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EIA Advisor
Planning Inspectorate
By email: LionlinkInterconnector@planninginspectorate.gov.uk

www.anglianwater.co.uk

Our ref: Lion Link/scoping consultation

12th April 2024

Dear Jack,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Application by National Grid LionLink Ltd (NGLLL) (the Applicant) for an Order granting Development Consent for the LionLink Interconnector

Thank you for seeking our advice on the scope of the Environmental Impact Assessment Scoping Report for the LionLink Interconnector project (the Project) in your consultation dated and received on 7th March 2024.

Anglian Water is a statutory consultee for nationally significant infrastructure projects within our region, as the statutory sewerage undertaker within the identified project area on the GB onshore portion of the Project within East Suffolk.

The Proposed Onshore Scheme Scoping Boundary – Anglian Water existing infrastructure

Anglian Water notes in 1.6.4 of the Scoping Report, that the proposed onshore scheme includes two landfall options, two underground cable corridor options, Friston substation, and Saxmundham converter station. Existing infrastructure noted in 1.6.5 references the significant infrastructure within the scoping boundary including high voltage overhead lines, the railway line and the A12. However, there will also be other utilities infrastructure within the onshore scoping boundary (Figure 1-2) potentially impacted by the onshore scheme, including Anglian Water sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres).

It is noted that the cable corridors may include up to two projects for the HVDC underground cables and up to three projects for the HVAC underground cables, that may result in greater number of interfaces with our assets if ducting is provided for additional projects within the cable corridors as it would necessitate a greater working area. However, we would support the opportunity to coordinate projects as far as possible, with the potential to minimise disruption. However, it is noted that the construction timeframe extends considerably when incorporating additional projects,

but such coordination would have the scope to minimise environmental impacts, maximise operational and capital carbon efficiencies, and minimise the number/instances of infrastructure diversions.

Utilities Failures [Appendix 28-A - Table 28-A-1: Major Accidents and Disaster Screening Table]

Anglian Water notes that the Project would be designed and constructed to appropriate design standards in respect of the crossing of sewerage network utilities, including consultation and agreement with the asset owners. The Scoping Report identifies that the Project is not considered to be vulnerable to sewage incidents or lead to any increased risk of a major accident or disaster and therefore is proposed to be scoped out from further assessment in the EIA. Anglian Water agrees that protective provisions in the draft DCO for the protection of any identified Anglian Water assets within the Order Limits are necessary to ensure that the operation of our apparatus is safeguarded, and the appropriate measures are undertaken in respect of any diversions that might be required as part of the proposed scheme. Approved works would need to be conducted in accordance with the Water Industry Act 1991.

There are pressurised rising mains within the scoping boundary for the proposed cable corridors and any underground foul drainage assets affected by the proposed scheme would require ground investigations to identify precise locations to avoid any damage when the onshore scheme interfaces with our assets, or locate assets if diversions are required. Potential impacts can vary depending on the size and depth of our pipes and if they are operating under pressure - this will be addressed through appropriate stand-off distances in the protective provisions. Depending on the landfall and subsequent cable corridor selected once further technical work has been undertaken, there will be varying degrees of interfaces with our assets.

Connections

Paragraphs 2.3.58 and 2.3.68 state that primary and secondary temporary construction compounds would be needed for the project to support the construction of the converter station and substation (or additions to the substation) and the cable corridors. It is accepted that the number and location of these will be determined during ongoing design development. In addition, the proposed converter station is likely to include the provision/installation of permanent services including foul drainage [2.3.65] although similar requirements are not noted for Friston Substation potentially due to the distance to the nearest sewer network.

Anglian Water would seek to understand whether wastewater connections will be required for onshore infrastructure and temporary construction compounds and recommend the Applicant engages with Anglian Water at an early stage when likely connections are known. It is noted from the Assessment of Alternatives (Chapter 3) converter station, there is a preference for site option 3 which could potentially connect to our Saxmundham WRC network depending on the siting of the converter station within the proposed site, and coordination/co-location with the Sea Link converter station.

Hydrology, Hydrogeology and Drainage (including flood risk)

Anglian Water welcomes the statement [12.7.10] that flood risk from and to the proposed Onshore Scheme will be assessed as part of the EIA – from pluvial, fluvial, reservoir, coastal, sewer and groundwater flooding, together with changes in flood risk from all sources as a result of the proposed onshore scheme. We consider that this should help to avoid increased risk of ground water infiltration/surface water ingress to our wastewater networks that may lie in the vicinity of the proposed onshore scheme.

The flood risk assessment as part of the EIA, should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks, particularly in terms climate change impacts. The likelihood of more extreme weather events leading higher than average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24 mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure. We agree that the potential impacts that lead to changes to groundwater and surface water flows as a result of the construction phase should be scoped in given the potential for increased flood risk for sensitive receptors and critical infrastructure [Table 12-7].

Anglian Water welcomes potential embedded design measures [12.5.4] such as Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations. The use of Sustainable Drainage Systems (SuDS) for the onshore works to remove the risks of surface water ingress and pollution arising from surface water connections to the public sewer network. Anglian Water is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems. The risk of sewer flooding and any required mitigation within the public sewerage network should form part of a Flood Risk Assessment and Surface Water & Foul drainage strategy.

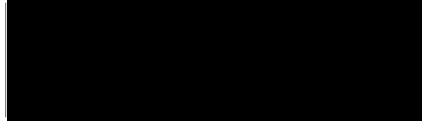
Anglian Water would wish to be engaged on the preparation of a drainage strategy and consider that this should be required to demonstrate the appropriate management of run-off from the proposed onshore scheme. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing (such as the converter station) to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

Engagement and consultation

Anglian Water would welcome continued engagement with National Grid LionLink Ltd (the Applicant) throughout the remaining stages of the project to address and resolve issues prior to the submission of the DCO including protective provisions. We agree that the preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to

reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

Yours sincerely,



Tessa Saunders
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Anglian Water Services