



## **Offshore Wind Farms**

### **EAST ANGLIA ONE NORTH**

**PINS Ref: EN010077**

**and**

### **EAST ANGLIA TWO**

**PINS Ref: EN020078**

**Deadline 12  
June 28<sup>th</sup> 2021**

**by**

**SEAS (Suffolk Energy Action Solutions)  
EA1N – EN010077 / SEAS ID no 2002 4494  
EA2 – EN010078 / SEAS ID no 2002 4496**

#### **Why this document in this form?**

*SEAS has made several detailed submissions on the River Hundred and the riparian woodland in Aldringham. We believe it is wet woodland, a priority environment, and protected. However, the Applicant continues to contest this, calling it a broadleaf woodland. We believe their surveys are flawed, and have missed essential evidence. We therefore offer photographic data to prove our case.*

#### **Summary**

**1 JNCC Woodland Classification, page 43 (<https://data.jncc.gov.uk/data/673dc337-e58f-4f6b-ac7b-717001983c2e/JNCC-NVC-FieldGuideWoodland-2004.pdf>)**

**2 The River Hundred and Riparian Woodland photographic record matched with the JNCC classification for W6 wet woodland, June 16th 2021**

**3 Notes on matters arising from the evidence presented**

**4 Questions for ExA**

**5 Map or area and viewpoints for data collection**



1

JNCC-NVC-FieldGuideWoodland-2004  
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**W6 *Alnus glutinosa* – *Urtica dioica* woodland**

A rather ill-defined community of eutrophic moist soils, especially where there has been substantial deposition of mineral matter, or on flood plain mires where enriched waters flood fen peat.

Alder is usually the most common tree, particularly on wetter soils, but is replaced by *Salix fragilis* in W6b and by downy birch on drier sites. Black poplar may occur, but rarely, and sycamore, ash and pedunculate oak are often occasional species. The shrub layer is usually open and patchy, with *Salix cinerea* the most common shrub, and hawthorn and elder on drier ground. *Salix viminalis*, *S. triandra* and *S. purpurea* are abundant in some stands.

Unlike the other alder types (W5 and W7) the field layer generally lacks tall swamp and fen species. The most typical species is *Urtica dioica*, which can form virtual monocultures, although it may be less common or absent. The few other typical species show a rough transition from wetter to drier habitats. Where soils are moist towards the surface, *Poa trivialis* and *Galium aparine* are frequent, with *Solanum dulcamara* and, often, clumps of swamp and fen species. On drier substrates *Lonicera periclymenum*, *Dryopteris dilatata* and *Rubus fruticosus* are more frequent. Less common species include *Angelica sylvestris*, *Cardamine flexuosa*, *Cirsium palustre*, *Glechoma hederacea* and *Ranunculus repens*. The field layer can appear 'run-down', and may be choked with brushwood from winter flooding or, in the case of drier stands, showing other signs of disturbance.

1.1 This specification will be measured against the state of the woodland on June 16th 2021, with the benefit of photo records.

1.2 When appropriate, photos from winter are included, either because of a seasonal issue (e.g. illustration of flooding), or because nettle now makes the site largely inaccessible without disturbance, or because nettle makes other features invisible by covering them (e.g. fallen trees).

1.3 The woodland is currently overgrown but it was possible on 16th June to trace a survey by the Applicant through broken undergrowth left behind. Some of the markers they left are presented here, and therefore views are presented from two of the survey's stand points, as shown by the markers.

1.4 Where possible, grid references drawn from *What3Words* are given. This app has its limitations owing to signal drift, but gives a broad idea of location and angle of data. In any case we are showing vistas, not targets. See Map, page 19.

1.5 Notes on photographs. These images were challenging to acquire because the woodland is currently in full summer growth. Invasive species Himalyan Balsam vies with Nettle for dominance in clearings, mosquitoes relish visitors, and ditch features make crossing difficult, even when water is low. Consequently, some photos are taken from the accessible edges, looking in, while others are illustrate compass points from the Applicant's fixed markers. These areas are also clearly marked on the Map, page 19.

1.6 We are grateful to local residents for allowing us to access the woodland and meadow for this purpose.

1.7 JNCC classification of Wet Woodland 6 (W6) is included verbatim in bold, with images logged by number in the text, for convenience.

2 NCC VERBATIM EXTRACT, page 43 (see image) W6 *Alnus glutinosa* – *Urtica dioica* woodland (Alder and stinging nettle wet woodland)

**2.1 [NCC] A rather ill-defined community of eutrophic moist soils, especially where there has been substantial deposition of mineral matter, or on flood plain mires where enriched waters flood fen peat.**

*Image 1 The riparian woodland east of the B1122 has rich, loamy soil, uncharacteristic of the coastal plain, which is sandy. Here the foot of a 55kg person has sunk easily into the wet soil. The divet is marked by a red circle. The nettles (*Urtica dioica*) visible here are characteristic of damp, rich soil. The date of this image is 16-6-21 after a dry period of several weeks with mild showers on 2<sup>nd</sup> June.*



**Grid ref. 52.188187,1.57790**

**2.2 [NCC] Alder is usually the most common tree, particularly on wetter soils**



*Image 2 Alders on river bank, summer /winter - note pervasive Himalayan Balsam characteristic, of wet environments. Grid ref. Approx 52.188565, 1.578823 facing west in summer, east in winter*





*Image 3, Line of Alders with regrowth, separating woodland from paddock, winter, from approx 52.188888, 1.578436, facing north*



*Image 4, Line of Alders separating woodland from paddock, summer - note pervasive, invasive Himalayan Balsam*

*Summer, from approx 52.188800 1.578371 facing north*

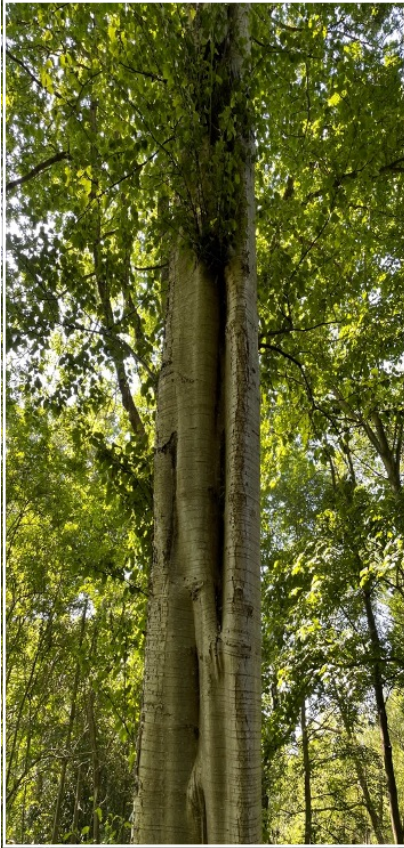


*Image 5, Brophyte-rich fallen tree; dense thicket of alder and poplar behind, winter 2021, southern end of wood, characteristic of W6. Approx 52.188043 1.578412 facing east*

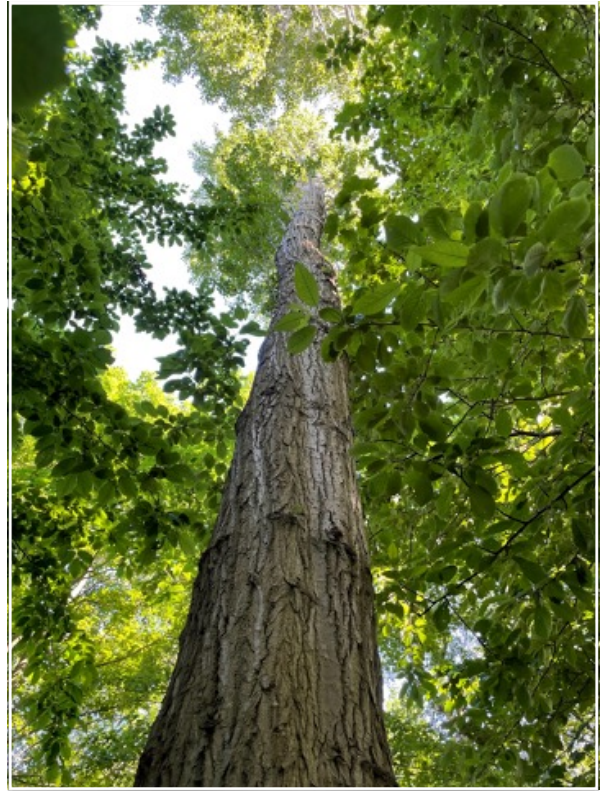




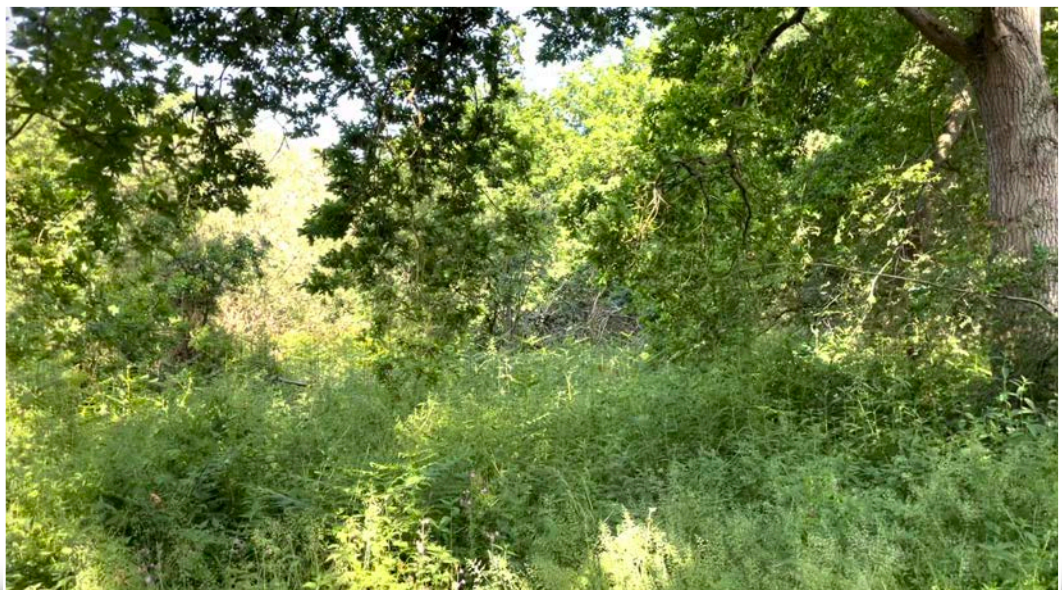
**2.3 [NCC] but is replaced by *Salix fragilis* in W6b and by downy birch on drier sites. Black poplar may occur, but rarely, and sycamore, ash and pedunculate oak are often occasional species.**



*Image 6 Example of Downy birch close to river approx 52.187689 1.579130*



*Image 7 Example of Black Poplar close to ditch approx 52.187689 1.579130*



*Image 8, Western edge (near Gypsy Lane) showing oak, and also wet site species: white poplar, aspen, nettle, cleaver (52.187949 1.577966, facing east)*





Image 9, Ditch in summer with willow, nettle, cleaver, nightshade (approx 52.187789 1.579080 facing north east)

**2.4 [NCC] The shrub layer is usually open and patchy, with *Salix cinerea* (goat willow) the most common shrub, and hawthorn and elder on drier ground. *Salix viminalis* (osier), *S. triandra* (almond willow) and *S. purpurea* (purple osier) are abundant in some stands.**

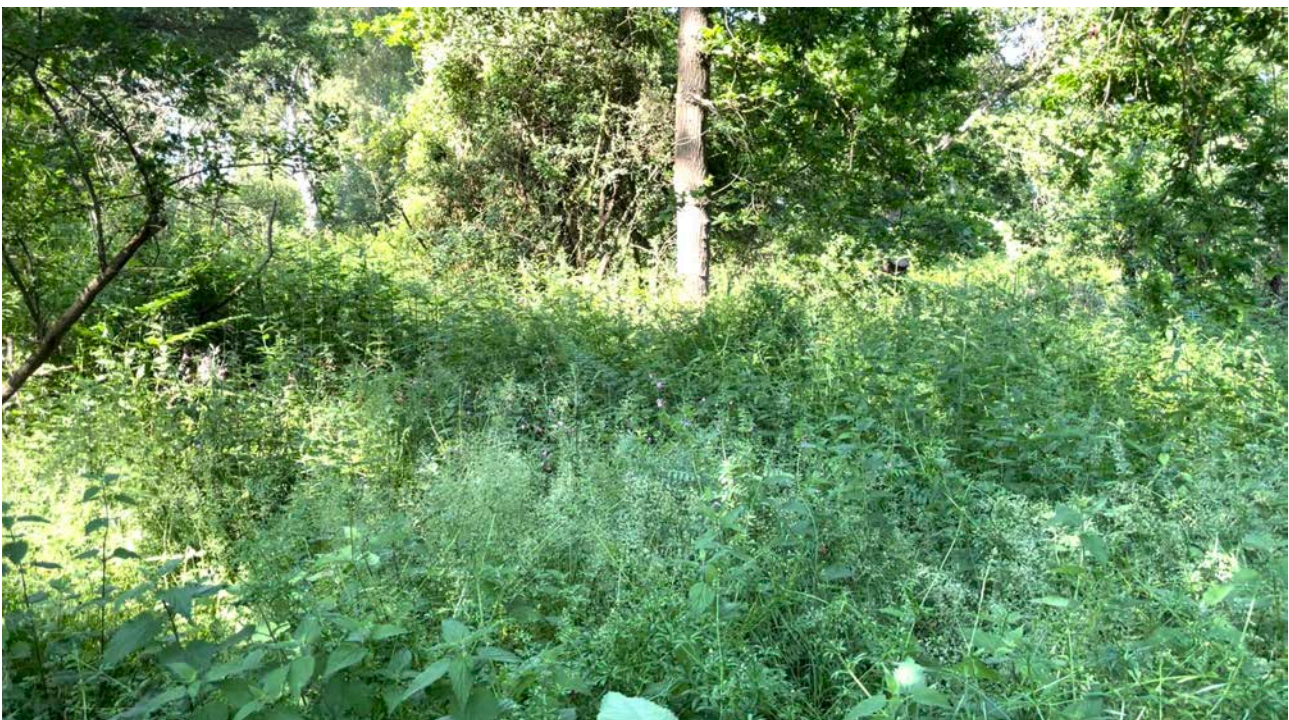


Image 10, Open and patchy shrub layer; here showing hawthorn, holly, elder, ivy, cleaver, nettle, fern, campion, Himalayan Balsam (from approx 52.187877 1.577975, accessed off Gypsy Lane, facing east)





*Image 11, ?goat willow/poplar seed caught in ivy, from 52.187735 1.578500 (from Gypsy Lane) facing east*

**2.5. [NCC] Unlike the other alder types (W5 and W7) the field layer generally lacks tall swamp and fen species. The most typical species is *Urtica dioica* (Nettle) which can form virtual monocultures, although it may be less common or absent.**

*2.5.1 Abundant, tall nettle has been evident in all images. Currently the nettle monoculture makes passage through the site difficult. Yet, nettle colonisation is now also challenged in this woodland by Himlayan Balsam (*Impatiens glandulifera*), invasive plant of riverbank and marshland (Images 2, 4 8, 9, 10, 11)*

**2.6 [NCC] The few other typical species show a rough transition from wetter to drier habitats. Where soils are moist towards the surface, *Poa trivialis* (rough meadow grass) and *Galium aparine* (Cleaver) are frequent, with *Solanum dulcamara* (Nightshade) and, often, clumps of swamp and fen species.**

*2.6.1 Several varieties of *Poa* are to be seen (Image 10), abundant cleaver (2, 8, 9, 10, 11), nightshade (9), fen species (12-15) (found in the clearing of the cable corridor in late winter).*



*Image 12, Yellow flag (in winter)*



*Image 13 Lords and Ladies*



*Image 14 Stinking hellebore*





Image 15, rushes with Himalayan Balsam, in the cable corridor, facing north

**2.7 [NCC] On drier substrates *Lonicera periclymenum*, (Honeysuckle) (Image 16), *Dryopteris dilatata* (Broad buckler fern) (Image 17) and *Rubus fruticosus* (Bramble) (Image 18) are more frequent.**

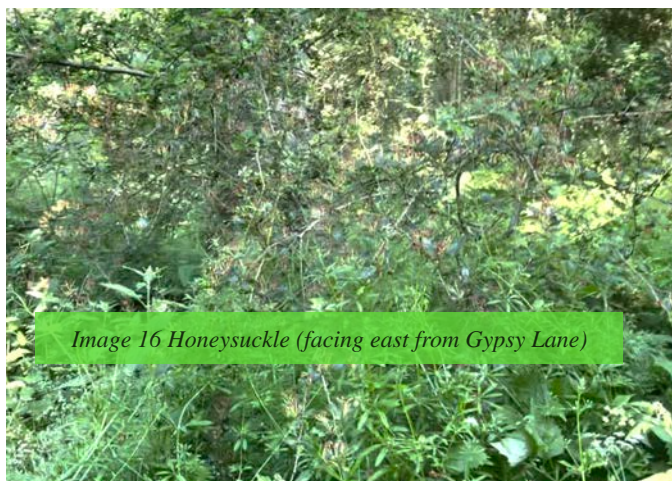


Image 16 Honeysuckle (facing east from Gypsy Lane)



Image 17 Fern,  
around 52.187735 1.578197 facing east



Image 18 Bramble in winter



**2.8 [NCC] Less common species include *Angelica sylvestris*, (Wild angelica) *Cardamine flexuosa*, (Bittercress) *Cirsium palustre*, (Marsh Thistle) *Glechoma hederacea* (Ground ivy) and *Ranunculus repens* (Creeping buttercup) (Images 19, 20)**



*19 Marsh Thistle, abundant Yellow Archangel and Ground Ivy, around 52.187837, 1.579307*



*20 Buttercup, around 52.187837, 1.579307*



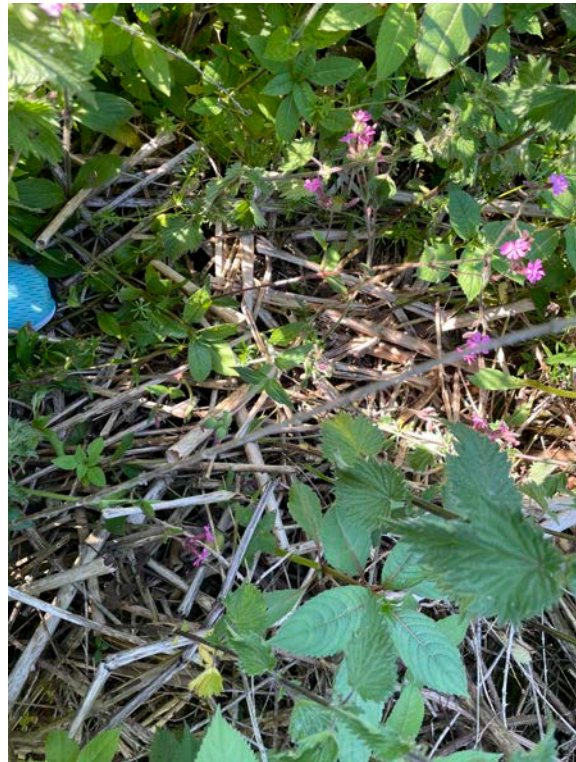
*21 'Run down' appearance from fallen tree stems (in winter)*

**2.8 [NCC] The field layer can appear 'run-down', and may be choked with brushwood from winter flooding or, in the case of drier stands, showing other signs of disturbance. (5, 21, 22, 23, 24)**





*22 Brushwood under ground ivy,  
and Himalayan Balsam in the  
cable corridor clearing*



*23 Fallen plant stems with Red Campion  
and Himalayan Balsam regrowth in cable  
corridor*



*24 Winter flooding, facing east to river*





25 *Marker 1*, made by SPR's surveyors at 'dry' edge of clearing, close to the B1122, showing Himalayan Balsam (approx 52.188187, 1.577900). These views taken on 24-6-21.

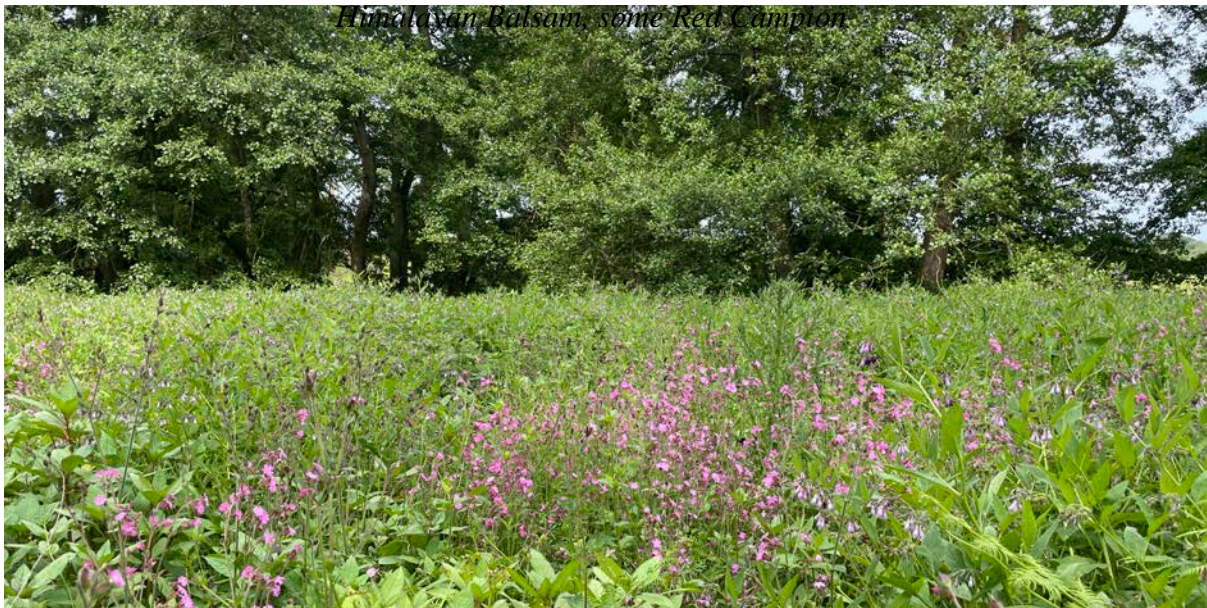


26 The view from *Marker 1* facing west towards B1122. Tall swathe of bracken on western edge near the Aldeburgh Road, with Himalayan Balsam coming through





27 View from **Marker 1**, facing north to the paddock - some grasses and rushes, Himalayan Balsam, some Red Campton



28 From **Marker 1**, facing east to the river - more, dense Himalayan Balsam ceding further away to nettle and cleaver



Image 29, **Marker 2** made by SPR's surveyors, showing mossy forest floor, Himalayan Balsam, approx 52.188618, 1.578471.





*30 View from [Marker 2](#), facing south east*



*31 From [Marker 2](#), facing east - rushes, alder, Himalayan Balsam*





32 View from [Marker 2](#), facing west - *Himalayan Balsam* close by, swathe of bracken closest the B1122

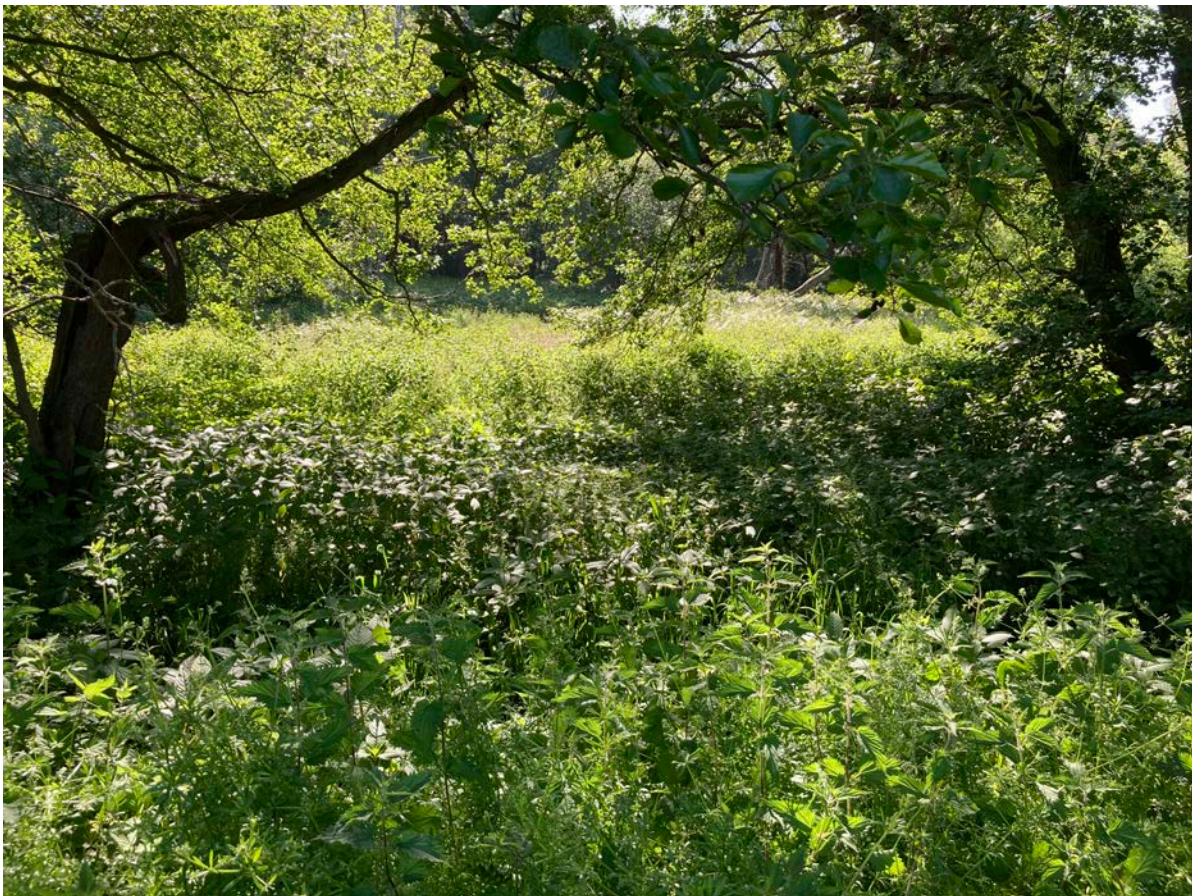


33 View from [Marker 2](#), facing south



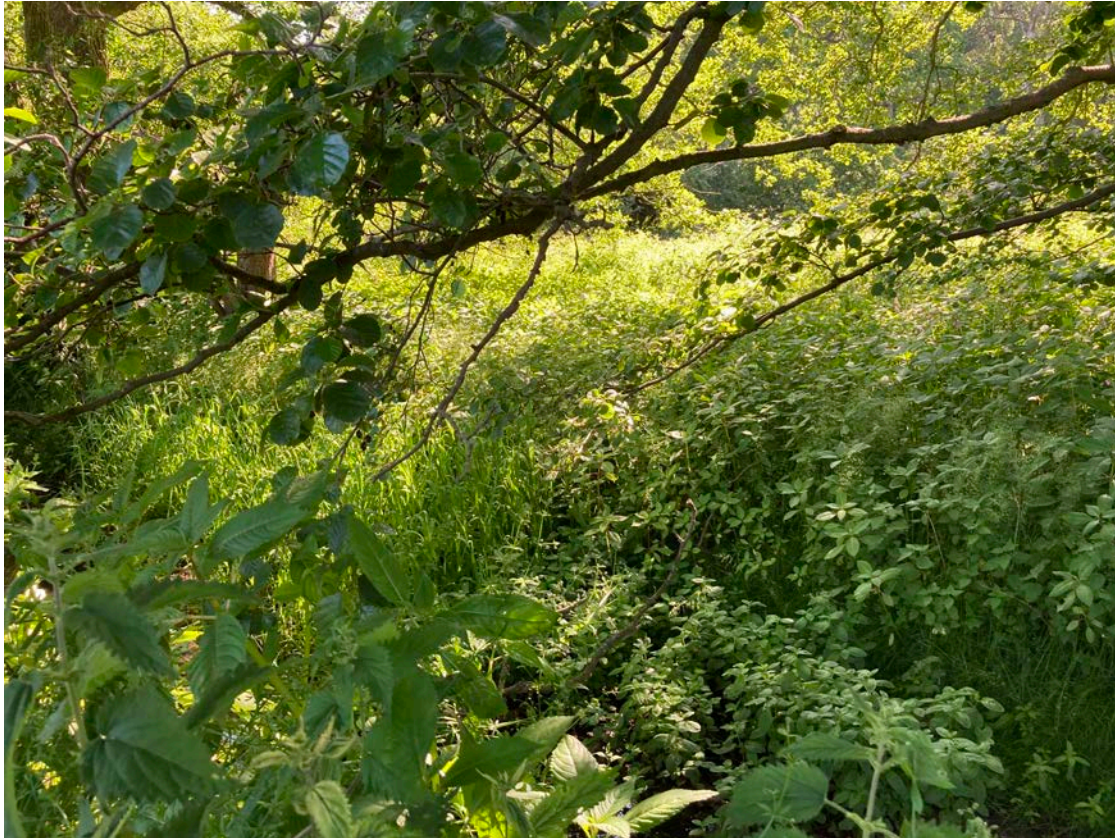


34 View from several paces south of [Marker 2](#), facing south, of multi-layered shrub and tree growth, and thicket



35 Image from the eastern **Riverbank viewpoint** facing west through the clearing which is also part of the cable corridor. Alder, nettle, cleaver, and Himalayan Balsam





*36 View of cable corridor clearing from opposite, eastern river bank (facing west).  
The river is not visible to passers-by without climbing over nettle and electric fence.  
The photographer used ladders and planks.*



*37 Alder on river bank at cable corridor with visible animal hole  
in river bank (facing west)*



### 3 Notes

**Numerous photographs and footage have been taken and mapped here to given experts the chance to assess the woodland from visual data.**

**3.1** This presentation has relied on visual evidence matched against the JNCC's wet woodland classification of W6 category. The woodland meets these criteria, and should therefore be both a protected and a priority environment.

**3.2** Vegetation missing in the 2004 JNCC-NVC Field Guide to Woodland is the non-native species Himalayan Balsam (*Impatiens glandulifera*), which, since publication, "has rapidly become one of the UK's most widespread invasive weed species, colonising river banks, damp woodlands[...]. It reaches well over head height, and is a major weed problem. Growing and spreading rapidly, it successfully competes with native plant species for space, light, nutrients and pollinators, and excludes other plant growth (through shading and smothering), thereby reducing native biodiversity" (CABI, 2021).

**3.3** Visitors to this woodland cannot avoid seeing *Impatiens glandulifera*. Access is made difficult by its extensive colonisation in swathes, and by *Urtica dioica* (Nettle) almost everywhere else. *Impatiens glandulifera* has already spread to the fen in the SSSI downstream (North Warren). The County Council has reminded riparian residents in the immediate vicinity that it is their duty to eradicate it on their property.

**3.4** It is therefore astonishing that the Applicant's surveyors seem to have missed it. The Applicant says in Section 6.5.1, paragraph 241 of 8.7 EA1N Outline Landscape and Ecological Management Strategy (OLEMS) that Himalayan balsam is "present along the Hundred River upstream of, but outside, the onshore development area" [REP10-005]. Their most recent visit also does not mention this issue, although last season's tall, woody stems were present throughout winter and regrowth was already germinating in April, and was certainly present in late May 2021.

**3.5** The ecologists of Suffolk County Council and East Suffolk Council also missed it. They stated in February that the woodland was dry (ESC submission REP6-075), despite not approaching closer than the B1122 from the west or closer than a public footpath 150m from the east [<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004129-4.SEAS%20ISH6%20-%20Action%20Point%2020%20-%20DEADLINE%206.pdf>] and [REP6-128]. Their own Environment Departments evidently have a different view.

**3.6** The cable corridor provides ideal, wet conditions for this invasive plant, adding further evidence that this is a W6.





## 4 Questions

**4.1** The surveys of this area have been flawed, and yet the Applicant's selection of the cable route through this sensitive, priority area was based on them [<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004868-SEAS%20-%20Habitats%20&%20Biodiversity%20-%20Deadline%209.pdf>]. If they had been carried out properly, the cable corridor might have had to be elsewhere, or else a different process would have been proposed to cross the area.

How can ExA ensure decisions are made on correct or corrected evidence at this stage of the hearings?

**4.2** How can ExA make confident decisions from flawed data?

**4.3** If the ExA are minded to recommend consent, how will adequate mitigation for this protected environment be achieved?

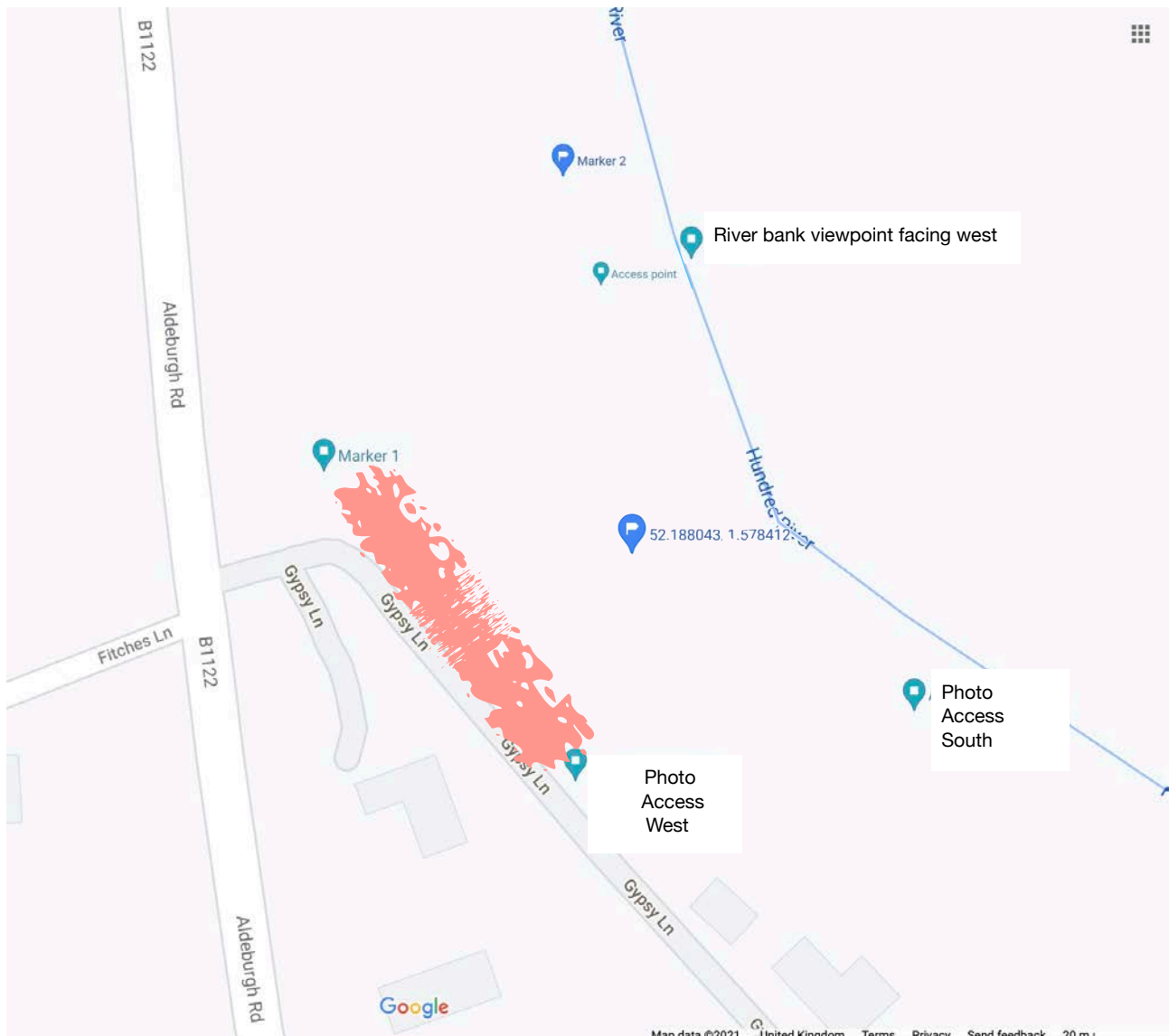
**4.4** Shouldn't adequate mitigation for this protected environment include microtunnelling from works area 26 to works area 28 inclusive rather than accepting inadequate tree planting in a different location, with smaller area, and different environment as mitigation?

**4.5** The government's policies on Biodiversity and Climate Change are becoming clearer with recent publications and high-level discussion making a bold case (*Ten Point Plan for a Green Industrial Revolution*, *The Dasgupta Review*, with the Treasury's response to this specifically targeting NSIPs, and the *BEIS Review*). Plus, incentives are being offered to 'Pathfinder' enterprises to achieve **both** NSIP and Biodiversity protection plus gain. In addition, the 2018 *A Green Future: Our 25 Year Plan to Improve the Environment*, (<https://www.gov.uk/government/publications/25-year-environment-plan>) is already in place.

How does allowing EAN1 & EA2 (+) projects to go ahead as they stand meet the criteria of the 25 year plan unveiled in that Paper?



## 5 Google map with locations of vista points



Approx location of Marker 1, Marker 2 left by SPR surveyors



Easily accessible area photographed between grid reference and Marker 1

Photo Access South - access to site from south

52°11'17.0"N 1°34'42.3"E Approx location of photographer for winter images of thickets