

SPR EA1N and EA2 PROJECTS



DEADLINE 6 – POST ISH7 HEARING ON BIODIVERSITY AND HABITATS REGULATIONS ASSESSMENT AND POST HEARING WRITTEN SUBMISSION OF ORAL CASE

PART 1 Agenda item 2 a - Hundred River

Interested Party: SASES **IP Reference Nos.** 20024106 and 20024110

INTRODUCTION

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

AGENDA ITEM 2a (i)

Hundred River - Priority deciduous woodland - wet woodland

1. Ecologists representing the Applicants, Suffolk County Council (SCC) and East Suffolk Council (ESC) reported having visited the Aldeburgh Road, Aldringham on Monday 15 February with the aim of assessing whether the area of woodland on the west bank of the proposed Hundred River crossing location and designated as Priority Deciduous Woodland should also be considered as Wet Woodland. Each ecologist stated at ISH7 the opinion that it is not wet woodland.
2. SASES felt obliged to defer to the judgement of three ecology specialists when offered an opportunity to comment.
3. ESC and SCC have subsequently been asked to supply their logs for this visit.
4. ESC replied saying “ESC does not require our technical officers to keep a public log of visits. They [the ecologists] predominantly viewed the site from the edge of the B1122, this was considered an adequate viewpoint to understand whether the area was comprised of wet woodland or not which was the purpose of the visit. James also viewed the wider area, including part of the field on the eastern bank of the river and the river downstream of the crossing point, from public footpaths 10, 64 and 65.” (Appendix 1)
5. SCC has responded saying “I understand that our Senior Ecologist, Andrew Murray-Wood, visited the woodland at Aldringham with James Meyer, East Suffolk Council’s Ecologist, on 15th February. They visited the area of the proposed Hundred River crossing and predominantly viewed the site from the edge of the B1122 and from the end of Gypsy Lane, as this was considered adequate to understand whether the area was comprised of wet woodland or not which was the purpose of the visit. A written submission in relation to this will be submitted at Deadline 6 (next week). Suffolk CC does not require its technical officers to keep a public log of visits undertaken in the course of their work.” (Appendix 2)
6. It was not mentioned at ISH7 that the ecologists had not in fact entered on the area of land that they had come to assess. They had only viewed it only from roadside and at a distance of c. 75 metres from riverbank. Footpaths 10, 64 and 65 are situated at least 175 metres away from the riverbank which would have been obscured by hedgerows.

7. The Applicants did not state whether or not their own ecologist(s) had actually entered on to the land during this visit.
8. Following ISH7, daily moisture level sampling has begun to be carried out by local people at the River Hundred crossing place at distances from 4 to 70 metres from the river using a basic soil wetness hygrometer. Despite minimal rainfall and low river levels, the instrument has been consistently recording the **maximum wetness** within its range at all positions up to 2 metres from the roadside, Within 2 metres of roadside the readings have been 'Normal', that is neither wet nor dry.
9. It is not possible to understand how ecologists could have formed a definite conclusion without even stepping on to the land in question or approaching closer to the river than 75 metres.
10. Consequently, SASES must now withdraw its acceptance of the assessment put forward by the Applicants, SCC and ESC at ISH7 that the land is not wetland and urges ExA not to accept those submissions as firm evidence in this respect pending clarification that may be contained within the Visit Report due by Deadline 6 or 7, or else receipt of an independent assessment.
11. The Applicant was asked to explain at ISH7 why no alternative cable crossing points had been evaluated. Mr McGrellis for the Applicants replied that there is no alternative feasible crossing place on the Aldeburgh Road and in justification referred to [APP-052](#) Chapter 4 Site Selection and Assessment of Alternatives.
12. [APP-443](#) 6.3.4.2 Appendix 4.2 Red/Amber/Green (RAG) Assessment for Onshore Substations Site Selection in the Sizewell Area at para 17 states that "the onshore study area was to be extended westward following consultation with Suffolk County Council (July, 2017) to look further west by potentially crossing Aldeburgh Road" and [APP-052](#) , in Table 6.1.4 indicates that the crossing point was selected by SPR in conjunction with SCC, SCDC and Waveney DC at Site Selection Meetings, Workshops and Visits during 2017. However, no evidence has been presented in the EIA to indicate that ecological surveys of the riparian woodland were carried out in 2017 near the selected crossing point on Aldeburgh Road.
13. The need for the ecologists to make an onsite assessment at this late stage of ExA's timetable of hearings for EA1N and EA2 together with significant errors and omissions in the EIA Extended Habitats Report in the area of the Aldringham River Hundred, begs the question: Was any professional assessment made of habitat on that particular section of riverside land in 2017 when the Aldeburgh Road crossing place was selected, or at any time since then?
14. SASES and others have repeatedly asked for the Applicants to publish the 'Cable Corridor Optioneering Report' mentioned in [APP-443](#) 6.3.4.2 Onshore substation Site Selection RAG Assessment para. 5 and the Engineering Report on the selection of the Aldeburgh Road Cable Crossing decision referred to in [APP-052](#) 4.9.1.3.4 which states at 146 that: "Following an Engineering feasibility review it was deemed feasible to cross Aldeburgh Road". Neither report has been forthcoming and there has been no mention in the EIA of Ecological Reports supporting or qualifying that decision.
15. The conclusion that must be drawn is that if, as the Applicants insist, this land is the only feasible place for the Cable Corridors to cross the Aldeburgh Road and if it is not possible to avoid a priority UK Biodiversity Action Plan habitat, then neither EA1N nor EA2 should be consented.

AGENDA ITEM 2a (iii)

Hundred River - Watercourse crossing method statement

16. The Applicants had responded to several of the Panel's earlier ExQ1 questions regarding the R Hundred crossing, essentially to the effect that they would much prefer to use an Open/Cut trenched approach across the R. Hundred rather than an alternative 'trenchless' approach and tunnelling under the river. The Applicants identified certain disadvantages of using trenchless methods at that location, but on the assumption that HDD is the only alternative method that would avoid risk to the watercourse, its neighbouring habitats and further downstream, to the Sandlings SPA including North Warren Nature Reserve.
17. The Applicants' Methodology does not say anything about other non-HDD trenchless methodologies. It has not provided any information on the feasibility and comparative advantages that might accrue from using micro tunnelling instead of Open /Cut trench.
18. SPR's Ground Engineering Consultants first mentioned micro tunnelling at SPR's Community Consultation events as being a potentially less intrusive technical solution than HDD for the installation of underground power cable ducts, indicating that it might be feasible to construct a cluster of tunnels from a point east of the R Hundred underneath all of the following vulnerable features:
 - the river itself
 - under the section of riparian woodland discussed under Agenda item 2 (i)
 - under the B1122 Aldeburgh Road
 - and finally beneath the Group TPO [SCDC/87/00030] woodland to the west of Aldeburgh Road, between Fitches Lane and Aldringham Court

emerging at a point beyond the woodland protected under and well away from human habitation. The distance involved (200 - 300 metres according to the Works Plans) should be within the capabilities and experience of a Civil Engineering specialist contractor.

19. Such a solution might not only mitigate, but **eliminate** much of the prospective damage to biodiversity in Aldringham, including loss of woodland, the risk of flooding during construction, B1122 traffic delays and interruptions to utility services. However, it must be recognised that even micro tunnelling could also bring substantial disturbance and perhaps other problems to residents living close by. Such matters would have to be weighed up against the benefits.
20. It seems reasonable to have expected that a major international company such as Iberdrola Scottish Power would have at least provided a professional and quantified analysis of the pros and cons of the available methodologies, rather than as it has simply choosing one.
21. SASES had previously asked at Deadlines 1, 4 and 5 that the Applicants be required to provide an evaluation of micro tunnelling at the Aldeburgh Road Cable Crossing– so far without response:
 - [REP1-371] SASES Written Representation – Construction Onshore Cable Corridor, page 5 para 42
 - [REP4-106] SASES Comments on Applicants' DL3 Submission Construction Issues, page 111
 - SASES [REP5-098] Further comments on Applicants' Watercourse Crossing Method Statement
22. We ask that the Applicants commit to publishing their expert report (which may already be to hand) on the feasibility, benefits and dis-benefits of a micro tunnel solution to protect the River Hundred, its riverside habitats, the TPO woodland west of B1122 and the road crossing as described above.

APPENDIX 1 – East Suffolk Council Ecologist’s Visit to Aldringham on 15 February 2021

On 18 Feb 2021, at 15:50, Jocelyn Bond <Jocelyn.Bond@eastsuffolk.gov.uk wrote:

Please find below a response from ESC Officers:

'James Meyer, Ecologist, did refer to his visit to the woodland at Aldringham in the hearing yesterday. His written submission in relation to that will be submitted at Deadline 6 (next week).

ESC does not require our technical officers to keep a public log of visits undertaken in the course of their work. So there is no 'log' to refer Ms Horrocks to.

However, Mr Meyer has advised me that he visited the area of the proposed Hundred river crossing on Monday (15th February) with Andrew Murray-Wood, Ecologist SCC. They predominantly viewed the site from the edge of the B1122, this was considered an adequate viewpoint to understand whether the area was comprised of wet woodland or not which was the purpose of the visit.

James also viewed the wider area, including part of the field on the eastern bank of the river and the river downstream of the crossing point, from public footpaths 10; 64 and 65.

We are happy to share this information, it will be submitted formally at deadline 6, however, we do not maintain a public log of technical officer visits as referred to by Ms Horrocks.'

Hoping this is helpful,

Best wishes

Jocelyn & T-J Haworth-Culf

Councillor Jocelyn Bond | Aldeburgh & Leiston Ward

East Suffolk Council

APPENDIX 2 – Suffolk County Council Ecologist’s Visit to Aldringham on 15 February 2021

On 19 Feb 2021, at 14:16, Russ Rainger (SCC Councillor) wrote:

Further to my communication of yesterday, I offer the following update.

I understand that our Senior Ecologist, Andrew Murray-Wood, visited the woodland at Aldringham with James Meyer, East Suffolk Council’s Ecologist, on 15th February. They visited the area of the proposed Hundred river crossing and predominantly viewed the site from the edge of the B1122 and from the end of Gypsy Lane, as this was considered adequate to understand whether the area was comprised of wet woodland or not which was the purpose of the visit. A written submission in relation to this will be submitted at Deadline 6 (next week).

Suffolk CC does not require our technical officers to keep a public log of visits undertaken in the course of their work. So there is no 'log' to refer you to.

I trust this is of assistance.

Regards

Russ

Russ Rainger
SCC Cllr for Aldeburgh and Leiston