

# SP MANWEB

## Reinforcement to the North Shropshire Electricity Distribution Network



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Environmental Statement Appendix 9.3

Flood Risk, Water Quality and Water Resources Scoping Opinion Response

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November 2018



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**Reinforcement to the North Shropshire  
Electricity Distribution Network**

**APPENDIX 9.3**

**FLOOD RISK, WATER QUALITY AND WATER  
RESOURCES**

**SCOPING OPINION RESPONSE**

**Environmental Statement**

**DCO Document 6.9.3**

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**The Planning Act 2008**

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

**Regulation 5(2)(a)**

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**Environmental Statement: Appendix 9.3 – Flood Risk, Water Quality and Water Resources Scoping Opinion Response**

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## APPENDIX 9.3:

# FLOOD RISK, WATER QUALITY AND WATER RESOURCES SCOPING OPINION RESPONSE

### 1.1 INTRODUCTION

1.1.1 This section provides the response to the hydrology (flood risk, water quality and water resources) assessment comments raised by the Secretary of State (SoS) within the Scoping Opinion<sup>1</sup>.

1.1.2 The following table lists the issues raised by the SoS within the Scoping Opinion and how these are addressed in the Environmental Statement (ES).

Table A9.3.1 – Issues Raised and Responses to the Scoping Opinion		
Paragraph	Issue Raised by SoS	Response
Hydrology		
3.70	The SoS notes in the description of the Proposed Development that concrete foundations are unlikely to be used but that this is not entirely ruled out. The ES should include an assessment of the worst case or the DCO should include measures to specifically rule the option out.	Ground surveys show that it is unlikely that there will be a need for concrete foundations along the route. However, the ES is based on the worst case scenario.
3.71	The SoS notes the intention to carry out a 'water features survey' in line with the advice from the Environment Agency (see Appendix 3 of this Opinion). However, the Scoping Report also states that effects on water resources will be scoped out because mitigation measures will be provided which will avoid significant effects (Scoping Report paragraph 11.6.9). The ES	Chapter 9 'Flood Risk, Water Quality and Resources' ( <b>DCO Document 6.9</b> ) and Appendix 9.1 ( <b>DCO Document 6.9.1</b> ) details what, and how, resources have been considered. No significant effects have been identified.

<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020021/EN020021-000012-Scoping%20Opinion.pdf>

**Table A9.3.1 – Issues Raised and Responses to the Scoping Opinion**

Paragraph	Issue Raised by SoS	Response
	<p>should clearly explain how effects on water resources have been considered and how significant effects have been mitigated. The Applicant is advised to agree the methods for carrying out any water features survey with the Environment Agency.</p>	
<p>3.72</p>	<p>Although it is not explicitly stated within the text of the Scoping Report, it appears that a Flood Risk Assessment (FRA) will be carried out but only for those points where the Proposed Development crosses Flood Zone 3. The reasons for restricting the FRA to Flood Zone 3 are not explained. The ES should provide sufficient information on flood risk as it relates to the development or that generated by the construction phase of the development. The SoS notes that it is stated in Table 6.2 that the DCO application will be accompanied by a Flood Consequence Assessment. The SoS assumes that this was intended to refer to a FRA.</p>	<p>A Flood Risk Assessment is provided as <b>DCO Document 5.2</b>.</p>
<p>3.73</p>	<p>The Applicant’s attention is also drawn to the comments from the Environment Agency in Appendix 3 of this Opinion, which points out that there are a number of small ordinary watercourses which have not been included in their Flood Map and which should be included in the FRA. The Applicant is strongly recommended to agree the methodology for carrying out the FRA with the Environment Agency.</p>	<p>The published extent of surface water flooding areas has been used to assess areas at risk. The methodology of the Flood Risk Assessment was agreed with the Environment Agency.</p>
<p>3.74</p>	<p>It would be helpful if the ES explained the justification for the</p>	<p>The extent of the surveys and study</p>



**Table A9.3.1 – Issues Raised and Responses to the Scoping Opinion**

Paragraph	Issue Raised by SoS	Response
	extent of the survey areas shown on Figures 11.1 and 11.2. The ES should also explain the methodologies used to carry out the assessments with reference to any professional guidance that has been relied on.	area is detailed in Section 9.3 of Chapter 9 'Flood Risk, Water Quality and Resources' ( <b>DCO Document 6.9</b> ), of this ES.
3.75	The SoS notes that the definition of magnitude of effect is confusing, and that there is an apparent overlap between the definitions of 'medium' and 'high' magnitude of effect. The criteria used to determine the significance of effect must be clearly defined and justified in the ES.	Defined in Appendix 9.1 ( <b>DCO Document 6.9.1</b> ).
3.76	In relation to the requirement for carrying out a Water Framework Directive (WFD), the SoS notes comments by the Environment Agency regarding distances of poles from watercourses. The SoS suggests that the Applicant review this response and justify the approach to the WFD. If distance of poles from watercourses is required to be stipulated, this should be secured through the DCO.	Noted
3.77	The Applicant's attention is drawn to the comments of the Canal and River Trust, contained in Appendix 3 of this Opinion, particularly in respect of potential impacts on the Montgomery Canal and its structures.	Noted