

**Kelsale-cum-Carlton Parish Council written summary of oral submissions to  
Issue Specific Hearing 7 [Biodiversity and Ecology] with additional comments.  
For Deadline 5, 23<sup>rd</sup> July 2021**



## **Biodiversity & Ecology (Part 1)**

### **2.e. Protected Species**

For some reason unknown to the Parish Council, Kelsale-cum-Carlton is referred to by the Applicant as 'South of Yoxford' or (together with Theberton) as a number of hamlets in Saxmundham (which seemingly refer back to an arcane ONS(?) statistical grouping). The underlying nature of the dispersed hamlets contained within the Parish does reinforce one of the Ancient Estate Claylands LCT characteristics, but the effect of lumping all into a larger town ensures the individuality of the Parish is lost.

Consequently, KcCPC are concerned that a wide range of ecological assets within the Parish may have been omitted from the Applicants analysis. Moreover, it was felt essential that this potential omission be redressed.

We therefore submitted data produced by the Kelsale-cum-Carlton Biodiversity Group (which includes at least three notable experts) at Deadline 2 [Rep2-351].

This includes data for Red List species and Suffolk Priority Species amongst others.

## **2.h. The Sizewell Link Road**

The proposed SLR and ancillary works cover an area (by size) in excess of that of the Main Site.

On that basis alone, it is clearly vital to thoroughly understand the impact on biodiversity and ecological assets.

Our Parish is of the opinion that insufficient surveys have been carried out over long enough periods of time and therefore feel it necessary to supply a survey of its own to supplement the Applicants understanding of the area.

The Parish Council awaits with interest the response from the Applicant to our detailed report [Rep2 – 351].

Following the latest rounds of ISH's the Applicant has agreed with the ExA to respond at both Deadline 5 and Deadline 6, dependent on credible data becoming available.

Having viewed some of the Biodiversity ISH recordings, one of our experts (Mr Bowdrey) agreed with Mr Collins comments on Biodiversity and loss rather than gain stating the following:

“I think it very naïve to suppose that a net biodiversity gain could ever come out of such a destructive project. In any case how is this 'gain' to be measured?

The convenient (to developers) myth that quality habitats can be created to replace existing ones, at least short term, just doesn't stack up. It is on a par with the old habitat translocations of the past where habitat was scooped up and put somewhere else because it was in the way of development - all unmitigated failures.

How can any compensatory habitat ever hope to compare, on a comparatively short term, with an existing habitat established over possibly hundreds/thousands of years?

The point about time taken to establish new habitats is valid, even if well created these won't produce any net biodiversity gain at least for the duration of the project and probably for many years after.

Some species are very specialised in their requirements and relatively immobile and have limited capacity to spread from their chosen habitats, whilst other less specialised, more mobile and can quickly occupy new areas. The latter tend to be generalists which are more widespread anyway.

How is biodiversity gain defined? would it be deemed to be a successful outcome if widespread species increase but at the expense of scarce ones.

Is bioabundance as desirable as biodiversity? I think not.

Lastly, the concept of reptile translocations as a means of mitigating for habitat destruction is a flawed one.

Very few follow-up studies of reptile translocations have been carried out in the UK and those that have suggest that translocated reptiles eventually fail to establish successfully at the receptor site.

I doubt if the sites created within the wooded area are suitable habitat anyway - wouldn't there be reptiles there already and if so, how will they compete for resources with the incoming population?

The new 'habitat' will certainly require intensive annual maintenance to keep it open and in a suitable condition. “

His colleague Mr Cuthbert wholly agreed with the above comments regarding biodiversity gain. He went on to say, “...this is extremely unlikely in the short-term and new habitats will require decades of sustained management if the full range of species is to be restored, perhaps never, although some will return quite quickly as you say”.

**2.h. Otters:** I have personally witnessed otters in East Green, Kelsale on more than one occasion. They seem to like emptying the many ponds and remnant moats of the Green, of their fish stock! They are listed as present by the Biodiversity Group, and this information was included in our REP2-351. Suffolk Wildlife Trust (SWT) also visited a pond in Curlew Green and confirmed the presence of otters in that part of the Parish.

By way of an update, in June 2021 one of our team found a dead adult Otter close to the cement works. It was badly flattened but relatively fresh, probably killed by traffic a day or two earlier.

This location lays just outside the parish boundary (in Theberton Parish), but it was obviously moving around the area, well away from a main watercourse.

I am advised by the finder (a member of the biodiversity team) this is not really unexpected as Otters (especially males) are more likely to wander in search of food of all kinds, a mate, or to explore potential breeding territories.

His understanding is that Otters are now well established in most of the main rivers and streams in Suffolk, perhaps even to population capacity, and may turn up almost anywhere. He expects the Otter Group of SWT could advise on this.

**2.h. Red Deer:** Again, referred to in REP2-351, but our comments reinforced by Mr Langton. Deer from the coast travel through our Parish in the area in which the Link Road is proposed, across the A12 and on to other areas such as the Simpsons Fromus Reserve which was a medieval deer park with connections to Framlingham.

We are concerned that a reasonable 'base case' has not been achieved, as had it been, there would surely have been provision in the SLR design for large mammal safeguards.