

SPR EA1N & EA2 PROJECTS



DEADLINE 8 - SASES POST HEARING SUBMISSION (ISH14 DAY 2) – BIODIVERSITY AND HRA

Interested Party: SASES

IP Reference Nos: 20024106 & 20024110

Date: 25 March 2021

Issue: 1

Part 1 – Agenda Item 12 b) - Update on the status of outstanding areas of disagreement in relation to the crossing of the Hundred River and the Applicant's Outline Watercourse Method Statement

1. SASES submitted its previous comments on the Outline watercourse crossing method V01 and revised method V02 in [REP4-106] at page 11, [REP5-098], [REP6-128] at page 3 and [REP7-089] at page 13.
2. There exists potential for permanent damage to the riverside ecology and particularly the land between the west bank of Hundred River and B1122, much of which would be lost through the proposed Open Cut solution circa 40- 44% by our calculations. We welcome the Applicants' commitment at ISH14 that the proposed 'bellmouth' road crossings at Access points 5 & 6 on the Aldeburgh Road are to be redesigned as a straight road crossing – to be confirmed at D8. Nevertheless we anticipate that at least 40% of woodland on west bank side of river would nevertheless be lost if both projects are constructed, 20% if one project only constructed.
3. We await Natural England's further comments on whether the west bank of river may be wet woodland habitat and its opinion on whether the recent pre-ISH7 Royal Haskoning Ecologists' February survey was conclusive given that it was not carried out during the appropriate season. SASES expressed its concerns in 'SASES Deadline 7 Submission - Comments on Applicants' Deadline 6 submissions' [REP7-089] - Appendix 4: Applicants' D6 Ecology Survey Results, at page 14.
4. SASES has urged the Applicants to seriously consider microtunnelling as an alternative to Trenchless crossings (if only as engineering due diligence) originally within SASES's Deadline 1 : 'Written Representation concerning Construction - Onshore Cable Corridor' [REP1-371], para 42. We do however appreciate that there would be advantages and disadvantages with either method.
5. We are disappointed that SPR has not provided an analysis of the relative merits at this Watercourse crossing of using 'Microtunnelling' as distinct from 'HDD' and has not provided relative quantification of the factors for and against. Incidentally, we observe that 'Volker Trenchless' the firm employed by SPR to tunnel beneath a large number of roads, watercourses etc for East Anglia ONE project would seem from their website to specialise only in HDD.

6. The Applicants have stated that :

“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”.

Reference: Id 76 on page 41 of Applicants’ ‘Deadline 6 Comments on SASSES’ Deadline 5 Submissions’, Section 2.3 : Further comments on Applicants’ Outline Watercourse Crossing Method Statement’ **[REP6-031]**.

We believe the Applicants may be confusing HDD which requires a longer run in from ground level with microtunnelling. HDD is ‘surface launched’, while microtunnelling is ‘pit launched’. We had estimated that a tunnel length of only circa 250m would be required.

7. The Applicants refer in Section 1.3 on page 1 of EA1N & EA2 Project Update Note’ **[REP7-042]** to the maximum width of works at the River Hundred crossing having been reduced from 50m to 34m, but does not make clear that should both projects go ahead that would be $2 \times 34 = 68\text{m}$. The Project Update Note is confusing in this respect in that its title refers to both projects. The same comment applies to EA1N & EA2 Project Update Note **[REP3- 052]**, 2.2 on page 6.

8. Evidence that the maximum width would be 68m may also be found in the Applicants’ Outline Watercourse Crossing Method Statement **[REP6-041]**, Section 4.8 : Onshore Cable Route Width which is explicit at para 64:
“Since submission of the Application, the Applicant has reduced the working width of the onshore cable route where the cables cross the Hundred River from 50m to 34m **per project**. This working width applies for a distance of 40m from the Hundred River’s western bank and eastern bank (the Hundred River Crossing buffer)”.

9. The Applicants’ documentation and their responses to questions posed by ExA’s Mr Rigby at CAH3 Session 3 (at Video Recording time 33:13 to 47:34) were confusing on whether the reduced width of 34 m refers to each project or both projects. Draft DCO Requirement 12 and paras 23 and 75 of Statement of Reasons **[REP7-013]** for **each** project both refer to a 34 metres width being required for that one project. The Applicant has variously mentioned the purpose for such wide separation as to make sufficient room for construction vehicle turning and to facilitate cooling of cables during the Operation phase. It is not clear why such a large spacing of the cable ducts is required only at the watercourse. A width of 68m is 250% wider than the maximum width commitment of 27.1m for the cable route at the Aldeburgh Road pinch point, just a few metres away and would seem excessive for vehicle turning purpose.

10. The Applicants have provided no evidence that habitat surveys were carried out prior to SPR’s original selection of the Aldringham watercourse and road crossing place in 2017.

11. The Applicants in their D7 Submission – ‘EA1N & EA2 Applicants’ Comments on SASSES Deadline 6 Submissions’ **[REP7-059]**, at Section 2.2 Comments on SASSES

Post ISH7 Submission, at page 15, Id 8 state that a final decision to cross the Hundred River was made in June 2018.

12. The Extended Phase 1 Habitat Survey was carried out in two phases during April 2018 and March 2019 and submitted with the Developers' Applications. Reference: 22,1 Introduction paras 1 and 2 of 6.3.22.3 Environmental Statement - Appendix 22.3 – Extended Phase 1 Habitat Survey (Part 1 of 2) **[APP-503]**.
13. Not one single Target Note (TN) was identified on the west bank woodland at either phase of the 2018 Extended Habitats Survey, despite its rich biota habitats, many fallen trees etc.
Only one TN was plotted in the entire Works 19.
Reference: Figure 22.3.3c Extended Phase Habitat Map Results : **[APP-503]**, (Map of TNs in the Aldringham area).
That contrasts with the recent (Feb 2021) Royal HaskoningDHV pre-ISH7 survey which identified 25 TNs at Works No 19 of which 22 are within the woodland between river's west bank and the road.
References: Applicants' Deadline 6 Submission: 'EA1N&EA2 Ecology Survey Results - Version 01' **[REP6-035]**, Sheet 3 of Updated Ecology Survey Target Notes (map) and the Applicants' 'Written Summary of Oral Case ISH7' **[REP6-052]**.
14. SASES has also listed significant errors, oversights and confusion in the 2018 Extended Surveys of the Hundred River area. These are documented in SASES "Deadline 7 Submission – SASES Comments on Applicants' Deadline 6 submissions", Appendix 4 **[REP7-089]**, page 14.
15. SASES therefore concludes that the Applicants' formal confirmation of their Site Selection decision of June 2018, which depended on the feasibility and suitability of the Aldeburgh Road pinch point cable crossing, was made without reference to an adequate ecological survey of Works no 19 or the Aldringham River Hundred Valley Special Landscape Area (SLA).
16. The Applicants insist that there is no practical alternative B1122 / river crossing route (to Friston). If a trenchless microtunnelled watercourse crossing is deemed infeasible or unacceptable, then that riverside habitat would be lost. It was a failure on the Applicants' part not to have properly assessed it in the EIA – a failing that is a further cause for SASES to ask that neither EA1N nor EA2 should be recommended for planning consent.

Part 2 - Agenda Item 13 – AOB

Terrestrial Ecology on the Substation Site

17. Unlike the remainder of the Onshore Development Area, the effects on ecology at the Substation Site are permanent. Very significant adverse effects will occur during construction, which will likely displace the majority of wildlife on the site. However significant effects will remain during the operational phase meaning that wildlife is unlikely to return.

18. The Applicant makes a very broad-brush statement that “*all areas of agricultural land are considered of low ecological importance*” (REP6-008/OLEMS para 235). The Applicant however fails to recognise that there are several woods, many hedgerows, as well as water-bodies in and around the substation site, which are a haven for wildlife. Many of these features are protected, as are the field margins, which provide connectivity corridors.
19. Protected and endangered species benefit from the tranquillity of the site away from roads, traffic and urbanisation. The site is adjacent to Grove Wood, which is a County Wildlife Site and encroaches onto Laurel Covert, part of which will be removed due to the development.
20. It is unclear by which recognised criteria the Applicant has defined “Important” hedgerows. In the updated OLEMS at Deadline 6 (REP6-008), these are defined as ‘*species rich, intact, recorded as having a high level of bat activity*’ plus various archaeological criteria. This differs from Government Guidance on Countryside Hedgerows, which defines Important Hedgerows (mostly on archaeological criteria) separately from Protected Hedgerows. All hedgerows within an agricultural setting are Protected and not all the hedgerows, which currently exist on the substation site, have been identified by the Applicants (these are identified in SASES submission REP7-092). The Applicant failed to respond to this point in the ISH14.
21. Curiously it has been stated by the Applicants that hedgerows require removal in order to facilitate landscape mitigation around the site, but have not considered that this removes foraging routes for bats and other animals. This will have significant effects during the early years of planting.
22. Figures 22.7e and 22.7f of the Applicants’ bat surveys (APP-280) have recorded bat-roosting sites and commuting and foraging routes across the substation site. The foraging/commuting routes are clearly defined along the existing hedgerows, the vast majority of which will be removed. Grove Wood, Laurel Covert and the Wooded Pit are shown to have moderate to high potential for roosting, foraging and commuting.
23. Despite requests, the Applicant has failed to produce high-frequency data on noise emitting from the substation, which affects bats. Bats themselves emit high frequency sound in their search for prey (called echolocation) and have hearing ranges way above humans. The Applicant should produce this high-frequency data to the Examination as it is also relevant to ISH 12 on Noise. The Applicant responded at ISH14 by saying there was little information available. This position is clearly unacceptable.
24. Artificial light is also detrimental to bats as they are nocturnal creatures. As well as being a very quiet area, the substation site has pristine night skies. The introduction of artificial light during construction and operation will be detrimental to bats as it increases their chance of predation and can delay emergence from the

roost. This is particularly important as the main peak of nocturnal insect activity occurs at or soon after dusk. Long-eared bats and barbastelle bats (identified at the substation site) are particularly sensitive to light. Artificial light is also detrimental to other nocturnal creatures, such as owls and badgers, which have been identified on the substation site.

25. Skylarks, which are on the Red List, are common on the site and the Applicants' survey identified 15 of these on their visit. Brown hares, which are a declining species, can also be seen, as well as deer, badger and a wide range of birdlife.

26. Little has been said during the Examination regarding the ecology of the substation site, which has been largely overlooked in favour of the designated sites and offshore issues. The very tranquillity of the site makes it a valuable habitat for wildlife and this influence also spreads out into the surrounding area. SASES would ask for the ecology of the substation site to be recognised and considered in the determination of these Applications.