

Sizewell C Nuclear Power Station 'Stage 3' Consultation

Suffolk Wildlife Trust - Key Concerns

Suffolk Wildlife Trust has a wide range of concerns about the ecological impacts of the proposed Sizewell C (SZC) nuclear power station development. Whilst we will be setting these out in full in our response to the Stage 3 consultation, below we have listed five of the key areas of concern which we have identified from an initial analysis of the Stage 3 consultation documents.

Ecological Information within the Stage 3 Consultation

Whilst we understand that the Stage 3 consultation is required to be presented in a Preliminary Environmental Information (PEI) format, we are concerned that yet again there is a significant amount of environmental assessment and information missing from the documents. The consultation documents state that this information will be presented in full as part of the Environmental Statement which will accompany the Development Consent Order (DCO) application. However, given how the project has changed between the Stage 2 and Stage 3 consultations, we are concerned that by taking this approach of presenting significant volumes of new or updated information at the time of the DCO it will make it very difficult for consultees and the public to respond effectively.

By way of comparison, the PEI consultations for the East Anglia ONE NORTH and TWO offshore windfarms have included full draft Environmental Statements.

Sites of International Nature Conservation Importance

The site proposed for SZC sits within a network of sites designated for their international nature conservation importance, this includes the Minsmere-Walberswick Special Protection Area (SPA); Minsmere-Walberswick Heaths Special Area of Conservation (SAC) and Minsmere-Walberswick Ramsar site to the north, the Sandlings SPA to the south and the Outer Thames Estuary SPA and Southern North Sea cSAC offshore.

These sites and the species that they support, are potentially vulnerable to impacts arising from the construction and operation of the power station. Details of the assessment of the full range of these impacts, as required under the Conservation of Habitats and Species Regulations (2017), is not included as part of the Stage 3 consultation and therefore there is no certainty that the likely impacts have been fully assessed or that acceptable avoidance or mitigation measures can be implemented as part of the proposed development.

Sizewell Marshes Site of Special Scientific Interest (SSSI)

Sizewell Marshes Site of Special Scientific Interest (SSSI) lies immediately to the west of the proposed SZC platform. From the information provided in the Stage 3 consultation it is clear that there are a number of elements of the proposed development which will result in an adverse impact on the SSSI. In particular, construction will result in the permanent loss of over 6 hectares of the SSSI with a further 3 hectares 'temporarily' impacted upon. We are also concerned that this supposed 'temporary' impact will in fact be permanent and therefore over 9 hectares of the SSSI will be lost (of a site that is only 105 hectares in total).

In addition to the permanent loss of parts of the site, we are also significantly concerned that the construction of the main platform and SSSI crossing structure will result in significant hydrological changes within the SSSI. The value of the SSSI is reliant on carefully controlled water levels and anything that creates significant unmanageable level changes will damage a large part of the site.

Coastal Processes

EDF are proposing both hard and soft sea defences to protect the power station and a beach landing facility for use during construction and operation of the site. From the information provided in the Stage 3 consultation it appears that these proposals have the potential to result in significant impacts on coastal process, including affecting sediment transport along the coast and possibly causing embayment to the north of the station platform. Such impacts would not only damage the beach to the north and south (which supports a valuable assemblage of shingle flora), but also risks impacts on designated nature conservation sites further inland. In particular, the Minsmere-Walberswick Special Protection Area (SPA); Minsmere-Walberswick Heaths Special Area of Conservation (SAC); Minsmere-Walberswick Ramsar site and Minsmere-Walberswick Heaths and Marshes SSSI would all potentially be put at risk by changes in coastal process and the knock-on effects that these would have.

Protected and UK Priority Species

The Sizewell Estate and the wider area around it is known to support a range of species, including some protected species and some of conservation importance (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). While it may be possible for EDF to mitigate impacts on many of these, we consider that the Stage 3 consultation contains insufficient ecological survey and assessment information to be able to conclude this with certainty.

We are particularly concerned about the impact that the construction phase of the development could have on the bat populations which use the estate. The large construction laydown area, stretching from the coast to Abbey Road and down to Leiston, could fragment populations such as those of the Barbastelle bat (*Barbastella barbastellus*) which rely on being able to move relatively long distances through the landscape. The lighting and noise disturbance created by construction activities would create a barrier to such movement. The development would also result in both the loss of roosting opportunities through tree removal and foraging areas, especially during the construction period when areas of currently suitable habitat, such as at Goose Hill, are converted to construction laydown areas.

Suffolk Wildlife Trust (February 2019)