

SPR EA1N and EA2 PROJECTS



DEADLINE 2 - COMMENTS ON EXQ1 RESPONSES - 1.2 ECOLOGY

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Issue: 2

Reference	Question	Response	SASES Comment
1.2.54-56	Does the OLEMS provide sufficient information for EMP?	SPR do not intend to provide an EMP until post-consent for approval by LA SCC accept this with the exception of bats, hedgerows, woodlands and trees.	Suggest a draft EMP should be produced before consent together with a Schedule of Mitigation (Note: specific species surveys are incomplete)
1.2.59	Pre-construction surveys	An up-dated OLEMS to be submitted at Deadline 3 to include a list of pre-construction ecology surveys to be carried out at a later date.	Some further surveys that were omitted from the ES (especially with regard to bats) should be undertaken pre-consent. Further research of the Lesser Horseshoe Bat sighting near Billeaford Hall is required.
1.2.61	Asks for explanation of how SPR consider the application has taken advantage of enhancing bio-diversity.	SPR refer to Ecological Enhancement Clarification Note. The Clarification Note states that the Applicant is not obliged to Bio-diversity Net Gain under an NSIP. <i>Councils say the projects do not comply with 5.3.4 of EN-1 in this regard.</i>	This is unacceptable and bio-diversity enhancement should be provided as mitigation for disruption to a wide range of species.
1.2.64	Importance assigned to some nationally significant species is questioned.	This relates to badgers and SPR have submitted an Onshore Ecology Clarification Note to provide explanation.	Badgers should be accorded their lawful significance as a protected species.

1.2.67	Will works at crossing of river impact on Sandlings SPA?	SPR acknowledge there is potential for disturbance and pollution, but state it will be temporary.	Not acceptable. There should be no impact on the Sandlings SPA.
1.2.68	Will an outline badger or reptile mitigation plan be submitted as requested by Natural England?	Final mitigation measures for badgers to be included in EMP post-consent. The applicants do not consider it necessary to provide a mitigation plan for reptiles.	Not acceptable, particularly in view of the large numbers of badgers that will be displaced at the substation site and the suitability of the onshore development area for reptiles.
1.2.70	h) Can Applicant confirm when updated CIA with Sizewell in relation to bats will be submitted	Applicant rejects any cumulative impacts with SZC on ecological receptors (including bats) saying there is no overlap.	A cumulative assessment for ecological receptors, particularly bats, with SZC should be carried out as the landfall and parts of the cable route are near to Sizewell.
1.2.77	Grove Wood - Is there an Arboricultural Method Statement to provide to the Woodland Trust to assess impact on veteran trees?	SPR: There is no outline or final AMS. This will form part of the EMP post-consent.	Any impact on veteran trees in Grove Wood should be assessed pre-consent as the Applicant relies on the screening provided. Note NE require buffer zone of 15M for root protection. SASES question whether this is possible with regard to Grove Wood.
1.2.75	Growth rates - ESC/SCC to expand on its previous comments	ESC refer to LIR Paras 15.22 – 15.26	SASES direct the ExA to the submission by Jon Rose & Associates regarding growth rates in East Suffolk, submitted by SASES at Deadline 1.
1.2.79	What assessments are needed regarding noise impacts on ecological receptors?	SPR say Clarification Note will be submitted at Deadline 3. ESC has concerns with high frequency noise as it has significant effects for a range of ecological receptors, especially bats.	These impacts from noise should have been assessed earlier, especially regarding bats and birds.