

SPR EA1N AND EA2 PROJECTS



DEADLINE 5 – FURTHER COMMENTS ON APPLICANTS' ExA.AS-3.D3.V1 EA1N Outline Watercourse Crossing Method Statement - Version 01 01 [\[REP3-048\]](#)

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Date: 3 February 2021

Issue: 1

1. Introduction

SASES commented briefly on the Applicants' Outline Watercourse Crossing Method Statement at Deadline 4 on page 11 of [\[REP4-106\]](#) and stated an intention to respond more fully at Deadline 5.

2. Background

The Local Authorities, SASES and other Interested Parties expressed concerns during earlier phases of Consultation and during these Examinations regarding the environmental impact of the Applicants' choice of a crossing place between Aldringham Court (formerly Raidsend) and the Gipsy Lane / Fitches Lane road crossing on B1122 Aldeburgh Road in Aldringham.

A major concern has been the potential impact on the roadside landscape and the setting of Grade II listed Aldringham Court together with the damaging loss of tracts of woodland. Another has been the proximity of construction activities to residents in the close vicinity during construction phases. The Applicants have made commitments to pre-install cable ducting for the second project during construction of the first project and to reduced widths of the cable route(s) across the woodland to the west of Aldeburgh Road and on the east side up to a line 40 metres from the river.

However, there is no commitment as yet on the positioning of the river or road crossing place within the present 93 metres order limits width between Aldringham Court and Fitches Lane. There is no clarity on how much woodland would be cleared save that only 5 metres width would be preserved between Fitches Lane and the construction activities on Work No. 20.

The Outline Watercourse Crossing Method Statement confirms the Applicants' recent commitment to a maximum working width of the cable route from the river to within 40 metres distance of the road of 80 metres (EA1N and EA2) or 40 metres for one project. That would lead to the loss of up to one third of a hectare of important riparian wetland habitat.

3. Alternatives to the Applicants' proposed Open Cut Watercrossing Methodology

The Applicants list in Appendix 4 certain constraints they believe to be relevant to an alternative trenchless technique at this general location, including proximity to the B1122 road and nearby residential properties, geological conditions in the area (apparently as yet unknown to the Applicants) and the possible need for larger cables at this place depending on tunnel depth. The Applicants conclude that there is insufficient lateral space and that it has insufficient confidence in trenchless techniques at this location.

However, no evidence has been presented that the Applicants have considered an alternative option of using other trenchless solutions such as 'microtunnelling' to install the six cable ducts and the associated two fibre optic cables along a single length extending from east of the River

Hundred, beneath that river, under the Aldeburgh Road and its footpath and beneath woodland to east and west of the river. We estimate the length of tunnelling required might be c. 200 - 300 metres, within the range of current microtunnelling technology.

Benefits would include reduced ecological and landscape damage together with the avoidance of traffic and services disruption along the Aldeburgh Road.

At an earlier Public Information Day Consultation event, SPR told us that Horizontal Direct Drilling (HDD) would require large compounds, spoil heaps and generate an unacceptable level of disturbance for residents close by. 'Microtunneling' was briefly mentioned as a perhaps less impactful alternative to HDD.

We feel this document is deficient in not including in Appendix 4 a technical comparison that addresses the spatial, environmental and residential advantages and disadvantages of the available alternative trenchless methods such as 'microtunnelling' that may (or may not) be more appropriate for this location and such a small river.

4. The feasibility of a microtunnelled alternative to open cut methodology

In view of the potential benefits to Landscape, Woodland and Ecology at, near and downstream of the crossing point, SASES suggests the Applicants are asked to provide an expert engineering report on the feasibility, benefits and dis-benefits of a comparative non-HDD trenchless crossing of River Hundred, Aldeburgh Road (B1122) and the woodland on east and west of the Aldeburgh Road.

In preparing such a report, proper consideration must be given to potential dis-benefits from the present trenched proposal of ecological damage in at the crossing point and at the SSSI /SPA into which it feeds and construction noise impact on residents (including noise from large diesel pumps running 24/7 for up to two months).

END