

31 January 2022



Interested Party Registration identification numbers : 20024016 (EA1N) and 20024017 (EA2)

SCOTTISH POWER – EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO

Cable Corridor Flood Risk during Construction at Work Plan Nos. 19 and 20¹

[\[REP11-004\]](#) crossing the Hundred River valley and at residences in Gypsy Lane, Aldringham

1. Introduction

- 01 This is a response to paragraph 8 i of the letter of 20 December 2021 to all Interested Parties from Gareth Leigh, Head of Energy Infrastructure Planning at BEIS:

8. Flood Risk

- 02 *Suffolk County Council and Interested Parties are asked to comment on the Applicant's response to the Secretary of State's questions in the 2 November 2021 consultation letter regarding surface water and drainage management during construction. Parties are asked to comment on the updated construction surface water drainage proposals and the proposed amendment to requirement 22 (Code of Construction Practice) in Part 3 of Schedule 1 to the Development Consent Order which was submitted by the Applicants"*
- 03 I refer to two earlier submissions to the Secretary of State's letters of 2nd and 17th Nov 2021² and a submission to PINS ExA at Deadline 11³ [\[REP11-194\]](#) and [REP11-191](#) that included information and photographs of previous flooding incidents in Gypsy Lane, Aldringham.

2. Background

- 04 The Hundred River is a 'Main River' managed by the Environment Agency. Figure 5.24 of the Local Planning Authority Strategic Flood Risk Plan⁴ confirms the area of land adjacent to the Hundred River Cable Corridor crossing place as being within 'Flood Zone 3b' and by definition "a functional floodplain, land classified as having a 5% Annual Exceedance Probability (AEP) and land where water has to flow or be stored in times of flood. This land would flood with an annual probability of 1 in 20 (5 %) or greater in any year".

¹ Submission - 2.3.2 EA1N Works Plan – Version 07 Sheet 5– Sheet 5 illustrates Work nos. 19 and 20

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005220-2.3.2%20EA1N%20Works%20Plan.pdf>

² Response to SoS letters of 2nd and 17th Nov 2021

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-007539-W%20Halford%20-%20Letter%20to%20Secretary%20of%20State%20BEIS%2030%20Nov%202021.pdf>

³ Submission : Post hearing submission on Issue Specific Hearing 16 (ISH16), Session 2 – PART ONE

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005327-DL11%20-%20William%20Halford%20and%20Jane%20Rossin%20D11%20Post%20Hearing%20Submission%20on%20ISH16.pdf>

and Submission : Post hearing submission on Issue Specific Hearing 16 (ISH16), Session 2 –PART TWO

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005326-DL11%20-%20William%20Halford%20and%20Jane%20Rossin.pdf>

⁴ Suffolk Coastal and Waveney District Councils Level 1 Strategic Flood Risk Assessment April 2018

3. Re: Question 8 Flood Risk, sub paragraphs i and ii

- 05 The Applicants have not identified a potential for incremental flood risk at residential receptors on low lying ground in Flood Zone 2 and situated close to Cable Section 3b at Work No.19¹ east of B1122 Aldeburgh Road.
- 06 When selecting a substations site, the Applicants decided upon a route from landfall to Friston that would cross the Hundred River and pass through the North-South midpoint of Aldringham village. Two cable corridors with up to 70 metres combined width would cross the Aldringham Hundred River and its floodplain at Work no 19.
- 07 No alternative routes to Friston were evaluated and no expert assessment has been made of additional impact of cable corridor construction works over and above the present fluvial and pluvial flood risk across the Hundred River and its flood plain.
- 08 The primary concern here is with the likelihood of increased risk of flooding resulting from displacement of surface water from one or two impermeable haul roads and large hardcore HGV turning areas at the Hundred River Functional Floodplain in Aldringham along both river banks. This would be compounded in the event of an inundation during construction of the proposed Hundred River 'open cut trench' Watercourse Crossing river diversion which will entail diversion of the river flow through 24/7 over pumping via pipes or via flumes, just a few metres upstream from the residences downstream.
- 09 Additionally, after a period of heavy rainfall, construction works and loss of permeable land and woodland on higher land at Work No 20 to the west side of Aldeburgh Road could deposit surface flood water in Gipsy Lane where there are two residences within 18 metres distance from Functional floodplain 3b.
- 10 It is well understood that the schedule for construction of EA1N may well not be concurrent with that for EA2. Additionally, at least three other projects (National Grid's Nautilus, Eurolink and Sealink Interconnectors) have announced plans for, or have already commenced, their onshore surveys alongside the EA1N / EA2 cable corridors. One can foresee a series of projects extending up to 10 years duration (worst case). The combined impact of so many projects at this 'pinch point' could hardly be considered 'temporary'. It is therefore unfortunate that the flood risk sequential and exception test disciplines stipulated by NPS EN-1 for major energy infrastructure project planning applications were not applied at this section of the cable routes during Site Selection.
- 11 The Applicants' proposed return period of 1 in 10 for the entire onshore cable route is arbitrary and takes no account of the risk to residences near the Hundred River and duration of construction activities at this section of the cable route. The application of a 1 in 10 return period for flood risk mitigation design at the Hundred River crossing would seem to be inadequate.
- 12 Suffolk County Council has not provided the Secretary of State with data on significant flooding events near the Hundred River. However, there are only three houses at and along Gipsy Lane and it is understood that residential flooding locations are not determined as significant unless five or more residential properties have been affected. Residents there accept as a regular event flooding due to Hundred River bank overtopping following a period of significant rainfall. It would only be reported to the County Council if the highway itself is affected or else in circumstances where the Council might be expected to provide assistance, for example by clearing blocked roadside drains. The local Parish Council tells me that it does not retain records of flooding events.

- 13 Figure 3 'Example Construction Surface Water Drainage Scheme for a Section of the Onshore Cable Route' of Outline Code of Construction Practice V09⁵ [REP13-005](#) provides an illustration of how the Applicants might mitigate flood risk at Work No 19. This indicative example of flood risk mitigation does not provide convincing evidence that measures to mitigate flood risk can be accommodated and effective within the order limits along the entire length of section 3b of the cable route which is subject to width and other constraints.
- 14 In Plate 11.1 on page 52, 'Example of How to Control Surface Water and Sediment will be controlled within the onshore Cable Route' the Applicants have substituted the previous description of an 8.4 wide tranche within the design of each cable corridor cross section as illustrated in para. 68 of 6.4 Environmental Statement - Non-Technical Summary⁶ [APP-572](#): 'Top Soil Stockpile 1 Stand Offs' with a different description: 'Indicative location of surface water drainage management measures'. It is unclear whether that would be feasible along cable section 3b or what might be the implications.
- 15 Surface water flood risk at Work Nos 19 and 20 might have been avoidable had the Applicants been prepared to seriously consider a non-HDD Microboring trenchless solution for crossing those sections of the Cable Route, as was suggested by several Interested Parties during the Planning Inspectorate examination of the Applicants proposal.

END

⁵ Deadline 13 Submission - 8.1 EA1N Outline Code of Construction Practice (Clean) (Version 09)
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005605-8.1%20EA1N%20Outline%20Code%20of%20Construction%20Practice.pdf>

⁶ 6.4 Environmental Statement - Non-Technical Summary
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001005-6.4%20EA1N%20Environmental%20Statement%20Non-Technical%20Summary.pdf>