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*Sizewell C (SZC)*

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ESC comments on any additional information /  
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East Suffolk Council: 20026200

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## Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP) (May 2021) [REP1-016]

1.2.1 - Whilst the Environmental Statement may not predict many Significant adverse impacts, there are a number of areas where we challenge this conclusion (please see Local Impact Report [REP1-045] Chapter 8 for further details). Also, we consider that there is a need to monitor receptors where a non-significant impact has been predicted to ensure that the actual level of impact matches that forecast.

1.4.9 - This does not match what is required by Requirement 4 of the draft DCO. The draft DCO requires that the TEMMP is submitted for discharge by ESC prior to the listed works commencing, not that the final version submitted during Examination becomes the approved version.

2.2 (Minsmere European sites and Sandlings SPA (North)) Recreational Pressure – ESC has not seen the draft Monitoring and Mitigation Plan for this suite of sites which is referred to in this section (2.2.2). As it is proposed to secure this mitigation and monitoring via the S106 agreement (2.2.2) we consider that it is important that the Plan is provided to the Examination to enable it to be reviewed.

2.2.5/Table 2.1 – We defer comment on ornithological monitoring at these sites to Natural England and the RSPB.

2.3 Other European Sites – As with the Minsmere European sites and Sandlings SPA (North) draft Monitoring and Mitigation Plan, ESC has not seen a draft of this document and therefore

are unable to provide more detailed comments at this stage. We consider that it is important that the Plan is provided to the Examination to enable it to be reviewed.

2.3.3 - We defer comment on monitoring of red-throated divers to Natural England and the RSPB.

Table 3.1 (Row 1) Botanical Monitoring – says that there are 12 vegetation monitoring plots in the SSSI but then list monitoring times for 14 plots (6 in one year and 8 in the other).

3.1.8 and 3.1.10 – These paragraphs make reference to the preparation of Method Statements for works in the area of temporary SSSI loss, however it is unclear when these will be prepared or how they are secured as part of the DCO.

3.1.12 – When/where is the updated Aldhurst Farm management strategy? There is no reporting mentioned in this paragraph, is this covered in the existing/forthcoming plan?

3.1.11 Bullet Point 3 – should be ESC not SCC.

3.1.14 – Requirement 14A secures a Fen Meadow Plan, based on the Fen Meadow Strategy. It does not secure the submitted Fen Meadow Strategy. Please see our Local Impact Report [\[REP1-045\]](#) comments on fen meadow mitigation and monitoring (under the Sizewell Marshes section).

Table 3.2 (Suffolk Shingle Beaches CWS) – Please see Local Impact Report [\[REP1-045\]](#) comments in relation to this CWS. The proposed sediment recharge activities will have a significant impact on the shingle flora which needs to be considered in the monitoring strategy.

Table 3.3 (Marsh Harrier Habitat Establishment) – The table does not set any targets for what acceptable vegetation establishment or small mammal and bird population sizes look like; without these it is not possible to determine whether habitat establishment has been successful.

3.2 e) (Aldhurst Farm non-wetland components) – Monitoring at Aldhurst Farm also needs to include recreational activities as the site is proposed to form part of the recreational mitigation package for displaced exiting recreational users and campus residents. Recreational use monitoring at Aldhurst Farm needs to be undertaken holistically with that being carried out as part of the European designated sites recreational disturbance mitigation work.

Table 4.2 (Fish) – We defer comments on fish monitoring to the Environment Agency and Natural England.

Table 4.3 (Natterjack Toad) – We defer comments on natterjack toad monitoring to Natural England.

Table 4.4. (Bats) – We have a number of concerns about the bat monitoring strategy set out in Table 4.4, particularly in relation to monitoring of impacts on foraging and commuting. These are set out in detail in paragraphs 8.141 to 8.148 of the Local Impact Report [[REP1-045](#)].

Table 4.5 (Reptiles) – With regard to timings, it is unclear what is meant by “Twice annually: in May/June and again in September” in this table. A reptile survey generally involves multiple visits as part of one survey, it is therefore unclear whether this timing involves multiple visits in both May/June and again in September, or one single visit in May/June and again in September? We do not consider that single visits would be adequate for a robust monitoring strategy.

Table 4.6 (Terrestrial Mammals) – Water Vole – Aldhurst Farm is listed as a potential water vole translocation site if population numbers at the time of the commencement of works indicate that it is required. It is understood that one of the wetland basins at Aldhurst Farm is currently fenced to prevent water vole access so that it remains available as a translocation site if it is required. If it is determined that translocation to Aldhurst Farm is not required, then the TEMMP must include a commitment to remove the existing fence as soon as possible after works commencing in order to make this basin available for natural colonisation.

Table 4.6 (Terrestrial Mammals) – Otter – Monitoring of the use of the SSSI Crossing and Lovers Lane culvert by otter must be undertaken more often during the construction phase than in years 1, 5 and 10 as currently proposed in the TEMMP. Monitoring should be undertaken at points throughout the year, during every year of the construction period.

Table 5.1 (Associated Development Sites – Great Crested Newts) – It is unclear why the monitoring proposed for great crested newts at the relevant Associated Development sites stops at year 8? Several of the sites, including the Northern Park and Ride, the Green Rail Route and potentially the Sizewell Link Road, will be decommissioned after the power station construction phase and therefore there is the need to monitor for this period as well.

Table 5.2 (Associated Development Sites – Bats) – We consider that the proposed crossing point surveys must be undertaken every year in Years 1 to 8. There is considerable uncertainty over the likely success of the proposed crossing points (particularly as details of which are largely outstanding) and therefore it is essential that they are monitored more regularly so that their success (or not) can be more easily understood and if necessary additional mitigation measures implemented. Monitoring of the Sizewell Link Road must also be coordinated with that being undertaken on the Main Development Site, given the continuity between the two areas and the fact that the same bat populations will be affected by the two developments.

Appendix 2: In relation to the Two Village Bypass and Sizewell Link Road, under “Party Responsible” many of the newly created habitats are listed for eventual adoption by the Highways Authority. We query whether this is correct as many of the areas appear to be outside of those which are usually subject to such adoption. Whilst we defer further detailed comments on this matter to Suffolk County Council as the highway authority, we draw it to the attention of the Examiners as ensuring appropriate long-term management of these areas is essential to them delivering their ecological mitigation and compensation objectives.

Biodiversity Net Gain (BNG) Reports (Main Development Site (Appendix 14E) [[REP1-004](#)]; Sizewell Link Road [[REP1-017](#)]; Two Village Bypass [[REP1-018](#)] and Yoxford Roundabout [[REP1-019](#)])

East Suffolk Council have not reviewed the detail of the Biodiversity Net Gain calculations provided for the Main Development Site, Sizewell Link Road, Two Villages Bypass and Yoxford Roundabout. Please see our comments on the principle of the use of Biodiversity Net Gain calculations as part of the ecological impact assessment process in paragraph 8.84 of the Local Impact Report [[REP1-045](#)]. We are not the responsible authority for assessing Biodiversity Net Gain.

Wet Woodland Strategy [[REP1-020](#)]

1.1.4 – The Strategy proposes that the wet woodland creation areas at Benhall and Pakenham will be monitored for 10 years before determining whether the creation target of 2.36Ha has been reached. Whilst we understand that a ‘time to target’ is required, we consider that it will take longer than 10 years for wet woodland of the quality that is being lost to establish at the new sites. Monitoring over a longer period is therefore likely to be required to determine whether true compensation has actually been achieved at the two sites.

4.1.4 – As set out in paragraph 8.37 of the Local Impact Report [[REP1-045](#)], we are concerned that there is a lack of complete detailed investigative surveys at each of the SSSI compensation sites demonstrating that the required habitat creation is definitely feasible. In the absence of this information, it is not possible to be sufficiently certain that the required volume of habitat creation can be achieved and that the ES conclusion of Minor Adverse, Not Significant is robust.

6.1.11 – As set out in our response to 1.1.4 above, we are concerned that a 10-year time frame is too short a period to confirm the establishment of wet woodland habitat of a quality adequate to compensate that being lost from Sizewell Marshes SSSI. Dependent on the conditions achieved at each site and how the new habitat develops, it may be necessary to extend this period. This comment also relates to section 7 of the Strategy.

## Outline Landscape and Ecology Management Plan (OLEMP) [[REP1-010](#)]

No ecology comments at this time.

From a landscape perspective, the landscape-based objectives remain consistent with previous versions and they accord with all the key issues that have been discussed throughout the consultation phase. It is still a high-level document, but we welcome it as a basis for ongoing discussions with the Applicant.

## Consolidated Mitigation Route Map [[REP1-006](#)]

The contents of the Mitigation Route Map in relation to terrestrial ecology mitigation is noted. As set out in the Local Impact Report [[REP1-045](#)] and the response to the Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP) [[REP1-016](#)] above, we maintain a number of concerns about the ecological assessment and mitigation and compensation measures provided as part of the application. Whilst we have not reiterated these in response to this document, it is essential that as and when additional measures are included to address these concerns, the Mitigation Route Map is updated accordingly.

## Summary consultation documents for targeted noise consultation [[REP1-021](#)]

ESC welcomes the consultation with these residents and its scope. We welcome the inclusion of these property types and locations in this additional consultation and within the scope of the Noise Mitigation Scheme, the details of which we look forward to discussion with the Applicant. We will comment further to the ExA as appropriate as this element progresses.

## Main Development Site Design and Access Statement Second Addendum [[REP1-005](#)]

ESC welcomes the updated Chapter 5 Design Principles – Framework for Good Design, we welcome the division between **Overarching Design Principles** and **Detailed Design Principles** and the proposed application of these.

We welcome the additions to Table 5.3 3. Detailed Built Development Principles: 56 (turbine halls / operational service centre) - *The colour palette shall be discussed and agreed with East Suffolk Council and shall include details of the manufacturer's maintenance specification for external facing cladding.*

57 (interim spent fuel store) - *Reserved Matters applications shall include details of the available colour options, including an explanation of how the proposed colour choice has responded to the building's setting.*

64 (reactor stack) - *The colour palette shall be discussed and agreed with East Suffolk Council.*

These small additions had been previously requested by ESC and we therefore welcome their addition.