



## SPR EA1N & EA2 PROJECTS

### DEADLINE 12 - COMMENTS ON THE APPLICANTS' EXA.AS-21.D11.V1 EA1N&EA2 HUNDRED RIVER ECOLOGY SURVEY REPORT VERSION 01 [REP11-063]

Interested Party: SASES

IP Reference Nos: 20024106 & 20024110

Date: 28 June 2021 Issue 1

1. Section 1.1 of REP11-063 states that the Applicants conducted this further survey in late May 2021 in order to verify or update their previous findings with regard to the Aldringham River Hundred area (Works No 19). This was on advice from Natural England. We have considered it to be a supplement to Extended Phase 1 Habitat Survey – Part 1 [APP-503] and Ecology Results February 2021 [REP6-035].
2. SASES does not accept that the evidence provided is sufficient to confirm the Applicants' previous assessment that the riparian woodland between Hundred River and B1122 is not wet woodland. Important questions remain unanswered – see para. 10 below.
3. The correct classification of this riparian woodland is highly important to biodiversity in the area. The loss of trees and vegetation from it would inevitably be damaging to this special habitat and cannot be mitigated or compensated by the planting such as the Applicants proposes in Works no 24 which is a totally different and unsuitable arable land environment 800m distance to the west.
4. Aldringham residents are able to observe this habitat and changes to it continuously through the seasons. Vegetative growth has been prolific since early April. The undergrowth is now so dense and high that by late May it would have been difficult to walk across this land.
5. SASES previously noted important inaccuracies in the Applicants' previous Surveys in this area in Appendix 4 and Appendix 5 of our deadline 7 Submission – Comments on Applicants DL6 Submissions [REP7-089]. We do not understand why this sensitive area of the Aldringham River Hundred Special Landscape Area was not surveyed in 2018 as thoroughly as other designated areas of the cable route.
6. Our chief concern with this latest report of an ecological walkover survey on 28 May 2021 is about the species that have **not** been reported and the rationale for the Applicants' firm conclusion based on those wet woodland tree and plant indicators that have been reported. We continue to believe that important evidence indicating that this is 'wet woodland' has been overlooked or ignored. For example, we cannot understand how the Applicants' Surveyors ecologists have not recorded the extensive areas of the non-indigenous invasive species Himalayan Balsam (*Impatiens glandulifera*). This is widespread and dominant in many parts of the land within the Applicants' Order Limits across the west bank riparian woodland, not only alongside the river but across this section woodland between B1122 and the river.
7. The plant Himalayan balsam is an indicator of wetness in the land. It is well documented that in the U.K. balsam is generally to be found along riverbanks and in

wet woodlands and damp meadows. It is not a native plant and therefore not listed in JNCC UK Biodiversity Action Plan (ABAP) Priority Habitat Description for Wet Woodland. Nevertheless it is inexplicable that qualified ecologists could have failed to identify and make note of it in their reports. The plant is classified as invasive because of its ability to exclude native species. It makes no sense that a survey has been completed without noting that it was found to be widespread there. SASES expressed concern in paras 7 and 10 respectively of Appendix 4 and Appendix 5 of SASES Deadline 7 submission [REP7-089] that the Applicants had not noted the extensive areas of dead stalks of "wetland loving Himalayan Balsam, a wetland plant which is pervasive on the land" in its February 2021 ExA.AS-26.D6.V1 EA1N&EA2 Ecology Survey Results - Version 01 [REP6-035]. Its new growth has been increasingly prominent following germination in early March. By 28 May 2021, large swathes of Balsam should have been impossible to ignore and one month later it has reached the height of 2m and will shortly be in bloom..

8. The Applicants' statement in Section 6.5.1, paragraph 242 of 8.7 EA1N Outline Landscape and Ecological Management Strategy v06 (OLEMS) [AS-127] that *Himalayan balsam is "present along the Hundred River upstream of, but outside, the onshore development area"* is also inexplicable and misleading. Suffolk County Council also will be fully aware that Himalayan Balsam has been present on this land over many years and indeed has in the past visited the area in order to inform land owners of their responsibility to eradicate it.
9. The Applicants have relied at ISH 7 and subsequently upon support from ESC and SCC ecology officers for its conclusion that the land is 'semi-natural broadleaved woodland' and not 'wet woodland'. Ecology officers from both Councils did meet the Applicants' ecologist at the roadside during the 15 February 2021 Survey just two days prior to ISH7. They expressed support for the Applicants' conclusions at ISH7 and in ESC submission REP6-075. However, when SEAS requested sight of their Visit Logs, it was informed in writing by both Councils that neither officer had actually stepped on the land to inspect it. They had relied on views from the roadside and the nearest public footpaths approximately 175m away. Neither officer had documented his observations in a Visit Log. We submitted evidence on this in SASES DL6 Post ISH7 Hearing on Biodiversity and Habitats Regulations Assessment - Part 1 - Agenda item 2a (i) Hundred River - Priority deciduous woodland - wet woodland and its Appendix 1 and Appendix 2 [REP6-128].
10. We believe that even at this late stage of the Hearings, important questions remain unanswered:
  - a) Why has the Applicant ignored the presence of Himalayan Balsam in its February 2021 and May 2021 surveys on this land?
  - b) Why have no scientific measurements been presented on soil type or its 'wetness' as one would expect to see in a proper botanic survey?
  - c) Why were no observations regarding this sensitive and habitats rich section of riparian woodland presented in the original Extended Phase 1 Habitat Survey or with EA1N and EA2 planning applications.
  - d) Had this length of the River Hundred been properly assessed in 2018, how could the Applicants' decision to select this river crossing place for the two Cable Corridors have been feasible or defensible?

References:

APP-503 6.3.22.3 Environmental Statement - Appendix 22.3 – Extended Phase 1  
Habitat Survey (Part 1 of 2)

APP-277 - 6.2.22.4 Environmental Statement - Figure 22.4a-f – Extended Phase 1  
Habitat Survey Results - Figure 22.4c.

- e) Why has local knowledge of the Hundred River area and its habitats that has been presented in good faith by SASES, SEAS and individuals during these Hearings been ignored or discounted?
- f) How could the Council ecology officers have been able to make a valid assessment from the roadside 86m away from the river?
- g) Why has it been necessary for Natural England to rely solely upon survey evidence presented by the Applicants and Local Authorities?
- h) Given the continued controversy, why has an 'independent' survey not been carried out at Work No 19, if only as a matter of ecological 'due diligence'?
- i) The Applicants' proposal to plant trees at Work No 24, a field of dry sandy soil cannot replace this riverside habitat, within which the Applicant has reserved a working area on the west side of 68m x 40m. Why has no suitable mitigation been proposed to protect this habitat or else to establish an equivalent area such as on marshland elsewhere near the Hundred River?

**Recent photographs of the woodland between Hundred River and B1122**

**An area of Himalayan Balsam with a background of nettles in the background  
(2 June 2021)**



**An area of Himalayan Balsam in foreground with a line of Alders separating the woodland from paddock behind (24 June 2021)**



END