

**SEAS summary of outstanding issues on Applicants D4 responses
following ISH2 and on ExQ2
ECOLOGY & BIODIVERSITY**

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Summary of outstanding Ecology & Biodiversity issues following ISH2 and ExQ2

Introduction

1. SEAS and its expert advisors have reviewed the adequacy of responses from the Applicant at Deadline 4 to issues raised at Issue Specific Hearing 2 (including the summary [\[REP4-159\]](#) of matters raised by SEAS at that hearing) and to the Examining Authority's questions to the Applicant in ExQ2. The relevant documents are: [RE4-025](#); [REP4-058](#); [REP4-083](#); [REP4-085](#); [REP4-086](#); [REP4-099](#); [REP4-101](#); [REP4-236](#)

PD-021 - ExQ2

2. SEAS welcomed question 2LVIA11, which asks the Applicant to include contingency measures within the Outline Landscape and Ecological Management Plan (oLEMP) should acid grassland creation fail.
3. SEAS considers that the same question (2LVIA11) should also be asked in relation to paragraph 2.9.32 of the Environmental Statement (ES).

REP4-025- 6.2.2.2(D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology & Biodiversity.

4. In this ES update SEAS has made the following observations re: Acid Grassland
5. Para 2.9.32 – The same question (2LVIA11) should be asked in relation to para 2.9.32 of the ES:
 - a. *Outline Landscape and Ecological Management Plan (oLEMP)*
 - b. *Include contingency measures for acid grassland in case reinstatement plans fail or are not achievable within the timeframes stated. This should be reflected in the REAC [REP4-235].*

6. The Applicant should be providing more detail at this stage on the suitability of the proposed location and its soils for such creation, to ensure it is an appropriate location.
7. **Para 2.9.50** of the ES states only 0.3ha of the aid grassland meets the Priority Habitat criteria. Has the supporting data for this been presented elsewhere? If so, it would be useful if this were cross-referenced. If not, then it needs to be.
8. **Para 2.9.50** of the ES describes the presence of bands of semi-improved neutral grassland. This habitat type does not exist in the UKHab habitat descriptions, which now forms the standard guidelines. We request that this habitat be described using the latter.
9. **Par 2.9.63** of the ES states that the acid grassland creation location has suitably sandy soils and is close to other areas of acid grassland. However, there is no consideration of the recent land use of this location, and how that might have altered the chemical and physical composition of the soil such that it may not now be suitable for acid grassland reversion, particularly over the short-term interim period required to off-site the temporary loss of the existing acid grassland. Again, we believe the Applicant should be providing more detailed evidence that the location is suitable for such habitat creation.
- 10.NB: These comments have also been made in SEAS D5 response to ExQ2.

REP4-058 - 6. 6 (F) Habitats Regulations Assessment Report (Tracked)

- 11.Regarding the revised HRA, we note that loss of functionally-linked land for all European Sites except Sandlings SPA, continues to be screened out. We believe the lack of any baseline data for foraging marsh harrier from the Alde-Ore and Minsmere-Walberswick SPAs is a flaw in this assessment, and means it cannot screen out the potential for land functionally-linked to these SPAs not being impacted.

REP4-083 - 9. 87 (A) Applicant's Comments on Responses to First Written Questions (ExQ1)

12. **1ECOL6 – p55.** The Applicant is relying on photographs to demonstrate there are significant areas of intact concrete on the former hoverport area. As reptiles can access fissures as narrow as 5mm, to underpin a robust assessment a detailed survey to accurately map such features is required to determine whether vehicles need to track across them. Otherwise, reptiles are at risk of killing and injury in contravention of the W&CA.
13. **1ECOL31 p70.** The above also applies to 1ECOL31.

REP4-085 - 9. 89 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 (ISH2)

14. **Section 3. 1, p5.** The Applicant states:

“Reptile surveys are designed to identify active populations during the active season. If reptiles were hibernating within cracks, simply driving over the surface would not disturb them; any structural risks (e. g. , cracks collapsing) will be assessed as part of the structural survey”.

15. We do not agree. Firstly, reptile surveys identify areas used outside the hibernation season, but these can include crevices in concrete that can be used for shelter on a diurnal basis throughout the active season, e. g. at night, or in cool or wet weather. In addition, likely hibernation features can be elucidated through reptile surveys early in the active season (e. g. March), when individuals do not venture far from their chosen hibernaculum to bask. A detailed survey of such features and their structural integrity to withstand the predicted vehicle movements without risk of damage (and therefore killing or injury to reptiles) is required.

16. **Section 3 & 4, p9.** We strongly disagree that tracking surveys are not required. Data from other bat surveys suggest there may be a barbastelle maternity roost close to the substation location. Given the number of other barbastelle maternity roosts identified during the SZC baseline surveys (using tracking techniques), it would not be surprising if others exist close-by, including within the Order Limits of Sea Link. Hedgerows close to maternity roosts will be important dispersal and foraging habitats, so their temporary loss could have a significant impact on the local conservation status of a rare Annex II bat species. Such information would likely result in a material change to the impact assessment, contrary to the Applicant's response.

17. We would also like to highlight, that this Summary document only covers issues discussed during the hearing, and not any written representation submitted after due to lack of time during the hearing. We look forward to the Applicant responding to our concerns regarding deficient survey effort for two key SPA species: nightjar and marsh harrier, using functionally-linked land within the Order Limits.

End