



Interested Party ID: 20025904

The Sizewell C Project EN010012

Deadline 5: Written submission of oral case.

ISH7: Biodiversity & Ecology, Part 1

Agenda item d. i). Duties under ss. 40 & 41 Natural Environment & Rural Communities Act 2006.

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My oral case on behalf of Friends of the Earth, Suffolk Coastal group, focused on the very large number of invertebrates, some of which are protected under the Natural Environment & Rural Communities Act 2006. I made the following points:

In 2014 Hyder Cresswell undertook an invertebrate survey on behalf of EDF Energy, focusing on Sizewell Marshes SSSI, but including two contiguous areas of coastal habitat, namely within Suffolk Shingle Beaches County Wildlife Site (CWS) and the southern portion of the Minsmere/Walberswick SAC/SSSI. The conclusion was that 'the area supported both terrestrial and aquatic invertebrate assemblages of high nature conservation value'. 796 species were recorded in 2014, of which 55 were classified as having a recognised conservation status. Of these, 10 were classed as NERC (2006) Section 41 Species of Principal Importance. Unfortunately, these are not specifically listed, although a few are mentioned within the text, such as the very rare White-mantled Wainscot. This is because the analytical method used is that of ISIS, which focuses on assemblage types within specific habitats. Red Data Book and Nationally Scarce species are, however, picked out and listed.

According to the document Annex 14A4.4, 'Sizewell C Invertebrate Surveys 2016', within [APP-231](#), data collected from further surveys, also using the ISIS method, when added to those up to 2014 a total of 2,068 species results. Here again, the focus is on RDB and Nationally Scarce species, but not on those protected under the NERC Act 2006. One can assume, however, that the number must be greater than 10.

The Suffolk Biodiversity Partnership states in its Community Strategy to 2008, that it will

*'work to protect and enhance Suffolk's wildlife habitats and species. This is important with respect to designated sites, as well as habitats and species within the Suffolk Biodiversity Action Plan, **which are largely irreplaceable**'.* (SSP, 2008.)

The Partnership can only achieve this commitment if it knows which the protected habitats and species are. Yet in its invertebrate surveys, Sizewell C Co fails to identify most of those species.

This is particularly important bearing in mind that parts of these prime habitats would be lost to concrete and would have to be compensated for. Suffolk Wildlife Trust calculates that at least 9ha of Sizewell Marshes SSSI would be destroyed, possibly as much as 12ha, along with a considerable number of rare and uncommon species, including resident and visiting invertebrates. Some of these are specialists and will only thrive where conditions are exactly right. This is one reason why they are 'irreplaceable'. Quite simply, it is very difficult, if not impossible, to replicate those exact conditions elsewhere.

The ExA is referred to our Written Representation [REP2-461](#), which identifies some of the harmful effects on invertebrates likely to result from the Sizewell C Project. This report also explains why the habitat creation at Aldhurst Farm would not offer compensation to some of these specialist species.

The same applies to the fen meadow compensation sites. The proposed site at Pakenham is particularly problematic due to its distance from Sizewell. Some invertebrate and plant species are only found in the coastal region and not further inland. These would not re-colonise in that location therefore.

At the hearing on Friday afternoon 16 July, I requested on behalf of our members that the Applicant make available lists of species threatened by the Sizewell C Project that are protected under the NERC Act, so that proper compensation can be put in place. Sizewell C Co's QC, Stephen Tromans, confirmed that this would be done.

REFERENCES

Fulcher, R. (2021). 'Negative impacts of Sizewell C on the invertebrates of Sizewell Marshes SSSI and nearby designated habitats.' Written Representation. Suffolk Coastal Friends of the Earth.

Mellings, J. & Davies, J. (2014). 'Sizewell C invertebrate surveys 2014.' Hyder Consulting (UK) Ltd/NNB Genco.

Suffolk Strategic Partnership (2008). 'Transforming Suffolk: Suffolk's Community Strategy 2008-2028.' www.onesuffolk.co.uk.