



Interested Party ID: 20025904

The Sizewell C Project EN010012

D3: Summary of written submission of presentation at the

Open Floor Hearings concerning:

Biodiversity Net Gain

Two highly valued County Wildlife Sites

The Main Development Site Access Road

BIODIVERSITY NET GAIN

Deep concern was expressed over the loss of so much woodland due to the proposed construction of Sizewell C. Rather than gain, we clearly end up with a loss, despite the promised new planting of 50ha around the Sizewell Estate. Trees either already removed or planned to be felled are as follows:

All of Coronation Wood to make more space for SZC

Large proportions of Kenton Hills and St James' Covert for extra reptile habitat

Almost the whole of Goose Hill/Dunwich Forest for the construction area (46ha)

Wet woodland for the SSSI crossing (3.12ha)

Paines Plantation to improve Bridleway 19 (150m – 40-50 trees)

Only 0.7ha of replacement wet woodland is currently on offer. This is a Biodiversity Action Plan Priority Habitat and should be enhanced, not reduced.

The Biodiversity Net Gain calculations are based on the assumption that the mitigation habitats would be successful for the target species. However, success rates for compensation sites are very poor, at between 26-46% if conservation-led and even less if developer-led. This is largely due to failure to monitor and inadequate management.

The much-vaunted Aldhurst Farm habitat creation scheme is supposed to compensate for the loss of high-value wetlands from Sizewell Marshes SSSI. Unfortunately, this lies within a Nitrate Vulnerable Zone, so that the water quality is too high in nutrients and therefore unsuitable for the rare specialist invertebrates such as the Norfolk Hawker dragonfly. These will not thrive here.

The very rare White-Mantled Wainscot moth, found only in the Suffolk coastal region, would have the whole of its central range wiped out by the construction works, putting it at severe risk of extinction.

TWO HIGHLY VALUED COUNTY WILDLIFE SITES

Goose Hill woodland forms a major part of Sizewell Levels & Associated Areas CWS, while Sizewell beach is a part of Suffolk Shingle Beaches CWS, both of which are greatly enjoyed for recreational purposes. These two valuable areas would be totally destroyed. The Applicant dismisses Goose Hill as a mere 'plantation', yet the CWS citation describes it as of 'ornithological importance'. Hobby, Crossbill and Firecrest all nest here.

The sandy rides of Goose Hill support two scarce butterflies, namely White Admiral and RDB2 Grayling, both BAP priority species and protected under the NERC Act. The dunes of Sizewell beach are also a Grayling habitat. The construction works would obliterate these two colonies of Grayling, a butterfly already in steep decline, and the new access road

would prevent northwards dispersal of any left on Leiston Common, thereby reducing breeding opportunities. Remaining White Admirals at Kenton Hills would become weakened due to isolation and pollution from the adjacent railway and construction site.

The beach supports vegetated shingle, where plants such as the rare sea-pea and yellow horned poppy grow. The Applicant maintains that substrate would be kept and re-distributed on the new defences in the anticipation that the plants would re-grow, but no scientific work has been carried out to demonstrate how this might be successful. We request that this should be put in place. Conditions on top of rock armour would be very different from a natural shingle beach.

THE ACCESS ROAD

This road would go right across Suffolk Coast & Heaths AONB, dividing this pristine landscape completely into two. It would also cross over Sizewell Marshes SSSI, taking the north-eastern corner of this designated site. No alternative route has been put forward. The company has therefore failed to follow the Mitigation Hierarchy whereby Avoidance is the first step.

The road would form a permanent barrier between Sizewell Marshes SSSI and the European sites of Minsmere immediately to the north. These sites are functionally linked, as species from the Minsmere-Walberswick SAC, SPA and Ramsar, many protected, rely on the Sizewell SSSI for foraging.

According to peer-reviewed research, up to 1km either side of the road, known as the Road Effect Zone (REZ), would become degraded due to noise and pollution, with a loss of up to 30% of bird species. Bats would also suffer losses for up to 1.6km either side, including the rare Barbastelle. All are protected. Animals with extensive ranges could be affected for 5km. With no proper underpasses, road kill is inevitable.

The SuDs drainage systems are no more than 80% effective, leaving 20% of pollutants to drain from the road into the designated habitats. Then there is the litter chucked out of passing vehicles, a real danger to wild animals.

In conclusion, it is our view that harm to protected species and habitats would be so severe, that this project should not be allowed.

R. Fulcher, 24 June 2021.