

Ian Mackay  
Scottish Power Renewables

**By e-mail only**

08/11/2018

Dear Ian,

**RE: East Anglia ONE North and TWO Phase 3.5 Consultation – Terrestrial Ecology**

Thank you for sending us details of this consultation. Suffolk Wildlife Trust is the county's leading nature conservation organisation. We are a registered charity, set up in 1961 to safeguard the wildlife of Suffolk by managing nature reserves, influencing the management of land and water, recording sites of wildlife value, campaigning on wildlife issues and inspiring people to take action for wildlife. We have the following comments on the information provided as part of this consultation:

The Phase 3.5 consultation introduces a potential alternative location for the onshore substations and associated infrastructure at Broom Covert, Sizewell. However, as with the recent Phase 3 consultation, little ecological survey and assessment information is provided as part of this consultation. Whilst we understand from the information available that terrestrial ecology survey and assessment work is underway, in the absence of this detail we can only provide high level comments on the proposed options.

**Broom Covert, Sizewell Option (EDF and EDFa)**

This site option is located between Sizewell Marshes Site of Special Scientific Interest (SSSI) and Leiston Common County Wildlife Site (CWS) and Sizewell Levels CWS to the north and part of the Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh SSSI to the south. To the east are Sizewell A and B nuclear power stations and to the west lies the town of Leiston. As set out above, as there is no ecological survey information provided as part of this consultation it is not possible to provide detailed comments on the options proposed, however we have a number of concerns about the potential adverse ecological impacts of substation development in this location.

**Statutory and Non-Statutory Designated Sites**

The option is in close proximity to a number of sites designated for their nature conservation value, these include sites of international, national and county importance. The proposed development has the potential to result in direct and indirect impacts on these sites, both during construction and operation.

Development of the Broom Covert site would also result in built development stretching from the sea to the western side of Leiston. This would sever ecological connectivity between the habitats of the Sandlings SPA to the south and the habitats of the Sizewell Marshes and the Minsmere-Walberswick heaths and marshes to the north. This is likely to have significant adverse impacts on species which rely on these habitats and the connectivity between them.

We also note from the Indicative Broom Covert Masterplan drawing (number: EA1N-EA2-DEV-DRG-IBR-

00TBC166) that the proposal would include surface water discharge to a drain in the north-east corner of the site. This drain is part of the network of drains which forms part of Sizewell Marshes SSSI. This SSSI is, in part, designated for the fen meadow and ditch habitats that it supports. These habitats are nationally important and are sensitive to changes in water availability, flow and quality. The discharge of surface water to this drain has the potential to affect these parameters and result in an adverse impact on the SSSI.

#### RAG Table

The Ecology section of the RAG Assessment Summary (October 2018) uses proximity to designated nature conservation sites as part of its scoring criteria. Although the “Proximity to Local Designations” makes reference to Sizewell Belts Nature reserve, it does not include Leiston Common CWS and Sizewell Levels CWS both of which are within 150m of the potential substation site (EDF and EDFa).

#### Protected and/or Priority Species

The Broom Covert site is largely comprised of former arable land which is being converted to grassland as part of EDF Energy’s Sizewell C proposals. Given the land management work that has been undertaken on the site in recent years, it is likely that the area supports a range of species, some of which may be either legally protected and/or Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). Without ecological surveys being undertaken on the site it is not possible to fully determine what impacts the proposed development would have on such species or whether these impacts could be adequately mitigated or compensated.

#### Existing Use

As identified in the consultation documents, the Broom Covert site is currently proposed as a reptile receptor site under EDF Energy’s Sizewell C proposals. Should the Broom Covert site be selected for the EAOW ONE North and TWO substations, we query where replacement reptile receptor land will be proposed should the Sizewell C scheme come forward?

#### Cable Corridor

Whilst the potential cable corridor from the landfall to the substations is shorter with this location, it will still be in close proximity to the Sandlings SPA and Leiston-Aldeburgh SSSI. Construction of the cable corridor has the potential to result in an adverse impact on these sites and therefore further assessment of this is required.

#### **Grove Wood, Friston Option (W1 and W1a)**

As previously set out in our response to the Stage 3 consultation (our letter of 24<sup>th</sup> August 2018), the refined substation area is in close proximity to Grove Wood County Wildlife Site (CWS) and the surrounding area is known to support a range of protected and/or UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). The refined cable corridor crosses, or is adjacent to, a number of sites designated for their nature conservation importance, including part of the Sandlings Special Protection Area (SPA), the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), Aldringham to Aldeburgh Disused Railway Line CWS and Knodishall Common CWS.

#### RAG Table

The Ecology section of the RAG Assessment Summary (October 2018) uses proximity to designated nature conservation sites as part of its scoring criteria. However, for the Grove Wood, Friston option (W1 and W1a) no sites are listed under the “Proximity to Local Designations” section. The Friston option is less than 50m from Grove Wood CWS and therefore the table must be updated to reflect this, this should include changing the zone score from Green to Amber in accordance with the published methodology.

#### **Conclusion**

Both of the identified substation options and their associated cable routes have the potential to result in significant adverse impacts on the natural environment. As set out above, this includes impacts on designated sites such as the internationally important Sandlings SPA and nationally important Sizewell Marshes SSSI, along with a range of protected and/or Priority species. However, the absence of the provision of sufficient ecological survey and assessment work as part of the consultation means that it is not possible to determine whether impacts have been fully considered or can be adequately mitigated or compensated for with either site option. It is therefore essential that the potential ecological impacts of the proposal are understood prior to the final selection of the substations site and associated cable route and

that stakeholders have the opportunity to review and comment on this information. An option which will result in significant adverse effects on the natural environment should not be selected.

If you require any further information or wish to discuss any of the points raised above, please do not hesitate to contact us.

Yours sincerely

James Meyer  
Senior Conservation Planner