Suffolk Coastal Friends of the Earth

Interested Party ID: 20025904

THE SIZEWELL C PROJECT
NNB Generation Co (SZC) Ltd
EN010012

SUMMARY of WRITTEN REPRESENTATION

Negative impacts of Sizewell C on the invertebrates of Sizewell Marshes SSSI and nearby designated habitats

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- Sizewell Marshes Site of Special Scientific Interest are designated in part for their 'exceptional interest for their invertebrate fauna, supporting a wide range of taxa and many nationally rare or scarce species'. The Applicant refers to 143 species of conservation concern, of which 23 are Red Data Book listed.
- The construction of Sizewell C would cause both direct loss and chronic damage to Sizewell Marshes SSSI and its resident and visiting invertebrate fauna. Some populations would never recover, in particular the very rare specialists. Local extinctions are likely.
- Prime wetland habitat, which has taken centuries to evolve, would be lost due to the removal of ditches and building on the marshes and rare fen meadow.
- One of the richest habitats for invertebrates is the north-eastern area of the SSSI, known as the Triangle. This would completely disappear under concrete.
- Such destruction would add to the catastrophic collapse in entomofauna here in Britain, with 40% of species forecast to be extinct within a few decades.
- Needs of the different species are not properly taken into account by the Applicant, so that mitigation proposals are inadequate.
- Aquatic invertebrates that thrive in water low in nutrients would be at extreme risk, due to a change in water quality within Sizewell Marshes SSSI (e.g. Norfolk Hawker dragonfly, RDB1, W & C Act). This would result from drawdown due to the insertion of the cut-off wall around the station platform and replacement of clean ground water with unsuitable ditch water.
- Water at the Aldhurst Farm habitat creation is also too high in nutrients, due to the adjacent sewage works and agricultural run-off. It lies in a Nitrate Vulnerable Zone.
- This scheme will also not mitigate for the species with other specialist requirements, such as ancient unmanaged reedbed (the local White-mantled Wainscot, RDB3) or very old ponds (*Odontomyia angulata,* RDB1). It will take far too long to mature.
- Ecological linkages would be permanently severed by the new Access Road, with reduction in ability to disperse and limitations to genetic diversity. Invertebrate colonies will thereby become weakened.
- Destruction of Goose Hill woodland and total elimination of its valuable sandy rides would result in direct loss of habitat of scarce White Admiral and Grayling butterflies.
- Felling of this large woodland would remove the protection from the north that it offers to Sizewell Marshes SSSI and its inhabitants, with exposure to northern winds and a resulting change in micro-climates.
- Building of the SSSI Crossing involves the destruction of wet woodland habitat, home of the rare Alder Signal moth, an alder carr specialist. Plans to create some wet woodland to the north-west are only a fraction of the amount lost, lack connectivity, have not yet been implemented and would be far too late to compensate.

- Collective effects on invertebrates of dust, fumes and lighting taken together are entirely missing from the documents.
- Persistent artificial lighting would increase predation of both caterpillars and flying insects, including such rarities as the Suffolk Antlion (RDB2).
- The digging up of the beach (Suffolk Shingle Beaches County Wildlife Site of 'high conservation value') includes elimination of the grassy dune habitat where Grayling also thrives. The CWS citation mentions the many other 'rare invertebrate species'.
- EDF Energy has not followed the recommendations of its own surveyors, whereby areas of the beach should be left undisturbed, from which the restored land could be naturally re-colonised.
- The term 'temporary' (i.e. 12 years) loss of habitat, often used by the Applicant, cannot apply to invertebrates, as their lives are so short, up to 3 years at most.
- Invertebrates are at the bottom of the food chain. Their loss is extremely serious, as those taxa that depend on them, bats, birds, reptiles, amphibians, fish etc, will all be likewise affected. At worst, this can result in ecological collapse.