Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN020078

Response to the Secretary of State's request for further information

Dr Gill Horrocks 20024567, 20024566

Summary

1. **Cumulative Impact and this Enquiry – continuing NSIP development in the same area for 10 years**
2. **Cumulative impact and flooding**
3. **Cumulative impact and biodiversity**

Dear Sirs

I write in response to the request of the Secretary of State (SoS) for further information on this proposal by end 31st January 2021.

1. Cumulative Impact and this Enquiry – the context

1.1 During the Planning Enquiry, the Applicant argued that the Enquiry should be confined to EAN1 and EA2, according to procedural regulations, although the cumulative and concurrent impact of Sizewell C was allowed to be considered.
1.2 In fact, National Grid Venture's Nautilus Interconnector had already been introduced to our local authorities and communities, before the public EAN1 and EA2 Enquiry began, and further information on additional proposed infrastructure became available during the Planning process. Eurolink Interconnector and the Sea Link Interconnector will apply subsequently to make landfall and onshore connection in the same area. SCD2 Interconnector, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm are mooted next.
1.3 In addition, the application for Sizewell C, in the same area, and to be built concurrently, is at decision stage.
1.4 We are concerned therefore that the process of isolating EA1N and EA2 from the other projects during the Enquiry has created a Trojan Horse, which, if accepted by SoS, will facilitate several subsequent NSIP developments to follow here.
1.5 This means that this small, hitherto protected, ecologically vital and internationally celebrated area of Suffolk, is proposed to become an energy hub for 9 separate projects on an unprecedented scale, without proper consultation with the local population at the ballot box and without any sort of overall coherence, co-ordination or transparency necessary for NSIPs. Locally we stand to lose tens of millions in revenue every year as this mass industrialisation will destroy our main source of income: tourism, which is based on wildlife, culture, and leisure activities. The cumulative impact will be an existential threat.
1.6 Interventions were made by Interested Parties and Statutory Representatives to attempt to correct the imbalance caused by the procedural exigencies of discounting imminent developments outside the Application. We attach a link to the letter by one of our local Councillors to the Examiners.[1] For process to be fair, these procedures should allow for the demands of evidence and build in adjustment.

2. Cumulative impact and flooding

2.1 The Applicant admitted that the cumulative impact of its projects with Sizewell C would interfere with the catchment areas of the River Hundred and the Leiston Beck.[2]
2.2 It is worth stating what these two rivers feed: the River Hundred feeds the Aldeburgh-Leiston SSSI and the coastal AONB, flowing through what was formerly designated SLA; the Leiston Beck feeds the Sandlings SSSI and the marshes of Eastbridge and the internationally important Minsmere Reserve. These designated SSSIs protect a rare, broad diversity unique to this area.

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[1] REP1-316 *https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-002863-DL1%20-%20Russ%20Rainger.pdf*

[2] APP-068, paras 159ff *SPR Chapter 20 Water Resources and Flood Risk Environmental Statement Volume 1*

2.3 It is not improbable that adding the cumulative impact of another 6 energy projects to this disturbance of the vital rivers is likely to be an existential threat to the SSSIs and special landscapes of the area.
2.4 Neither river has been properly assessed as receptor, so no real mitigation has been proposed.[3]
2.5 Current protection against agricultural run-off from the river, such as the constructed bund in RSPB North Warren, is unlikely to prevent repeated, prolonged and additional industrial pollution, as the underlying watertable is high and classed as highly vulnerable,[4] and both underground aquifers and surface channels in the coastal region are sandy, interconnected and highly permeable, as well as currently being pure enough to provide potable well water to a significant number of dwellings, as they have for centuries.[5] In addition, DEFRA has calculated the impact from LSEs within a few hundred metres of a SSSI as being highly likely, damaging and to be avoided.[6] Unfortunately, these repeated projects make the SSSIs extremely vulnerable. Repeated environmental insult is inevitable.
2.6 The River Hundred floods.[7]

2.6.1 River Hundred's overtopping contributes to the richness of the botanical quality of the grazing marshes and the biodiversity of the protected, and probably wet, woodland due for demolition in the Applicant's trenching. Alder trees, specially adapted to wet environments, currently protect the river bank, slowing the spate, removing pollutants from the stream and feeding the SSSI south of the trenching point.[8]
2.6.2 The Hundred's flooding also threatens roads and property in Aldringham, Coldfair Green and Knodishall.[9]
2.6.3 The Environment Agency is unlikely to know of the extent and regularity of its flooding as residents tend not to report.[10]

I here refer to the submission for this deadline by IPs Louise and Derek Chadwick, who have documented with photos, the sequential, annual flooding events by the River Hundred close to the pinchpoint.

2.6.4 The Applicant's assessment of geological and hydrological data also misses the important contribution to the health of the floodplain by the wet woodland at the

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[3] REP-8-240 Deadline 8 ISH 14 *SEAS, HABITATS and BIODIVERSITY The quality of biodiversity surveys*

[4] Ibid.

[5] REP1-380, Tessa Wojtcak, Material submitted for consideration for Issue Specific Hearing 2 (ISH2), Onshore Siting, designs and construction

[6] REP-8-240 page 2 *Deadline 8, SEAS, HABITATS and BIODIVERSITY The quality of biodiversity surveys*

[7] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-007543-SEAS_SoS_Flooding_30Nov2021.pdf

[8] REP6-139, REP6-140, EN010078-004106-5.SEAS ISH7 - Post hearing River Hundred Woodland - DEADLINE 6

[9] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-007543-SEAS_SoS_Flooding_30Nov2021.pdf

[10] ibid.

pinchpoint.[11] This woodland was omitted from, and was consequently not assessed in, the Applicant's initial HRs[12] and then was hastily and incorrectly assessed at the wrong time of year during the Enquiry.[13] The permanent loss of this priority environment will have consequences for the statutorily protected areas of the catchment and floodplain.

2.6.5 Disturbing the catchment and floodplain in this area where this is high vulnerability of groundwater promise a perfect storm of permanent damage to both biodiversity and human settlement.

Annual overtopping of River Hundred in Aldringham within metres of the pinchpoint

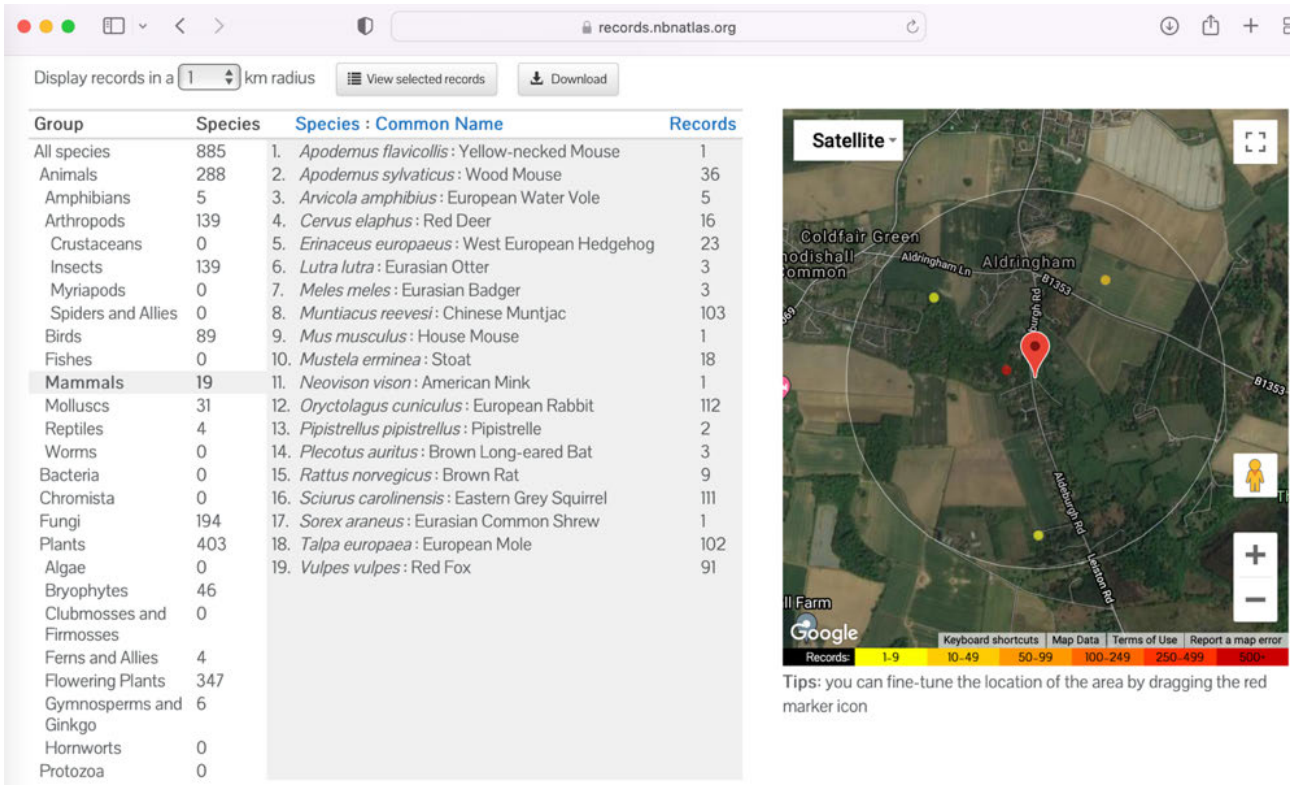
[11] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002685-ExAWQ1D1V109EA1NEA2ApplicantsResponsestoWQ1Volume917FloodRiskWaterQualityandR_378394_1.pdf (Applicants' Responses to ExA WQ1 Volume 9, 2nd November 2020)

[12] REP5-108 SEAS ISH3 Post-hearing submission https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003791-DL5%20-%20SEAS%20-%20Habitats%20and%20Biodiversity.pdf and also REP-139, REP6-140 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

[13] REP6-035 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004307-EN010077%20345053%20EA1N%20Appendix%20C8%20-%20NE%20Comments%20to%20the%20Ecology%20Survey%20Results%20[REP6-035]%20Deadline%207%20.pdf

3. Cumulative impact and biodiversity

3.1 Local people have voiced our concerns about inadequate ecological surveys throughout the planning hearing, and now that it is undeniable that multiple windfarms will use the same piece of coastal Suffolk to join the Grid, it is more important than ever that this situation be corrected formally and thoroughly with the correct number of surveys at the correct time of year, by properly qualified surveyors, and with appropriate equipment.
3.2 Christine Laschet submitted to the Examiners the records held by the County Recorders and National Biodiversity Database of the species found within a 1000m radius of the proposed river damming. There are numerous priority species recorded within the orbit of the wet woodland, including water vole, red deer, nightingale, turtle dove, slow worm, grass snake, otter, cuckoo, yellow-necked mouse, brown long-eared bat and yellowhammer.[14] A more recent search shows that more species have been recorded since, and the count is currently 885 – a richness associated with riparian ecology. A CSV file of all species recorded can be provided on request.



Group	Species
All species	885
Animals	288
Amphibians	5
Arthropods	139
Crustaceans	0
Insects	139
Myriapods	0
Spiders and Allies	0
Birds	89
Fishes	0
Mammals	19
Molluscs	31
Reptiles	4
Worms	0
Bacteria	0
Chromista	0
Fungi	194
Plants	403
Algae	0
Bryophytes	46
Clubmosses and Firmosses	0
Ferns and Allies	4
Flowering Plants	347
Gymnosperms and Ginkgo	6
Hornworts	0
Protozoa	0

Species : Common Name	Records
1. *Apodemus flavicollis* : Yellow-necked Mouse	1
2. *Apodemus sylvaticus* : Wood Mouse	36
3. *Arvicola amphibius* : European Water Vole	5
4. *Cervus elaphus* : Red Deer	16
5. *Erinaceus europaeus* : West European Hedgehog	23
6. *Lutra lutra* : Eurasian Otter	3
7. *Meles meles* : Eurasian Badger	3
8. *Muntiacus reevesi* : Chinese Muntjac	103
9. *Mus musculus* : House Mouse	1
10. *Mustela erminea* : Stoat	18
11. *Neovison vison* : American Mink	1
12. *Oryctolagus cuniculus* : European Rabbit	112
13. *Pipistrellus pipistrellus* : Pipistrelle	2
14. *Plecotus auritus* : Brown Long-eared Bat	3
15. *Rattus norvegicus* : Brown Rat	9
16. *Sciurus carolinensis* : Eastern Grey Squirrel	111
17. *Sorex araneus* : Eurasian Common Shrew	1
18. *Talpa europaea* : European Mole	102
19. *Vulpes vulpes* : Red Fox	91

Screenshot taken 25th January 2022

3.3 The habitat for these important species has been there for decades if not centuries. However, the cable route will be destructive: trees cannot be planted atop buried cable, so the protected woodland will be permanently sacrificed by the first trenching.
3.4 The Applicant discusses the slowness of recovery from trenching in non-agricultural areas, but in this case there can be no recovery because the woodland will not be replaced. The red-listed species currently relying on this ecology will die out in a series of local extinctions.

[14] REP1-229, REP1-230 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002464-DL1%20-%20Christine%20Laschet%20-%20Deadline%20Submission.pdf

3.5 Even the shrubs and grasses proposed to be planted by the Applicant after trenching will prove short-lived when the subsequent projects trench through to their construction sites, making the area uninhabitable for at least 10 years. Unfortunately, the red-listed migratory species will not be able to recover from this loss.
3.6 The Applicant's ecologists missed the existence of the woodland completely in its first deskbound attempt; when on site, the surveys focussed on an area north of the woodland rather than on the rather inaccessible, rewilded woodland (for instance, the ecologists recorded no Himalayan Balsam in the woodland, which is visibly overrun with it in summer, and has been for many years). This was commented on by Natural England, who also pointed out that the Applicant's hasty survey during the Examination was carried out at the wrong time of year and to an inadequate botanical standard to assess the nature and biodiversity of the wet landscape of the River Hundred.[15]

Southern edge of woodland and trench point with abundant Himalayan Balsam taken June 2021

3.7 Despite SEAS' repeated requests, the Applicant has refused to investigate the possibility of microtunnelling to save this area, notwithstanding the process's apparent fitness for purpose. It would limit surface ground disturbance to agricultural fields, avoid damage to the riparian environment, save the centuries-old hedgerows and avoid bringing misery to the inhabitants of the

[15] REP7-073 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004307-EN010077%20345053%20EA1N%20Appendix%20C8%20-%20NE%20Comments%20to%20the%20Ecology%20Survey%20Results%20[REP6-035]%20Deadline%207%20.pdf
Appendix C8 to the Natural England Deadline 7 Submission Natural England's Comments to the Ecology Survey Results [REP6-035]

centre of Aldringham, some of whom may have repeated trenching passing within metres of their homes over 10 years.[16]

Conclusion

Significant evidence has been presented to the ExA that the Ecology Surveys have been inadequate and are unsafe for a decision, as they put at risk several red-listed, priority species, a rare and priority wet woodland environment, a nationally-designated important zone for invertebrates[17], rare reptiles and amphibians (including the great-crested newt), and do not assess the cumulative impact on the SSSIs within the impact zone of their construction.[18] Multiple construction projects over 10 years will not allow recovery, therefore extinctions and depletion will become permanent.

This is the least desirable outcome for the area and a needless sacrifice of ecology that can least afford it. It makes the race to construct windfarms no more than greenwashing.

Thank you the opportunity to present this evidence.

Yours faithfully,

Dr G Horrocks, [redacted]

[16] Deadline 8, ISH 14, REP8-239 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004668-DL8%20-%20SEAS%20-%20Biodiversity%20and%20HRA%20-%20Part%20B.pdf SEAS Issue Specific Hearings 14 (ISHs14) Post-hearing submission HABITATS and BIODIVERSITY The case against open trenching of the River Hundred

[17] *Ibid* page 16 PEI Section 22.5.3.8, Para 139

[18] SPR Appendix 22.2 Onshore Ecology Cumulative Impact Assessment with the Proposed East Anglia TWO Project, Environmental Statement Volume 3

Selected images of species within metres of the pinchpoint taken by Louise Chadwick

Protected: newly-fledged Tree Creeper

Protected: Greater Spotted Woodpecker feeding young

Priority: Brown Long-Eared Bat
reliant on the old trees that will be felled and the plentiful invertebrates of the wet woodland and marshes

Priority: Water Vole (dead)
Multiple holes in the banks of the River Hundred

Priority: male Adder

Priority: Red Deer