

SPR EA1N and EA2 PROJECTS



DEADLINE 7 - COMMENTS ON APPLICANTS DEADLINE 6 SUBMISSIONS

Interested Party: SASES **PINS Refs:** 20024106 & 20024110

Date: 4 March 2021

Issue: 1

INTRODUCTION

1. These comments relate to a variety of the Applicants' submissions made at Deadline 5 excluding (the Applicants' responses to Written Questions 2 and the Applicants submissions relating to the draft DCO which are addressed in separate documents). The fact that a comment has not been made any particular submission should not be construed as SASES agreeing with the submission and SASES maintains its views as set out in previous submissions.

OUTLINE OPERATIONAL DRAINAGE MANAGEMENT PLAN

2. See Appendix 1

OUTLINE CODE OF CONSTRUCTION PRACTICE

3. See Appendix 2

OUTLINE WATERCOURSE CROSSING METHOD STATEMENT

4. See Appendix 3

ECOLOGY SURVEY RESULTS

5. See Appendix 4

APPLICANTS SUBMISSION OF ORAL CASE - ISH7 BIODIVERSITY AND HRA

6. See Appendix 5

APPLICANTS RESPONSES TO HEARING ACTION POINTS - ISH7

7. See Appendix 6

TRAFFIC AND TRANSPORT DOCUMENTS (Outline Travel Plan, Outline Access Management Plan, Outline Construction Traffic Management Plan, Clarification Note Sizewell Projects Cumulative Impact Assessment (Travel And Transport))

8. See Appendix 7

APPENDIX 1
OUTLINE OPERATIONAL DRAINAGE MANAGEMENT PLAN

See letter from GWP Consultants dated 4 March 2021



Upton House
Market Street
Charlbury
Oxfordshire, OX7 3PJ
United Kingdom
tel +44 (0)1608 810374
fax +44 (0)1608 810093
e-mail info@gwp.uk.com
www.gwp.uk.com

Substation Action Save East Suffolk

GWP Report No: 210304

Our ref: mm040321.let

Your ref:

04 March 2021

Dear Mr Mahony

Flood Risk related Comments on Deadline 6 Submissions in respect of Scottish Power Renewables EA1N and EA2 Project Onshore Works near Friston

This letter constitutes a brief technical critique of selected flood risk-related documentation placed on the Planning Inspectorate web-portal on 26 February 2021 at Deadline 6. These Deadline 6 submissions have been made by Scottish Power Renewables (SPR) with respect to flood risk near Friston Village, with further comments also provided by Suffolk County Council, as the Lead Local Flood Authority and others. This work has been commissioned by Substation Action Save East Suffolk (SASES).

Qualifications of Author

This letter has been prepared by Mr Clive Carpenter. Clive has a BSc (Hons) in Geology, an MSc in Hydrogeology and Groundwater Resources, is a Fellow of the Geological Society (FGS), Chartered Geologist (C.Geol), Chartered Member of the Chartered Institute of Water and Environmental Management (C.WEM, CIWEM) and Associate Member of The Academy of Experts (AMAE). Clive has more than 30 years of post-graduate experience in water resources management, water hazard mapping and risk reduction, flood risk assessment, climate change vulnerability assessment, and disaster risk reduction, both in the United Kingdom and overseas.

Instructions

SASES instructed Mr Carpenter in June 2019, to provide expert independent advice and review of the SPR environmental statement and related documentation, with respect to the flood risk impact on Friston Village, and to ascertain whether flood risk has been i) assessed in accordance with policy on site location; ii) adequately investigated; and iii) adequately mitigated.

Document Listing

GWP has identified 9 documents of direct relevance to flood-risk of the proposed development to Friston Village submitted at Deadline 6. These include:

- SPR updated Outline Operational Drainage Management Plan (tracked and untracked versions);
- SPR updated Outline Code of Construction Practice (tracked and untracked versions);
- SPR comments on Suffolk County Council's (SCC) Deadline 5 Submissions;
- SPR comments on East Suffolk Council's Deadline 5 Submissions;
- SPR comments on SASES Deadline 5 Submissions;
- SCC Deadline 6 Flood Comments; and
- Environment Agency Deadline 6 Comments.

The restricted time available to review these 100's of pages of submissions, necessitates a brief assessment only, and one which focuses on primarily new responses and updates, rather than highlighting existing positions and previous statements.

The purpose of the response below is to highlight these on-going and additional concerns, for subsequent detailed consideration at ISH11, and is not a detailed assessment itself.

SPR Outline Operational Drainage Management Plan (OODMP)

The OODMP has been updated since its last submitted version. Time does not permit a detailed critique or reporting of that review, however the following points remain a concern, and need to be considered at ISH11:

- i) SPR considers this large-scale project does not require detailed flood risk assessment and mitigation design – this is clearly unacceptable given the clear increase in flood risk to Friston village created by the development;
- ii) SPR states that by demonstrating an attenuation scheme can fit within the site area that a viable scheme exists – this is not consistent with the SUDS hierarchy which requires ground infiltration where possible, an approach that would increase the area required for drainage schemes;
- iii) SPR use the QBAR to address TOTAL flow flood risk concerns – the QBAR derived does not consider the known ground depressions, wider catchment characterisation, or flow constraints of the Friston watercourse. As such the QBAR rates presented are poorly constrained, considered unreliable, and may be sufficiently large to still cause flooding in Friston;
- iv) SPR states the QBAR will be revisited post-approval using hydrological modelling – this is unacceptable, the QBAR is a primary design parameter for determining the size and therefore the viability and achievability of the on-site drainage schemes;
- v) SPR states the Friston catchment is ungauged, so no flow data exists – this will therefore constrain SPRs ability to accurately model the flows and therefore means the QBAR will remain uncertain. SPR should have installed flow monitoring gauging stations in the catchment 2 years ago, they have not;
- vi) SPR states they will include lost natural depression storage from one depression in the required storage calculations – this is unacceptable, all lost storage should be included, else flood risk will increase;
- vii) SPR states the attenuation basins are not above ground level – this is wrong, they are banded on their downslope side;
- viii) SPR hydraulic calculations show the proposed storage volumes are 5-10% more than the design storage volumes – but no sensitivity analysis is provided on the input parameters, the % is too small;
- ix) The total storage volumes presented, including freeboard and landscaping are so large to be captured by the Reservoir Act for the infiltration scheme and are just below the limit

for the attenuation scheme – this highlights the risk presented by these basins when at maximum volume retention, the excessive inundation threat posed to the village, and the concerns over the lack of blockage analysis, lack of consideration of exceedance events and overtopping structures, and lack of engineering construction detail of the retention bunds;

- x) SPR states the wetland nature of the landscaping proposals for the basins – this is inconsistent with the need for extremely well managed attenuation structures to avoid loss of infiltration and minimise blockage risks and over-topping; and
- xi) The SPR plan drawings of the attenuation basins show no outflow from the northern basin area – how does it empty and where does the discharge outfall go to.

There therefore remain considerable concerns on the adequacy of the OODMP, the viability and achievability of the proposed drainage schemes on-site, reliance on detailed design post-approval, the lack of baseline watershed characterisation, the lack of flood risk assessment of receptors in Friston, and the retention of such large volumes of water uphill of the village within semi-natural (wetland) and therefore difficult to maintain structures.

SPR Outline Code of Construction Practice (OCoCP)

An updated OCoCP has been submitted by SPR. SPR state a Drainage Management Plan and Flood Management Plan will be produced as part of the final CoCP. SPR state attenuation ponds will be included to provide sufficient attenuation due to increased impermeable areas during the construction process. There are no other additional details provided by SPR.

The construction area is considerably larger than the operational area, it will be stripped of vegetation and soils and generate not only increased run-off flows, but also accelerate soil mobilisation and sediment loading in the run-off water – which will require removal prior to discharge.

SPR have provided no details whatsoever of the construction phase surface water management scheme – no design storm return period, no estimate of increased run-off and sediment loading, no locations or sizing of ponds, no evidence the entire disturbed site can flow into those ponds, no details of turbidity clarification methods and what areas these require. In short there is negligible information presented which demonstrates SPR can manage surface water during the construction period.

This remains unacceptable from both a flood risk and water quality perspective.

SCC Comments for Deadline 6

SCC continues to challenge SPR on numerous on-going concerns relating to surface water flood risk and water management, and are not satisfied by SPR's Deadline 5 responses.

Two additional points raised by SCC are: a requirement to replace all lost existing run-off storage in addition to the attenuation storage identified by SPR to mitigate increased run-off from the development; and articulating their position regarding the SUDS hierarchy – specifically that infiltration should be prioritised and maximised not just integrated with a surface water disposal scheme.

We agree with the above points, as well as the on-going concerns SCC has with the SPR submission.

Other Documents

The SPR comments on third party submissions do not raise any new points and have been raised before and dismissed by these parties.

It is noteworthy the Environment Agency does confirm that SCC is the regulatory authority for surface water management and flood risk.

I trust the above is self-explanatory.

Yours sincerely



Clive Carpenter

Partner and Head of Water Resources

APPENDIX 2

COMMENTS ON OUTLINE CODE OF CONSTRUCTION PRACTICE SUBMITTED AT DEADLINE 6

Summary

Comments and concerns based on the updated document referenced above are listed below with more details provided in the body of this note:-

1. The updated Outline Code of Construction Practice (OCoCP) adds in a new provision that seeks to exclude preparatory and pre construction to be delivered outside of the provisions of the OCoCP; Appendix 1 should be deleted as all works must be executed in accordance with the OCoCP.
2. Working hours and limiting working hours for noisy operations – additional mitigation required.
3. Artificial Light and temporary power generation – additional mitigation required.
4. Control Measures Noise – acoustic screening and acoustic - additional mitigation required.
5. HGV vehicle compliance, pollutants and emissions - Euro V1 standards. Additional mitigation and compliance required.
6. Access Strategy – the B1121, Mill Road, Grove Road and footpaths from Grove Road should not be used for any aspect of the works including the use of these roads by operatives, creating rat runs and significant disturbance. Specific mitigation and references to these roads needs to be added to the OCoCP.

1.4 Control of Onshore Construction Works

The OCoCP states that preparatory works will not be included in the final Code of Construction Practice (CoCP). SASES would like the Applicant to acknowledge that the OCoCP will apply to all works whether permanent or temporary. By its very nature some of the temporary works or preparatory works will be significant projects in their own right and may run over many years. This exclusion by the Applicant is of concern and the OCoCP should be amended accordingly. There are further comments on this principle set out towards the end of this note.

2.4 Construction Principles.

The OCoCP states the appointed contractor will be encouraged to register with the Considerate Contractor Scheme. SASES would like to make sure this is a mandatory

requirement for SPR to insist its contractor or contractors registers with the Considerate Contractor Scheme.

2.5 Construction Method Statements (CMS)

The CMS should also take account of noise and to limit noise – this is not specifically mentioned in this section but may be covered under one of the Environment Agency Pollution Prevention Guidance documents. It is not clear whether noise has been included in this section and it would help if reference to noise can be added to make it clear method statements will address noise.

3.0 General Site Operations

SASES has previously requested the Applicant review working hours but this has not been taken into account which still shows 7am- 7pm Monday to Friday and 7am – 1pm Saturday. SASES requests again that weekday working hours on site should be substantially reduced and weekend working should not be permitted when in close proximity to residential receptors, in particular Friston and where people live within close proximity to the cable corridor. Noisy works should be limited between 10:00 and 16:00. This point has been made previously but is stated again at this deadline as due to the proximity to residential receptors, the quality of life, health and wellbeing of residents will be severely damaged over many years. Weekend working should not be allowed except in cases of emergency if the DCO is approved.

3.3 Screening

There is no mention of temporary acoustic baffles within this section although reference is made under section 9.1 to help to reduce construction noise.

SASES requests that acoustic baffles and screening should be included as a mandatory requirement to be incorporated within the final OCoCP.

3.4 Site Induction

All construction operatives, sub-contractors and onsite workforce should be accredited to the nationally accepted standard of the 'Construction Skills Certification Scheme' (CSCS), individuals should hold personal CSCS cards which should be verified as part of the site induction process.

3.7 Artificial Light Emissions

Artificial lighting should not be allowed during the non-working hours and should be automatically extinguished, and this requirement should be set out in the Artificial Light Emissions Management Plan. Lower level security lighting should not be used unless activated by automated movement sensors. There should be no reason to use generators on site except where there is loss of power and mains power should be used throughout preparatory works and construction works. SASES do not support the use of temporary power generation during or after construction works. The OCoCP should be updated accordingly.

9.1 Control Measures (noise and vibration)

This clause refers to best practice noise mitigation that will be typically adopted by the contractor. There is a brief note about acoustic barriers and screens stating they may be used but the OCoCP then it leaves this decision to the contractor when the CoCP is prepared.

SASES would like an undertaking from the Applicant that they will mandate the use of acoustic screens, panels and barriers rather than relying on the contractor to make this decision. This requirement should be passed down to the contractor as a specific contractual term and not be left to the construction contractor to decide whether this type of best practice will be adopted. The OCoCP should go much further than stating the plan 'will typically include then list a number of best practice mitigation measures.' The OCoCP should mandate and insist the contractor uses acoustic baffles and screening whether pre construction or during construction works.

10.1 Control Measures

The OCoCP mentions an Air Quality Management Plan will be developed. As part of this plan any vehicles whether HGV on/off site including Non-Road Mobile Machinery or vehicles transporting materials or vehicles removing spoil etc should comply to Euro V1 emissions standards to minimise pollution and noise.

10.1.1 Access Strategy (Vehicles)

No vehicles whether HGV, transit vans or any vehicle used by site operatives must not be allowed to access Mill Road in Friston from the A1094 or to access Mill Road to access the A1094 from Friston or to access Grove Road as rat runs or use the B1121 through Friston to access the construction site whether this is for preparatory works, pre-construction or for construction works.

SASES notes that the Applicant intends to access the site using one of the footpaths from Grove Road for pre-construction works. SASES wants to make it clear that this would create major problems on local village roads, impact on the local community and the use of transit vans or other vehicles to access the site pre construction or during construction is an unacceptable approach.

These caveats and exclusions are not specifically stipulated in the OCoCP and must not be allowed to happen. It needs to be made clear in the OCoCP that the use of Mill Road, Grove Road or any footpath from Grove Road is an unacceptable methodology whether during the pre-construction phase or during construction works.

SASES requests the Applicant amends the OCoCP and this exclusion is added to the final version when published.

10.1.7 HGV Emissions

SASES appreciates the Applicant wishes to have 70% of vehicles adopting Euro V1 standard. However, taking into account air quality, the impacts of other projects particularly Sizewell C and the rural nature of the environment, the Applicant should ensure its contractor uses 100% Euro V1 standard vehicles.

SASES requests the Applicant makes it a contractual obligation within the OCoCP, passed down to the contractor that all vehicles will comply with Euro V1 standards. These minimum standards should apply to all construction works carried out including along the cable corridor, the Construction Consolidation Sites and must be a specific requirement to be set out in the OCoCP. There is reference to when the two villages are bypassed and reference to “where possible” should be deleted. The use of the highest quality vehicles reducing environmental impact and adopting best practice taking into account climate change and the potential for these projects to be constructed over many years means the use of the words “where possible” should be deleted. Vehicle particulates and pollutants need to be minimised and this condition should be clearly stated in the OCoCP.

11.1.1 Sediment Management

Paragraph 123 which is a newly added clause should be omitted which refers to clause 120. The provisions set out in clause 11.1.1 should apply to all areas identified as being at flood risk or not. This is just good practice.

Appendix 1 Provisions

Onshore Preparation Management Plan

Section 1 and 2 - Introduction and Onshore Preparation Works

Any pre construction preparatory works should be carried out in accordance with the principles set out in the OCoCP. Each section of preparatory works should have its own method statement, its own CoCP, its own Construction Phase Plan to meet minimum standards where working hours and other delivery principles should be in accordance with the final version of the OCoCP. The purpose of the appendix could circumvent the conditions set out in the OCoCP which would be an unacceptable approach.

There are various provisions that seek to create standalone management plans and some activities that the appendix seeks to exclude obligations, such as a statement for example, that preparation works in connection with archaeological investigations will not be subject to an onshore works Management Plan. Preparation works in connection with Highway Access, Public Rights of Way, pre-planting etc are being requested to be discharged through other plans. However, the principles set out in the OCoCP should apply to all preparatory works and pre construction works. The Applicant is seeking to limit its approach, methodology and to move away from the principles set out in the OCoCP. This is an unacceptable approach potentially creating risk and uncertainty for the region, local people and rural villages.

Section 3 - Onshore Works Management Plan (Appendix 1)

This new clause seeks to set out its own rules outside those stipulated in the OCoCP and this is unacceptable as working hours, delivery programme, timing, HGV access, noise etc seeks to set new provisions to be determined, with obligations to be agreed that could severely impact on local people and the environment.

The provisions of Appendix 1 appear to try and create an “agreement to agree” which is unacceptable. The principles of working hours, noise, emissions, HGV movements, Euro V1 standards etc as set out and agreed in the OCoCP **must also apply** to any preparatory or pre construction works including sign off and approval by the relevant authority, including Highways etc.

SASES requests that the Applicant adheres to all of the principles of the OCoCP for temporary or preparatory works when it’s finally agreed. Reference to Appendix 1 should be deleted and all works whether preparatory works, pre- construction works, or construction works should be delivered in accordance with the final version of the OCoCP.

APPENDIX 3

SASES COMMENTS ON APPLICANTS DEADLINE 6 OUTLINE WATERCOURSE CROSSING METHOD STATEMENT V0

1. SASES appreciates the further information provided by the Applicant at Outline Watercourse Crossing Method Statement Rev 02.
2. The Applicant has cited several disadvantages of using an alternative microtunneling solution but has not described a feasible scheme nor quantified any of the disadvantages. Therefore it is not possible for SASES to assess whether the benefits to the integrity of the river, the ecology of River Hundred and Sandlings SPA, local residents, and landscape from such an approach would be more or less beneficial than the Open Cut method proposed.
3. The Applicants have commented further on this topic in 'Applicants' Comments on SASES Deadline 5 submissions' at 2.3 Further Comments on Applicants' Outline Watercourse Crossing Method Statement stating:
4. "When accounting for the additional lateral distance required to reach sufficient depths to drill beneath the bed of the Hundred River, beneath the B1122 Aldeburgh Road and underneath the woodland west of Aldeburgh Road, the Applicants calculate a drill length of at least 500m. Further details on the suitability of microtunneling have been included within the updated Outline Watercourse Crossing Method Statement at Deadline 6 (document reference ExA.AS-5.D6.V2)".
From our understanding of the differences between HDD and microtunnelling, it would appear this reference is in respect of HDD **not** Microtunnelling techniques.

APPENDIX 4

SASES COMMENTS ON APPLICANTS' DEADLINE 6 ECOLOGY SURVEY RESULTS

Background

1. SASES has previously highlighted serious deficiencies and errors in the results of EIA 2018 Extended Phase 1 Habitat Survey [APP-277](#) Map 22.4c and [APP-503](#) for the Aldringham and River Hundred area. Those surveys identified **only one** Target Note (TN10b) in the entire area of Works No 19 to the east of Aldeburgh Road and only one (TN162a) in the whole area of woodland (Aldringham Group Tree Preservation Order SCDC/87/00030) to the west of Aldeburgh Road. No Target Notes had been identified in the 2018 Extended Phase 1 Habitat Survey within the area of Priority Deciduous Woodland Habitat designated as such by Natural England. The description and photographs of Oak TN10b were incorrect and portray a very different oak tree, to be found further north and apparently beyond Works No 19 order limits, while the notable oak referred to in this the Applicants' latest visit to the site on 15th 16th February 2021 as TN15 was entirely absent from 2018 Extended Phase 1 Habitat Survey, despite being the most impressive Oak in the River Hundred valley and situated within the Cable Corridor Order Limits.
2. The Applicant did not present evidence of any Ecological Survey prior to 2018. We believe that to have been a serious omission, given the earlier decision by SPR in July/ September 2017 to select that place for its Cable Corridors. SASES has repeatedly requested sight of the Applicants' Optioneering /Feasibility reports that SPR has claimed support its selection of a crossing place along the Aldeburgh Road, but without response. Similarly, the Applicant has failed to release the 'Wardell Armstrong Report' on its Landfall selection, the result of which must have led to the need for a cable route across the Aldeburgh Road.
3. The Applicants have consistently stated that this was the only feasible crossing point and therefore it is all the more surprising that no comprehensive ecology assessment of these habitats was ever made prior to these ExA Hearings. The absence of any Target Note within the area of woodland between the west bank of the river and Aldeburgh Road, a rich habitat of live and decaying trees, would seem to indicate that the Surveyors ignored the allegedly Wet Woodland area altogether in their previous 2018 Extended Phase 1 Habitat Survey.
4. We believe the Applicant was incorrect in stating at ISH7 that gorse, holly and horse chestnut had been observed on the alleged Wetland. It is possible that she was referring to TN162A to the **much drier** west of Aldeburgh Road where those species were indeed noted in the 2018 Extended Phase 1 Habitat Survey. Gorse, holly and horse chestnut are not present on the alleged wetland now and that is now verified by TN17 – TN35 of this latest 15th 16th February assessment.
Re: Survey Results for Applicants' visit to site on 15th 16th February 2021 at Work No. 19
5. It is noteworthy that the Applicants have only at this late stage identified twenty-five Target Note observation points, all within Works No 19, three within the meadow on east side of river and twenty-two on the area of Priority Deciduous Woodland between River Hundred and Aldeburgh Road that has been described by SEAS as 'Wet Woodland'

6. Contrary to the Applicant's report at ISH7, that area of woodland was wet on date of visit and has remained so during the three weeks following that visit. SASES has been carrying out daily wetness measurements since ISH7 using a basic horticultural soil hygrometer. The results for that area of land between 4 metres from riverbank to 2 metres from Aldeburgh road have all indicated wetness at the maximum of the instrument's wetness scale.
7. SASES appreciates the Applicants' difficulties in identifying plant life at the dead of winter and amidst large areas of snowdrift. However, we feel it unaccountable that the Applicant has omitted to mention and highlight the extensive areas of dead stalks of wetland loving Himalayan Balsam a wetland plant which is pervasive on the land. On the other hand we are not aware of any teasel there.
8. We feel the Applicants must be mistaken in concluding that the area was dry on those days and request evidence of any soil hygrometer measurements they may have taken on that piece of land during their visit.
9. A significant proportion of the trees on this piece of land have fallen, many incidentally now providing an ideal habitat for an extensive variety of biota. This must be a further indication of the wetland soil structure. It is surprising that the Applicants' survey has ignored this evidence.
10. For the reasons above, SASES is unable to accept the conclusion inferred by this Ecology Survey Results report that this area is not "wet woodland".

APPENDIX 5

APPLICANTS SUBMISSION OF ORAL CASE - ISH7 BIODIVERSITY AND HRA

RE: Agenda item 2 : Effects on Terrestrial Ecology

2.1 Hundred River

2.1.1 Priority deciduous woodland - wet woodland

Re: Applicants' paragraph 9 and the 2018 Extended Phase 1 Habitat Survey [APP-277](#) Map 22.4c and [APP-503](#)

1. SASES has previously highlighted serious deficiencies and errors in the 2018 Extended Phase 1 Habitat Survey results for the Aldringham and River Hundred area. It had identified **only one** Target Note (TN10b) in the entire area of Works No 19 to the east of Aldeburgh Road and only one (TN162a) in the whole area of woodland (Aldringham Group Tree Preservation Order SCDC/87/00030) to the west of Aldeburgh Road.
2. No Target Notes were identified in the 2018 Extended Phase 1 Habitat Survey within the area of woodland on the west side of the River Hundred designated by Natural England as Priority Habitat Deciduous Woodland.
3. The description and photographs of Oak TN10b were incorrect and portrayed a very different oak tree, to be found further north and apparently beyond Works No 19 order limits.
4. The notable oak referred to as TN15 in the Applicants' latest visit to the site on 15th 16th February 2021 is entirely absent from 2018 Extended Phase 1 Habitat Survey despite being the most impressive Oak in the River Hundred valley and situated within the Cable Corridor Order Limits.
5. The Applicant has not presented evidence of any Ecological Survey prior to 2018. We believe that to have been a serious omission, given the earlier decision by SPR in July/September 2017 to select that place for its Cable Corridors. SASES has repeatedly requested sight of the Applicants' Optioneering /Feasibility reports on where SPR's selection of a crossing place along the Aldeburgh Road, but without response. Similarly, the Applicant has failed to release the 'Wardell Armstrong Report' on its Landfall selection the result of which must have led to the need for a cable corridor crossing route on the Aldeburgh Road.
6. The Applicants have consistently stated that this was the only feasible crossing point and therefore it is all the more surprising that no comprehensive ecology assessment of these habitats was ever made prior to these ExA Hearings. The absence of any Target Note within the area of woodland between the west bank of the river and Aldeburgh Road, a rich habitat of live and decaying trees would seem to indicate that the Surveyors ignored the alleged wet woodland area altogether in their previous 2018 Extended Phase 1 Habitat Survey.
7. We believe the Applicant was incorrect in stating at ISH7 that gorse, holly and horse chestnut had been observed on the alleged Wetland. It is possible that she was referring to TN162A which was located in the centre of the dry woodland west of Aldeburgh Road and where those plant species were indeed noted in the 2018 Extended Phase 1 Habitat Survey. Gorse, holly and horse chestnut are not present on the alleged wetland now and as confirmed in TN17 – TN35 of the latest 15th 16th February assessment.

Re: Applicants' paragraphs 9 – 11 referring to a revisit to site on 15th 16th February 2021.

8. It is noteworthy that the Applicants have only at this late stage identified twenty-five Target Note observation points, all within Works No 19, three within the meadow on east side of river and twenty-two on the said area of land that has been described by SEAS as wetland between the river and the Aldeburgh Road.
9. Contrary to the Applicant's report at ISH7, that area of woodland was wet on date of visit and has remained so during the three weeks following that visit. SASES has been carrying out daily wetness measurements since ISH7 using a basic horticultural soil hygrometer. The results for that area of land between 4 metres from riverbank to 2 metres from Aldeburgh road all have been at the maximum of the instruments wetness scale despite recent relatively dry weather..
10. SASES appreciates the Applicants' difficulties in identifying plant life at the dead of winter and amidst large areas of snowdrift. However, we feel it unaccountable that the Applicant has omitted to mention and highlight the extensive areas of dead stalks of wetland loving Himalayan Balsam a wetland plant which is pervasive on the land. On the other hand we are not aware of any teasel there.
11. We feel the Applicants must be mistaken in concluding that the area was dry on those days and request evidence of any soil hygrometer measurements they may have taken on that piece of land during their visit.
12. A significant proportion of the trees on this piece of land have fallen, many incidentally now providing an ideal habitat for an extensive variety of biota. This is surely a further indication of the wetland soil structure and it is highly surprising that the Applicants' survey has ignored this evidence.
13. SASES would assert that support for a conclusion that the land is not wet woodland from Suffolk County Council and East Suffolk District Council ecologists who visited Aldringham on the same day must be discounted, for the simple reason that it has since been admitted that neither one of them entered on to the land and therefore could not have made an objective and independent assessment from afar.
14. For the reasons above, SASES is unable to accept the Applicants' Oral Case "that this area does not comprise wet woodland".

2.1.2 Adjacent Meadow and Hairy Dragonfly

SASES has no comment at Deadline 7.

2.1.3 Watercourse Crossing Method Statement

15. SASES appreciates the further information provided by the Applicant at Outline Watercourse Crossing Method Statement Rev 02.
16. The Applicant has cited several disadvantages of using an alternative microtunneling solution but has not described a feasible scheme nor quantified any of the disadvantages. Therefore it is not possible for SASES to assess whether the benefits to the integrity of the river, the ecology of River Hundred and Sandlings SPA, local residents, and landscape from such an approach would be more or less beneficial than the Open Cut method proposed.
17. The Applicants have commented further on this topic in 'Applicants' Comments on SASES Deadline 5 submissions' at 2.3 Further Comments on Applicants' Outline Watercourse Crossing Method Statement saying:
18. "When accounting for the additional lateral distance required to reach sufficient depths to drill beneath the bed of the Hundred River, beneath the B1122 Aldeburgh Road and

underneath the woodland west of Aldeburgh Road, the Applicants calculate a drill length of at least 500m. Further details on the suitability of microtunneling have been included within the updated Outline Watercourse Crossing Method Statement at Deadline 6 (document reference ExA.AS-5.D6.V2) . From our understanding of the differences between HDD and microtunnelling, it would appear this reference is in respect of HDD not Microtunnelling techniques.

2,2 Other Terrestrial Ecology

2.2.1 – 2.2.4

SASES has no comment at Deadline 7.

2.2.5 Trees and Hedgerows

19. The Applicants have submitted Important Hedgerows and Tree Preservation Plans (REP3-010). However not all Protected and Important Hedgerows have been identified on these plans.
20. Government guidance on Countryside hedgerows: protection and management can be found here:
<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>
21. This guidance identifies Protected Hedgerows as having the following characteristics: more than 20m long with gaps of 20m or less in its length; less than 20m long, but meets another hedge at each end.
22. With regard to location, a hedgerow is protected if it is on or next to: land used for agriculture or forestry; land used for breeding or keeping horses, ponies or donkeys; common land; a village green; a site of special scientific interest; a protected European site; a local or national nature reserve or land belonging to the state. A hedgerow is not protected if it is in, or marks the boundary of, a private garden.
23. None of the Applicants' Hedgerow Plans refer to Protected Hedgerows, of which there are many throughout this mainly agricultural area. It should be noted that there is an unlimited fine if Protected Hedgerows are removed without consent.
24. The Applicants have stated that there are 67 Important Hedgerows which require removal. However this number of affected hedgerows is significantly understated as no Protected Hedgerows have been identified on the plans. An Important Hedgerow has different criteria, as follows: it is at least 30 years old; marks all or part of a parish boundary that existed before 1850; contains an archaeological feature; is in or next to an HER: marks the boundary of an estate that existed before 1600; is part of a field system that existed before 1845; contains protected or endangered species; includes woody species specified in Schedule 1 of the Hedgerow Regulations.
25. Selecting just 'Important' Hedgerows has resulted in Protected Hedgerows being omitted from the DCO. This area of East Suffolk is rich in hedgerows and there will be wholesale destruction along the full length of the cable route and substation site resulting in a dramatic change in character of the area and loss of habitat for wildlife.
26. The Applicants' classification of two hedges either side of Fitches Lane, Aldringham demonstrates the fallacy in the Applicant's approach. The hedgerow on the north side of footpath 7 is deemed to be unimportant while the hedgerow on its south side has been classified as Important. They are both ancient and in places, they complement and overhang each other forming an attractive archway, but the Applicant has classified them differently.

Re: Applicants' paragraph 8 regarding Important Hedgerow 21 (approximately 250m long) .

27. At ISH7, Mr McGrellis, SPR Onshore Consents Manager on behalf of the Applicants made a commitment that although the whole length of this hedge is designated for removal on sheet 5 of 2.10 Important Hedgerows and Tree Preservation Order Plan [APP-020](#), no more than a maximum of 27.1 metres would actually be removed. It is most disappointing to read in Applicants' paragraph 8 of their ISH7 Oral Case that the Applicant has withdrawn that commitment.

APPENDIX 6

APPLICANTS RESPONSES TO HEARING ACTION POINTS - ISH7

1. Hundred Wood

1. **Action Point** : Applicants to submit updated habitat surveys of the woodland to the west of the Hundred River and the adjacent meadow, with relevant accompanying explanatory text, including an assessment of the potential for micro-siting to avoid features of importance.
2. **Applicants' Response** : As outlined in the Outline Landscape and Ecological Management Plan, a pre-construction walkover survey would be undertaken by the Arboricultural Clerk of Works and Ecological Clerk of Works and an engineer to assist in micro-siting along the onshore cable route to minimise woodland, tree and scrub loss where practicable. This will include (as an example) the micrositing of spoil storage or temporary lay down areas to allow the retention of trees where possible.
3. **SASES Comments:** We refer to the Applicants' Deadline 6 'Ecology Survey Results, section 3.1 Work No 19 and to SASES Deadline 7 Comments on Applicants Submission of Oral Case –ISH7 Biodiversity and Habitats Regulation Assessment, Section 2.1 which contains SASES comments on those results.

2. Watercourse crossing method statement

4. **Action Point** : Updated watercourse crossing method statement to be submitted by Applicants, to including a more detailed justification for the trenching methodology proposed.
5. **Applicants' Response** : The Outline Water Course Crossing Method Statement has been updated and submitted at Deadline 6 (document reference ExA.AS-5.D6.V2)..
6. **SASES Comments:** We refer to SASES Deadline 7 Comments on Applicants Submission of Oral Case –ISH7 Biodiversity and Habitats Regulation Assessment, 2.1.3 Watercourse Crossing Method Statement which contains SASES comments on Outline Water Course Crossing Method Statement v2.

APPENDIX 7

TRAFFIC AND TRANSPORT DOCUMENTS (Outline Travel Plan, Outline Access Management Plan, Outline Construction Traffic Management Plan, Clarification Note Sizewell Projects Cumulative Impact Assessment (Travel And Transport))

Deadline 6 Submission 8.11 - Outline Travel Plan Version 03 24th February 2021	
Para 7	<p>Introduces the term “...two certified plans referred to in draft DCO...” Document then refers to 4 plans</p> <p>Outline Access Management Plan (OAMP)</p> <p>Outline Construction Traffic Management Plan (OCTMP)</p> <p>Outline Port Construction Traffic Management and Travel Plan (OPTCTMTP)</p> <p>Outline Public Rights of Way Strategy (OPRoWS)</p>
Page 7 Para 25 Table 2.1	<p>Introduces the term – Light Vehicles</p> <p>It is noted that the Table 2.1 refers to Light Vehicles, which appears to be employee vehicle movements. The OCTMP covers HGV movements. Where is the corresponding information on Light Commercial Vehicles (LCVs) to be found?</p>
Page 10 – Table 2.2	<p>General Employee Travel Plan Measures</p> <p>The is no indication at this point of any intent to adopt measures such as staggered start for different on-site activities normally used to reduce peak traffic .</p>
Outline Code of Construction Practice Rev 03	
Page 16 Para 52 Fencing	<p>Does the proposed fencing take into account the fact that small groups of deer (Red Deer and Roe Deer) frequently move quite freely across the whole area and may find their normal passage blocked by fencing along the length of the haul road and substation(s) perimeter.</p>
Outline Access Management Plan Rev 03	

Page 2	This is first time an OPTCTMP has been revealed
Page 6	<p>It is noted that the Applicant provides no assurance that Light Commercial Vehicles (ie that category < 7.5 tonnes GLW) will not travel to the site via:</p> <ul style="list-style-type: none"> • the B1121 through Benhall Green. Sternfield or Friston • the B1119 Saxmundham to Leiston • the B1353 Aldringham - Thorpeness
Page 6	Map showing access points and crossing points has been altered
Page 8 Table 2.1 Re: Access 13	<p>It is noted that: “ During construction the would only be used for Abnormal Indivisible Load (AIL) deliveries associated with transformers and National Grid employees. This is taken as a firm committment by the Applicant that Access 13 will not be used by HGVs or Light Commercial Vehicles (LGVs)</p>
Page 12 Table 2.3 Visibility Requirements	<p>It is noted that the visibilty requirment at accesses 10 & 13 are at the margins of acceptability</p> <p>It ids noted that no comparable visibility data are supplied for crossings 11/12 (Grove Road) and 3 4 Thorpeness Road. Grove Road has very limited visibility distances</p>
Page 21 Paras 73 & 74	<p>This paragraph details difficulties which would be experienced by an HGV making a left turn from the A1094 to the B1121 a consequence of junction geometry but a right turn is OK. The note is curious as the baseline position is that NO HGVs will travel along any part of the B1121.</p> <p>It is noted that layouts still refer to crossing 11/12, 7/8 and 3/4 as “Access”.</p>
Comments on Outline Construction Traffic Management Plan – Version 03	
Para 54	<p>It is noted that the Applicant intends to allow access to the CCSs before 7:00 am ie outside the prescribed woking day. This is unacceptable due to the noise that will result.</p>
Para 72	<p>It is noted that the proposed works involve carriageway widening and vegetation clearance. Reference is made to removal of works post AIL delivery, but no mention of restoration of vegetation.</p>
Para 84 Theberton Amenity Improvements	<p>Permanent footway alterations are planned at Theberton: the rationale for these “improvements” appears weak. Can</p>

	the Applicant confirm that these changes were requested by SCC (as Highways Authority) or by local residents?
Para 88 Snape Amenity Improvements	Permanent footway alterations are planned at the Snape cross roads on the A10194. Given that this is a busy road and any roadworks will give rise to traffic delays, the rationale for these “improvements” appears weak. Can the Applicant confirm that these changes were requested by SCC (as Highways Authority) or by local residents?
Para 107 to 109	The Applicant has not provided any evidence regarding possible interruptions to utilities. It should be noted that a substantial 3-phase power supply to the Parish Church is buried beneath the road at the intersection of Church Lane and entrance to the Village Hall and nearby properties.
Clarification Note Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)	
Para 6	Notes potential overlap with SZB Relocated Facilities project
Para 34 Table 2.4	Why has Link 1 (A12 just north of Yoxford been omitted? Is it considered that there are no pedestrians in this area?
Para 36 Link 2	This statement is only true if all SZC traffic approaches from the south
Para 47	The first sentence is confusing – it may be that some word/words have been left out
Para 53 Link 4	The Applicant first acknowledges “...that the Projects have potential to result in significant impacts through a high sensitivity section at Theberton...” but then consider that the provision of a few metres of footpath and a dropped kerbcrossing would reduce this to one where “...residual impacts are considered to be not significant ” This is an astonishing claim.
Para 59 Link 6	The Applicant again acknowledges “...that (the Projects) have potential to result in significant impacts through the high sensitivity section of the A1094 ...” (Snape ?) but then considers that the provision of a few metres of footpath and a crossing (dropped kerb?) would reduce this to one where “...residual impacts are considered to be not significant ” Again an astonishing claim.
Paras 69 to 73	Applicant concludes that within the definition of “Severance” in GEART, cumulative impact issues do not result in severance

Table 2.6	<p>Applicant combines a view of severance taken from two different sources and turns an 'unlikely' and slight/moderate/substantial view of traffic flow increment to produce a magnitude assessment of negligible/Low/Medium / high category, and a view that in all cases the test of significance results in a "No".</p> <p>The convolving of numerical values and 'attributes' is mathematically unsound.</p>
Para 79 Cluster 1	<p>Concludes that although the CIA show an increase of 3% in traffic flow across the A12/B1119 junction the fact that neither of the Projects require a turn at this junction would have a negligible contribution to collisions. This is a non-sequitur.</p>
Para 80 - Cluster 3	<p>SZC assessment that prior to opening the proposed roundabout, there is likely to be a slight increase in collision frequency. Increased SPR based HGV is likely to result in further increase. The Applicant's assessment cumulative traffic flow would not contribute to a significant adverse effect depends upon the definition in this instance of "significant adverse"</p>
Para 89 - A1094	<p>It is noted that a cumulative impact of a 14% increase in traffic results in a "minor adverse cumulative impact". Again the definition of minor adverse requires careful scrutiny by the ExA.</p>
Para 107	<p>Should Junction 6 to 13 read Links 6 to 13?</p>
Para 109	<p>Correct summarisation not checked</p>
Para 110 Cumulative Noise	<p>It is noted that there is a cumulative impact regarding noise, categorised as "minor" (~70%), "moderate"(22%) or "negligible"(~6%) using Applicant's definition of severity.</p>
Para 126	<p>Is the intention to provide pedestrian amenity along links 2 & 3 correct?</p> <p>Link 2 is defined elsewhere as the stretch of A12 between Friday Street and Yoxford?</p> <p>Link 3 is defined as the stretch of A12 south of Friday Street Junction</p>