



NE Comment (Numbering is Applicant's)

Applicant's Comments



SEAS comments

**Offshore Wind Farms**  
EAST ANGLIA ONE NORTH  
PINS Ref: EN010077  
and  
EAST ANGLIA TWO  
PINS Ref: EN020078  
Deadline 9

by

SEAS (Suffolk Energy Action Solutions)  
EA1N – EN010077 / SEAS ID no 2002 4494  
EA2 – EN010078 / SEAS ID no 2002 4496

**Summary**

Response by SEAS to the Applicant's Comments on NE's Deadline 7:  
*4 Applicants' Comments on NE Appendix C8 [REP7-073] – NE's Response to the Ecology Survey Results [REP6-035]*  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004502-ExAAS-17.D8.V1%20EA1N%20EA2%20Applicants'%20Comments%20on%20Natural%20England's%20Deadline%207%20Submissions.pdf>

A request for ExA to instruct the Applicant to carry out fully independent surveys by fully qualified and chartered ecologists before the end of the examination.



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SEAS has been increasingly concerned at the quality of the surveys on which the planning application stands.

The 'Guidelines' cited recommend identifying priority habitats at P1 /including during desktop surveys. The priority riparian woodland was missed at this stage (as were wet meadow, arable and hedgerow environments, for that matter). NVC classification requires a wet woodland assessment in late spring or summer, not winter. 'Guidelines' say that further surveys should be undertaken if rare or priority elements are suspected (pp 31 ff) - which should be according to specific criteria and compared to national and local baselines This has not been carried out, nor has correction and accordance of priority status been fed into the plans for watercourse crossing. (SEAS described at deadline 8 the P1 surveys in which omissions and errors occurred, and on which plans for watercourse crossing, SSSI crossing and felling of priority woodland are still founded.)

As NE wrote "it is a priority habitat under the UK biodiversity Action Plan (UK BAP) if confirmed as wet woodland and a habitat that is most threatened and requiring conservation."

With a three month examination extension to June, there is no reason why an independent survey cannot be conducted at the right time of year to satisfy all parties. Thereby SEAS requests that the ExA instruct the Applicant to undertake an appropriate and comprehensive survey by fully independent, chartered ecologists with no association to Royal Haskoning, Scottish Power or National Grid.

1 At this time Natural England believes it would be inappropriate to provide further scientific advice based on this survey alone due to survey limitations.

2 Whilst Natural England notes the Applicants want to be helpful in providing the necessary evidence, unfortunately the survey hasn't followed standard best practice in relation to the timing and ground conditions. Many vegetation species are only evident in spring or summer and these are really important in identifying the habitat type and its quality. To have the degree of confidence required in habitat surveys at this time of year we would expect a botanist with FISC 5/6 would undertake the survey.

3 In addition, for undertaking surveys at the appropriate time of year and appropriate level, we advise that a National Vegetation Classification survey might be required to prove or disprove the quality of the habitats.

The Applicants are disappointed that NE continues to question the classification of the woodland at the Hundred River crossing despite the evidence provided by the Applicants.

All surveys undertaken to date have been in accordance with the 'Extended Phase 1' methodology as set out in Guidelines for Baseline Ecological Assessment (Institute of Environmental Assessment, 1995) and by suitably qualified professional ecological surveyors. Across the ecological profession, it is accepted that Phase 1 habitat surveys can be conducted all year round. However, the Applicants acknowledge that the optimum time to have undertaken the February 2021 survey would have been between April and September.



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4 Whilst the Applicant believes that the February 2021 survey supports their characterisation surveys, there remains uncertainty and significant time has elapsed since the surveys undertaken to support the environmental statement. Therefore, it may be of help to the Applicant to consult the following as there may be existing evidence to support their surveys:

a) Local Record Centre to check for species records.

b) the Vice-county BSBI recorder - they will have likely visited the area as part of the current Atlas project where they recording all plants on a tetrad basis (and they will have visited at a good time of year within the last 2-3 years). The data may or may not be submitted to the local record centre, <https://bsbi.org/local> botany. The <https://bsbi.org/maps> can be accessed by anyone to obtain a plant site list.

The Applicants also acknowledge that follow-up botanical surveys can be required to supplement Phase 1 habitat surveys undertaken at sub-optimal times of year, but this is subject to the findings of the Phase 1 and whether the surveying ecologist deems further data is necessary to reach a robust conclusion. It is important to note that the primary aim of the February 2021 survey was to verify the habitat classification assessment of the area already undertaken in April 2018.

Whilst the Applicants are not aware if Natural England has visited this area, it is understood that it agrees with SEAS' conclusion that the woodland onsite should be classified as 'wet woodland'. The information submitted by SEAS to support its conclusion was obtained from a visit undertaken in January 2021 (as stated in REP5-108 in response to the discussion at ISH3). With this in mind, Natural England's assertion that the Applicants' survey did not follow standard best practice in relation to timing and ground conditions should certainly apply to SEAS' submission also.

Please see 1C above. P1 surveys were suboptimal and also took place, from the photos, before spring was showing, which was again the wrong time of the year.

It is our understanding that NE requires adequate evidence. Unlike the Applicant, SEAS would not presume to second-guess NE's thoughts. NE points out that classification cannot take place from the existing surveys and suggests ways of achieving a credible result. The riparian woodland, its relationship with the river, and the river's with the SSSI, were not included in P1. We have already written on this at some detail and will not repeat it here. The woodland is a priority, protected, network environment. Credible mitigation has not been offered.

SEAS included photos taken in January 2021 but we live here all year round, so have been openly offering other images as evidence, from previous seasons, to characterise the ecology and biodiversity of the river valley as we know it. This enables experts to gain a view of what is present from our evidence, which is not possible from the Applicant's surveys and difficult in any case during lockdown. Evidence is the whole purpose of the photos and cataloguing.

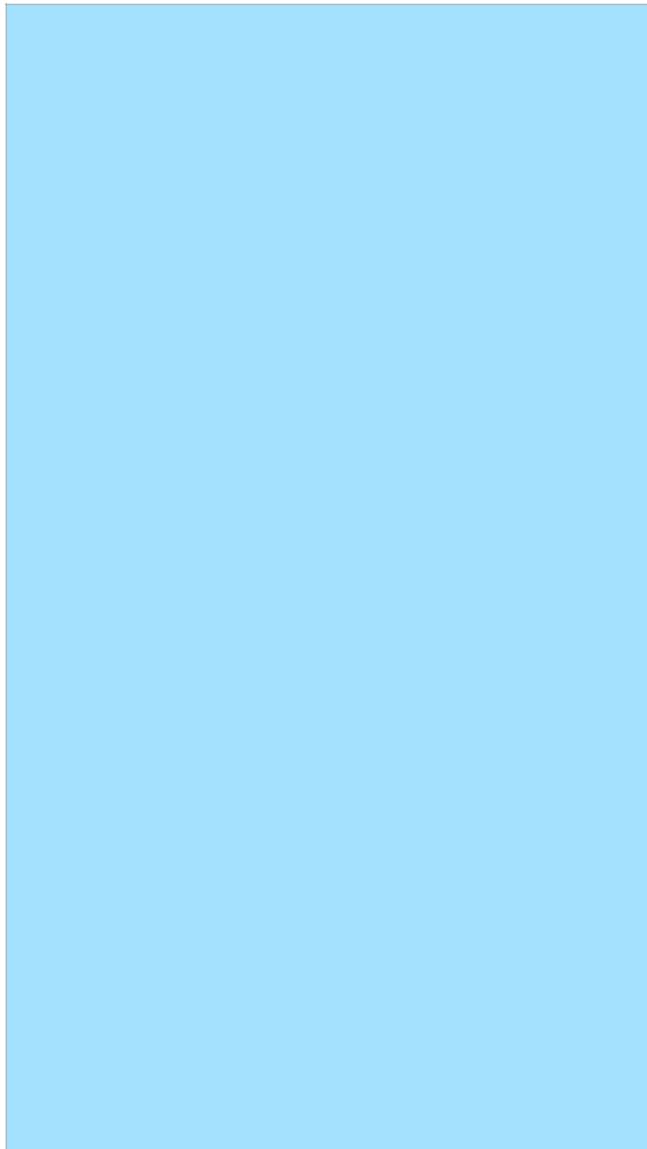
Local professional volunteers are helping to record species as they come through and we will send results to the County Recorder.



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The Applicants maintain that the woodland at the Hundred River crossing is semi-natural broadleaf woodland.

This conclusion is supported by the independent site visit undertaken by the Councils, as confirmed verbally at Issue Specific Hearing 7 and subsequently by ESC in its written submission at Deadline 6 (REP6-075). ESC states *"we agree with the habitat characterisation of area as set out in the ES. We do not consider that the area within the red line boundary is wet woodland as defined by the JNCC"*.

The woodland is a priority environment. Yet 44% will be felled at the crossing.

The Applicant has said it will only carry out its statutory obligations in terms of biodiversity protection (not best practice). The woodland is not in the SSSI, so the Applicant will prefer to offer no protection (the Applicant is prepared to trench the SSSI, after all).

The Applicant has planned the cable corridor without acknowledging or accounting for the riparian environment. They have no other riparian site to replant, and not enough land has been allocated to woodland replacement in the plans. The only mitigation they can offer is to shave a metre or so off the trenching. This is shockingly inadequate. If a woodland is suspected of being in NVC's wet category the whole site should be surveyed and not simply the order limits.

The Applicant's account here of the County Ecologists is neither complete nor straightforward. Our County and District Councillors have forwarded written responses that they sought on their constituents' behalf which state that the Councils' ecologists only stood at the side of the woodland so could not have adequately surveyed the area. One ecologist also scanned the east side of the order limits from a few hundred yards away in the meadow. <https://bit.ly/3mNp7WE> (ExA website). Moreover, when SEAS at ISH 14 asked the county ecologists for sight of their surveys during ExA (ISH 14, 17-3-21, 12.55PM (06.31-07.36), they refused because they said they had not done any surveys, and had only "scoped" the area. The Council's ecologists therefore cannot and do not support the Applicant with evidence or methodology.