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**Post Open Floor Hearing submission
for
the Royal Society for the Protection of Birds
and Suffolk Wildlife Trust**

**Submitted for Deadline 2
2 June 2021**

Planning Act 2008 (as amended)

In the matter of:

**Application by NNB Generation Company (SZC) Limited for an Order
Granting Development Consent for
The Sizewell C Project**

**Planning Inspectorate Ref: EN010012
RSPB Registration Identification Ref: 20026628
Suffolk Wildlife Trust Registration Identification Ref: 20026359**

The RSPB and SWT Open Floor hearing speech, delivered during OFH 8, Thursday, 20th May

Good afternoon Sir. I am Adam Rowlands, Suffolk Area Manager for the RSPB and representing RSPB and Suffolk Wildlife Trust today. I would also like to acknowledge Ben McFarland from Suffolk Wildlife Trust who compiled this presentation with me. I have worked for the RSPB for 30 years and was the Senior Site Manager at RSPB Minsmere from 2004 for 14 years.

Thank you for this opportunity to speak today. I will be briefly covering:

The history of RSPB and Suffolk Wildlife Trust's involvement in this area
The importance for protected sites and species
The wider ecological importance, and;
Visitor numbers and wider economic benefits.

The RSPB has a long history of involvement with the Suffolk Coast around Sizewell and owns two very significant reserves. North Warren to the south (first purchased in 1939) and Minsmere to the north (where RSPB management commenced in 1947 and land purchase began in 1977). The RSPB currently manages over 1,600 hectares of land for conservation and visitors between Aldeburgh and Walberswick.

Minsmere is famous as the site where avocets returned to breed in the UK after a 100 year absence and was also the only site where bearded tits bred in the UK in 1947 and marsh harriers in 1971. As well as saving these species in a national context, Minsmere has played an instrumental role in the successful return of the bittern as a UK breeding species, after becoming perilously close to extinction in the 1990s and saving the stone curlew on the Suffolk Coast, from a low point of a single pair 25 years ago. Minsmere boasts a greater biodiversity than any of the other 220 RSPB reserves in the UK, with over 6,000 species of plant and animal recorded. This is partly due to the great variety of habitats (coastal lagoons, shingle beaches and dunes, coastal grazing marshes, reedbeds and fens, heathland, acid grasslands and woodland) that cover an extensive area. In recognition of this importance, Minsmere has been awarded the Council of Europe's Protected Area Diploma Award since 1979, one of only five sites in the UK to achieve this designation. The most recent [resolution to renew the Award](#) included a condition

‘with regard to the project for a third reactor at the Sizewell nuclear power plant (project Sizewell C), carry out a proper Strategic Environmental Assessment and an Environmental Impact Assessment according to international standards; the results of these assessments should ensure that the construction of the new reactor will not be to the detriment of the Minsmere Nature Reserve’.

RSPB Minsmere's hydrology is contiguous to that of Sizewell Marshes and inextricably linked to the proposed development area. Any changes to the wetlands could result in impacts on the rare and sensitive species associated with this habitat. Minsmere's shoreline is contiguous with the new development and the reserve abuts the northern boundary of the proposed new sea defences. The shoreline is home to floral communities that are important in an international context. Any changes to the shoreline processes could both affect these fragile floral communities and could also accelerate coastal erosion, increasing the potential risk to the brackish and freshwater habitats inland from saline incursion.

The waterbirds that inhabit Minsmere, both for breeding and wintering, and the foraging marsh harriers are vulnerable to disturbance visually and from noise and light associated with the neighbouring construction site.

The terns that breed in nationally important numbers on Minsmere lagoons are dependent upon fish in the marine environment offshore to feed themselves and their offspring. And in addition, the marine environment supports an internationally important non-breeding population of red-throated divers that are sensitive to disturbance from boat movements and impacts on their fish food supply.

Sensitive areas such as the wetlands, heathlands and coastal dunes and shingle are also at risk from the displacement of visitors seeking recreation when Public Rights of Way and permissive paths are closed during the construction period. This could place ground nesting birds for which the RSPB and SWT reserves are nationally important (such as nightjar, woodlark and stone curlew) at particular risk as well as threatening fragile habitats such as vegetated shingle. This threat extends beyond Minsmere to sites such as Dunwich Heath and Aldringham Walks.

Minsmere and Dunwich Heath form part of the internationally important Minsmere to Walberswick Special Protection Area, Special Area of Conservation, Ramsar site and Site of Special Scientific Interest. Aldringham Walks is part of the Sandlings SPA. The sites sit within the Suffolk Coast and Heaths Area of Outstanding National Beauty.

However, in addition to this threat to increased visitor numbers via public rights of access, visitors to the core of RSPB Minsmere may be dissuaded from visiting due to the perceived or actual disruption caused by the construction period. Disruption to access and transport and visual, noise and other forms of disturbance may reduce peoples' propensity to visit or discourage them from making return visits (or encouraging others to do so).

In recent years Minsmere has attracted up to 125,000 visitors a year. The RSPB's economic analysis in 2017 identified that Minsmere directly employed 33.1 full time equivalent jobs, visitors to Minsmere spend £7.7 million in the local economy and support 160 full-time equivalent jobs.

The potential loss of income to the RSPB, vital to funding the RSPB's conservation work, as well as the loss of income and employment locally that would reduce from a reduction in visitor numbers is of significant concern to the RSPB.

Suffolk Wildlife Trust has been managing Sizewell Marshes SSSI for 27 years. Covering 105 hectares, Sizewell Marshes are important for their large area of lowland, traditional wet meadows which support outstanding assemblages of plants and invertebrates. The site occupies a low-lying basin of deep fen peat, where the water table is permanently high and it is the significant influence of the water table with its high water quality with a unique mix of geology that results in its outstanding biodiversity.

The Sizewell Marshes SSSI has three main habitats - species rich grazing marsh, tall herb fen and wet alder carr woodland. Floristically, the grazing marshes and its network of dykes is one of the best examples of this habitat remaining in East Anglia. Very species rich and containing a wide range of plants of conservation interest including the nationally scarce marsh dock and greater water-parsnip. The extensive ditch system supports a diverse aquatic flora which includes the nationally scarce soft hornwort, fen pondweed and whorled water-milfoil. Even small changes in the balance between surface water and groundwater could result in significant impacts to the SSSI plant community.

The Sizewell Marshes SSSI also has an outstanding, nationally important invertebrate community. 2,068 species have been identified within the study area, with 120 considered to be Nationally Scarce. The ditches support 18 species of breeding dragonfly including Norfolk hawker. 236 species of moths have been recorded including a number of national rarities. Many of the invertebrates

have life stage (for example, as larva or adult), that rely on the different habitat types found within the SSSI. Consequently, the loss of or impact on one habitat type, can indirectly influence another.

More widely, the Sizewell Marshes SSSI plays an important functional role within the landscape, with connectivity with Minsmere to the north and Aldringham Walks and North Warren to the south. The hydrology within the Sizewell Marshes SSSI directly relates to and potentially impacts upon RSPB Minsmere.

Beyond the SSSI, the wider Sizewell estate a nationally important population of barbastelle bat with multiple roost sites across much of the estate, including within the development footprint. Barbastelle are found only in southern England and Wales. Very few breeding sites are known in the UK (Sizewell estate being one) and the species is protected in the UK under the Wildlife and Countryside Act, 1981. It is also a Priority Species under the UK Post-2010 Biodiversity Framework. Internationally the rarity of barbastelle is recognised, being listed as Near Threatened on the global IUCN Red List of Threatened Species.

In addition to daytime roosts, there is also a maternity roost somewhere within the estate, which has not yet been located. The disturbance or destruction of a maternity roost would have a significant and deleterious impact on the population. A species that is extremely vulnerable to disturbance generally, the current low levels of light and noise enabling barbastelle to commute and forage widely across the estate and link up with important habitat within Minsmere.

On the estate, very close to the development site there is a small pond that contains a breeding population of natterjack toads. Given the rarity of the species, which is confined to a handful of coastal sites in the UK, the population of an estimated 12 individuals, is considered to be nationally significant. Natterjack toads can live up to 15 years and are especially vulnerable to disturbance, especially when they are restricted to only one or two ponds.

We are grateful to EDF for having consulted with the RSPB and SWT regarding their plans for Sizewell C for a decade. However, whilst we have been presented with reassurance that impacts will be understood, where possible avoided but otherwise appropriately mitigated or compensated we are concerned that those reassurances have as yet not been translated into designs and plans that satisfactorily convince us that Minsmere, Sizewell Marshes and the fantastic wildlife that these areas of the coast support are not significantly threatened by this proposed development. Although again we have been repeatedly assured that there will be no significant direct impacts on our land holding at Minsmere, the currently missing details within the application documents does not provide us with sufficient confidence that this will not be the case.

And we have many supporters who share our concerns. In just over 12 weeks from last November, 104,836 people signed the RSPB and Suffolk Wildlife Trust Love Minsmere e action sharing our concern over Sizewell C's impacts on nature. The number of people taking the Love Minsmere action has eclipsed the number of signatures and responses to all previous Sizewell C consultations and campaigns. It may also cast doubt over claimed support for the Sizewell C project. The campaign has seen support from a whole host of celebrities including Chris Packham, Anthony Horowitz, Julia Bradbury, Alison Steadman, Samuel West, Deborah Meaden, Bill Turnbull, Michaela Strachan, Mike Dilger, Iolo Williams, Emma Kennedy, Miranda Krestovinkoff, Dr Amir Khan and more.

We have worked closely with neighbouring landowners, communities, statutory bodies and NGOs and recognise that we and our supporters are not alone in these concerns, as has been reflected in many other contributions to the Open Floor Hearings over the last few days.

We welcome the opportunity to participate in the process and are determined to ensure that Minsmere and the Suffolk Coast will remain one of the UK's finest examples of wildlife habitat that people can enjoy.

We thank you for your time to listen to us today.