



Interested party ID 20025904

The Sizewell C Project: EN010012

Deadline 7 submission (03/09/21)

Written submission concerning ISH10, agenda item 4.c:

COUNTY WILDLIFE SITES

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1. Two highly valued CWSs under threat

We have already made some submissions concerning two County Wildlife Sites, large parts of which would be lost to Sizewell C construction works. These are Sizewell Levels & Associated Areas and Suffolk Shingle Beaches CWS. At the first 46 ha of Goose Hill woodland would be felled and at the beach both vegetated shingle and dunes would be lost and damaged.

We would like to draw the examiners' attention to EN-1 under Regional & Local Sites, paragraph 5.3.13, which states that they have '*a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and well-being of the community...*'. During the Open Floor Hearings, we described how much local people and visitors alike valued these two sites for recreation, and we expressed our distress at their loss. ([REP2-454.](#)) They are both also of high biodiversity value, Goose Hill being cited for its 'ornithological importance' while Suffolk Shingle Beaches is described by Natural England as being of 'national importance' for its rare plants and invertebrates. Loss of and damage to these two sites will leave East Suffolk much the poorer in terms of its biodiversity.

2. Suffolk Shingle Beaches CWS

In this submission we would like to focus on Suffolk Shingle Beaches CWS. Any loss or damage here is extremely serious within a national context, as this is ***one of only six such habitats within the whole of the UK***. It is therefore very rare. The main threats are: i) poor or changing sediment supply, which could occur naturally or due to Sizewell C marine works interfering with coastal processes; ii) installation of coastal defence structures; and iii) redistribution of material. Both ii and iii would occur at Sizewell beach as part of the Applicant's defensive proposals. Dunes and vegetated shingle are extremely fragile sites and are easily damaged by trampling and by vehicles. Much of these coastal habitats at Dungeness has been destroyed due to the shoring up of beach defences at the nuclear power station, the whole area now scarred by vehicle tracks. We do not wish to see this happen at Sizewell.

Suffolk Shingle Beaches is a ***UK Biodiversity Action Plan Priority Habitat***. The vegetated shingle supports rare plants, including Sea Pea, Sea Campion and Yellow Horned Poppy. ***Sea Pea is now Red-listed as Nationally Scarce*** and protected under the Wildlife & Countryside Act 1981. Matt Shardlow of the charity Buglife says that in this habitat 'diverse invertebrate communities are found' and lists many species that are not seen elsewhere, such as Whelk Shell Jumping Spider and Looping Snail. (Shardlow, retr. 2021.) Within the dunes, especially where there is also grass, uncommon bees, bugs and leaf-hoppers are found, including Brown-banded Carder Bee and Short-haired Bumble Bee.

2.1 Storage of beach substrate

Thanks to careful measuring on the ground by members of the Minsmere Levels group, we now discover that large swathes of the vegetated shingle on Sizewell beach would be permanently buried under the rock armour for the proposed hard coastal defences. The Applicant presumes that by storing substrate from the beach it will be possible to re-distribute the material over the defences and that the plants would re-grow. However, vegetated shingle needs a relatively flat surface in order to establish itself. The shingle will simply roll off the incline of the proposed hard defence feature.

At a meeting with the Applicant concerning our Statement of Common Ground, we raised the issue of storage of substrate and asked how it would be stored, under what conditions, for how long and where precisely. We pointed out that the restoration of the shingle in front of Sizewell B station has been relatively successful only because British Energy put in place scientific work in cooperation with the University of East Anglia to discover the best way to store seeds, including freeze-drying them, and to establish seedlings of the rare plants (Walmsley & Davy, 1997). We now await similar proposals from the Applicant, which have been promised to us at Deadline 8. It is not good enough simply to say that beach substrate will be stored for later use. What evidence is there to show that the plants would re-establish themselves and that such a method would be successful, without the interventions such as those put in place at Sizewell B? We need to see any such evidence and we need details of a proper scientific approach.

As things stand, it seems that both nationally rare plants and scarce invertebrates would be lost for ever under the Applicant's proposed defences.

REFERENCES

Shardlow, M. (retr. 2021). 'Coastal vegetated shingle: habitat management.' *Buglife report*.

www.buglife.org.uk

Walmsley, C.A. & Davy, A.J. (1997). 'The restoration of coastal shingle vegetation: effects of substrate composition on the establishment of seedlings.' School of Biological Sciences, UEA. *Journal of Applied Ecology*, 34: 143-153.