



Interested Party ID: 20025904

The Sizewell C Project EN010012

D3. Comments on SZC Co's response to the ExA's 1st Written Question (ExQ1),

REP2-110: 9.11, Vol 3 Appendices, Part 3:

'Relevant examples of recreation of fen meadow habitats', BIO 1.86.

The ExA's question asks specifically for relevant examples of successful re-creation of fen meadow habitats. It is well known that fen meadow is notoriously difficult to restore, let alone create from scratch. Our members would like to say that we have ourselves searched through the literature and also asked our expert advisers for such examples but have been unable to find any.

We would like to make the following additional points:

1.1.5 of SZC Co's response refers to 'restoration in Europe', however 'restoration' and 'conservation' are not the same as re-creation. With careful monitoring and management, it is indeed possible to maintain and even improve existing fen meadow, such as that at Sizewell Marshes SSSI, which has been well cared for by Suffolk Wildlife Trust. This involves cutting in the traditional way and grazing. As pointed out in Suffolk's 'Fens Local Habitat Plan' (www.suffolkbis.org.uk) there is a lack of livestock in this arable area for sustainable maintenance through grazing, which poses a problem for the three proposed compensation sites. SZC Co need to establish that cattle would be available for grazing.

1.2 This section covers the conditions required for fen meadow habitat and is simply a 'recipe', describing how to establish such conditions. There is no guarantee that fen meadow will result, the essential point being that the ecohydrological conditions must be right in the first place. Alternatively, it might be possible to manipulate water levels, but this must be independently sustainable in the long term, without requirements for pumping.

This leaves the question of water quality, that needs to be low in nutrients for fen meadow plant and invertebrate communities to flourish. As local people, we know that the proposed site at Benhall, for example, is high in phosphates due to regular flooding from the sewage works. It is our view that this would not be suitable for fen meadow creation.

1.2.7 As part of the 'recipe', topsoil removal is recommended. We would like to point out that this may not be possible at Pakenham as the ground is so waterlogged, it is unlikely that heavy machinery could be driven on to it.

1.3.3 This gives the example of Parkers Piece at Thelnetham. This is the Little Ouse Headwaters Project and is not a fen meadow creation project but is simply a restoration project. This is a charitable organization and relies on local volunteers to restore and maintain the fen. It is a constant battle to prevent succession into rush, reed and willow scrub.

In conclusion, SZC Co has been unable to answer the ExA's question by providing examples of successful creation of fen meadow. Nor has the company demonstrated to our Friends of the Earth members that such creation is indeed possible.

R. Fulcher, 24 June 2021.

