



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN020078

Deadline 13

HABITATS and BIODIVERSITY

by

SEAS (Suffolk Energy Action Solutions)
EA1N – EN010077 / SEAS ID no 2002 4494

Summary

SPR in action: practice makes imperfect

EA2 – EN010078 / SEAS ID no 2002 4496

1 Pre-construction surveys are flawed

SEAS has provided evidence of the lacunae and incorrect data in the biodiversity surveys offered by the Applicant (SEAS Deadline 9, Habitats and Biodiversity, 14 1.6) and has offered photographic records of the same areas which enable experts to judge what is present and what has been missed.

2 No management structure

There is no externally-visible management structure for all the contractors and consequently there are slow and poor responses to problems (SEAS Deadline 11, Habitats and Biodiversity). Pre-consent surveys have been devastating to red-listed species, as they have involved the destruction of many acres of habitat and forage during the breeding season, despite the presence of an ecologist. The image below shows the sterilisation of the cable corridor in the middle of a crop, which the Applicant denies happened. The entire Friston substation site was also sterilised and a hedgerow removed. This does not bode well for construction practice.



Image - photo of sprayed cable corridor this spring - April 21

3 It'll be alright on the night

There is over reliance on post-consent and on-the-hoof decisions at the application stage. SPR has admitted, for instance, that it does not know that a number of dwellings in the River Hundred valley in Aldringham-cum-Thorpe



are reliant on well water, and that they have not contacted the residents about how piercing the water table and aquifers may affect them (SEAS Deadline 11, Habitats and Biodiversity). Another example: the cable corridor width in ecologically sensitive areas is confused by whether two projects will coincide or not and whether mitigation is being considered or not (AUDIO ISH14 Day2 Session1, 17 03 2021, 1hr 12 and following), and whether the Applicant's ecologists might find evidence of protected species.

The problem here is that the pre-construction surveys are flawed, and that the ecologists seem both overly focused on the project's procedure and unable to grasp the significance of signs in key areas unless these areas are designated sites (for instance, their blindness to Himalayan Balsam colonisation in the riparian woodland, described in SEAS Deadline 12, Habitats and Biodiversity).

In addition, more ecologically supportive techniques like microtunnelling in sensitive areas require advanced planning, pre-consent feasibility studies and detail, none of which has been achieved.

4 We're still good to go!

The Applicant does not adequately revise its proposals in the light of conflicting data.

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

The numbers in brackets below refer to the Applicant's paragraph numbers in that document.

The Applicant is reluctant to shift in the light of evidence: the Applicant's dismissal of SEAS' request for microtunnelling beneath both the River Hundred and the protected woodland on both sides of the B1122 (*'Issue Specific Hearings 14 (ISHs14) The case against the open trenching of the River Hundred.*) was a reiteration of old arguments without addressing new data. SEAS has established that the applicant's surveys missed out a whole, wet, riparian woodland, and also reminded the Applicant of the need to protect the inhabitants of the Nursing Home and Fitches Lane (SPR32).

And the Applicant has not answered this question: why did they survey the River Hundred crossing point in April 2018, which they claim is the only possible route to Friston, if they had no notion of taking cables to Friston until December 2018? (SPR44).

5 **Rose-tinted glasses**

The Applicant's diversity case still rests heavily on the initial Application surveys, which were not comprehensive and contained errors, and smoothes over the evidence and objections brought to the Examination since (SEAS, Deadline 8 ISH 14 HABITATS and BIODIVERSITY, The quality of biodiversity surveys). This cannot be allowed to prevail.

6 **Practice Imperfect**

Local residents have had a shocking demonstration of the practical results of the Applicant's ecological and environmental attitude. A number called the police to report what they saw as wildlife crime.

Alas, there are loopholes in legislation when it comes to protecting species outside of designated areas - but the Applicant chooses to drive a drilling rig right through them while paying lip-service to ecological protection.



Image - discarded reptile traps, Thorpeness - April 21

The number of breeding seasons lost for protected species in the proposals have therefore been increased by this current one, 2021, making local extinctions all the more likely. Despite the delight of one of the Applicant's contracted-out ecologists on spotting a white-tailed eagle at Thorpeness, we now know that observation cannot translate into proper protection for this special area.



Image - Friston test trenching - April 21

The effects on the marine environment are hidden from land-dwellers; however the rapid destruction of the terrestrial environment has made it possible to visualise what is happening under the sea.

It is time for a proper policy review and the establishment of enforceable protocols for all offshore developments.

7 Questions for the Examiners

How will consenting EAN1 and EA2 fulfil the criteria of the 2018 Policy paper, '*A Green Future: Our 25 Year Plan to Improve the Environment*' ?

How will consenting EAN1 and EA2 address the accelerating response to the biodiversity crisis in Government Policy contained in The Dasgupta Review, the BEIS offshore network transmission review, and the



Government's alignment with UN guidance from the work of IPBES and IPCC teams?