



Interested Party ID: 20025904

**THE SIZEWELL C PROJECT**

**EN010012**

**NNB GENERATION CO (SZC) LTD**

## **SUMMARY OF WRITTEN REPRESENTATION:**

**Harmful effects of the proposed new Access Road on designated sites and protected wildlife**

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## SUMMARY

After an in-depth study of peer-reviewed research into the impacts of roads on habitats and their resident and visiting wildlife, combined with our local knowledge of the area, our members are left with grave concerns about the long-term harmful effects that the proposed Sizewell C Access Road would cause.

- The Access Road would stretch west to east across Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB), be visually intrusive, and divide this protected landscape completely in two. The ongoing noise of traffic would disturb the 'relative tranquillity' for which the area is designated.
- EDF Energy has provided no alternatives to the route of the Access Road, assuming that they could take land from Sizewell Marshes SSSI, protected under the Wildlife & Countryside Act 1981. The company has failed to follow the Mitigation Hierarchy, but has claimed Compensation in the form of their habitat creation at Aldhurst Farm. However, this scheme was never intended to compensate for the SSSI Access Road Crossing – only for the land take for the station platform.
- There is also no compensation for the loss of connectivity, crucial for the wildlife that thrives in this landscape of very high biodiversity value, currently completely open.
- The building of the road would involve the total destruction of the north-eastern triangle of Sizewell Marshes Site of Special Scientific Interest (SSSI) with its reedbeds, ditches, open water, wet woodland and grazing marsh. An 'outstanding' assemblage of invertebrate species, a special interest feature of the SSSI, depend on this wetland, some Red Listed and rare. Breeding and visiting birds would similarly have their habitat destroyed here.
- 46 ha of woodland at Dunwich Forest and Goose Hill would be felled and not replaced, together with their sandy rides, of high value to protected reptiles and butterflies, including the threatened White Admiral and Grayling, both Species of Principal Importance under the NERC Act (2006). Birds such as Hobby, Crossbill and Goldcrest would lose their habitat within the forest. Badgers have established setts here. Their loss would divide the two main social groups one from the other and be in contravention of the Badgers Act 1992. EDFE's assertion that the woodland is of little value is completely untrue.
- The Access Road would create a permanent barrier to the movement of wildlife between the designated sites of Sizewell Marshes SSSI and Minsmere-Walberswick SSSI, SAC, SPA and Ramsar. The Minsmere sites are functionally linked to Sizewell Marshes SSSI, where important foraging ground is offered for birds and animals. The only possible access north to south would be beneath the SSSI Crossing, which many

animals would not use due to its length and darkness and the marshiness of the surrounding land. This reduces the possibility of dispersal to find mates, with populations either side thereby becoming genetically weakened.

- This SSSI Crossing, with dark tunnel and culvert beneath, at 47m in length, would create a dead zone in the central portion of Leiston Beck/Drain (small river), the main drainage route to the north, causing chronic ecological damage, including loss of rare aquatic invertebrates, harm to fish, and affecting the designated Minsmere-Walberswick sites to the north and east, through which it flows.
- Peer-reviewed research into 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 up to 30% of bird species. There would also be population declines of a similar percentage of mammals, but stretching to 5km (according to mobility). This would directly affect species that depend on Sizewell Marshes SSSI, Minsmere-Walberswick SSSI, and the Minsmere-Walberswick SAC, SPA and Ramsar, particularly the south-eastern portion.
- Traffic noise would mask the communication signals of birds and amphibians, reducing their ability to establish territory, find mates, and warn of danger. During operation, this would increase substantially throughout the regular two-month-long outages, when 1,200 extra workers arrive on site. EDFE fails to mention this in the relevant DCO documents.
- Security lighting would remain after construction at various points along the road, exposing many species to predators. This would be extremely disorientating to bats and reduce their foraging ability, especially where the road dissects their established commuting routes. Reduction in bat populations are anticipated up to 1.6km either side of the road. Some bat species present are rare, including the Barbastelle.
- Despite EDFE's promised 'best practice', filtration systems such as SuDs, are never totally effective (80% at best), pollution inevitably draining into designated sites, including hydrocarbons and heavy metals, putting the wildlife at risk. Particulates from the traffic fumes, along with dust, will be blown on to the sites, while microplastics worn off tyres and brakes will also end up in the wetlands. Clearly, this would ruin an otherwise pristine landscape. Litter thrown from cars and lorries would be a perpetual hazard to wildlife, causing death and injury.
- No green bridge or underpass between the SSSI Crossing and the B1122 has been offered as a safe passage for the animals. Deaths of birds and animals through collisions would be inevitable, especially at the proposed speed of 50 mph.
- Legally protected species have been scoped out, leaving them vulnerable to 'incidental mortality' during construction, including hedgehog, harvest mouse and water shrew.
- The road would cause loss of recreational enjoyment due to closure and re-routing of much-valued footpaths.

- If the Secretary of State gives consent to this development, then the government would be contravening the Convention on Biological Diversity (1992) that calls for a substantial reduction in degradation and fragmentation of natural habitats.
- Unless a route to the station platform can be found that would not damage the protected landscape, nor designated habitats, nor protected species, then this application must be refused.