

## OPEN HEARING 20th MAY

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**Presenter no 18. Session 2: 4:00 pm** Representing himself: a local resident and professional specialist in species protection, habitat restoration, development planning and law.

### Introduction.

With the Sizewell C application, the intensity and permanenece of landscape and biodiversity damage to the AONB and beyond is of overarching major concern. In my view the application fails to uphold biodiversity protection standards that are embeded in Wildlife protection planning requirements, on multiple grounds.

This week the Environment Secretary said;

***“Much of the UK’s wildlife-rich habitat has been lost or degraded, and many of our once common species are in long-term decline. “to actually reverse the downward trend we have seen in recent decades, we need to change our approach and we need to change it right now.”***

The EDF Sizewell website states;

***“EDF wants Sizewell C to be an exemplar of how industry and environment can coexist peacefully when sensitively developed and managed.”***

But to achieve that would need a planning application with clarity, the right data and coherent answers:

There are significant hurdles:

- Missing essential information in the application must be provided
- Basics such as **Defra Matrix 2.0 Biodiversity Net Gain calculation tables**. Twelve weeks are needed to check and test these details and these are needed straight away please. Normal planning applications would not be accepted without them. The information given does not replace the formal calculations that suspiciously have been withheld. Uncertainties and potential over-counting of poor quality habitat needs to be exposed. For example unfenced

main road verges cannot be considered as wildlife habitat but more a polluted killing zone for many species.

- There is missing information on permanent roadways in the AONB and elsewhere including at Farnham. These will bring permanent fumes, particulates, noise, light and aquatic pollution, visual blight and wildlife kill from the roads. Bats, barn owls and deer for example will be hit by lorries and cars.

There should be five underpasses and extensive wildlife barriers along the 9 km of road between Yoxford and Sizewell. Why is such detail absent? Large roundabouts and ugly urban bunding is planned, completely out of character in the soft landscape of this part of East Suffolk.

- Secondly, there is a lack of evidence. One example is:

Construction of the large car park to the north of the main SZC platform will be open to the public, spilling hundreds of people daily into this remote area? Why is the car park not a closed and fenced operation with no access to the beach for the public or Sizewell workers? Not to do so is unthinkable in such a sensitive location.

- Thirdly there is poor evidence in several areas, for example;

Changes to coastal habitats and species including the dramatic expanse of sand and shingle beach and dune with its large and significant populations of plants & animals. This is to be removed and steeper profile reformed. There is no detail at all on how this will be done, other than bulldozing of the habitats, which will be illegal if the protected species are not properly trapped and relocated to prepared locations by suitably experts. This is so unlike the extensive and sensitive University-lead operation made for Sizewell B. An absolute travesty.

- Fourthly in respect of mis-construed evidence

Fen Meadow loss in the Sizewell Marshes SSSI is a confused planning matter. The tiny and remote Benhall and Halesworth watermeadow sites are next to Sewage Works and have nutrient rich catchments as have the pond digging attempts at Aldhurst Farm. The late plan

tries to ship away the problem to Pakenham, near Bury St Edmunds. Such actions to a different geographic administration is bad planning practice. I visited Pakenham and found many issues with the technical aspects of a rather vague proposal.

The applicant has missed the point with Fen Meadow in any case. Please note; it is the matrix of coastal fenland habitat in the Sizewell Marshes SSSI, of which fen meadow, wet woodland, clean water at varied depth and other habitats together provide for the SSSI Exceptional interest. The SSSI citation gives these as coastal fenland invertebrates.

In September 2019, the applicant refused to let me survey the for coastal fenland invertebrates across the habitats of the SSSI, targetted to investigate just this point. **EDF have mistaken both the needs and process in mitigating biodiversity loss.** As a result the application should be rejected.

At Studio fields and elsewhere, farmland have simply been sown with wildflower mix from a tractor. But it should have been nutrient stripped and decompacted first for five years or sometimes longer so it has prospects as a heathland habitat. Effort to provide for Marsh Harrier and the huge reptile populations on and around the development platform are compromised and capacity to provide for these species will be severely limited as a result.

Please do not be deceived from being taken to places where old habitat is being presented as new, as is suspected by the site visit locations. For example the north east part of the reptile habitat creation as opposed to the rest of the area, which is failing .

The woodland rides widened at St James Covert were already acid grassland. The edge areas made are too rich to prevent rapid scrub regeneration and too shaded in spring and autumn by adjoining trees to increase carrying capacity for reptiles significantly. There has simply not been enough thought planning and expert input to these cosmetic exercises.

At Kenton Hills reptiles have for five years entered through gaps under the gates and elsewhere into the so called heathland habitat areas and bred, after which the habitat has been flailed by machinery to try to hide the management problems caused by flawed habitat creation design. Police have been informed of these actions.

- Finally, with respect to Flawed evidence

Last year despite incomplete surveys East Suffolk Council permitted the felling of Coronation Wood, quite clearly an enabling project to the SZC development. Last winter, the 100 year old wood was felled prior to normal bat and reptile protection measures. Natural England refused the bat licence but EDF went ahead anyway. East Suffolk Council withdrew normal public communications on the matter and banned access to their ecologist. A request to EDF by Suffolk Constabulary to communicate with myself and to inspect the site with me in respect of a potential ongoing wildlife crime was refused but police investigations continue in May 2021.

Is this the way the SZC work is going to be done on a massive scale ? Is this an exemplary approach to planning and good management ? It is not. The question is, have criminal wildlife offences already occurred as a part of preparations for this application?