



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN020078

Issue Specific Hearings 1 (ISHs1)

Post-hearing written submission

HABITATS and BIODIVERSITY

by

SEAS (Suffolk Energy Action Solutions)

EA1N – EN010077 / SEAS ID no 2002 4494

EA2 – EN010078 / SEAS ID no 2002 4496



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Supplementary points

Summary

**This document disputes findings of Document Reference: ExA.AS-12.D1.V1/
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001111 (referred to as SPR +
paragraph number).**

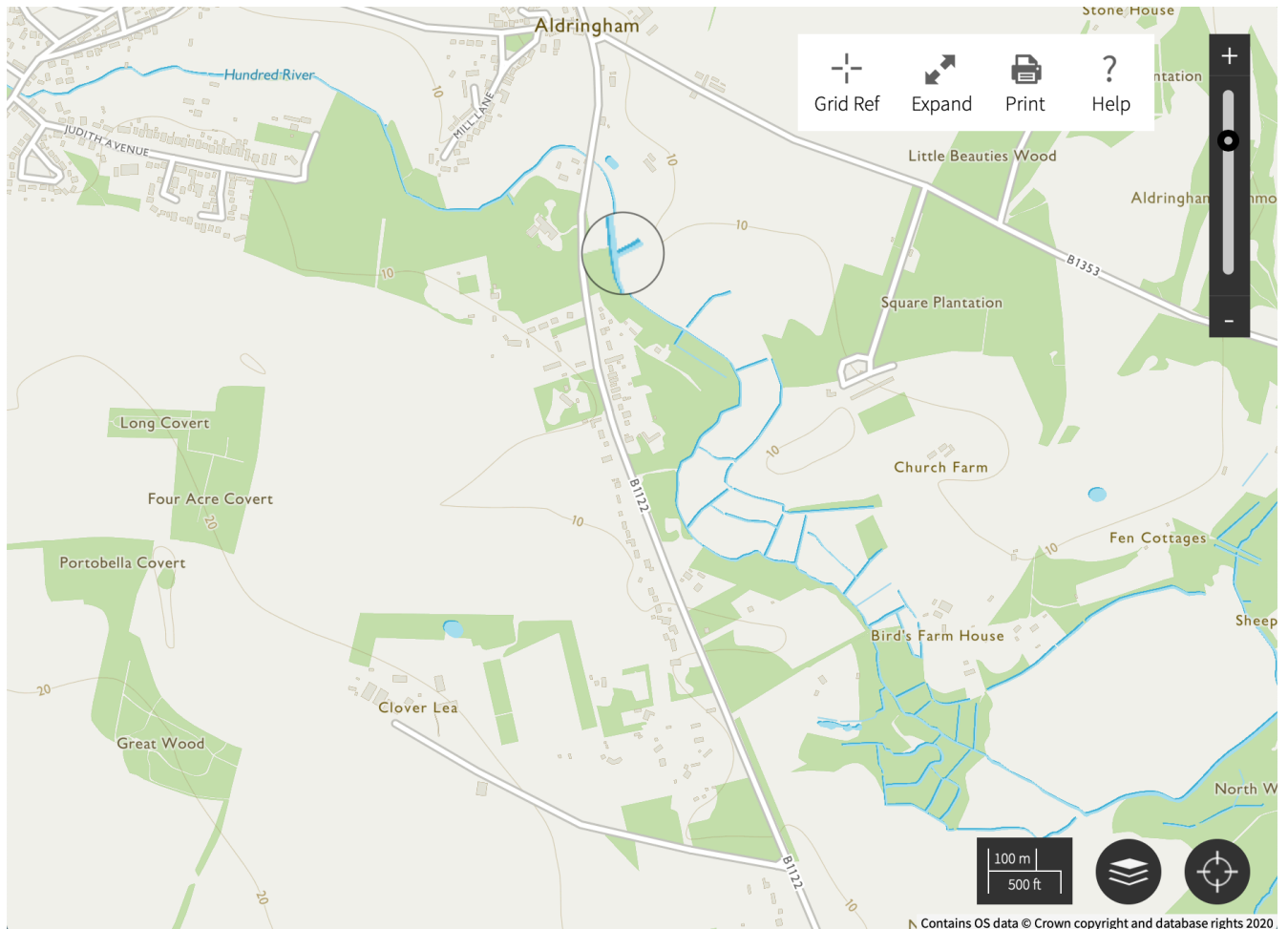
**In the continued absence of adequate or clear planning for protecting
biodiversity and preventing local extinctions from the applicant, this document
focuses on:**

1. Establishing the existence of important broadleaf, mature woodland, and the biodiversity corridor that it provides, that are missing from planning documents
2. Establishing that the assessments expressed in SPR 3.16 “No evidence of suitable habitat within the onshore development area to support invertebrates was recorded during the 2018 or 2019 ecology surveys” is incorrect, and that SPR 4.2.32 “The acid sensitive habitats (broadleaved woodland / dwarf shrub heath / fen, marsh and swamp) associated with either Leiston-Aldeburgh SSSI or Sizewell Marshes SSSI have not been recorded within the onshore development area and [...] The closest broadleaved woodland habitat to the onshore development area is approximately 630m south-west” is simply wrong.
3. Urging the consideration of microtunnelling/pipe-jacking as a means of minimising grave environmental harm and mitigating social impact at the pinch-point

Map of the Aldringham pinchpoint in context

The circle approximates the proposed bisection of the River Hundred

Woodland is coloured green



1. Establishing the existence of important broadleaf, mature woodland and the biodiversity corridor that it provides, that are missing from planning documents

1.1 The applicant's proposals currently show no awareness of the acres of riparian, broadleaf woodland which will require felling on the East side of the B1122. It is another lacuna in their preparation (SPR 4.2.31, SPR 4.2.32). The woodland is shown on the above map, drawn from OS data.

1.2 The woodland is estimated to be more than 140 years old and is in a rewilded condition near the bisection point.



1.3 Wilded woodland creates a desirable state¹ as it offers excellent and undisturbed habitat, hibernation, and forage for biodiversity.

2 Establishing that the assessments expressed in SPR 3.16 “No evidence of suitable habitat within the onshore development area to support invertebrates was recorded during the 2018 or 2019 ecology surveys” is incorrect, and that SPR 4.2.32 “The acid sensitive habitats (broadleaved woodland / dwarf shrub heath / fen, marsh and swamp) associated with either Leiston-Aldeburgh SSSI or Sizewell Marshes SSSI have not been recorded within the onshore development area and [...] The closest broadleaved woodland habitat to the onshore development area is approximately 630m south-west” is simply wrong.

The project will cut through more than 4 acres of mature, broadleaved woodland.

2.1 The pinch point is typical of rewilded broadleaf, riparian woodland, in that it is rich in protected and indicator species of mammals, birds, amphibians, reptiles and invertebrates² as we have shown in previous submissions, and in contrast to the assertion in SPR 3.18.

2.2 In fact, the cable corridor at this point will cut through a nationally important corridor for Invertebrates (the designated East Anglia/Suffolk B-line) which is now also a national area of special interest for invertebrates, according to BugLife, which is, of course, supported by Natural England. The assertion in 3.16 that invertebrates are absent is, therefore, incorrect.

2.3. The woodland offers vital bridging between Aldringham Woods and the continuing riverside environment, supporting biodiversity.

2.4 The map illustrates the important connectivity corridor provided by woodland between Coldfair Green and the wetlands of the SSSI. This connectivity stretches eastwards, and southwards, feeding fen, riparian wetland, coastal wetland, sandlings heath and North Warren RSPB reserve.

2.5 The arguments and assessments based on the absence of broadleaved woodland (4.2.31, 4.2.32) are therefore mistaken. The local broadleaved environment is in danger from the pollution caused by additional traffic on the B1122 and on the haul roads, which will be in close proximity to any trees left standing.

2.6 Broadleaf woodland can struggle to become established in the dry, acid, sandy soils of coastal Suffolk; mature woodland here is especially of value.

¹ Tree, Isabella, *Wilding*, London, Picador, 2018

² National Biodiversity Database



3. Urging the consideration of microtunnelling/pipe-jacking as a means of minimising grave environmental harm and mitigating social impact at the pinch-point

3.1 Felling the woodland will cause extreme shock to the very diverse wildlife systems in the area, by permanently destroying an important section of mature biome, removing multiple, above-ground resources for biodiversity, and breaking the connecting wildlife corridors, above and below ground, and weakening by pollution any survivors.

3.2 If HDD is considered less than acceptable for the circumstances, why has **microtunnelling/pipe-jacking** not been considered?

3.3 Carbon reductions

Microtunnelling can deliver environmental benefits in excess of 75%, compared to open-cut construction, as measured by reduced carbon emissions. Trenching is extremely disruptive, requiring considerably greater excavation and substantial backfilling. Long-term damage to existing installed infrastructure is also minimised by pipe-jacking or microtunnelling.

3.4 Improved logistics and project economy

Microtunnelling can reduce the quantities of incoming and outgoing materials, and consequently reduces the quantities of spoil and imported fill materials. This in turn enables reduced vehicle movements, plus less associated disruption.

3.5 Improved safety

Gang sizes are smaller, with a resulting reduction in necessary working-hours, which also means that accidents tend to be fewer. There is also significant reduction in the risk of injury as a result of utility strikes, and less risk to the public. There are, of course, significant utility resources below ground along the B1122.³

3.6 Improved impact on environmentally sensitive areas

The technique is successfully used to preserve protected trees, negotiate the utility-laden subterranean landscape of busy cities, safely pass beneath highways and buildings, and deal with high water tables. These challenges will almost all need to be met at the pinch point. Natural England has objected to open trenching the River Hundred because of the hairy dragonfly on its river banks and the endangered aquatic creatures that rely on its waters..⁴

3.7 Improved impact on community

The social, health and economic costs to the community from trenching are considerable. They are not factored in to project costings: apart from some minor mitigation concessions, the people are expected to bear the years of disruption and loss of income both at personal and community level. These costs remain hidden

³ *An Introduction to Pipe jacking and Microtunnelling*, Pipe jacking Association, 2017

⁴ Laura Anderson, Akkerman Inc., Brownsdale Minn., 'Microtunneling in Brookline, Mass.', *Trenchless Technology*, 2012



from the perceived cost of the project. Microtunnelling cuts the cost to the community because the disruption to life, work, health, dwellings and infrastructure can be minimised.⁵

3.8 We request that microtunnelling below the River Hundred and continuing across the pinchpoint should be fully assessed and considered as a means of avoiding a dramatic and permanent loss in biodiversity, and as a means of minimising the considerable impact on the local communities.

Dr G Horrocks, [REDACTED]
Saturday, 5 December 2020

⁵ Lauren Cella, 'What factors make microtunnelling more cost-effective? Ask an expert - Stuart Harrison', *Utility Magazine Australia*, April 19 2017 <https://utilitymagazine.com.au/what-factors-make-microtunnelling-more-cost-effective-than-traditional-open-cut-methods/>