**The Sizewell C Project Development Consent Order Application**
**Planning Inspectorate Reference: EN010012**

# Relevant Representation from Suffolk Wildlife Trust

**30 September 2020**

## 1. Introduction

Suffolk Wildlife Trust (SWT) has engaged fully with the applicant throughout the pre-application phase, with particular input into the Evidence Plan process. The process enabled some, albeit limited, progress to be made in a number of areas.

Throughout the Evidence Plan process, technical meetings and the rounds of public consultations, SWT were clear that we had a range of significant concerns over the plans for the project. These concerns largely stem from the fact that evidence was often limited, resulting in various assessments and conclusions not being robust. There are also a number of areas where we disagree with the interpretation of the data. The resulting mitigation and compensation will not offset the loss to biodiversity, or the impacts to protected sites and species. Despite lengthy discussions with EDF, many of the issues have not been resolved at the application stage. Despite this, SWT remain committed to ongoing dialogue to try and resolve areas of concern where possible.

Future representations by Suffolk Wildlife Trust can provide more detail at Examination.

## General Approach to European Protected Sites.

It appears that assessments of impact on the Special Protection Area (SPA) and Special Area of Conservation (SAC) rely on the delivery of monitoring and mitigation plans that are not actually contained within the DCO application. Consequently, it is impossible to determine potential impact in many cases.

Furthermore, assessment of the synergistic effects of different impacts is weak, effectively meaning that the conclusions regarding adverse effects on the integrity of the sites has not been fully determined.

## Coastal geomorphology

There is a lack of detail on coastal defence design, making it impossible to fully determine what any medium to long-term impacts might be. Therefore, we remain concerned what the long-term

impacts of the Sizewell C frontage and beach landing facility might be on local coastal processes and how these in turn might impact the Minsmere frontage, its protected sites and the function of the Minsmere sluice as well as important County Wildlife Site shingle areas directly in front of the development.

**Marsh Harrier Compensation Areas**

Whilst there has been some effort to provide compensation for the loss of marsh harrier foraging over Sizewell Marshes Site of Special Scientific Interest (SSSI) and the southern half of Minsmere Levels, we remain concerned that areas of foraging provided will be inadequate to offset overall loss. We believe the extent of dry habitat provided will not offset the loss of valuable wetland, with lower quantities of prey items available. We also consider that disturbance levels within the compensation site, due to the proximity to noise and visual disturbance, has been underestimated.

**Noise and visual disturbance**

We are concerned that the impact of noise and light spill on breeding, migrant and non-breeding birds within Minsmere Levels (part of Minsmere-Walberswick Heaths and Marshes SSSI) has not been fully captured. There is a lack of detailed assessment on the impacts of night-time noise and from the construction of the water management zone bordering Minsmere, specifically. There remains little assessment of impacts of lighting on birds on the Minsmere levels.

Detail is lacking in the lighting strategy for the SSSI crossing and along Upper Abbey Farm bridleway and around Ash Wood and how this will avoid impacts on bats specifically.

**Hydrological impacts on water quantity and water chemistry**

We are concerned that the proposals for the cut off wall and Sizewell Drain alignment may significantly change the local water quantity and quality within Sizewell Marshes SSSI and Minsmere-Walberswick Heaths and Marshes SSSI.

We believe there is potential for increased water flow from the development which may then create capacity issues at the Minsmere Sluice. This in turn could compromise water level management at RSPB Minsmere and its designated features and Sizewell Belts SSSI.

It is not clear if there is any long-term plan for the Minsmere sluice, which the Sizewell C development will rely on for drainage in the future. The Minsmere sluice has a limited lifespan, well within the operational and decommissioning timeframes of the power station, and there is no clear plan of what to do once this sluice begins to fail.

We remain concerned that there is long-term risk from contaminated leachate emanating from the borrow pits, potentially entering the Minsmere-Walberswick designated sites.

**Specific hydrological impacts on Sizewell Marshes SSSI**

Sizewell Marshes SSSI comprises of nationally important fen plant communities that are reliant on a defined water chemistry range and high water quality. Efforts to maintain the water levels can only be achieved, when groundwater will be displaced, by replacing high quality groundwater with surface water of a very different chemistry and quality. This is very likely to have significant deleterious effect on the plant community.

We also believe that the realignment of Sizewell Drain may have significant impacts on both water quantity and chemistry, significantly impacting key botanical communities.

Water levels can only be maintained within a relatively broad range. We are concerned that micro-topography, such as small depressions, which often support the rarest plant communities, will see significant water level changes, that are not picked up in the monitoring. We also have concerns that the proposed on-going monitoring is not detailed or sophisticated enough to pick up early changes in water level and plant community response.

In addition to the important plant community, the SSSI also supports an exceptional invertebrate community. Many of the rare species rely on high water quality and will therefore be extremely vulnerable to changes in water level and quality.

Despite modelling, such is the complexity of the system, we believe there remains a significant amount of uncertainty that the proposed mitigation will not be enough to prevent long-term damage to the SSSI.

**Loss of Sizewell Marshes SSSI**

We are concerned that the loss of SSSI via the causeway/culvert option instead of the bridge option, which will lead to a much larger loss, has not been adequately and clearly justified. We dispute the term 'temporary' damage and we believe it is likely many of the activities that will take place (such as repeated tracking across the SSSI) will result in the permanent damage to nationally important fen habitat. We are concerned that the proposed habitat compensation sites will not be able to offset the loss of biodiversity, with the outcomes likely to be deficient in quality and quantity.

Aldhurst Farm habitat creation has been designed to compensate for the loss of reedbed habitat. Due to the high nutrients found in the surface water, it is likely to only support more generalist species, with a resulting overall loss of biodiversity. It is likely this will also apply to the fen compensation sites.

**Protected species - Bats**

We have considerable concern that the overall impact on the nationally important bat population within the main development site has not been fully recognised. Specifically, the impacts of lighting and noise on bat foraging and the loss of connectivity across the landscape. Our main areas of concern relate to the loss of woodland at Goose Hill, impacts on the current dark corridor along Upper Abbey Farm bridleway, loss of the barn at Upper Abbey Farm and lack of adequate compensation, impacts on three sides of Ash Wood, loss of the Sizewell Marshes SSSI north to Minsmere and the total loss of an important foraging corridor north from Kenton Hills. We are also concerned that the assessment of cumulative impact from a variety of potential stressors is not adequate, failing to fully capture the effect of all impacts when assessed together.

Furthermore, we are concerned that the importance of the area of land impacted by the Sizewell Link Road has not been fully recognised.

**Protected species – Natterjack toad**

We are concerned there may be significant impacts on natterjack toad as a result of loss of hibernation sites due to the current proposed footprint of the Water Management Zone. It appears no alternatives to the location and extent of north eastern Water Management Zone have been

considered. This is an extremely vulnerable population and we are concerned over the limited scope of the proposed mitigation to improve habitat to the north and connectivity with potential breeding areas on RSPB Minsmere.

**Biodiversity Net Gain (BNG)**

We dispute the conclusions of BNG. It is crucial that mitigation measures are secured separately and not counted as contributing towards BNG. We are also concerned that the biodiversity value of existing habitats has not been adequately captured. Problems with habitat misclassification, numerical error and unjustified discounting of impacts have been identified.

**Looking Forward**

Suffolk Wildlife Trust recognise the value of EDF's ongoing work with us to try and resolve some of these issues. We will continue to engage EDF on all of these issues and endeavour to find common ground where possible.

It is our intention to work closely with the RSPB during the examination process on issues of mutual concern, such as protected species and impacts on important habitats. Where appropriate this will include joint submissions or support for each other's position. We are also supportive of the RSPB in other issues raised in RSPB's Relevant Representation.

Suffolk Wildlife Trust reserves the right to add to and/or amend its position in light of changes to or any new information submitted by the Applicant.