



SPR EA1N & EA2 PROJECTS

DEADLINE 6 – POST HEARING SUBMISSIONS (ISH7)

BIODIVERSITY & HABITATS REGULATIONS ASSESSMENT

PART 2 – Agenda Item 2b – Other Terrestrial Ecology

Interested Party: SASES

IP Reference Nos: 20024106 & 20024110

Date: 24 February 2021.

Issue:

INTRODUCTION

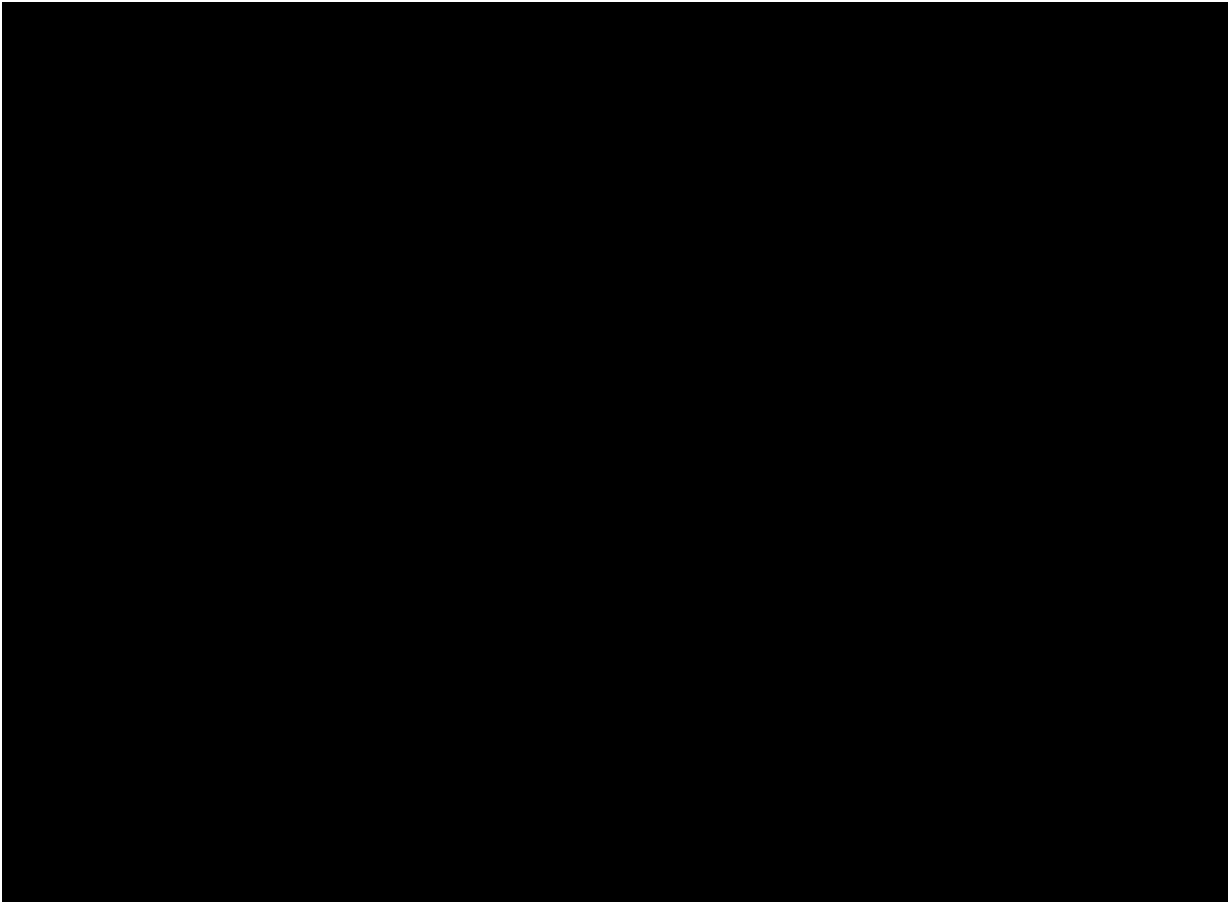
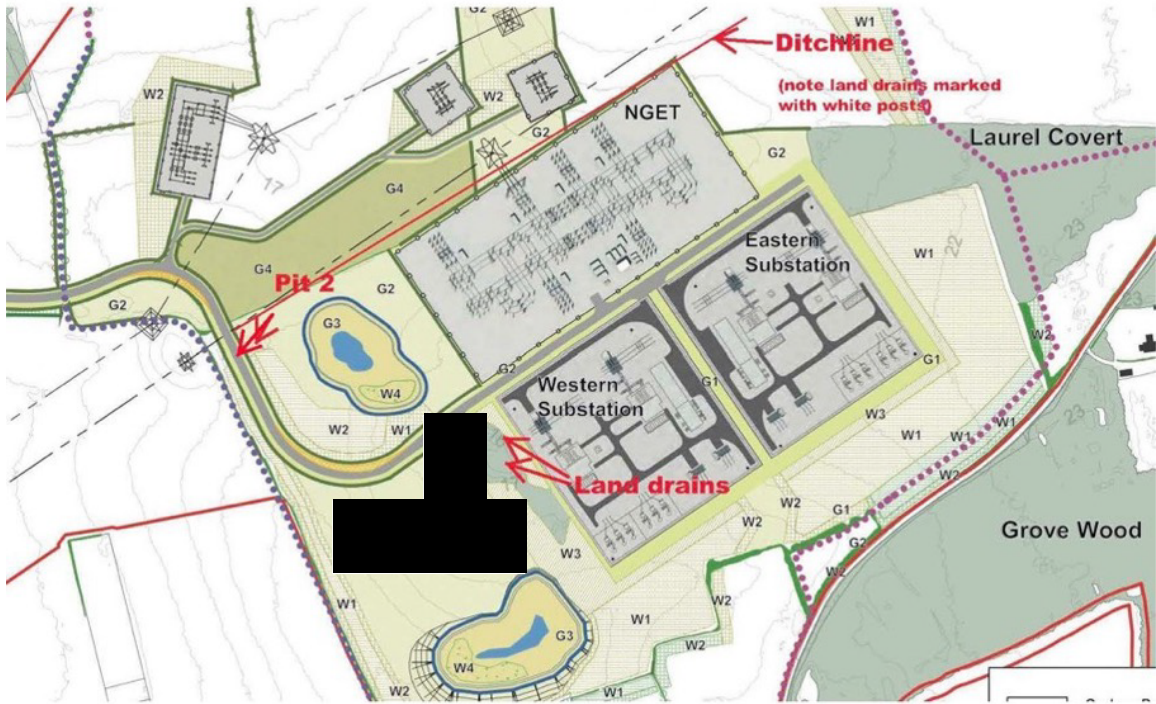
These submissions are made following Issue Specific Hearing 7 which took place on 17th February 2021.

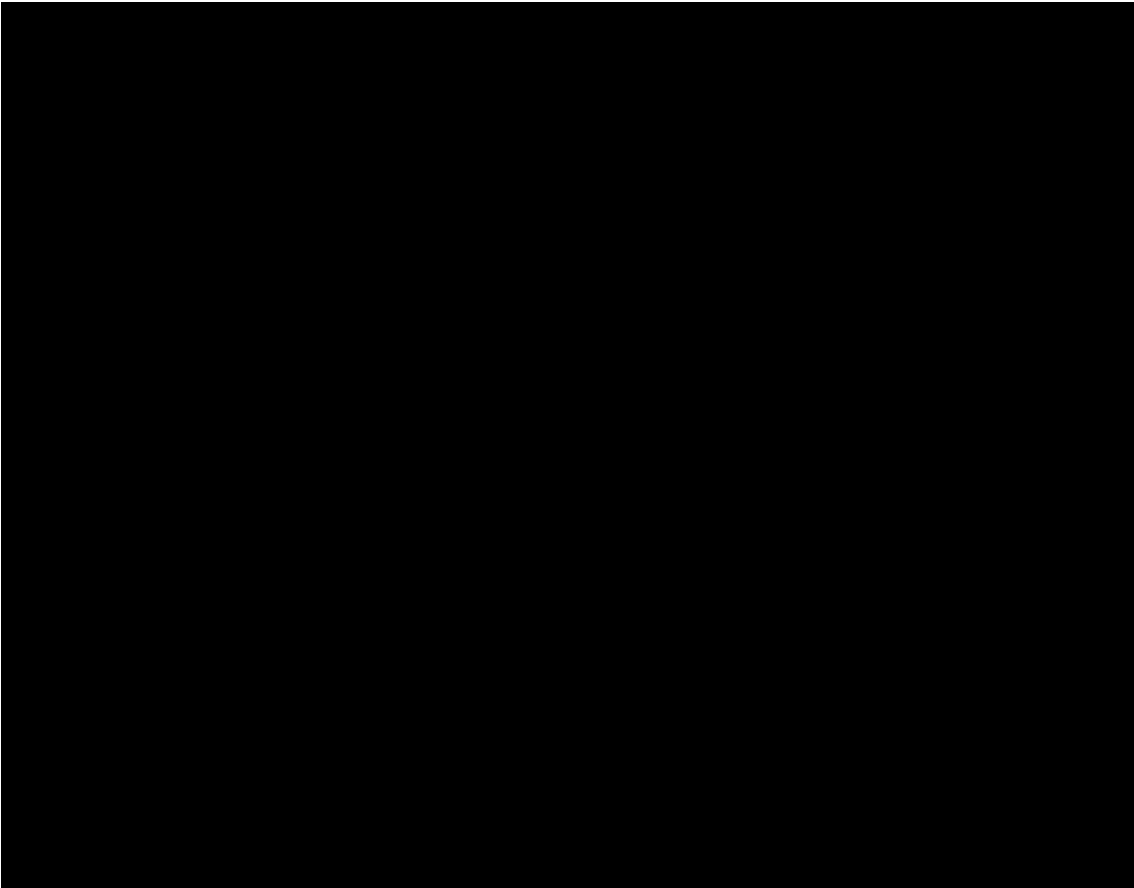
AGENDA ITEM 2b.ii

Badger Setts on the Substations Site

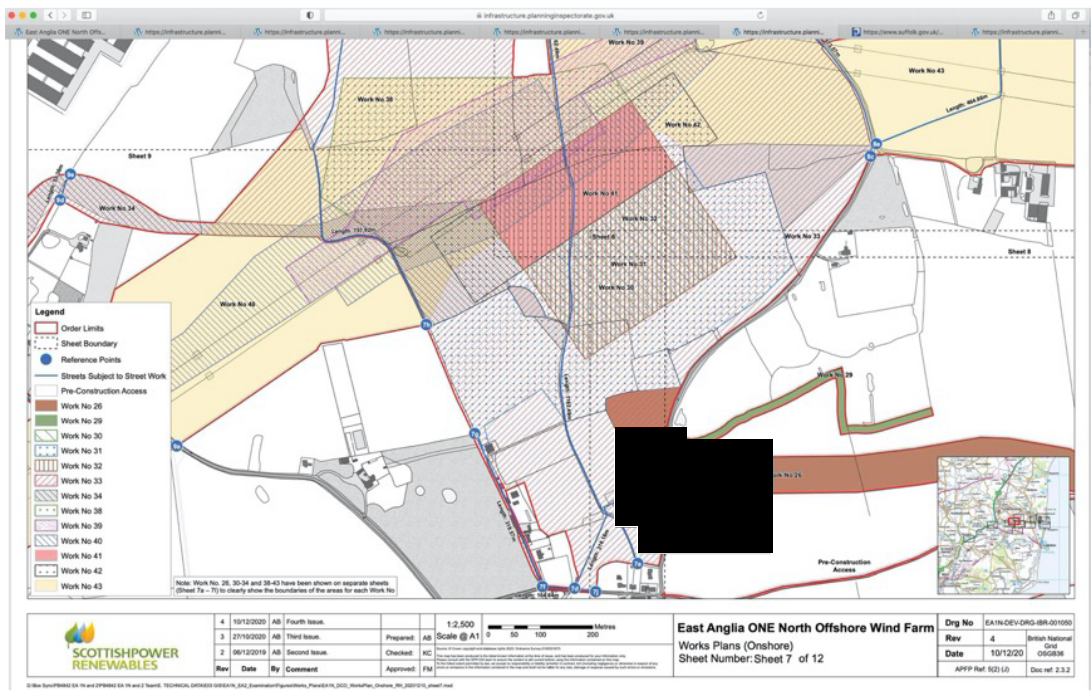
The maps and photographs are included for the attention of the Examining Authority. SASES appreciates that these will be redacted in publication.

1. At ISH 7, the Applicant stated that there were no badger setts on the Substation Site and that their expert ecologists had found no evidence of such. SASES has already made submissions to the Examination of the existence of a badger sett in the wooded pit adjacent to the westernmost substation and this was viewed by 3 members of the ExA on the Accompanied Site Inspection on 26th January 2021.
2. Below are the map and photographs provided to the ExA prior to the ASI (REP5-103). Evidence of this sett was also included in SASES' submissions at Deadline 1 on Onshore Ecology with photographs attached at Annex 3 (REP1-350) and Request for Site Inspections (REP1-340) as well as initial Relevant Representations (RR-069). The Applicants have therefore had sufficient opportunity to investigate this sett.
3. SASES appreciates this map and photos will be redacted when published however this does present a problem in having a fair and open examination of the existence of these setts, as the public is not able to comment on what has been submitted or corroborate the existence of the setts.





4. Prior to ISH 7 evidence was submitted by Gill Horrocks on 15th February 2021 regarding the existence of an [REDACTED]. Included in this document were a map and photographs of this sett. Works Plan Sheet 7a (REP3-006) is included below showing the relationship of the sett to the onshore substation site during the construction period. It can be seen that this is directly where the haul road enters the substation site and cannot be avoided.





[REDACTED]



[REDACTED]



5. Local residents can attest to the fact that these badger setts have existed in these locations for many years and it is not credible that the Applicants or their ecologists have not been aware of the presence of the setts.
6. The Applicants should be asked to make a full assessment of the known badger setts on the substation site during the course of this Examination. This would only require a very short visit to confirm the presence of the badgers.

AGENDA ITEM 2b. iii

Noise

7. The Applicants refer to an assessment of operational noise in their Deadline 4 Onshore Clarification Note (REP4-005). This concludes that the substation site is of *“low ecological value and as a consequence, disturbance from lighting and noise is predicted to be **minor adverse** and therefore not significant and only have the potential to affect ecological receptors in the immediate vicinity of the substations”*.

8. The Applicants have not acknowledged that the wooded pit, directly adjacent to the western substation, is a haven for wildlife in particular for bats, badgers, birds and deer, all of which will be very susceptible to operational noise and light. Similarly Laurel Covert to the east of the substations provides very suitable habitat for wildlife and will also be bisected by a proposed alternative public footpath. The wildlife will initially be displaced by the construction activity and be very unlikely to return due to light and noise in operation.
9. Further ecological surveys should be carried out at the wooded pit and Laurel Covert to determine the range of species present, particularly in respect of bats who are likely to be very sensitive to both light and noise. This should be carried out before the end of the Examination.

AGENDA ITEM 2b. v

Trees and Hedgerows

10. The documents submitted into the Examination only deal with the removal of Important Hedgerows and not ordinary hedgerows which may not be historic, but do contribute very suitable habitats for wildlife, including bats and birds. The Applicant should give details of any such hedgerows which are proposed to be removed, but have not been recorded.
11. It has become apparent in recent hearings that the Applicants have overstated the need for the removal of Important Hedgerows and have included the full extent of each hedgerow, whereas only a small portion may need to be removed. SASSES contends that the Applicant should define the area for removal more closely so as to preserve important habitats. There is a danger that any contractor will be able to remove extensive lengths of hedgerow for its own convenience rather than necessity.
12. In relation to the above, East Suffolk Council has drawn attention to the proposed removal of Important Hedgerows Nos 61, 62, 63, 64 and 66. The Applicant has said this is to facilitate the overhead line realignment works and only necessary sections will be removed. Again the Applicant should define the sections for removal.
13. SASSES welcomes the Applicants' confirmation in the hearing that the destruction of Important Hedgerow 21 in Fitches Lane, Aldringham, would not be the complete length as indicated on Sheet 5 of the Important Hedgerows and Tree Preservation Plan (APP-020) but instead would be restricted to a crossing width of 27.1M. Similar detail is required on the extent of other hedgerows to be removed.