

Stonestreet Green Solar

Environmental Statement

Volume 4: Appendices

Chapter 10: Water Environment

Appendix 10.4: Aldington Flood Storage

Area Risk Assessment

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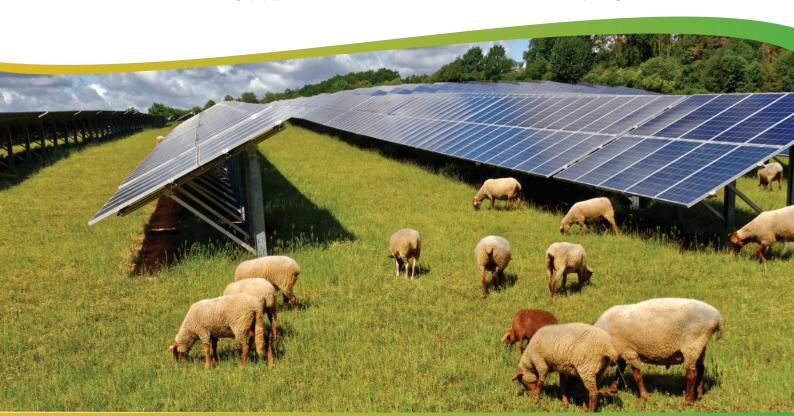
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The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009







Appendix 10.4: Aldington Flood Storage Area Risk Assessment

Stonestreet Green Solar

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Basis of Report

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1.0 Introduction

- 1.1 This Aldington Flood Storage Area Risk Assessment ('AFSA Risk Assessment') has been prepared on behalf of EPL 001 Limited ('the Applicant') to identify potential risks on the function or efficacy of the Aldington Flood Storage Area ('AFSA') in relation to the Development Consent Order ('DCO') application for Stonestreet Green Solar ('the Project').
- 1.2 The Project comprises the construction, operation, maintenance, and decommissioning of solar photovoltaic ('PV') arrays and energy storage, together with associated infrastructure and an underground cable connection to the existing National Grid Sellindge Substation.
- 1.3 The Project will include a generating station (incorporating solar arrays) with a total capacity exceeding 50 megawatts ('MW'). The agreed grid connection for the Project will allow the export and import of up to 99.9 MW of electricity to the grid. The Project will connect to the existing National Grid Sellindge Substation via a new 132 kilovolt ('kV') substation constructed as part of the Project and cable connection under the Network Rail and High Speed 1 ('HS1') railway.
- 1.4 The location of the Project is shown on **ES Volume 3**, **Figure 1.1**: **Site Location Plan (Doc Ref. 5.3)**. The Project will be located within the Order limits (the land shown on the **Works Plans (Doc Ref. 2.3)** within which the Project can be carried out). The Order limits plan is provided as **ES Volume 3**, **Figure 1.2**: **Order limits (Doc Ref. 5.3)**. Land within the Order limits is known as the 'Site'.

Baseline Description

East Stour River

1.5 The East Stour River is an Environment Agency ('EA') main river¹ which flows from east to west through and away from the Site to join the Great Stour 5.7km north west of the Site in Ashford. Upstream of the Site, the East Stour River drains a catchment area² of approximately 33.7km².

East Stour River Catchment (Aldington Flood Storage Area)

1.6 As shown in **Annex A**, a flood barrier is located within the Site on the channel and across the floodplain of the East Stour River. The structure is owned and maintained by the EA.



- 1.7 The land upgradient (east) of this embankment is referred to as the 'AFSA'. The AFSA is designed to store (attenuate) fluvial flows from the East Stour River during periods of fluvial flooding to reduce the flood risk downstream. The extent of the AFSA is shown on **ES Volume 3, Figure 10.3: Local Hydrology (Doc Ref. 5.3)**.
- 1.8 The EA have advised through consultation that upstream of the embankment the AFSA provides approximately 1,280,000 m³ of storage below the spillway crest level of 50.2mAOD covering an area of approximately 0.74 km².
- 1.9 Fluvial flows are able to pass through the embankment along the channel of the East Stour via a fish pass that includes a 300mm diameter orifice. This restricts flows to a discharge rate of 0.34 m³s⁻¹. When water levels are high enough, a proportion of the flow is diverted into a watercourse (Unnamed Tributary 3 see **ES Volume 3, Figure 10.3: Local Hydrology (Doc Ref 5.3)**) via a side weir. Flows in this channel passing through the embankment are restricted to a maximum of 4 m³s⁻¹ by means of a vortex flow control device.
- 1.10 If flows entering the AFSA exceed the capacity of these two routes, then water backs up and floods the land within the AFSA. This typically happens on several occasions each year. In the event that the capacity of the AFSA is exceeded, water over tops the embankment via the spillway and rejoins the main channel of the river (and its floodplain) downstream.

Background and Objectives

- 1.11 This report has been prepared to address the relevant EA S42 response to the PEIR (dated 28 November 2022) which states:
 - "We would reiterate that the red line boundary includes land that is part of the Aldington Flood Storage Area (FSA). It is essential that that the development does not in any way compromise the function or efficacy of this flood risk management structure or our ability to undertake maintenance or improvements. Without additional details and an assessment of risk we are unable to confirm if any development within the FSA would be acceptable."
- 1.12 The assessment provided in this report was informed by a discussion with the EA on 2 August 2023 and the representation made by the EA to the Planning Inspectorate on the 5th September 2024. The objectives of this assessment are to:
 - Identify and assess risk to the AFSA associated with the construction and decommissioning phases of the Project; and



- Identify and assess risk to the AFSA associated with the operation of the Project including the physical location of any proposed infrastructure.
- 1.13 Drawing reference 142-02-48-EA-01 AFSA-SSG Overlap ISS02 is provided in **Annex A** which shows the extent of the Site and the proposed development in the area around the AFSA embankment. This drawing is based on the **Works Plans (Doc Ref. 2.3)** and shows how the Project interacts with a buffer around the embankment as provided by the Environment Agency and shown in **Annex B**.
- 1.14 The **Design Principles (Doc Ref. 7.5)** state the following principles which are relevant to the AFSA embankment:
 - Offsets from the Aldington Flood Storage Area (AFSA) A buffer will be provided from the toe of the AFSA embankment as shown in **Annex A**. This buffer extends at least 8m from the toe of the raised embankment and extends beyond this to align with the wider standoff requested by the Environment Agency as shown in **Annex B**.
 - No new physical infrastructure will be developed within this buffer other than:
 - approximately 40m section of the internal haulage road associated with Work No. 7 during the construction and decommissioning phases;
 - The access track where it enters the Project Substation the works associated with this are above ground only comprise improvements to the surface treatment only; and
 - Approximately 10m section of the cable route to the Project Substation which crosses the northern most section of the Primary Access Track.
 - The internal haulage road required for construction and decommissioning will be provided using a permeable surface. No below ground excavation works will be undertaken for the internal haulage road.
- 1.15 Drawing 142-02-48-EA-02 Duct Area ISS01 is provided in **Annex C.** This shows indicative details for the proposed cable where it crosses the access to the AFSA embankment.
- 1.16 **Annex D** provides a relevant extract (Sheet 3 of 5 only) of the **Illustrative Landscape Drawings (Doc Ref. 2.7)** showing the illustrative landscape proposals within the wider extent of the AFSA.
- 1.17 A description of the Project is provided in **ES Volume 2, Chapter 2: Project Description (Doc Ref: 5.2)**.



2.0 Risk Assessment

- 2.1 Risk assessment tables are provided below for both construction and decommissioning phases (**Table 2-1**) and the operational phase (**Table 2-2**) of the Project. These set out specific activities and aspects of the Project that could theoretically result in adverse impact to the function of the AFSA. Tables 2-1 and Table 2-2 should be read in conjunction with Drawing reference 142-02-48-EA-01 AFSA-SSG Overlap ISS02 in **Annex A**, drawing 142-02-48-EA-02 Duct Area ISS01 in **Annex C** and the **Works Plans** (**Doc Ref. 2.3**) included within **Book 2: Plans**.
- 2.2 Consideration is given to whether risks are significant in the light of proposed mitigation as secured through the design of the Project or for activities during the construction and decommissioning phases, along with other measures which would be secured through the **Outline CEMP (Doc Ref. 7.8)** and the **Outline DEMP (Doc Ref. 7.12)**.

Table 2-1: Construction and Decommissioning Risk Assessment

Activity	Consequence	Discussion	Risk
Development activities occurring in close proximity to the AFSA embankment	Damage to embankment and requirement for Flood Risk Activity Permit ('FRAP')	Aside from the three elements listed in paragraph 1.11 no new physical infrastructure will be located within 8m from the toe of the AFSA embankment or otherwise within the AFSA buffer zone (as secured by the Design Principles (Doc Ref. 7.5)).	Low
		The approximately 40m of temporary internal haulage road required for construction and decommissioning (associated with Works No. 7) will be provided using a permeable surface. No below ground excavation works will be undertaken for the internal haulage road.	
		The access track where it enters the main project substation will only comprise improvements to the surface treatment. No excavation will be required.	
		The cable route into the project substation crosses the buffer zone for the AFSA embankment right at its northern end. This is more than 16m from the raised embankment and so should have no structural impact. It has also been aligned	



Activity	Consequence	Discussion	Risk
		so that this element of the works will not restrict access in any way. As set out in Schedule of Other Consents and Licenses (Doc Ref. 3.4) these works will only be progressed subject to receipt of a FRAP from the EA	
Major engineering activities in proximity to the AFSA embankment	Damage to embankment through subsidence and settling	No significant engineering activities will be undertaken within 8m of the AFSA embankment during either the construction or decommissioning phases of the Project.	Low
Excavations in proximity to the AFSA embankment	Damage to embankment through subsidence and settling	As shown on the Works Plans (Doc Ref 5.3) the PV panels and the cable trenches that wire them all together are deliberately located outside 16m from the toe of the AFSA embankment. On this basis no significant excavations are expected in close proximity to the AFSA embankment.	Low
		The only excavation that may be required within 16m of the toe of the AFSA embankment will be shallow and associated with landscaping works or the construction of the security fence. Such works are highly unlikely to give risk to any subsidence or settling.	
		As set out in Schedule of Other Consents and Licenses (Doc Ref. 3.4) these works will only be progressed subject to receipt of a FRAP from the EA.	
Piling in proximity to the AFSA embankment (Project Substation)	Damage to embankment through vibrations	The development platform level of the Project Substation will be no greater than 56m above ordnance datum (AOD) and no lower than 55m AOD. The development platform will contain retaining structures. The engineering design of the development platform is anticipated to comprise a 5m contiguous bored pile wall (to the north and west of the platform). These would be installed using the Continuous Flight Auger ('CFA') method. CFA piling has inherently low levels of vibration when compared to traditional piling (e.g. vibratory or percussive)	Low



Activity	Consequence	Discussion	Risk
		methods. The installation of contiguous bored piles would be unlikely to give rise to significant vibration levels and this approach is typically suitable for vibration-sensitive applications. Contiguous bored piles are only expected to be required along the western and northern sides of the Project Substation	
		and for the 132kV transformer foundations, and piling will be more than 8m from the AFSA embankment.	
Piling in proximity to the AFSA embankment (foundations for PV panel mounting structures)	Damage to embankment through vibrations	All permanent physical infrastructure will be located at least 8m from the toe of the AFSA embankment (as secured by the Design Principles (Doc Ref. 7.5)). This includes the PV arrays and therefore piling for the PV mounting structures will not be required in direct proximity to the AFSA embankment.	Low
		Mounting structures for PV panels will be supported on preformed metal piled foundations installed to a maximum depth of 3m below ground level ('BGL'). Alternatively, a non-intrusive mounting solution that uses pre-cast reinforced concrete blocks or similar, to provide ballast to support the PV panels would be used should piled foundations not be appropriate.	
Restrictions on access for maintenance and improvements to AFSA embankment during construction	Embankment temporarily inaccessible for	The Outline CEMP (Doc Ref 7.8) and Outline DEMP (Doc Ref. 7.12) secure measures to ensure access will be available at all times for the EA.	Low
	emergency repairs	It is acknowledged that a cable route crosses the access to the AFSA embankment. As illustrated in Annex C it is envisaged that this section of the cable route would be formed using ducting with the northern and southern half of the ducting installed separately to retain half width access to the AFSA embankment at all times. The cables would then be pulled though at a later date with no further impact to access.	
		The installation of the ducting would be progressed as quickly as possible to	



Activity	Consequence	Discussion	Risk
		minimise the duration for which access could be restricted. Work would also be scheduled for summer months to further reduce any risk,	
		Access would be further guaranteed by having road plates on standby during the construction process that can be dropped over the open half of the duct trench if at any stage full width access was required during the limited period of ducting installation.	
		More generally a minimum 8m buffer will be provided from the toe of the AFSA embankment during the construction and decommissioning activities, within which there will be no new physical infrastructure other than a short section (approximately 40m) of the internal haulage road. This will ensure that the existing access route along both the western and eastern sides of the embankment, used by the EA, remains accessible at all times during both the construction and decommissioning phases.	
Temporary infrastructure installed within close proximity of AFSA embankment	Restriction of access to embankment and requirement for FRAP	As illustrated in Annex A , a short section of the internal haulage road (approximately 40m) will extend just within the 8m buffer from the AFSA embankment on the downstream side. The internal haulage road will comprise the laying of ground protection mats and no below ground excavation works will be undertaken. All other temporary infrastructure will be located outwith the 8m buffer zone.	Low
Construction activities within AFSA	Additional debris or minor temporary changes in flood storage capacity	restricted to the creation of landscape features, biodiversity improvement areas,	Low



Activity	Consequence	Discussion	Risk
		the AFSA as described in ES Volume 4, Appendix 10.5: Schedule of Watercourse Crossings (Doc Ref. 5.4).	
		The Outline CEMP (Doc Ref. 7.8) requires an Emergency Flood Response Plan ('EFRP') to be provided as part of the detailed CEMP(s). The Outline CEMP (Doc Ref. 7.8) also includes a commitment to avoid storage of materials and stockpiling within the AFSA. In the event of a period of elevated flood risk (as identified via the EA flood warning service or on-site observations), construction areas within the AFSA would be secured and cleared and the area evacuated.	
Decommissioning	Damage to embankment and requirement for FRAP	Decommissioning works will be broadly similar in extent and disturbance to those relating to construction and, as already outlined, the same standoff (i.e. 8m) to the toe of the AFSA embankments will be applied. These works are therefore unlikely to give rise to additional impacts to the AFSA beyond those considered for construction.	Low



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Table 2-2: Operational Risk Assessment

Activity	Consequence	Discussion	Risk
Infrastructure installed within close proximity of AFSA embankment	access to	An 8m stand-off between the toe of the base of the AFSA embankment. No permanent physical infrastructure will be developed within this zone.	Low
access to AFSA embankment	access to embankment	The 8m buffer between the toe of the AFSA embankment and new physical infrastructure will ensure that the existing access route along both the western and eastern sides of the embankment remain accessible during the operational phase of the Project.	Low
		Upgrades to the existing track surface around the entrance to the Project Substation, and ongoing maintenance by the Applicant, will help ensure access to the embankment and AFSA is not impaired over the lifetime of the Project.	
		The detailed OMP will be required to include measures to allow the EA appropriate access to the AFSA (as secured by the Outline OMP (Doc Ref. 7.11) .	
Changes in flood storage within the		No PV panels are proposed within the AFSA.	Low
AFSA	flood attenuation	The Project Substation (including all associated drainage management measures) will be located on land that is currently (and will remain) outside the extent of the maximum impoundment for the 0.1% AEP flood event. The development platform level of the Project Substation will be no greater than 56m above ordnance datum (AOD) and no lower than 55m AOD. The development platform will contain retaining structures.	
		Above ground changes within the AFSA are restricted to improvements in landscape planting, and biodiversity enhancement areas and the creation of a wetland area for final polishing (i.e. water	



Activity	Consequence	Discussion	Risk
		quality control) of storm water discharge from the Project Substation.	
		Electrical cables will be routed through the AFSA however, the ground level will be restored to existing levels in line with standard practice and therefore once completed there is no potential for impacts on storage capacity within the AFSA.	
		Habitat scrapes / ecological depressions are proposed within the AFSA as part of the Illustrative Landscape Drawings (Doc Ref. 2.7) (extract presented in Annex D). A wetland area is also proposed within the AFSA, as described in the Outline OSWDS (Doc Ref. 7.14), to provide pollution control for runoff from the Project Substation. These scrapes / depressions will increase the available flood storage within the AFSA and not adversely impact on flood risk.	
		Therefore, the only changes in ground elevation within the AFSA will be shallow excavations which will contribute to increasing the capacity of the flood storage available.	
Vegetation Management with AFSA	debris that could affect flow in the event of	The landscape proposals within the AFSA will not specifically encourage the creation and growth of trees and so there should be no change in the generation of woody debris.	Low
	flooding	Landscape management measures secured through the Outline LEMP (Doc Ref 7.10) will include for the removal of cleared vegetation from the AFSA.	



3.0 Conclusion

3.1 This assessment concludes the construction, operation and decommissioning of the Project poses a low risk to the structure and operation of the AFSA. As such, the Project will not affect the function or efficacy of the AFSA or the AFSA embankment or the EA's ability to undertake maintenance or improvements now or in the future.



4.0 References

- 1 Environment Agency. (2023). Statutory Main River Map, Available at: https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53 dfc524433980cc333726a56386. (Accessed February 2024).
- 2 UK Centre for Ecology and Hydrology. (2023). Flood Estimation Handbook Web Service. Available at: https://fehweb.ceh.ac.uk/Map. (Accessed February 2024).



Annexes





Annex A: Overlap with Aldington Flood Storage Area

Appendix 10-4: Aldington Flood Storage Area Risk Assessment

Stonestreet Green Solar

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Annex B: Aldington FSR standoff area

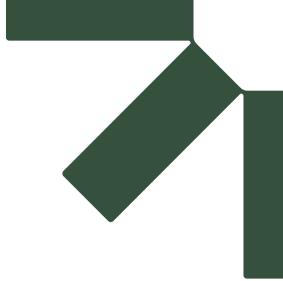
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Annex C: Illustrative Duct Area

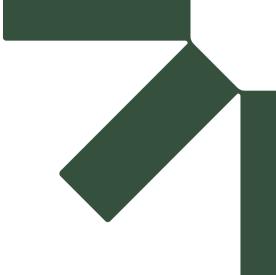
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Annex D: Illustrative Landscape Drawing (Sheet 3 of 5) – within AFSA

Appendix 10-4: Aldington Flood Storage Area Risk Assessment

Stonestreet Green Solar

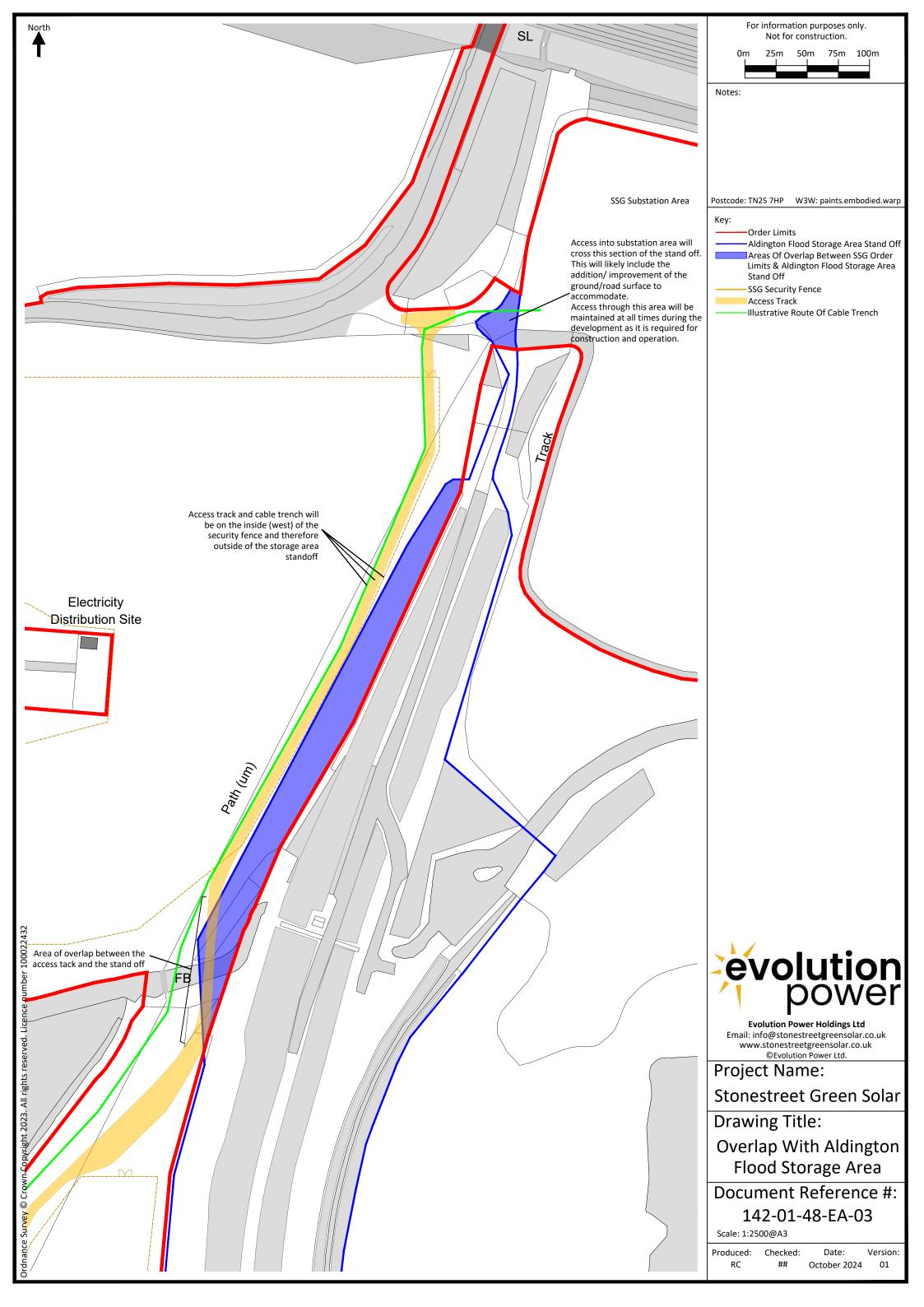
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5.0 References

- 1 Environment Agency. (2023). *Statutory Main River Map*, Available at: https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc52443 3980cc333726a56386. (Accessed February 2024).
- 2 UK Centre for Ecology and Hydrology. (2023). *Flood Estimation Handbook Web Service*. Available at: https://fehweb.ceh.ac.uk/Map. (Accessed February 2024).



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Metres

