



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Suffolk Energy Action Solutions' Deadline 6 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-27.D8.V1

SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001026

Date: 25th March 2021

Revision: Version 1

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Applicable to **East Anglia ONE North** and **East Anglia TWO**



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	25/03/2021	Paolo Pizzolla	Lesley Jamieson / Ian Mackay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	Final for Submission at Deadline 8



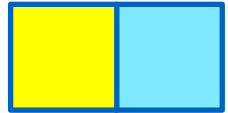
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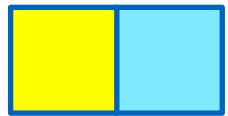
Glossary of Acronyms

AEoI	Adverse Effect on Integrity
DCO	Development Consent Order
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
JNCC	Joint Nature Conservation Committee
OLEMS	Outline Landscape and Ecological Management Strategy
PMoW	Precautionary Method Statement
PRoW	Public Right of Way
SBIS	Suffolk Biodiversity Information Service
SCC	Suffolk County Council
SEAS	Suffolk Energy Action Solutions
SPA	Special Protected Area



Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.



1 Introduction

1. This document provides the comments of East Anglia TWO Limited and East Anglia ONE North Limited (the Applicants) on Written Representations received from Suffolk Energy Action Solutions (SEAS) regarding the East Anglia TWO project and the East Anglia ONE North project (the Projects).
2. SEAS' Written Representations (REP5-108, REP5-109, REP5-110 and REP5-113) relate to various materials submitted by the Applicants at or before Deadline 4, including:
 - Post-Hearing Submission – Issue Specific Hearing 7 Habitats and Biodiversity (REP6-139);
 - Post-Hearing Submission – Issue Specific Hearing 7 Habitats and Biodiversity: Woodland at the River Hundred (REP6-140); and
 - Additional Submission - Further evidence of 'Other Projects' (REP6-043).
3. The Applicants' response to SEAS' Deadline 7 representations are provided in **Section 2**.
4. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



2 Comments on SEAS' Deadline 7 Submissions

2.1 SEAS' Post-Hearing Submission – Issue Specific Hearing 7 Habitats and Biodiversity (REP6-139)

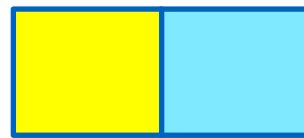
ID	SEAS' Comments	Applicants' Comments
Summary		
1	1 The riparian woodland's benefits to the river and the SSSI are outlined.	<p>No evidence of suitable habitat to support significant populations of invertebrates was noted during the 2018 extended Phase 1 habitat survey (APP-503 and APP-504) or the subsequent 2019 update survey. The Applicants revisited the site of the Hundred River crossing on 15th – 16th February 2021 (REP6-035) and again assessed that while potentially suitable habitats are present, this are limited at the location of the crossing. Furthermore, no emergent vegetation was identified during the 2021 survey and limited bankside vegetation (key species being bramble <i>Rubus spp.</i>, nettle <i>Urtica dioica</i>, teasel <i>Dipsacus</i> and perennial rye grass <i>Lolium perenne</i>) was recorded.</p> <p>Irrespective of survey findings to date, the Applicants have committed to the implementation of mitigation measures (Table 22.4, Chapter 22 of the ES (APP-070)) that will reduce impacts on all invertebrates if present. In addition, the Applicants have committed to undertake pre-construction surveys, and should the presence of invertebrates or suitable habitat for invertebrates be identified, appropriate mitigation measures (where required) will be implemented through the final Ecological Management Plan (EMP) secured under Requirement 21 of the draft DCO (an updated version has been submitted at Deadline 8, document reference 3.1).</p>
2	2 The ancient river irrigation systems are sketched as a means of ensuring reliable distribution of channels of river water, and their benefit as a remaining foothold for species like the Hairy Dragonfly.	
3	3 The riparian meadow is described. SEAS would like to thank Harry Barclay, horticulturalist, for help in identifying plant species there, upon which invertebrates rely.	
4	4 The vulnerability of the groundwater to trenching is illustrated and its consequences raised again.	
		<p>The Applicants provided a description of the baseline and assessment of potential impacts in respect of groundwater within Chapter 20 of the ES (APP-068). With regard to potential impacts to groundwater specifically associated with the crossing of the Hundred River, the Applicants propose mitigation within the Outline Watercourse Crossing Method Statement (an updated document</p>



ID	SEAS' Comments	Applicants' Comments
		has been submitted at Deadline 8, document reference ExA.AS-5.D8.V3), including seeking the relevant permits for the works and further consultation with the Environment Agency.
5	5 SEAS would like to thank Sarah Frances and Susie Curtis, herbologists, for their generous help in illustrating and identifying the rich variety of plant species in the riparian environment of the Hundred River, and for the gift of their own photographs from their regular logs of frequent visits to the area. High quality images are provided.	Noted.
6	6 Other terrestrial Ecology — SEAS offers photographs of areas either not visited by the Applicant, or where the Applicant has not found evidence of important species. SEAS intends to illustrate that, despite the Applicant not being able to record rare species, like Nightingales or Bats, these are locally known, their habitat is still present, and that therefore the 'industry standard' process of analysis is not providing adequate data in this case.	The Applicants have consistently acknowledged the ecological value of the areas of woodland adjacent to the Hundred River. The area around the Hundred River was identified during the extended Phase 1 habitat survey (APP-503 and APP-504) and within Chapter 22 of the ES (APP-070) as providing suitable opportunities for foraging and commuting bats and therefore a suite of surveys was undertaken between June and October 2018. As presented in Appendix 22.6 (APP-507), a range of different bat species have been recorded throughout the area, with common pipistrelle being the most abundant species recorded. However, soprano pipistrelle <i>Pipistrellus pygmaeus</i> , nathusius' pipistrelle <i>Pipistrellus nathusii</i> and barbastelle <i>Barbastella barbastellus</i> were also recorded. Furthermore, bats were observed along the public footpath immediately adjacent to the woodland, as well as within the woodland area to the east of this transect area.
7	7 SEAS considers the mosaic of habitat joined by hedgerow which the trenching will bisect and gives examples of the rich diversity of species recorded there. Old hedgerows have old biome; the construction project will be destructive to these and will struggle in	The Applicants have set out a comprehensive suite of measures for the implementation and ongoing management of planting within the Outline Landscape and Ecological Management Strategy (OLEMS) (an updated version has been submitted at Deadline 8, document reference 8.7), which includes the active watering of landscape planting.



ID	SEAS' Comments	Applicants' Comments
	any case to replace the hedges on acid sand without investment in irrigation.	
8	8 Evidence of knowledge of Badgers at the substation site was requested with photos of sett entrances provided. The ecologist said the setts would be destroyed under licence.	<p>The Applicants have recorded the presence of active badger setts at the onshore substation locations. Four outlier setts are proposed to be closed (under a Natural England licence), as they are located within areas currently identified for landscaping within the Outline Landscape Mitigation Plan contained within the OLEMS (document reference 8.7).</p> <p>A draft mitigation licence has been submitted to Natural England to obtain a Letter of No Impediment.</p>
1 Hundred River		
9	1.1 At the proposed crossing point, the River Hundred is bounded by priority deciduous woodland that offers flood protection and filtration of contaminants from the water, thanks to its ancient bankside planting and coppicing. It provides flow regulation and cooling to the benefit of the SSSI and RSPB Reserve which is close downstream.	<p>The Outline Watercourse Crossing Method Statement (an updated version has been submitted at Deadline 8, document reference ExA.AS-5.D8.V3) considers the potential impact of the Projects on the Hundred River and the features it supports and includes a number of measures developed to ensure the works do not result in unacceptable adverse impacts. These measures can be summarised as follows:</p> <ul style="list-style-type: none"> • Pre-construction surveys for eel, fish, otter and water vole will be undertaken. Survey results will inform the final construction method selected; • The results of pre-construction surveys will inform specific ecological mitigation measures within the final EMP prepared to discharge Requirement 21 of the draft DCO (document reference 3.1); • Where pre-construction surveys identify the presence of fish or eels, provision will be made for the upstream / downstream migration;
10	1.2 This riparian area is ecologically important and protected.	
11	1.3 No mitigation has been proposed for this protected environment.	



ID	SEAS' Comments	Applicants' Comments
		<ul style="list-style-type: none"> • Periods of low flow will be chosen to undertake the crossing works wherever practicable; • Where there is a risk of sediment run-off, sediment interception techniques would be used; • Any over-pumping at the Hundred River crossing would be undertaken in a manner that ensures the flow rate downstream of the crossing is the same as upstream; • Following laying of the duct or onshore cables, subsoil and topsoil will be replaced, and the riverbank reprofiled and replanted. The specification will be set out in the final Watercourse Crossing Method Statement; and • The construction footprint of the crossing will be reinstated as soon as practicable following completion of the crossing works. <p>Furthermore, the Applicants have undertaken and submitted a screening for Likely Significant Effects and an assessment of Adverse Effect on Integrity (AEoI) of the Sandlings Special Protected Area (SPA) arising from the works associated with the Hundred River crossing (an updated Outline Watercourse Crossing Method Statement has been submitted at Deadline 8, document reference ExA.AS-5.D8.V3). The assessment concludes that the works associated with the Hundred River crossing will not result in AEoI of the Sandlings SPA.</p> <p>The precise working method for crossing the Hundred River will be agreed through the discharge of DCO Requirement 22(2)(k) post-consent and through an application for a Flood Risk Activity Permit from the Environment Agency prior to commencement of the onshore works.</p> <p>Natural England will also be consulted during the preparation of the final Watercourse Crossing Method Statement. The potential for downstream</p>



ID	SEAS' Comments	Applicants' Comments
		impacts on the Sandlings SPA and its qualifying features will be managed through the implementation of the identified mitigation measures to minimise sediment generation from construction activities associated with the crossing of the Hundred River.
12	1.4 The applicant does not have enough land to replace all the woodland scheduled for destruction.	Having verified the results of the 2018 extended Phase 1 habitat survey through the site visit undertaken in February 2021, the Applicants are confident that there is sufficient area within the Order limits to replace woodland on a like-for-like basis to that lost as a result of the Projects. The Applicants note that the Hundred River is considered as a receptor within Chapter 20 of the ES (APP-068) relating to water resources and flood risk and is referred to throughout Chapter 22 of the ES (APP-070) in relation to its ecological function as a waterbody. The OLEMS (document reference 8.7) sets out details of the ecological mitigation areas available within the Order limits, those within which woodland planting will be delivered and those within which further woodland planting may be delivered if a need is identified during pre-construction surveys and in consultation with the relevant planning authority.
13	1.5 The applicant certainly has no sites available to replace riparian woodland.	
14	1.6 The River Hundred and its woodland have hardly been considered as receptors and will effectively be sacrificed as plans stand.	
15	1.7 The Applicant states there is no alternative to this route. In that case, the project should not continue.	The Environmental Impact Assessment process requires the consideration of alternatives in order that selection of the most environmentally appropriate options can be evidenced. The Applicants undertook a rigorous site selection process before determining that the Projects could not go ahead without the Hundred River crossing. Through the site selection process as explained within Chapter 4 of the ES (APP-052), the Applicants have sought a cable route that first avoids and then minimises potential environmental impacts in the round.
2 Adjacent meadow and Hairy Dragonfly		
16	2.1 The meadow has been in Stewardship for some years.	



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17	2.2 This means that there are restrictions on grazing, treatment and spraying. These rules have been observed for at least a decade. The present farmer keeps Red Poll Cattle on the meadow and manages their grazing by moving them up and down the valley.	No evidence of suitable habitat to support significant populations of invertebrates was noted during the 2018 extended Phase 1 habitat survey (APP-503 and APP-504) or the subsequent 2019 update survey. The Applicants revisited the site of the Hundred River crossing on 15 th – 16 th February 2021 (REP6-035) and again assessed that while potentially suitable habitats are present, this are limited at the location of the crossing.
18	2.3 The channels at 90 degrees to the river are historic irrigation catches for grazing meadows. These marked drains in the riparian meadow are well vegetated and suitable habitat for Hairy Dragonfly.	As presented in section 22.5.3.4, Chapter 22 of the ES (APP-070), the Hundred River was assessed as providing suitable habitat for both otter and water vole and therefore was subject to presence / absence surveys. Despite suitable habitat being present, no evidence of otter or water vole was recorded during the surveys, nor does Suffolk Biodiversity Information Service (SBIS) hold any records. These species were therefore assumed to be absent for purposes for the Ecological Impact Assessment undertaken to inform the Applications.
19	2.4 The riverside meadows are still locally prized for grazing as non-riparian grass cannot support large animals on these sandy soils in our dry summers.	The Applicants recognise these species are mobile and therefore, given the presence of suitable habitat, a pre-construction survey (within the optimal survey window) for both species (and invertebrates) will be undertaken to inform the requirement for mitigation measures and/or licensing requirements.
20	2.5 Downstream, more constructed channels lead into what would have been managed reed beds for domestic use (such as, thatching, light, and beekeeping). These are now managed for the benefit of the RSPB reserve. Below is a widened channel leading to fen.	The commitment to pre-construction surveys is specified within section 5.13.3 of the OLEMS (document reference 8.7).
21	2.6 The Hundred River has a sluggish flow in summer and is a sympathetic environment to aquatic stages of invertebrates. These are food for fish, and the birds and mammals, like Otters, that feed on them. The winged stages support bats and birds, like Swifts and Swallows, that hunt above the surface of the water.	
3 Riparian Meadow		
22	3.1 The ditches in this meadow each support trees, bushes, bramble and other plants.	As presented in Chapter 22 (APP-070), suitable habitat for common reptile species was recorded and whilst no specific reptile survey has been



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23	3.2 In brief summary, the sward is mixed grasses, with long grass retained in several areas. Heron, an indicator species, forages in the grass, in which are found Frogs and Toads.	undertaken, appropriate mitigation measures to ensure the legal protection of common reptile species have been identified. These measures are presented in the OLEMS (document reference 8.7).
24	3.3 These images, taken in summer, indicate the presence of Rumex. Rumex is used as food plants by the larvae of a number of Lepidoptera species.	Furthermore, a reptile Precautionary Method of Working (PMoW) will be produced and implemented during the works where reptile habitat is recorded. The written details of the reptile PMoW will be included within the EMP which, under Requirement 21 of the draft DCO (document reference 3.1), must be approved by the relevant planning authority in consultation with the relevant statutory nature conservation body prior to works commencing. In addition, the implementation of the reptile PMoW will be supervised by the Ecological Clerk of Works (para. 229, APP-584) to ensure compliance.
25	3.4 Patches of long grass provide habitat and forage for a variety of animals including Voles which support another indicator species that nightly quarters the meadow: Barn Owl.	
26	3.5 We can see that the long grass has been allowed to seed. The contrast between the irrigated area and the wet meadow is stark. Long grass, as well as bare, sandy areas make this area a good place for basking reptiles. Common Lizard, Grass Snake, Slow Worm and Adder are known all along the river and fen.	Barn owls are likely to use much of the local farmland area for foraging. According to the Barn Owl Trust ¹ , arable land is relatively good for barn owl foraging and, birds require only 14 to 21ha of rough grassland in arable habitats within 2km to meet their foraging requirements, which is only around 1.1 to 1.7% of the total area. This is likely to help explain why the barn owl population in Suffolk has a favourable conservation status and according to the Suffolk Community Barn Owl Project ² , hosts some of the highest densities in Britain. Based on this evidence, local breeding barn owls are likely to continue to utilise suitable foraging habitat throughout the area, and any localised loss of rough grassland is unlikely to substantially impact any individual's breeding or survival or affect the population status.
27	3.6 Achillea Millefolium (Yarrow), can be seen in this series of snaps, and Nettle, Dandelion, Clover, Thistle and Plantain. Yarrow is used by cavity-nesting birds, including the Common Starling, to line their nests. Numerous invertebrates feed exclusively on	Yarrow is a relatively common species that flowers from June onwards. Any localised losses of this or other common plant species are unlikely to affect the

¹ <https://www.barnowltrust.org.uk/how-to-manage-land-for-barn-owls/barn-owl-habitat-requirements/>

² <https://www.suffolkbirdgroup.org/scbod-barn-owls>



ID	SEAS' Comments	Applicants' Comments
	Yarrow. Leaf Miners, Case Bearers and Pugs also favour it. Chrysanthia Viridissima feed on it.	ability of common breeding bird species to gather sufficient nest material from the local area and prevent successful breeding.
28	3.7 Pinus — seen as monolith and also living specimens in these images — produces forage for Lepidoptera, Panolis Flammea. Its seeds are eaten by Crossbill, Jay, Nuthatch, Siskin, and Woodpecker. Its pollen is thought to play a vital role in detrital food webs such as enabling fungi to decompose nutritionally lacking litter, and moving matter between terrestrial and aquatic food systems. (We demonstrated in our last submission that the woodland floor supports fungal networks also.)	Scots pine is relatively common in the local area, forming areas of plantation and being established on the widespread sandy soils. Should any trees in the Hundred River area become unavailable to bird species due to the proposed works, it is likely that birds would be able to locate sufficient resources elsewhere in the local area.
4 Aquifer vulnerability		
29	<p>4.1 The area's aquifers have a typically moderate to low yield close to the surface and so the riparian meadow and woodland are considered of medium to high vulnerability (DEFRA).</p> <p>4.2 We refer to the Applicant's own Archeological test trenches of 30 November 2019 which rapidly filled with groundwater.</p> <p>4.3 The area is sandy so any contaminants from trenching will be quickly and widely spread through groundwater and are likely to also be readily dispersed by the irrigation channels and the main river flow.</p>	<p>The Applicants note that, given the time of year such trenches were excavated, the ground would likely have been wetter given seasonal rainfall.</p> <p>The Applicants have provided measures within the Outline Watercourse Crossing Method Statement (an updated version has been submitted at Deadline 8, document reference ExA.AS-5.D8.V3) that will be carried forward to the final Watercourse Crossing Method Statement to control release of contaminants.</p>
30	4.4 The level of the distributed water is also critical downstream where loss of, or excess, water levels threaten the habitat of the Bittern (for instance) and the sensitive plants of the brackish water meadows closer to the sea. A high degree of micromanagement and monitoring is required by the managers of the SSSI and Nature Reserve.	The Applicants have provided measures within the Outline Watercourse Crossing Method Statement (an updated version has been submitted at Deadline 8, document reference ExA.AS-5.D8.V3) that will be carried forward to the final Watercourse Crossing Method Statement to control release of contaminants.



ID	SEAS' Comments	Applicants' Comments
31	4.5 The advice of the Irish Geological Survey in these circumstances is to find another site. (Geological Survey, Ireland, 'Assessing Groundwater vulnerability,' 2021)	The Applicants question the applicability of the Irish Geological Survey for the Projects being undertaken in England, although note this advice.
5 The Riparian meadows of the River Hundred in Aldringham by Sarah Frances and Susie Curtis		
32	We are locals that devote our time to the stewardship, by constant seasonal observation, of the area — which is rich, undisturbed, rural landscape, endowed with huge biodiversity of typically-found native flora and fauna — a rare, unspoilt piece of nature.	The Applicants note these submissions and have no further comment.
33	[Various photographs]	
34	5.2 List of some plants commonly found here [please refer to page 15 of 24 in (REP6-139) for full list]	
6 Other terrestrial ecology		
35	6.1 The Applicant's latest surveys examined some of Fitches Lane and the attached wood, but not the arable land adjacent, much of which is in, or eligible for, national stewardship schemes.	The Applicants have described the baseline of and assessed potential impacts regarding environmental stewardship schemes within Chapter 21 of the ES (APP-069). This assessment identified the land within the Order limits west of Fitches Lane is not currently subject to environmental stewardship scheme agreements.
36	6.2 The hedgerows bounding both sides of Fitches Lane are treated as one rather than two in parallel. Both hedges will be removed. They are recorded as species poor by the Applicant. This is Fitches Lane — not species poor.	The Applicants note that the length of hedgerow associated with Fitches Lane required for removal in this area is important hedgerow marked 21 on sheet 5 of 12 of the Important Hedgerows and Tree Preservation Order Plan (REP3-010).
37	6.3 The Lane has been in existence for centuries. The Applicant's ecologist says they could not penetrate the areas of scrub.	At the time of the 2018 and 2019 ecological surveys, the ecologists noted areas of dense scrub which prevented their access for health and safety reasons. These limitations are acknowledged by the Applicants but in spite of these



ID	SEAS' Comments	Applicants' Comments
		<p>limitations, the findings from the ecological surveys do not undermine the conclusions (and in turn the identified mitigation measures) that are presented in the ES Chapter 22 (APP-070) and/or the OLEMS (document reference 8.7).</p>
38	<p>6.4 The impenetrable scrub and bramble stands are excellent nesting areas for our breeding Nightingales.</p>	<p>Although dense scrub may be suitable habitat for nightingale, no records of the species were made in proximity to the Hundred River crossing area during baseline ornithology surveys in 2018 and 2019, or provided in RSPB historic data since 2009 (as presented in Chapter 23 Onshore Ornithology (APP-071)). Should any active nightingale territories be located in the vicinity of the proposed works, efforts would be made under the Breeding Bird Protection Plan to ensure that breeding would continue without disturbance.</p>
39	<p>6.4 The wood offers cleared and canopied habitat favoured by Nightingale and Turtle Dove and the undisturbed biome of the Lane plus the 'impassable' areas offer invertebrate forage for many indicator species, like Bat, Nightingale, and larval forms of many other invertebrates, which also benefit from the proximity, on the northern edge of the wood, of the River Hundred. Adjacent to the south are arable fields. To the west is the village of Knodishall (Coldfair Green).</p>	<p>No turtle dove or nightingale territories were recorded in the vicinity of the wood in 2018 or 2019 baseline surveys, and no records from RSPB data from 2009 to 2018 were in this location (as presented in Chapter 23 (APP-071)). Should any active territories be located in the vicinity of the proposed works, efforts would be made under the Breeding Bird Protection Plan to ensure that breeding would continue without disturbance.</p>
40	<p>6.5 A buffer area for nesting birds of 5m is unlikely to be acceptable to any bird species more shy than a Robin.</p>	<p>The 5m buffer is a minimum distance to comply with the Wildlife & Countryside Act 1981, to ensure that nests, eggs or young of all species are not destroyed. Appropriate buffer distances surrounding a nest site would be species-specific and would be determined by the Ecological Clerk of Works, based on the nature and duration of works that would take place nearby. Any species listed in Schedule 1 of the Act would be afforded enhanced protection from disturbance to adults, by appropriate mitigation measures as part of the Breeding Bird Protection Plan.</p>



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41	6.6 Despite unfruitful surveys by the applicant, Nightingale and Turtle Dove, plus other migrating warblers, are known to breed annually here and have done so for all of living memory.	No turtle dove or nightingale territories were recorded in the vicinity of the wood in 2018 or 2019 baseline surveys, and no records from RSPB data from 2009 to 2018 were in this location (as presented in Chapter 23 (APP-071)). Should any active territories be located in the vicinity of the proposed works, efforts would be made under the Breeding Bird Protection Plan to ensure that breeding would continue without disturbance.
42	6.7 Equally, use of these woods by various bats is well-known. While the Applicant's equipment did not pick up the Brown Long-Eared Bat, Suffolk FWAG identified its presence in the area.	<p>A desk-based exercise and field survey were undertaken in relation to bats, the findings of which were used to inform the Ecological Impact Assessment presented in Chapter 22 (APP-070). Biological records (including bat records) were obtained from the SBIS.</p> <p>The Applicants acknowledge that the brown long-eared bat is a common and widespread species distributed across Suffolk. However, the suite of bat surveys (emergence / re-entry, monthly activity transects and monthly static bat detector) did not record this species. Therefore, it was concluded this is species was absent in this particular area during the survey.</p>
43	6.8 If surveys described by the Applicant as 'industry standard' are failing to give an accurate picture of local ecology, we suggest that the form of such surveys seems wanting. Appealing to knowledgeable locals — and there are many around — will give protected and endangered species a better chance of visibility, before it is too late and they are pushed into local extinction.	All ecological surveys in support of the Applications were undertaken by suitably qualified ecologists within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance (such as but not limited to the Handbook for Phase 1 Habitat Survey (Joint Nature Conservation Committee (JNCC)). Furthermore, industry accepted species-specific guidance and standards have been used when assessing habitats for their suitability to support legally protected and notable species.
44	6.9 This screenshot is from a video of a Nightingale who was singing in the southern hedge of Fitches Lane, where it adjoins the hedge in the adjacent arable field. The song was captured on video and can be made available for the library.	Noted.



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45	6.10 Both hedges will have to be removed.	The Applicants note that the length of hedgerow associated with Fitches Lane required for removal in this area is important hedgerow marked 21 on sheet 5 of 12 of the Important Hedgerows and Tree Preservation Order Plan (REP3-010).
46	6.11 Fitches Lane and the paths through the wood are resources joining two villages, enabling children to walk to the Primary School, as well as offering places for children to play. Although there has been some development by the new owners in recent years (one owner's child has a bike track in an area of the wood), we still hear our migrant birds return each spring. The construction will remove this resource and the Lane.	Noted. The Applicants note that a temporary diversion of the public right of way (PRoW) E-260/007/0 (from the western end of Fitches Lane towards Coldfair Green) will be required during construction. This temporary diversion will be implemented in accordance with the final Public Rights of Way Strategy, which must accord with the Outline Public Rights of Way Strategy (REP3-024) and be approved by the relevant planning authority prior to undertaking works that would affect the PRoW, pursuant to Requirement 32 of the draft DCO (document reference 3.1). Pursuant to Article 11 of the draft DCO , temporary PRoW diversions must be provided to the standard defined in the Outline Public Rights of Way Strategy (REP3-024), to the satisfaction of the relevant highway authority, prior to the stopping up of the existing PRoW.
47	6.12 Images of the invertebrates in the area taken by the author. [please refer to page 19 or 24 of (REP6-139) for images]	Noted.
7 Arable Fields adjoining Fitches Lane and reaching Snape Road (B1069)		
48	7.1 Adjoining fields are partly industrially farmed, or eligible to join national Land Stewardship schemes (DEFRA).	The Applicants have described the baseline of and assessed potential impacts regarding environmental stewardship schemes within Chapter 21 of the ES (APP-069). This assessment identified the land within the Order limits west of Fitches Lane is not currently subject to environmental stewardship scheme agreements.
49	7.2 There is a mosaic of ecologically rich areas between and bounding the arable fields, including long-established wooded areas, old hedgerows, and water bodies (including domestic	The Applicants' surveys have recorded three hedgerows that interact with the Projects' Order limits in the arable fields immediately west of Fitches Lane. The Applicants have committed to crossing two of these hedgerows via a reduced



ID	SEAS' Comments	Applicants' Comments
	<p>ponds). This means there is high biodiversity here, connected by hedgerow. Many of these old hedgerows will be bisected by the Applicant and their long-established habitats and ecological connectivity destroyed, particularly in the earth.</p>	<p>working width to minimise impacts to hedgerows. Given the angle of incidence of crossing important hedgerow marked 21 on sheet 5 or 12 of the Important Hedgerows and Tree Preservation Order Plan (REP3-010) (as a result of taking the most direct line through the area of woodland west of Aldeburgh Road), the Applicants need to retain rights to remove the full length of this hedgerow that falls within the Order limits. During the detailed design and where micrositing allows, the Applicants will aim to minimise the length of hedgerow removal required for important hedgerow 21.</p> <p>As per the OLEMS (document reference 8.7) all sections of hedgerow removed will be reinstated within the first available planting season following construction and will aim to enhance baseline conditions where possible (for example, through improved species diversity).</p>
50	<p>7.3 National Biodiversity Database generates 5242 occurrence records within a 1km circle centred on Sloe Lane (which is close to the proposed compound in work area 24).</p>	<p>Noted. The Applicants note that the assessment provided within Chapter 22 of the ES (APP-070) was in-part informed by data from the SBIS, which supplies the National Biodiversity Network their data. As such, these data have already been taken into account in drawing the conclusions of the assessment.</p>
51	<p>7.4 These images were taken recently at the southern extremity of the arable sector adjoining Fitches Lane because the authors were snowed in. It serves to illustrate how some hedgerows have been restored and pollinator strips established, Creatures rely on the connectivity that these provide. [please refer to page 21 or 24 of (REP6-139) for images]</p>	<p>Noted. The Applicants' surveys have recorded three hedgerows that interact with the Projects' Order limits in the arable fields immediately west of Fitches Lane. The Applicants have committed to crossing two of these hedgerows via a reduced working width to minimise impacts to hedgerows. Given the angle of incidence of crossing important hedgerow marked 21 on sheet 5 or 12 of the Important Hedgerows and Tree Preservation Order Plan (REP3-010) (as a result of taking the most direct line through the area of woodland west of Aldeburgh Road), the Applicants need to retain rights to remove the full length of this hedgerow that falls within the Order limits. During the detailed design and where micrositing allows, the Applicants will aim to minimise the length of hedgerow removal required for important hedgerow 21.</p>
52	<p>7.5 The creatures seen in this area include Hare, Buzzard, Crow, Harrier, Jackdaw, Woodlark, Skylark, Fieldfare, Goldfinch, Swift, Swallow, Martin, Flycatcher, Pheasant, Wagtail, Owls (Tawny, Little and Barn), Kinglets, Hedgehog, Bat (Brown Long-Eared and Pipistrelle), Stoat, Fox, Vole, Mole, Rat, Mice, including the Yellow-</p>	



ID	SEAS' Comments	Applicants' Comments
	Necked Mouse, and numerous invertebrates: Moths, Butterflies, Beetles, Worms and many Wasp species, Solitary Bees, and Bumble Bees in the banks of the old field boundaries. Amphibians (Newt, Toad and Frog) benefit from adjacent water bodies and garden ponds.	As per the OLEMS (document reference 8.7) all sections of hedgerow removed will be reinstated within the first available planting season following construction and will aim to enhance baseline conditions where possible (for example, through improved species diversity).
53	7.6 The Applicants have made little provision to protect these creatures, arguing that hedgerows will be replaced or filled in. Some of these hedgerows are very old with an ancient biome, and cannot easily or rapidly be replaced.	
54	7.7 The Applicants do not acknowledge how long restoration of their habitat will take in this arid environment, nor have they made provision for prolonged and necessary support for replacement plants.	The Applicants have set out a comprehensive suite of measures for the implementation and ongoing management of planting within the OLEMS (document reference 8.7), which includes provision of watering landscape planting.
55	7.8 Their surveys have not returned robust data about the habitats of species likely to be impacted by the works.	All ecological surveys in support of the Applications were undertaken by suitably qualified ecologists within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance (such as but not limited to the Handbook for Phase 1 Habitat Survey (JNCC)). Furthermore, industry accepted species-specific guidance and standards have been used when assessing habitats for their suitability to support legally protected and notable species. Whilst suitable habitat for legally protected or notable species may be present, if evidence of their presence is not recorded then they are assumed to be absent. Despite the absence of evidence to confirm their presence, the Applicants recognise that some species are mobile and therefore if suitable habitat is present, pre-construction surveys for the relevant species will be undertaken within the optimal survey window to confirm their presence remains absent or to inform the requirement for mitigation measures and/or updated licensing requirements.
56	7.9 Their conclusions that species are not there, despite the existence of their habitat, are therefore not safe.	
57	7.10 Post consent is too late, and too precarious, for further surveys to be undertaken. It also fudges the cumulative effect of the destructive impact on protected and endangered species by only focussing on their existence in ready-mapped areas, until there are no obstacles to construction.	



ID	SEAS' Comments	Applicants' Comments
8 Badgers		
58	8.1 SEAS requested information on the badger setts at the substation site. Redacted reports have made it difficult to ascertain if the Applicants were aware of setts or not.	Under the Protection of Badgers Act 1992, information showing sett locations must be kept confidential to prevent persecutions. The Applicants' confidential badger survey information has been submitted to the Planning Inspectorate, Natural England, East Suffolk Council (ESC) and Suffolk County Council (SCC) only.
59	8.2 The Applicant said there were none on the substation site. A photo of the existing sett on the site is shown below. In addition a newly located, large sett is also shown, with the photo taken shortly before 17th February.	Four active badger setts have been recorded at the onshore substation and National Grid Infrastructure locations during the surveys to date. As these four outlier setts are located within areas currently proposed for landscaping, a Natural England badger mitigation licence to close these setts will be required.
60	8.3 The Applicant said that a licence would be sought from Natural England to destroy the setts.	All badger mitigation works will be undertaken in accordance with an approved method statement and badger mitigation licence obtained from Natural England. A draft badger mitigation licence (including method statement) has been prepared and submitted to Natural England to obtain a Letter of No Impediment for badgers. The Applicants recognise badgers are a mobile species and therefore, given the presence of optimal habitat for these species at this location, a pre-construction survey (within the optimal survey window) will be undertaken to inform the requirement for mitigation measures and/or updated licensing requirements. The commitment to pre-construction surveys is specified within section 5.13.3 of the OLEMS (document reference 8.7).
Conclusions		
61	In the same week as the complete publication of Professor Dasgupta's review of 'Economics and the Environment', witnessing	Noted.



ID	SEAS' Comments	Applicants' Comments
	the act of balancing this project's destruction of nature in pursuit of profit left a bad taste in the mouth.	
62	The incomplete, cookie-cutter proposals to 'restore' the environment after construction, such as replacing a mature woodland with a strip of heath, or arguing that filling holes in a hedge is ecological enhancement, fall far short of the action needed to provide beneficial renewable energy.	The Applicants note that reinstatement and restoration of land used in construction is standard approach for any project that requires the undergrounding of cables, pipes or such other buried infrastructure. A comprehensive suite of measures for the implementation and ongoing management of planting is set out within the OLEMS (document reference 8.7) to maximise successful reinstatement and planting.
63	In Dasgupta's model, the loss of natural capital is an example of how our institutions are unfit to manage these externalities, with Government paying people more to exploit nature than prioritise and protect it. Destruction of our local ecosystems means that we have not changed our conceptual framework adequately enough to invest in economic activities that enhance our stock of natural assets instead.	The Applicants note that this statement is made in relation to the current policy framework, rather than directly in relation to the Projects. The Applicants have had due regard to current policy and legislation in preparing these Applications.
64	After all, the bottom line of this windfarm project is meant to generate profit for its shareholders, which is surely why so many energy firms, like BP, with its history as fossil fuel champion, are outbidding each other for tranches of the sea bed.	No comment.
65	Instead, we need to look at cumulative effects on this environment, which will be grave. After the damage done by these two projects there will be, we know, another six. The failure to consider alternative solutions was one of the key criticisms in the Judicial Review of the Norfolk Vanguard decision.	No comment.



ID	SEAS' Comments	Applicants' Comments
66	“Protecting and enhancing nature needs more than good intentions — it requires concerted, coordinated action.”	Noted. Again, the Applicants interpret this comment from SEAS applies to the strategic approach of the UK Government to infrastructure development and coordination, rather than being directly applicable to the Projects.



2.2 SEAS' Post-Hearing Submission – Issue Specific Hearing 7 Habitats and Biodiversity: Woodland at the River Hundred (REP6-140)

ID	SEAS' Comments	Applicants' Comments
1 Summary of the Oral Hearing Submission		
1	1.1 The Applicant, SCC and ESC visited the woodland at the same time on 15th February	Whilst the Applicants undertook an ecological survey the Hundred River on the 15 th February 2021, this survey was independent of ESC's and SCC's visit.
2	1.2 On 17th February, they reported to the ISH Hearing that they observed no flooded patches despite the recent snow and that woodland was well-drained ('pretty dry').	An ecology survey report presenting the February 2021 survey finding was submitted at Deadline 6 (REP6-035). Whilst recent snow and rainfall had been experienced prior to the Applicants' visit, no evidence to support the area of woodland being considered wet woodland was noted. This justification is presented in the February 2021 survey report submitted at Deadline 6 (REP6-035).
3	1.3 Gillian Horrocks requested from local Council representatives where the officers had been, since their observations of this area's characteristics do not accord with ours.	The Applicants are unable to comment on ESC's or SCC's approach to their site visit.
4	1.4 The council officers reported that they had predominantly viewed the site from the edge of the B1122 and from the end of Gypsy Lane, as 'this was considered adequate to understand whether the area was comprised of wet woodland or not which was the purpose of the visit'. James Meyer also visited the meadow on the east of the river by the public footpaths	The Applicants are unable to comment on ESC's or SCC's approach to their site visit.
5	1.5. We await the written submission of the Applicant's ecologist to assess what records she was able to take and where.	An ecology survey report presenting the February 2021 survey finding was submitted at Deadline 6 (REP6-035).



ID	SEAS' Comments	Applicants' Comments
6	1.6 The Applicant repeated that they applied industry standard analysis by chartered ecologists and that the riparian woodland was not wet.	All ecological surveys in support of the Applications were undertaken by suitably qualified ecologists within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance (such as but not limited to the Handbook for Phase 1 Habitat Survey (JNCC)). Furthermore, industry accepted species-specific guidance and standards have been used when assessing habitats for their suitability to support legally protected and notable species.
7	1.7 SEAS pointed out that the observations and knowledge of well-informed local persons provide substantial and valuable insight to the local ecology, and that the Applicant's scanty analysis prior to this stage had left the protected riparian woodland without protection.	Again, the Applicants would note that all ecological surveys in support of the Applications were undertaken by suitably qualified ecologists within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance (such as but not limited to the Handbook for Phase 1 Habitat Survey (JNCC)).
2 Riparian water levels		
8	2.1 The water levels are controlled downstream by a sluice system. Water is drained very quickly when required as the bitterns and rare brackish species managed by RSPB can easily be disturbed by excess or too little river water.	The Applicants assume that this narrative relates to the classification of the woodland in the vicinity of the proposed Hundred River crossing. The Applicants would note that their classification of the woodland at the Hundred River is based on the species present rather than moisture levels in the ground (in line with the Joint Nature Conservation Committee's (JNCC) Handbook for Phase 1 Habitat Survey (2016)). The species found during surveys in both 2018 and 2021 did not comprise those associated with wet woodland. A full survey report was submitted at Deadline 6 (REP6-035).
9	2.2 The water levels were reduced rapidly on 18-19 January 2021 after torrential rain. Images of the 2 prior flooding were presented by SEAS in our last submission: these wet pools disappeared within 24 hours once the sluice was opened. However, is the ground now wet or dry?	
3 Riparian Soil		
11	3.1 The soil in this area is largely acidic sand. Seasonal flooding provides an overlay of fertile silt in this woodland, and the trees in the	The Applicants assume that this narrative relates to the classification of the woodland in the vicinity of the proposed Hundred River crossing. The



ID	SEAS' Comments	Applicants' Comments
	woodland offer leaf mulch, but sandy soil always offers a friable appearance, even when wet. Image 1 shows a small hole dug to a garden trowel's depth about 10m from the river bank. A simple meter reading for soil moisture content records a waterlogged character, yet the sandy soil is crumbly.	Applicants would note that their classification of the woodland at the Hundred River is based on the species present rather than moisture levels in the ground (in line with the Joint Nature Conservation Committee's (JNCC) Handbook for Phase 1 Habitat Survey (2016)). The species found during surveys in both 2018 and 2021 did not comprise those associated with wet woodland. A full survey report was submitted at Deadline 6 (REP6-035).
12	3.2 The sandy topsoil offers no barrier for water from the river to spread evenly within it.	
13	3.3 The soil is soft: boots sink into the ground even 40 metres from the water's edge.	
14	3.4.1 Gillian Horrocks has grazed large animals in this area for over 20 years. At 16 metres above sea level, three days without rain in summer means widespread desiccation of pasture.	
15	3.4.2 In contrast, grazing meadows on sand but close to the river provide pasture all year round, without significant degradation of the sward in wet periods as would occur on heavier soils.	
16	3.5 On 20-2-2021, a simple water meter was applied to the soil at bank side, 25 metres away from the bank and 40 metres away. There had been no rain for 6 days. Its readings were 'Waterlogged' in all three cases. At the area by the road, and by Gypsy Lane, where the Ecologists stood, the meter described the soil as 'Wet' and in one area 'Normal'.	
17	3.6 The altitude by the B1122, taken from Google Earth, and where we know the ecologists stood, is 11 metres. The altitude by the river, taken from Google Earth, is 9 metres. The 2m difference in altitude,	



ID	SEAS' Comments	Applicants' Comments
	which is reflected in a notable bank, obviously affects the water distribution to the higher areas by the B1122.	
18	3.7 Images 2,3,4, dated 30-11 2019: test trenches dug by the Applicant [please refer to page 3 of 6 of (REP6-140) for images]	
19	3.7.1 The trenches dug by the Applicant in this area as Archeological tests in November 2019 show the depth of the sandy layer (Image 2), and, importantly, the rapid flooding within short, winter daylight hours, of the investigative trenches (Image 3, 4). The river was not in spate; we had overnight frosts and no rain.	
20	3.7.2 We suggest that the Applicant's trenches provide ample evidence that the soil remains wet, and water close to the surface, in these riparian areas, on both sides of the river. The soil also remains wet, not far below the surface, at some distance from the river because water is able to travel without great impediment through sand, and the height above sea level remains as low, or lower than, 9m on both sides of the river.	
4 Wet Woodland		
21	4.1 SEAS offered many photos and arguments in our last submission that this is a wet riparian woodland. We do not feel that enough evidence has been produced to contradict this view.	Wet woodland typically occurs on poorly drained or seasonally wet soils. It can be found on floodplains, as successional habitat on fens, mires and bogs, along streams and hill-side flushes and in peaty hollows. It occurs on a range of soil types, including nutrient-rich mineral soils and acid, nutrient-poor organic soils. Predominant tree species usually include alder, birch and willow, but ash, oak, and beech can be present on the drier riparian areas.
22	4.2 In their verbal submission (17-2-2021), the ecologists described the meadow on the east bank as a grazing marsh, and also mentioned that the west bank with the woodland was lower, therefore more susceptible to flooding, than the east side.	



ID	SEAS' Comments	Applicants' Comments
23	4.3 We underline that they characterised the east bank as marsh and the west bank as vulnerable to flooding. Both banks provide, therefore, wet environments. In addition, on both sides of the river drains or catches carry water into and out of the woodland and meadow, ensuring the continued 4 irrigation of the area.	Semi-natural broadleaved woodland is characterised by trees that are typically deciduous with broad and varied leaf shapes. The pattern of losing and gaining leaves allows for the woodland floor and understorey to be as varied as the canopy. Regarding the woodland to the east and west of the Hundred River, the key ground fauna species recorded during the 2018 / 2019 extended Phase 1 habitat survey include bramble, bracken and gorse. The tree species recorded include oak, silver birch, hawthorn, holly, creeping willow and horse chestnut. Whilst some of the species recorded can be associated with wet woodlands, when assigning the classification of semi-natural broadleaved woodland this has been determined using a site wide understanding of the species recorded during the surveys, in combination with industry guidance of assigning habitats (i.e. a classification of semi-natural broadleaved woodland was considered the most appropriate).
24	4.5 These catches are well vegetated and sheltered, and suitable for all intermediate stages of dragonfly and damselfly life. The Hairy Dragonfly is annually observed in this location by local residents.	The February 2021 survey verified that the woodland within the Order limits west of the Hundred River does not comprise of species associated with wet woodland. Upper canopy species were recorded to comprise scattered oak, cypress, beech, silver birch, hazel and sycamore throughout, alongside alder, goat willow and bay willow recorded along the banks of the Hundred River. There is a limited middle canopy present, with key species comprising primarily of hazel and blackthorn. Ground vegetation species include daffodil, snow drop, broad leaf dock, cleavers, nettle, teasel, ground ivy, bramble, ferns and a small patch of reed canary grass. Yorkshire fog, forget-me-not and horsetail are also prevalent, and pin cushion moss and delicate fern moss was also recorded as being present.
25	4.6 Wet woodland can be patchy. Wet woodland is also variable and need not be characterised by surface pooling all year round, or at all.	
26	4.7 Flooding in this particular woodland is seasonal and short-lived as it is also managed by sluicing according to the needs of the SSSI and RSPB Nature Reserve	
27	4.8 Not all wet woodland has pooling or is constantly underwater: it can follow this pattern of seasonal overflow.	
28	4.9 In addition, the high level of groundwater ensures adequate wetness all year round. The choice and management of trees planted over a century ago (in our previous submissions we gauged the age of the mature trees as over 160 years, and recorded a row of coppiced alder) reflects expert and ancient methods of flood management.	
29	4.10 The wet conditions and fallen logs support self-propagating alder, poplar and willow saplings, the sedge, mosses, ivys, lichens and fungi, and many species that rely on these wet environments like ragged robin, iris and orchid. They struggle elsewhere: 'The dry	



ID	SEAS' Comments	Applicants' Comments
	climate of the Suffolk Coast does not provide ideal conditions for mosses and ferns'	The topography of the woodland is relatively flat adjacent to the river which has low gradient banks; this alludes to some waterlogging should the river overtop during high water events.
30	4.11 Wet woodland is sensitive to disturbance. Images 2,3,4 show that the underground water here rapidly responds to disturbances. Trenching will be deleterious to wide areas sharing the same water source and equilibrated levels of underground water.	
31	4.12 Therefore, the proposed area of the trench corridor observed by the ecologists cannot be considered as an element that is discrete from the rest of the woodland. It will, in fact, disrupt a protected, rare environment even at some distance from the trenching point.	
32	4.13 This riparian environment reflects the description of wet woodland in the 'UK Biodiversity Action Plan, 2011'	
5 Summary		
33	5.1 While historically the river bank was planted with thirsty trees like alder that also offer structure and protection to the fragile soil of the riverbank, these and other thirsty species like poplar and willow effortlessly propagate themselves here, even at a significant distance from the riverbank.	See comments at ID1 to ID32.
34	5.2 The woodland therefore regulates the quantity and force of water that impacts the riverbank, thereby protecting downstream properties from flooding.	
35	5.3 These thirsty species have been shown to regulate and improve water quality by absorbing agricultural run-off, which is important to the integrity of the SSSI and RSPB North Warren.1	



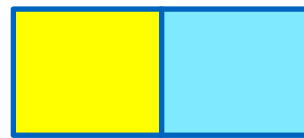
ID	SEAS' Comments	Applicants' Comments
36	5.4 The woodland is self-sustaining in its wilded state.	
37	5.5 The woodland offers the ideal mix of areas of open ground, scrub thicket, sapling, and closed canopy, beneficial to the river, its wildlife, and sensitive areas downstream.	
38	5.6 Its orientation provides valuable shade to cool the river water to the benefit of the life within it, and supporting the SSSI and RSPB reserve which depend on it, close by. Cooling through increasing the creation of riparian woodland wherever possible is encouraged by the Forestry Commission to counter climate change.	
6. The economics of ecology		
39	6.1 The British Government recently published 'The Dasgupta Review', which criticises the global economy that is based on eroding natural assets for what is routinely celebrated as 'economic growth'.	Noted.
40	6.2 Here is an example of the review's demand for a radical shift in our economic world view. Decarbonising our energy systems is a necessary part of balancing demand and supply. But we must not concern ourselves only with the symptoms of environmental damage and not the cause. For instance, in this (simplified) example, we might see woodland destroyed to build an electrical substation. GDP will record an increase in produced capital, but does not show the depreciation of 'natural capital' that absorbs carbon, prevents soil erosion, creates habitat for much-needed pollinators and other invertebrates, and provides direct benefits to society – from purified air and water to improved mental health – that reduce burdens on health services and social fabric. These losses carry severe economic costs.	



ID	SEAS' Comments	Applicants' Comments
5 Conclusions		
41	5.1 We do not believe that enough evidence has been offered to show that this is not a wet woodland. Simple water content tests show that the area is wet.	Again, the Applicants would note that their classification of the woodland at the Hundred River is based on the species present rather than moisture levels in the ground (in line with the Joint Nature Conservation Committee's (JNCC) Handbook for Phase 1 Habitat Survey (2016)). The species found during surveys in both 2018 and 2021 did not comprise those associated with wet woodland. A full survey report was submitted at Deadline 6 (REP6-035).
42	5.2 However, wet or not, this riparian area, at last, has been acknowledged. It is also ecologically important and protected.	As stated at Issue Specific Hearing 7, this area has always been acknowledged by the Applicants and is considered within the Applications (e.g. Chapter 22 of the ES (APP-070) and recorded during the Extended Phase 1 Habitat Survey (APP-503 to APP-504)).
43	5.3 No mitigation has been proposed for this protected environment.	The Applicants have prepared an Outline Watercourse Crossing Method Statement (document reference), which sets out relevant mitigation measures which must be carried forward to the final Watercourse Crossing Method Statement prepared post consent in consultation with the Environment Agency and Natural England for approval by the relevant planning authority prior to the commencement of the onshore works (pursuant to Requirement 22 of the draft DCO (document reference 3.1)).
44	5.4 The applicant does not have enough land to replace all the woodland scheduled for destruction.	Please refer to the Applicants' comments at ID13 in the table within section 2.1 .
45	5.5 The applicant certainly has no sites available to replace riparian woodland.	Please refer to the Applicants' comments at ID14 in the table within section 2.1 .
46	5.6 The River Hundred and its woodland have hardly been considered as receptors and will effectively be sacrificed as plans stand.	Please refer to the Applicants' comments at ID15 in the table within section 2.1 .

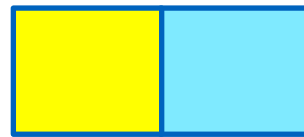


ID	SEAS' Comments	Applicants' Comments
47	5.7 The Applicant states there is no alternative to this route. In that case, the project should not continue.	Please refer to the Applicants' comments at ID16 in the table within section 2.1 .

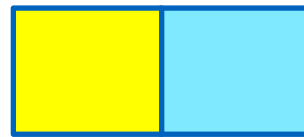


2.3 SEAS Additional Submission – Further evidence of ‘Other Projects’ (REP6-043)

ID	SEAS' Comments	Applicants' Comments
1. A12 improvements: A14 ‘Seven Hills’ to A1152 Woods Lane		
1	<p>East Suffolk Council have just started the consultation on the A12 Major Road Network proposals. An indicative timescale and map of the proposal is included within this consultation document.</p> <p>https://www.suffolk.gov.uk/council-anddemocracy/consultations-petitions-and-elections/consultations/a12-improvements/#timeline</p> <p>If works commence 2023 and complete 2025 they clash with SPR's newly proposed timeline.</p>	<p>The Applicants understand that initial public consultation on this scheme commenced in February 2021, that the outline business case will not be submitted to the Department for Transport until the Summer, and that design of the scheme will not commence until the Autumn. At this stage there are no details available on the scheme that would facilitate any sort of cumulative impact assessment with the Projects.</p>
2. The Sizewell C Project DCO		
2.1 8.4 Planning Statement Appendix 8.4I Implementation Plan		
2	<p>Within the Sizewell C Project DCO submission documents there is an implementation plan that shows a high level timetable for delivery of the scheme including the major highway elements.</p> <p>https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-002217-SZC_Bk8_8.4_Planning_Statement_Appxl_Implementation%20Plan.pdf.</p>	<p>The Applicants refer to the <i>Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) Clarification Note</i> updated for Deadline 6 (REP6-043).</p>
2.2 Transport Assessment		



ID	SEAS' Comments	Applicants' Comments
3	<p>In terms of transport modelling these details can be found in the Transport Assessment.</p> <p>https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-002581-SZC_Bk8_8.5(A)_Transport_Assessment.pdf.</p> <p>The modelling allows for assumed growth as well as strategic growth based on East Suffolk Council plans including cumulative effects from EDF and SPR; planned growth either as general regional background growth or where they are of a significant size as discrete sites. Within the modelling an estimation made of likely delivery of the developments based on advice from ESC planners. To this is then added the Sizewell C traffic and, in the case of the cumulative impact assessment for the two SPR projects too.</p>	<p>The Applicants refer to the <i>Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) Clarification Note</i> updated for Deadline 6 (REP6-043).</p>
<p>3. Local Growth and its impact on traffic in East Suffolk</p>		



ID	SEAS' Comments	Applicants' Comments
4	<p>The Planning Inspectorate may have previously been informed that Coastal Suffolk and Waveney districts were combined in May 2019 to form a 'Super District Council'. In terms of local growth and its impact on traffic in East Suffolk this means that two Local Plans have been formed with ambitious plans for Housing, Employment, Retail and Leisure, Transport, Flooding and Coastal Erosion, Natural Environment, Historic Environment.</p> <p>Both Coastal Suffolk and Waveney local plans should be considered in the cumulative effect of 'Other Projects' as there are clearly many district infrastructures that will clash with ScottishPower Renewables timeline as well as EDF's Sizewell C timeline. Something has to give or there will be gridlock.</p> <p>This document builds upon SEAS principal submission with regard to further evidence of 'other projects' as requested by the Examining Authorities, REP5-116.</p>	<p>Sizewell C is included within the cumulative impact assessments provided as part of the Applications. Additionally, the Applicants have reviewed and where possible updated these cumulative impact assessments throughout the Examinations as more information on Sizewell C has become available.</p> <p>Regarding proposals within Local Plans, these are strategic and at this stage there are no details available on them that would facilitate any sort of cumulative impact assessment with the Projects.</p>