



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN020078

Issue Specific Hearings 14 (ISHs14)

Post-hearing submission

Verbal contribution to

HABITATS and BIODIVERSITY

by

SEAS (Suffolk Energy Action Solutions)

EA1N – EN010077 / SEAS ID no 2002 4494

EA2 – EN010078 / SEAS ID no 2002 4496



SUFFOLK
ENERGY ACTION
SOLUTIONS



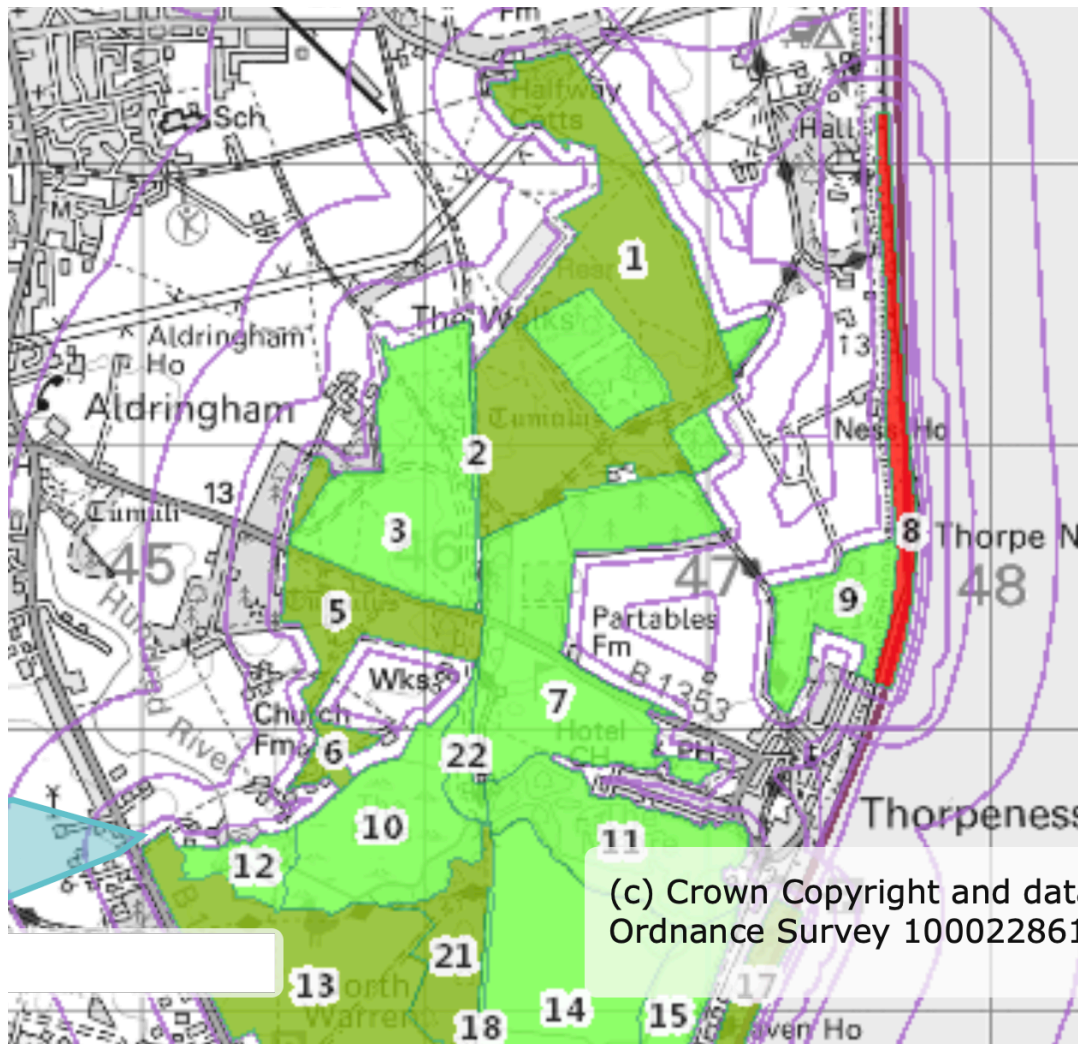
Agenda Item 12 a Nightjar and woodlark of sandlings spa

1 a DEFRA recently added a new layer to its MAGIC maps that shows impacts from activity external to protected sites in terms of probability and intensity. This layer illustrates how and where the cable corridor **outside** the SPA/SSSI will impact unfavourably on formally protected areas (below).

1 b SEAS has repeatedly said that protected species are not confined to SSSIs. The mapping supports our view that the Applicant's surveys are not adequately picking up significant species. In some case, the season of their surveys is wrong. For instance, reptile mats were installed last week (5th March 2021), which is too early. Surveying woodland for wet status in snowy February is also too early.

1 c The Applicant says that its surveys have followed industry standard procedures but in the very least these timings are not in accordance with national guidance.

The Applicant's surveys are therefore unsafe.



Impact Risk Zones (DEFRA)

Key: Green areas have statutory protection.

Lilac lines show impact dynamics on areas with statutory protection



Agenda Item 12 b River Hundred Crossing

2 DEFRA's mapping of Impact Risk Zones in relation to statutory protected areas confirms that the cable corridor outside the SPA/SSSI will impact unfavourably on the formally protected areas. Work on the River Hundred will impact the SSSI in two main areas: within 600 m of SSSI area 6 to the East and within 1000m of SSSI areas 12 and 13 to the South. The work also impacts the Lapwing Conservation Area to the South East of the crossing point.

3 The River impacts the SSSI by its flow to the South, and also by its catches and ditches, which spread river water west and east, thereby enabling spread by penetration of any likely significant and adverse effects.

4 River Hundred is in itself vulnerable to any indirect and in-combination effects within ex-situ habitats of the SSSI from air pollution/geology/contamination/groundwater/hydrology effects — and is therefore also vulnerable to contributing to LSEs and AEOIs. No proper mitigation is proposed for this aquatic environment.

5 a The river's riparian woodland is a priority habitat under the UK biodiversity Action Plan (UK BAP), which are considered the habitats that are most threatened and requiring conservation.

5 b In addition, we do not agree with the Applicant's characterisation of the woodland as dry and have already submitted two documents on this matter, which record waterlogged levels in the soil and show the Applicant's own test trenches rapidly filling with water.¹

5 c The Applicant's survey was carried out at the wrong time of year and cannot be adequately concluded until May. In addition, the whole woodland should be surveyed, not just the order limits. The reason we insist on this matter here is that the crossing will more deeply affect a wet woodland. Wet woodlands are sensitive to changes in climate conditions and therefore this woodland is unlikely to recover from the removal of a large section of its trees, disturbance to soils and changes to hydrological conditions.

6 Mitigation of simply reducing the width of the cable corridor is not adequate and offers no protection for rare species in these conditions.

7 a We would also like to discuss the damming of the river because the River Hundred has seasonal flooding events both upstream and at the cable crossing. Alder, willow and poplar currently line the riverbank and they provide strength and structure to absorb the energy of the flow of the river. They also contribute to eliminating pollutants as well as carbon capture, and were traditionally planted to counter

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004131-6.SEAS%20ISH7%20-%20Post%20submission%20on%20Terrestrial%20Ecology%20-%20DEADLINE%206.pdf>
And

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004130-5.SEAS%20ISH7%20-%20Post%20hearing%20River%20One%20Hundred%20Woodland%20-%20DEADLINE%206.pdf>



flooding. Once these trees are removed, these natural flood defences will leave vulnerable the properties in Gipsy Lane and further downstream, and probably contribute to the seasonal flooding that we see on the B1122.

7 b In other wind farm applications, a number of measures have been proposed to avoid such likely significant events, including trenchless crossings to avoid LSEs for the river environment and SSSI .

8 SEAS has heard from a microtunnelling enterprise in the UK that its processes cause the event to be longer in duration than HDD would, and are more expensive to the commissioner, but the cost to biodiversity and to human life is considerably less. We have come across financial economies as a driver in these hearings before (in, for instance, the reluctance to encase EAN1 cables in the trenches). The dismissal of microtunnelling by the applicant because of the plant involved does not feel like a good argument from where we are living. Microtunnelling can achieve lengths of over 1000 metres and uses inert polymer rather than bentonite, which is not ecologically harmful. Trees, roads, services, rivers and water table are suitably preserved. Microtunnelling has been the method of choice for construction of services at Heathrow Airport that had to traverse runways without halting their use.

9 According to the recommendations of the Dasgupta report, we must now include impact on biodiversity in our accounting systems when weighing a proposed project. In accounting for the trenched crossing of the river, we should count the cost in terms of increased flooding risk, the heating of the watercourse caused by loss of tree cover, the loss of carbon capture and loss of water filtration by absorption of pollutants that wetland trees provide, the loss of habitat, the loss of champion trees of substantial age and veteran trees that provide increasingly rare habitat for bats, the risk to the statutorily protected areas close by, the loss of social tranquility, amenity and connectivity for the human population, and its effect on the health of our village. But the Applicant has not begun to mitigate for this crossing. Instead they seem committed to wholesale loss of biodiversity with heavy economic consequences for everyone else.