



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN020078

SEAS – HABITATS and BIODIVERSITY Deadline 11 -June 7th 2021

by

SEAS (Suffolk Energy Action Solutions)

EA1N – EN010077 / SEAS ID no 2002 4494

EA2 – EN010078 / SEAS ID no 2002 4496

Summary

- 1 The devastation caused by pre-construction surveys
 - 2 The River Hundred and Riparian Woodland surveys
 - 3 ESC, NE response to the Riparian Woodland
 - 4 Responses to SPR's latest arguments
 - 5 Spin
 - 6 Policy environment
- Appendices 1-5: Drone footage of Friston surveys &
Ground level footage of Friston and Coldfair Green



<https://www.suffolkenergyactionsolutions.co.uk/>
info@suffolkenergyactionsolutions.co.uk

SEAS – HABITATS and BIODIVERSITY Deadline 11 -June 7th 2021

1 Devastation from pre-construction surveys

Please see as evidence the following videos - Appendices 1 to 5 via wetransfer link - <https://we.tl/t-48JAzb0wsk>:

Appendix 1, Drone footage of Friston, 4 June 2021

Appendix 2, Drone footage of Friston, 4 June 2021

Appendix 3, Driving down Grove Road South at 10mph (audible nightingale), 5 June 2021

Appendix 4, Driving down Grove Road North at 10mph (audible nightingale), 5 June 2021

Appendix 5, Ground footage of Sloe Lane, Coldfair Green/Knodishall showing sprayed stripe of cable corridor

Screen shots of Friston on 4th June 2021 (these do not convey the extent of the devastation – please look at the videos <https://we.tl/t-48JAzb0wsk>:)





These substation survey works are very close to the village of Friston and actually encroach on some resident's back gardens

ExA should know that **Suffolk County Council asked SPR to call a meeting with local representatives** in response to the disturbances caused by their investigations. In fact, SPR



complained about local dissatisfaction at Deadline 10. SPR's communications officer, Joanna Young, organised attendance by senior team members and by local groups on 14-5-21. The reasons for the meeting were that locals are deeply upset by the preparatory works. These involved sterilising the whole site of the Friston substation and much of the cable corridor as a strip through arable fields, plus fields that would be inaccessible during the investigation, during the week commencing April 12th.

1.1 Works took place without comprehensive notification

1.1.2 Spraying took place when arable species were nesting

1.1.3 Hedgerow was removed when species were nesting

1.1.4 In consequence, locals were concerned that wildlife crimes were being committed and called the RSPB, Natural England and the Police.

1.1.5 Animals along the route were frightened unnecessarily by plant movement and processes — both domestic horses and wild deer.

1.2 Contractors on the ground

While individuals approached by distressed locals / landowners / horse owners and/or police may have responded helpfully, this does not alter the fact that contractors were placed in an unenviable position by SPR because there was inadequate notification and no proper preparation of the local area either within SPR's own contractual structures or in the community

1.2.1 There is still no visible management structure for comprehensive oversight of the activities of contractors, and no line of accountability. What has been happening is firefighting and this should not take the place of thorough preparation.

1.3 Targeted, unseasonal spraying

SPR's land agents denied they had asked farmers to spray, although they do not say what the agricultural contractors were actually told, or asked, to do. Yet, the Friston substation site was sterilised; only the cable corridor at Sizewell was sprayed, across the middle of a crop; and the Aldringham land adjacent to Fitches Lane was sprayed as far as the borders with Aldeburgh and into

Knodishall. All this took place in the same week commencing 12th April.

The aerial image below shows the sprayed cable corridor between Fitches Lane and Sloe Lane.



Below is the view westwards towards Friston – the cable corridor is still visible at 6-6-21



View to the east (Fitches Lane and Coldfair Green Primary School on left)



Closeup of sprayed field margin, Thorpeness



Poor safety management, Thorpeness



1.3.1 Whatever message local contractors received from SPR via land agents, and when, all these fields were sprayed when maximum damage would be caused to breeding wildlife, and also without following nationally recommended practice to protect pollinators. At the meeting, Rory Daines, SPR's contracted Environmental Clerk of Works, dismissed the importance of arable fields, specifically of the invertebrates supported by and supporting them, which is contrary to national recommendation and acceptable practice. The consequence of this ignorance was also that no local beekeepers were warned about the spraying so they could not protect pollinators as they would normally try to do.

1.4 Inadequate management

Working through contractors requires clear, enforced, tested protocols, feedback mechanisms, and an adequate timescale that is sensitive to the local environment. Having an ecologist on site is, of course, reassuring, but that is not the problem here. Prior planning,



preparation and lines of responsibility are lacking. This does not bode well.

1.5 Devastating Timing for Wildlife

A variety of protected species depend on the cable corridor and will lose their habitat or suffer active harm from disturbance and chemicals. Skylarks, for instance, nest away from field margins in spring and breeding is only successful if there is no cutting between early April and the end of May. Woodlarks nest early and appreciate wide field margins around spring barley (as in the Aldringham field). These species are already likely to have suffered harm as a result of the spraying in early April. Nightingales also returned to Fitches Lane, Grove Road Wood, and to the hedged field margins in Aldringham as well as to the riparian woodland. Two can be heard on the ground-level footage of Grove Lane (Appendix 3 & 4). Whether they will be able to produce viable young thanks to the devastating loss of forage this year remains to be seen. Rare reptiles, invertebrates and bats also will also have lost a season's forage – again this bodes ill for their reproductive abilities and future survival. This important fact should have been factored into planning the works, especially as planning consent has not yet been granted. SPR's action has already stacked on another year to the removal of habitat and forage for local, threatened species by the proposed development, bringing local extinctions closer.

1.5.1 Adequate notice of works should have been given to the landowners/contractors so that SPR could be seen to minimise these risks to the protected populations, even if they have licenses.

1.5.2 SPR has lost credibility in these bungled preparations. Concerned locals will continue to complain and call the police if they feel wildlife crimes are being committed. It is up to SPR to implement a visible management structure with clear timetable, which follows good practice.

1.6 River Hundred and other water bodies

SPR admitted at this meeting that it did not know that a number of dwellings in the River Hundred valley in Aldringham-cum-Thorpe are reliant on well water. They have not contacted the



residents about how piercing the water table and aquifers may affect them.

1.6.1 Flooding

The potential for flooding at the crossing of the River Hundred has not been assessed.

1.6.2 The usual response that actual construction will deal with this flexibly and depending on topography at the time of construction (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005120-EA1N%20ISH16%20S2.html> minute 11 ff, now cannot be taken seriously or left to chance.

1.6.3 The risk, during construction, of flooding is not to be discounted since long term devegetation will take place and will include trees, like the banks of alder, which are traditionally used to protect and strengthen soft riverbanks and remove surplus water from both watercourse and the wet riparian soils.

1.6.4 The proposed widening and narrowing of the corridor to accommodate water collection as necessary is far from clear or possible at the River Hundred as we have seen no proper plans for the width of the corridor at this point. This does not inspire confidence. In fact, this crossing has not yet been comprehensively or credibly assessed.

1.6.5 While it may seem clear that properties immediately downstream are at risk, properties upstream also have suffered from the river overtopping, including Burrell Cottages in Knodishall and Leiston Road, Knodishall. Proper flood assessments must be made, and credible mitigation planned and proposed.

2 The River Hundred and Riparian Woodland surveys

The meeting with SPR on 14-5-21 produced some interesting viewpoints from the ecological contractors, who were keen to share the richness and diversity of the sites outside the SSSI, to reassure residents that they had accounted for the biodiversity that we know exists. This is an interesting divergence from those surveys that

have actually been presented to ExA which downplay the presence of important species like nightingale, turtle dove, nightjar, even within the SSSI.

2.1 The ecological contractors are constantly monitoring the area, we are assured. However, the riparian woodland is a rewilded area and so is now largely inaccessible. The image shows how nettle and cleaver (to the right) have reached over a metre high and Himalayan Balsam is growing strongly (around a metre high at



present) in the foreground. This could be expected in a W6, *Alnus glutinosa* – *Urtica dioica* woodland, with a soil that reads wet on metering (JNCC guidelines).

2.2 The Applicant's observers can also be observed: residents have witnessed young people strolling by on the other side of the river in pleasant conversation. This may give the ecologists or students a view of the bank, but is it good practice, and how can it produce a credible survey of the inaccessible woodland?



3 ESC, NE's latest response to the Riparian Woodland – an objective or political intervention from ESC?

East Suffolk Council intervened directly with Natural England to assert that the woodland is not W6, despite the fact that the ecologist's observations were from several hundred metres away, and in February, and under partial snow (our elected representatives found out exactly where the Councils' ecologists stood on their visit). Indeed, the Council ecologists refused to confirm that they had examined the site in adequate depth to the ExA, saying they had merely scoped it. (Deadline 9 SEAS Habitat and Biodiversity, 4 1.3 1.3)

3.1 We conclude that this has become a political issue, which is lamentable. We suggest that ESC wants this project for the benefit of its northern constituency, as two out of three of our own, local, elected representatives have resigned since.

4 Responses to SPR's arguments

Re. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004773-ExA.AS-10.D9.V1%20EA1N&EA2%20Applicants%20Comments%20on%20SEAS'%20Deadline%208%20Submissions.pdf> - *Applicants Comments on Suffolk Energy Action Solutions Deadline 8 Submissions*

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-10.D9.V1

SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001039

Date: 15th April 2021

4.1 Microtunnelling

SEAS clearly requested microtunnelling beneath the River Hundred and the protected woodland on both sides of the B1122. Therefore, we envisage the caissons on agricultural land clear of the protected areas on both sides of the river, as we described in some detail in 'Issue Specific Hearings 14 (ISHs14) The case against the open trenching of the River Hundred.' The Applicant here reiterates old arguments without addressing the points we



made, which included protecting the inhabitants of the Nursing Home and Fitches Lane as well as avoiding Net Biodiversity Loss. (SPR32)

4.2 Poor surveys

Again, the Applicant reiterates old statements from its own early surveys without addressing our valid objections (and even their own late assessment of the woodland). Please see SEAS Deadline 9, Habitats and Biodiversity, 14 1.6, where examples of the consequences of inadequate assessment of the river and riparian environment are given. (SPR33-38)

4.2.1 Why did the Applicant survey the River Hundred crossing point in April 2018 if it had no notion of taking cables to Friston until December 2018? (SPR44).

5 Spin

Quote: Re. [East Anglia TWO Limited](#) (PDF, 499 KB) Deadline 9 Submission - EA1N&EA2 Deadline 9 Topic Position Statements - Version 01 EIA / Habitat Regulations Assessment (HRA) *“Outside the SoCG process NE has made representations regarding classification of the woodland adjacent to the proposed location of the Hundred River crossing.”*

5.1 This is because the Applicant did not acknowledge or plan for the felling of a hectare of broadleaf riparian woodland in its proposals. Its acknowledgement came very late in the examinations. It has not proposed mitigation for it and has no fit site to replace it.

5.2 We continue to hear contradictory accounts of how wide the trenching would be or needs to be at the river and in the woodland, including glossing over the actual width of the trench if both projects are constructed together. AUDIO ISH14 Day2 Session1, 17 03 2021, 1hr 12 and following. Mitigation for flooding has not been considered. Leaving it until construction happens is too late, as we have seen from the bungled testing (above, 1).

5.3 The Applicant again brings in the opinion of the local Councils on the nature of the woodland. The council ecologists visited the site at the same time as the Applicant: *“this is supported by the Councils who have undertaken their own independent site*



visit. However, NE continues to reserve judgement on the matter by stating that February is a sub-optimal time to undertake habitat surveys (most recently REP8-162).”

5.4 However, even the Council ecologists refused to confirm that they had examined the site in adequate depth. (Deadline 9 SEAS Habitat and Biodiversity, 4 1.3 1.3)

5.5 We suggest that this optimistic set of conclusions presents a rosy picture of the state of the Biodiversity case, since it rests on the initial Application surveys, which were not comprehensive and contained errors, and smooths over the evidence and objections brought to the Examination since (SEAS, Deadline 8 ISH 14 HABITATS and BIODIVERSITY, The quality of biodiversity surveys).

5.6 The Applicant then claimed broad agreement between NE and themselves on most matters. NE’s Risk and Issues log (deadline 9) is not quite so rosy. NE recorded 155 ongoing issues of concern in offshore and terrestrial ecology. 89 out of these 155 issues remained unresolved, which is, of course, the majority — around 57%.

5.7 The Applicant’s destruction of many hectares of biodiversity at the beginning of spring 2021 calls into question the foundations of their surveys, their planning procedures and their methods. A theory should be judged by its practice: their practice plainly contradicts what they claim.

6 Comments on the Changing Policy Environment (REP8-235)

The Applicant continues to ignore Government Policies other than the Energy White Paper 2020. Surely, they should be looking to achieve a synthesis of policies rather than place one policy on energy in opposition to other Government Policies on energy, like the BEIS review, and the Dasgupta report, and even the declared support of the Prime Minister for an offshore transmission grid (PMQ, House of Commons, 19-5-2021).

End