



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix C6 to the Natural England Deadline 4 Submission

**NE Comments to Documents Submitted at Deadline 3 in Relation to Onshore Ecology
[REP3-048, REP3-060, REP3-061, REP3-070]**

For:

The construction and operation of East Anglia TWO Offshore Windfarm, a 900MW windfarm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

13th January 2021



NE Comments to Documents Submitted at Deadline 3 in Relation to Onshore Ecology [REP3-048, REP3-060, REP3-061, REP3-070]

This document is applicable to both the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

Summary

This document provides advice on the following documents submitted by the Applicant at Deadline 3 in relation to onshore ecology:

- Outline Watercourse Crossing Method Statement [REP3-048]
- Deadline 3 Onshore Ecology Clarification Note [REP3-060]
- Air Quality Deadline 3 Clarification Note [REP3-061]
- Applicants' Comments on Natural England's Deadline 2 Submissions [REP3-070]

NB: Natural England's advice on the Outline Landscape and Ecological Management Strategy [REP3-30] will be provided at Deadline 5

Outline Water Course Crossing Statement (OWCCS) [REP3-048]

1. Natural England welcomes the confirmation that the ducting will be carried out in parallel, to ensure effects to the environment are kept to a minimum.
2. However, Natural England has concerns that although the document focuses on fish and ecology in the immediate vicinity of the crossing, potential impacts further downstream are not considered. Although Data Forms for the SPA and citation for the SSSI are included, there is no discussion on potential environmental impacts to site features. We advise that this is addressed in any OWCCS. The Applicant has just noted this will be included in the ecological management plan (EMP) post consent. Moving forward, unless this document is submitted into examination, Natural England is unable to comment or agree there will be no significant impacts to designated sites and protected species.



Deadline 3 Onshore Ecology Clarification Note [REP3-060] and Air Quality Deadline 3 Clarification Note [REP3-061]

3. Natural England welcomes the submission of the Deadline 3 Onshore Ecology Clarification Note [REP3-060] submitted at Deadline 3 in relation to semi-natural broadleaved woodland and non-road mobile machinery emissions (NRMM) impacts on ecological receptors. Please see detailed advice below
4. In addition, Natural England welcomes the submission of the Air Quality Deadline 3 Clarification Note [REP3-061] which provides a quantitative assessment of NRMM emissions. Please see detailed advice below
5. These documents provide responses submitted by the Applicant at Deadline 3 to ecology and air quality matters raised by the Suffolk Wildlife Trust and East Suffolk Council and Suffolk County Council through their representations for the statement of Common Ground (SoCG) process.

Semi-Natural Broadleaved Woodland [REP3-060]

6. We note that, in response to the comments by the Suffolk Wildlife Trust, the loss of semi-natural broadleaved woodland is now recorded as a priority habitat and that the effect on this habitat has been changed, as noted in paragraph 10 [REP3-060], to moderate adverse and significant. We agree that this is an appropriate assessment of both the importance of the habitat nationally and of any potential loss to this habitat.

NRMM Impacts on Ecological Receptors [REP3-060]

7. Whilst Natural England welcomes the air quality [REP3-061] and additional onshore ecology [REP3-060] clarification notes, our concerns remain outstanding as limited detail has been provided on the interest features of each site which are likely to be affected by this proposal.
8. We note that paragraphs 32 and 33 [REP3-060] contain a very brief summary of the total habitats that may be affected on each designated site together with a description of the habitats at the landfall site. A comprehensive qualitative assessment is needed to explain the findings of the quantitative assessment i.e. it should refer back to the data set out within the Air Quality Clarification Note [REP3-061] and explain the effect on each habitat.
9. The main habitats likely to be affected, according to the data, are at locations E1, E2, E4, E5, E6 and E7, as listed within Table 2.6 Receptor Locations, Habitats and Associated Nutrient Nitrogen



and Acid Critical Loads of the Air Quality Clarification Note [REP3-061]. These habitats comprise acid grassland and broadleaf woodland which are both sensitive to NoX pollutants. The proposed development was recorded as likely to increase nitrogen deposition to well above the critical load of the two habitats at each location listed above. Furthermore, at other locations, it is shown to contribute a further c.50% of the critical load, yet this Additional Onshore Clarification note does not explain in sufficient detail why those effects are likely to be insignificant, despite the conclusions from the air quality modelling work.

10. Paragraphs 32 and 33 of the onshore ecology clarification note [REP3-060] states that the designated sites are likely to be affected for 8 months (Leiston-Aldeburgh SSSI) or 5.5 months (the Sandlings SPA) each year during construction. It is questionable whether this should be stated to be insignificant, given the number of years, the current pressure on the sites due to current background levels of nitrogen and the fact that the full details of construction are not yet confirmed. We need further detail, as set out below, to carry out a full assessment on the likelihood of significant effects from the proposal upon the designated sites: -

11. :

- a) The full effect of the change in air quality on the designated sites, taking into account information such as:
 - i. the sensitivity of the notified or interest features
 - ii. the current state of the habitats in question ie. what condition are they in? Is there evidence of the effects of NoX pollution on these habitats already?
 - iii. the most appropriate environmental benchmarks for each feature on each .designated site (e.g. site relevant critical levels and critical loads). We recommend using the Air Pollution Information System (www.apis.ac.uk) to obtain information about site/habitat sensitivity (e.g. critical loads and levels for ecosystem protection).
 - iv. the location of the interest features and their proximity to the works.
- b. Prevailing environmental conditions, e.g. the total pollution burden predicted at the sites. In the first instance we recommend using the information on the Air Pollution Information System (www.apis.ac.uk) for estimates of current ('background') pollution concentrations and deposition".
- c. The predicted pollution in combination with other relevant plans and projects
- d. Description of the modelling approach and the key assumptions and areas of uncertainty within it.

12. Natural England would like to note that the above list is not necessarily exhaustive and it is the responsibility of the Applicant to provide all necessary information to fully assess the implications



of the proposed development on designated sites. Furthermore, Natural England would also want to check whether air quality effects during decommissioning have been considered.

13. Please be advised that the habitat survey at the river crossing will need to be updated prior to construction to ensure that the baseline data is accurate.

EA1N & EA2 Applicant's Comments on NE's Deadline 2 Submission [REP3-070] – Onshore Ecology

1.1 Outline SPA Crossing Method Statement (NE Appendix C2b REP2-053)

14. 2 - Natural England acknowledges that the area at the landfall site within Sandlings SPA is not supporting habitat. Nevertheless the position of the cable route through the designated site has potential to cause disturbance, as it is effectively separating two areas of the SPA. This disruption may lead to stress to ornithological features, which in turn effects breeding potential.
15. 3 - Natural England consider that the Environmental Statement does not contain the level of detail that would be required to assess whether works actually happening within a European site would be significant. It is usual to provide this detail so that planning applications can be full assessed.
16. 4 - Natural England welcomes the proposed enhancement measures and proposal to carry out 5 years of monitoring and management. However, in terms of achieving long term environmental benefits, it is questionable whether five years will be sufficient to provide long term habitat for ground nesting birds. For example, nightjar require clearfell areas, i.e. areas of specific growth levels (about 6/7 years growth). If this area is not managed following this time, the habitat is not likely to be suitable for breeding purposes for this species.

1.2 Ecological Enhancement Clarification Note (NE Appendix C4 REP2-054)

17. 1 - Natural England is concerned that, while the aim is to provide enhancement, there is insufficient detail submitted in all the documents so far to assess whether the proposals are appropriate. In our view a development of this size should be providing a generous level of enhancement i.e. more than the 10% requested of standard planning applications. The Enhancement detailed within the ecology reports, including the Enhancement Clarification Note, OLEMS and Environmental Statement, appear to be not considered strategically across the application site, but are provided within areas that are no longer likely to be affected by the cable route, with no plan how it is actually intended to enhance the habitats.
18. 2 – Natural England understands that the proposed reduction in footprint will be beneficial to the enhancement programme, but details remain limited on how it is intended to improve the



ecological value of the land in question

19. 3 – Natural England notes the opportunity for enhanced connectivity between Laurel Court and Grove wood and the proposed infill of gaps in hedgerows. This is likely to improve connectivity as suggested in the response. Natural England ideally requires a comprehensive mitigation and enhancement strategy document, so we can understand exactly what the enhancement areas are and how they will be created, managed and monitored.

20. 5 - Noted.

1.3 Onshore Ecology Clarification Note (NE Appendix C5 REP2-055)

21. Summary – we welcome the acknowledgement that the Applicant will work with Natural England to ensure that concerns are addressed prior to consent.

22. 2 – Hairy Dragonfly. We note the explanation provided regarding the suitability of the habitat at the landfall site to the larval stage of this species. We agree that an area with arable habitat and little suitable bankside vegetation and lacking in good water quality is not likely to support the larval stage. However, as time has passed since the habitat survey was carried out, we consider it important to provide an updated habitat survey in this location prior to works, to ensure there has been no change in the habitat.

23. Since the site of the crossing is currently unsuitable for hairy dragonfly, there would appear to be a good opportunity as part of the reinstatement works to include bankside flora that will support this species.

24. Air Quality - Natural England welcomes the submission of the Air Quality Clarification Note [REP3-061], which, in our view, has provided a sufficiently comprehensive review, in terms of the quantitative analysis, of how the works, and traffic associated with it, are likely to affect the air quality of the Sandlings SPA and Leiston Aldeburgh SSSI. Whilst we acknowledge that the works are temporary, nevertheless the habitats within these sites are already under pressure from NoX pollutants (as evident from APIS) and therefore care should be taken not to add a significant level of further pollution to these sites.

25. Natural England advises that, where a significant effect cannot be ruled out, consideration is given to how pollution can be reduced during construction, operation and decommissioning. If this is not possible, then we would expect mitigation to be provided for the habitats that are likely to be significantly affected.



26. Natural England advises that the Onshore Ecology Clarification note [REP3-060], still has limited detail regarding whether the habitats are likely to be damaged due to changes in air quality, and how this effect can be avoided, reduced, or mitigated. This should be either available within the Air Quality Clarification Note [REP3-061] or Onshore Ecology Clarification note [REP3-060], but does not appear to be included in either document (see the bulleted list above regarding the detail that we require to assess this).

2 *Applicants' Responses to NE Comments on other Interested Parties' ExA Written Question Answers (NE Appendix K1b REP2-058) – Onshore Ecology*

27. 1.2.54 - 1.2.56 - Natural England refers the ExA and Applicant to our previous comments regarding the Ecological Management Plans. We reiterate that, as an overarching document, the OLEMS provides a broad brush approach when describing the EMP and LMP. In order to fully understand how mitigation and enhancement will fit it to the plans, we need to understand how the sites will be created, managed and monitored.

28. 1.2.55 - Natural England is content to join discussions regarding the results of the pre-construction surveys.

29. 1.2.61, 64, 67 - Natural England refers to our previous advice on the ecological enhancement clarification note [REP2-054].

30. 1.2.70 - Natural England welcomes the acknowledgement that linear routes for bats will be maintained, using temporary infill measures where necessary within the relevant hedgerows.

31. 1.2.73 - Natural England notes the update regarding woodland and hedgerows and have no further comments at this stage.

32. 1.2.80 - Natural England notes that given the uncertainty regarding whether the Marlesford Bridge will be used, we consider it appropriate to assume use and provide ecological data for this site.

33. 1.2.91 - Natural England expects to be included in discussions regarding the landfall construction method statement, as there is potential for methods to impact on ecological receptors.

34. 1.2.93 - Natural England notes the further update provided by the Applicant, which has provided some further detail on the nightingale and turtle dove proposed mitigation. However we consider that, where mitigation for species associated with designated sites is required, we should have access to a mitigation strategy early on in proceedings so that we can decide whether the mitigation adequately offsets the effect.