



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

East Anglia ONE North Offshore Wind Farm

Appendix C5 to the Natural England Deadline 2 Submission

NE Comments on Clarification Note – Onshore Ecology [REP1-023]

For:

The construction and operation of East Anglia One North Offshore Windfarm, a 800MW windfarm which could consist of up to 67 turbines, generators and associated infrastructure, located 36km from Lowestoft and 42km from Southwold.

Planning Inspectorate Reference: EN010077

17th November 2020



Natural England's comments on the Onshore Ecology Clarification Note Submitted at Deadline 1 [REP1-023]

This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

Summary

Natural England welcomes the onshore ecology clarification note. However, we believe that further information needs to be provided at the time of consent before we can support any conclusions made as set out in our detailed comments below.

Detailed Comments

1. Badgers

Natural England welcomes clarification on this matter. We understand that, as badgers are not threatened nationally (and there is also no locally important populations within the application site, according to the submitted survey data) the species is defined as a low importance receptor in Table 1. On reflection, providing badgers are treated in accordance with the Badger Act 1992 and appropriate mitigation is provided across the terrestrial site (under licence where necessary), Natural England has no concerns regarding the importance level of the species within the documentation.

2. Hairy Dragonfly

As explained in the report, hairy dragonfly (*Brachytron pratense*) are associated with the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). Natural England requested further information on any potential effects on this species due to the planned river crossing.

We note that, as it is intended to entirely avoid the bird breeding season, this will incorporate avoidance of the time when the hairy dragonfly is active, between May and July. We also understand that, as the trenchless technique will be used, this will avoid direct effects on the Leiston-Aldeburgh SSSI.

However we consider that it is important to ensure that all aspects of the hairy dragonfly's (*Brachytron pratense*) life cycle have been considered. This species remains in the larval stage for approximately



2 years. When it reaches the final stage of development it crawls out and can be found amongst vegetation on the banks of its water body, where it is very susceptible to injury for a short while until it emerges as the adult.

Therefore, although there is protection for the adult dragonfly within the bird mitigation, we also need to know whether any aspect of the works are likely to affect the species at other stages of development, either while within the water body or on the bank (note the species may well be using habitats outside the SSSI), either directly or indirectly. We recommend that further information is provided on potential effects to these aspects of the species' development cycle.

3. Air quality – NoX

Natural England understands that an updated Air Quality Clarification Note, which will include a quantitative assessment, will be submitted to the Examinations at Deadline 3. Natural England agrees that this assessment will be necessary so that effects to all important receptors can be fully understood.

Furthermore we note that the Air Quality Clarification Note states in Paragraph 14 that additional assessment is required by an ecologist to determine whether any significant impacts may be experienced at affected habitats. However, following a review of the section on air quality in the Ecology Clarification Note, although it is clear that the three designated sites that have potential to be affected by changes in air quality have been listed correctly (the Sandlings Special Protection Area (SPA), Leiston- Aldeburgh SSSI and Sizewell marshes SSSI), it is not clear from this note which habitats within them are likely to be affected and why this is not likely to be significant.

As discussed in the Ecology note, there appears to be a likely significant effect due to changes in air quality associated with these applications. We agree that habitats closest to the road will be most significantly affected, with the effect lessening the further away from the road, but this fact does not lessen the need for a review of potential effects to the designated sites.

In our view, in order to provide sufficient clarity on this matter, the Ecology Clarification note needs to be updated in order to provide further explanation of the locations of the designated sites in relation to the roads and furthermore to explain which habitats within these sites have potential to be affected by NoX pollution. It would also be useful to include a summary of site conditions and current pollution trends in this document i.e. whether NoX pollution is increasing or decreasing over time.

4. Impacts to Ecological Receptors as a result of NRMM

In paragraph 30, it is stated that, 'due to the linear nature of the works area, the number of plant



items active in the vicinity of receptors for each activity along the length of each section of cable route is not anticipated to be in excess of that required on a 'standard' construction site'. We acknowledge that, if the project is carried out in a linear, logical and sequential manner as described within this note, it is less likely that more NRMM will be necessary across the construction sites.

In Paragraph 42 it is stated that there will not be significant pollution at the crossing point due to the seasonal restriction. It is not clear why this would reduce pollution, given that using the trenchless technique requires works for a longer period than the open trenching technique i.e. a year rather than five months, and with 24 hour construction. We would welcome further explanation on this within the next submission of the air quality clarification note, along with further information on effects to ecological receptors as discussed above.

We note that it is not possible to provide at this time a full assessment of the effects of NRMM on Leiston-Aldeburgh SSSI as the exact locations of the landfall will not be known until the detailed design of the project stage. But as much information as possible should be provided at the consenting phase. Natural England will need to review any new information/assessment as soon as it becomes available.