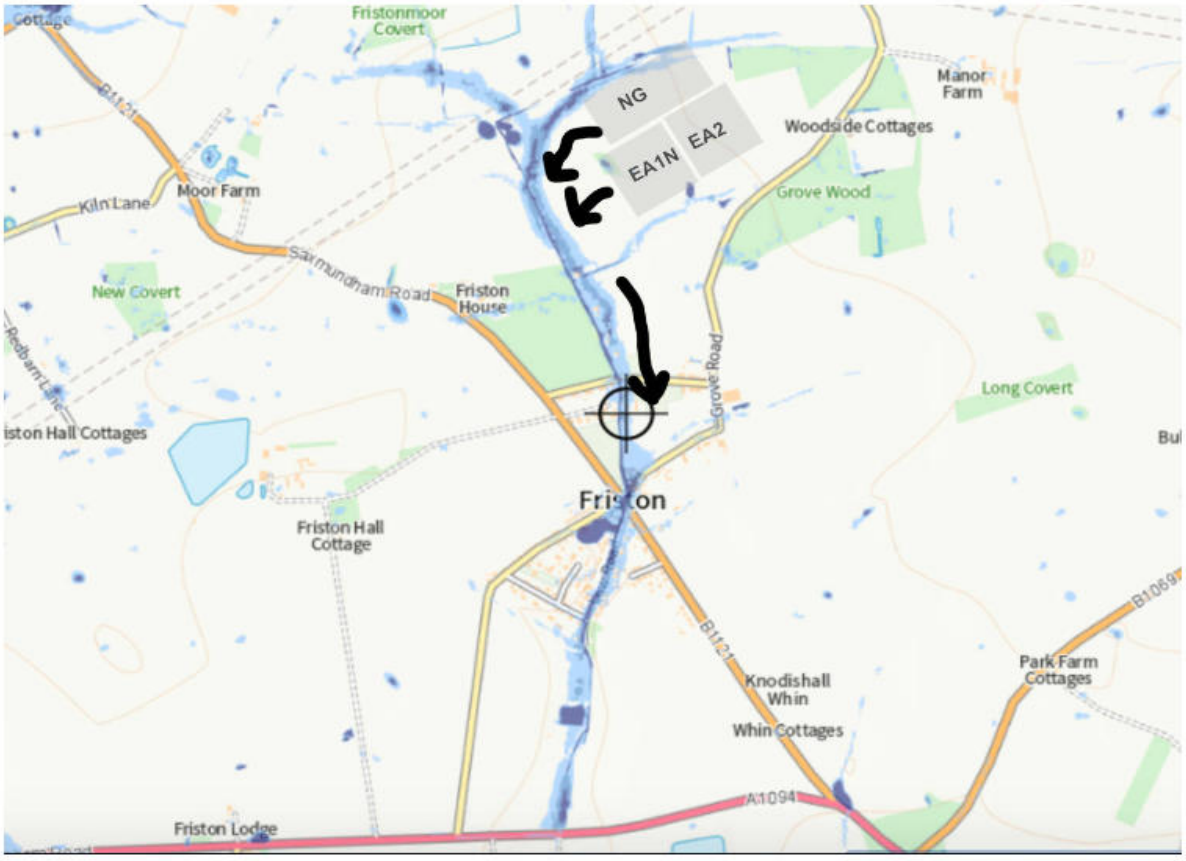
Nicholas Thorp

Annex 1

Archeology trench nearest to Grove road north of Friston water remaining 2 weeks after rain.

Archeology trench pointing towards Grove Wood 2 weeks after rain. Grove road runs to the right of this image.

Annex 2



Likelihood of flooding in this area

This location is in an area with a high probability of flooding

FLOOD ZONE 3

Land and property in flood zone 3 have a high probability of flooding

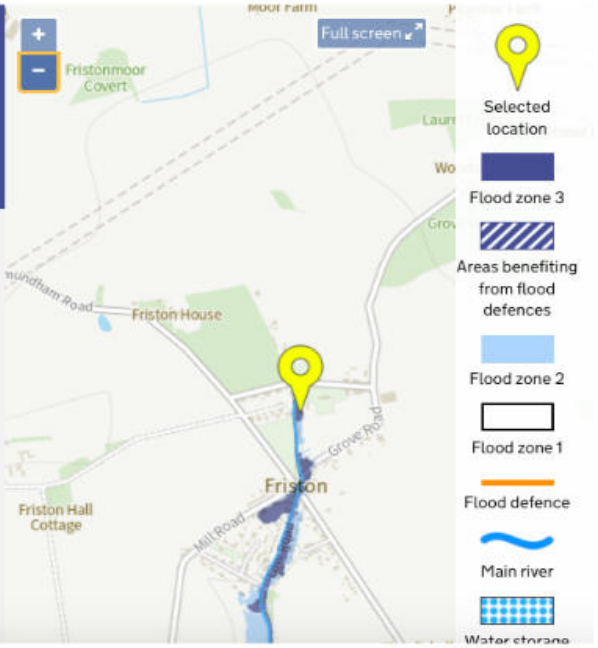
More information about flood zones

1 You must carry out a flood risk assessment for development in flood zone 3

2 For some types of development in flood zone 3 you must follow the Environment Agency's standing advice for carrying out a flood risk assessment

3 You can also read more about flood risk assessments for planning applications

Learn more about the potential sources of flood risk in



Flood maps with overlay of EA1N EA2 & NG substations in situ, arrows indicate the flow of water down toward the village and ditch.