



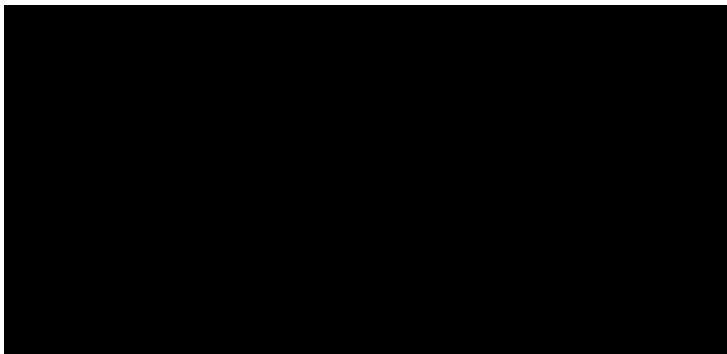
**THE SIZEWELL C PROJECT**

**EN010012**

**WRITTEN REPORT OF ORAL PRESENTATION AT  
OPEN FLOOR HEARINGS,  
18 May 2021**

**ID 20025904**

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## **BIODIVERSITY NET GAIN**

The Applicant maintains that biodiversity net gain in habitats will be offered in the long term to compensate for the loss of wildlife sites due to Sizewell C construction works and to comply with the government's ambition for biodiversity enhancement through the 25-year Environment Plan.

Local people have been deeply upset by the complete felling of 100-year-old Coronation Wood to make more space for Sizewell C. In addition, virtually the whole of Goose Hill woodland and Dunwich Forest would be cut down, amounting to a huge 46ha, to accommodate the new access road, the various haul roads and the construction site.

Because many protected reptiles would lose so much of their habitat at Sizewell, the Applicant, by law, must provide them with alternative sites. In order to do this, EDF Energy has already cut down great swathes of trees at Kenton Hills and St James' Covert, to make space for the animals.

In addition, 3.12ha of scarce wet woodland would go under concrete, as a result of the construction of the SSSI road crossing and part of the station platform. (REP1-004, p. 6.) Sizewell Marshes Site of Special Scientific Interest is protected by law under the Wildlife & Countryside Act and should never be built on. It is designated for its breeding birds, some rare, and outstanding assemblage of invertebrates, many extremely rare. Moreover, wet woodland is a Biodiversity Action Plan habitat.

Only after persistent pressure from ourselves and others, including Natural England, has the company finally agreed to offer just 0.7ha of replacement wet woodland for the total of 3.12ha that would be lost. There is vague mention of creating more here and there, but no specific plans. This is not good enough. (APP-224: 14.7.197.)

To mitigate for so much loss of woodland, the company has promised to plant 50ha 'around the estate'. Do trees planted here and there make up for established mature woodland, where so many birds, bats, insects and many other animals have their home? We don't think so. Saplings do not offer nesting sites for birds nor roosts for bats.

Even with 50.7ha of new tree planting, it is quite clear that by adding up the amount of woodland that has been, or would be cleared, we would end up with a net loss, not net gain.

Most of the biodiversity net gain being promised is based on the assumption that the new habitats would be successful for the target species. How do we know that the reptiles, for example, will thrive in their new habitats? Unfortunately, success rates for such schemes are very poor. Peer-reviewed research tells us that even scientifically responsible translocations, carried out for conservation purposes, show a success rate of only 26-46% (Germano *et al* 2015). Developer-led translocations fare even worse, often due to lack of long-term monitoring and inadequate management.

As for the Aldhurst Farm habitat creation, the aim here was to compensate for the direct loss of high-quality wetlands within the Sizewell Marshes Site of Special Scientific Interest. However, many species that thrive there have specialised requirements. EDF's assumption is that these rare invertebrates will happily establish themselves at Aldhurst Farm. Some of the more common species may well do that. However, the water quality at the farm is not the same as that of the eastern part of the SSSI, where there is very clean water that is low in nutrients. The rare Norfolk Hawker dragonfly, for example, Red Data Book listed and protected under the Wildlife & Countryside Act, spends two years as an aquatic nymph and will only thrive in water low in nutrients. (Mason & Parr, 2016.) The new habitat has unfortunately been created in a Nitrate Vulnerable Zone (NVZ), due to agricultural run-off, where nitrates in the water exceed drinking water standards. (APP-297: 19.4.41.) Moreover, the Leiston Beck that runs through the Aldhurst Farm, comes from the adjacent sewage works and is enriched with phosphates. (APP-309: 1.3.33.) Species such as this endangered dragonfly will not thrive here.

Another specialist is the White-mantled Wainscot moth. This is so rare that it is only found in the Suffolk coastal region, Sizewell Marshes being a particularly important habitat. (Pritchard, 2012.) It is listed under the Natural Environment & Rural Communities Act as a Species of Principal Importance that is 'at risk'. This moth needs ancient reedbeds for its larvae, not new, where there are plenty of dead stems. Moreover, like many moths, it is attracted to light. The 24-hour lighting for construction works would expose this highly

sensitive insect to predation and upset its natural bio-rhythms. (MacGregor *et al*, 2015.) Sizewell C construction works would wipe out most of the central part of its habitat. Bearing in mind the very low numbers of this moth, it could easily become extinct as a result.

It is our view as Friends of the Earth that specially designated sites should be sacrosanct and never destroyed for development, not even a part of them. We profoundly disapprove of biodiversity offsetting. No new habitat will ever be the same as the old one, which may have taken hundreds of years to evolve. Bit by bit our most precious wildlife sites have been eaten away. The Sizewell C proposals are a classic example of how that would happen here if the scheme is allowed to go ahead.

## **TWO HIGHLY VALUED COUNTY WILDLIFE SITES**

There are two CWSs that are at extreme risk from Sizewell C, namely the Sizewell Levels & Associated Areas and Suffolk Shingle Beaches. At present these two offer important recreational facilities to local people, with either beautiful walks along peaceful woodland tracks or the exhilaration of fresh seaside air and the opportunity for bird watching, swimming and dog walking. On a sunny weekend, hundreds of people will be enjoying themselves at Sizewell. Then – along comes the biggest building site in Europe.

The Sizewell Levels CWS incorporates Goose Hill woodland, which, as we have seen, would be almost entirely obliterated by the new access road and the extensive laydown and construction areas. The Applicant dismisses these woodlands as mere ‘plantations’. However, the CWS citation describes the Goose Hill woodlands as being of ‘ornithological importance’. Hobby, for example, nests here, as do Crossbill and Firecrest.

The sheltered sandy rides are of vital importance for two scarce butterflies, White Admiral and Grayling. Wild honeysuckle grows in the woodlands, the food plant of White Admiral caterpillars. Grayling uses the sunny rides for thermo-regulating and, in summer, our members have often seen it, myself included, doing just that, its wings together and sideways on to the sun. The loss of butterfly habitat here is extremely serious. (Parker, R., 2019.) EDF maintains that there are White Admirals in the Kenton Hills woodland, but these would become weakened through isolation and inability to disperse northwards to find

mates. The construction dust would coat the honeysuckle on which the caterpillars feed, while persistent diesel fumes would cause the leaves to produce defensive chemicals, harmful to the larvae. (Farmer, 1993.)

Grayling would also lose its other important habitat at Suffolk Shingle Beaches CWS, where the warm, grassy dunes provide it with ideal conditions. These would be entirely dug up for the new hard defences. Like the White Admiral, this is listed under section 41 of the Natural Environment & Rural Communities Act as a Species of Principal Importance, and should be protected, enhanced and restored. Grayling is classed as a Red Data Book 2, 'Vulnerable' species. It has declined by 58% within the last 10 years due to habitat loss, degradation and fragmentation – precisely as would happen here.

The beach itself consists of vegetated shingle, where plants such as the rare sea-pea and yellow-horned poppy grow. We have the best vegetated shingle habitat in the world. Yet this entire beach would be dug up for both the new defences and construction work to create the proposed jetty and Beach Landing Facility (BLF). The Applicant maintains that substrate would be kept, in the anticipation that the seeds would regrow on the defences – but would they? There is no information about where it would be kept, under what circumstances and for how long. Some seeds will not germinate after a few years of storage. Conditions on top of imported rock armour would not be the same as on a natural beach. Has the scientific work been carried out? It seems not.

### **THE NEW ACCESS ROAD**

Of all the proposals connected with Sizewell C, this is one of the very worst. It would go right across Suffolk Coast & Heaths Area of Outstanding Natural Beauty, dividing this pristine landscape completely into two from west to east.

During the nine years that our Friends of the Earth group has been involved in the consultations for Sizewell C, no alternative route has ever been suggested. The company has failed to follow the Mitigation Hierarchy, whereby Avoidance is the first step. Rather, an assumption has been made that it would be OK to take land for the road from the north-east corner of Sizewell Marshes SSSI if they provided Compensation by way of a new habitat. Compensation should only be offered as an absolute last resort, not the first.

This Access Road would create a permanent barrier to the movement of wildlife between the designated sites of the Minsmere-Walberswick SAC, SPA and Ramsar and that of Sizewell Marshes SSSI. The Minsmere sites are functionally linked to Sizewell Marshes, where important foraging ground is available for birds and animals.

Peer-reviewed research into what is known as the 'road effect zone' (REZ) demonstrates that, in addition to mortality of wild species through traffic collisions, up to 1km either side of the road would become degraded, with a loss of up to 30% of bird species. Traffic noise would mask their communication signals, reducing their ability to establish territory, find mates and warn of danger. (Luther & Gentry, 2013.) Depending on the mobility of various animals, the road effect zone can extend as far as 5km. As for bats, reduction in populations can be expected for up to 1.6km either side of the road. Some bat species present are very rare, including the Barbastelle, and all are protected. (Benitez-Lopez, A. *et al*, 2010; Fahrig & Rytwinski, 2009.)

While the Applicant's documents promise 'best practice' and the use of SuDs drainage systems, our research shows that none of these is 100% effective. At the best, just 80% of hydrocarbons and heavy metals from diesel and petrol leaks are captured, leaving 20% of pollutants to drain into the surrounding area and into the designated sites. (SDS, retr. 2021.) Microplastics from the wear of brakes and tyres are not even accounted for. Then there is the inevitable litter, dropped or thrown out of vehicle windows, a life-threatening hazard to wild animals.

Roadless areas are fast diminishing, with the planet being shattered into hundreds of thousands of fragments, causing degradation of eco-systems. It is the view of Friends of the Earth that the designated habitats of Sizewell and Minsmere would never recover from the impacts caused by the permanent Access Road. This, combined with the overall effects of 12 years of construction works, would be utterly devastating to the resident and visiting wildlife.

This project must be refused.

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