Suffolk Coastal Friends of the Earth

Interested Party ID: 20025904

The Sizewell C Project EN010012

Deadline 5 submission

ISH7 Part 1, Written submission of oral case

2. b) iii. WET WOODLAND and other flora and fauna by reason of which it is of special interest

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The felling of wet woodland within Sizewell Marshes SSSI

Wet woodland occurs when damp ground is colonised by species such as willow, birch and alder. It is often referred to as 'alder carr'. The entomological charity Buglife has published a report on this habitat, saying that 'wet woodland is an extremely rich invertebrate habitat, supporting a very large number of species, many of which are now rare in Britain'. Associated species include specialist beetles, weevils, craneflies and hoverflies, soldier flies and caddis flies. Even quite small seepages can support nationally scarce species, especially craneflies. Dead wood, with its association with water, provides a specialised habitat not found in dry woodland.

During the last century there were considerable losses of wet woodland in Britain, often due to land clearance for agriculture, or, as here, for development, or due to lowering of the water table from too much abstraction.

Requests for compensation

Two years ago at a Sizewell C Community Forum, I pointed out that there would be a significant loss of wet woodland due to the Sizewell C construction works, and I asked whether EDF Energy was considering some form of compensation. The reply was that the woodland lost was of lesser value than the remaining stands. Unlike these, it was not ancient, so the view was that there was no need for compensation. (We now discover that this is not quite true, as some of the woodland marked for felling is described as either 'ancient' or 'mature', particularly along the edge of Goose Hill. See Fig. 10, p. 169, APP-231.) It was taken for granted that the loss of wet woodland within the Site of Special Scientific Interest was acceptable.

It was a considerable relief to our members, therefore, to learn the following year that, after intervention by Natural England, compensation was now being considered. Although the wet woodland was not a particular feature of interest in the Sizewell Marshes SSSI citation, it was nevertheless a Biodiversity Action Plan Habitat, nationally scarce, and protected under s41 of the Natural Environment & Rural Communities (NERC) Act 2006. Moreover, the invertebrate population dependent upon the wet woodland was a part of the 'outstanding assemblage' mentioned in the citation.

Yet we heard nothing more until Stage 5 Consultation, December 2020, concerning proposed changes to the application. Here it was suggested that the new wetland habitats to be created as part of the Marsh Harrier compensation area, and for flood mitigation, would later be allowed to transition to wet woodland, either by natural succession or by planting (NNB GenCo, 2020: 4.4.4). As this would amount to only 0.7ha for a loss of 3.06ha of wet woodland (increased to 3.12ha in REP1-004), this was clearly most unsatisfactory. Equally, no attempt would be made to establish the new woodland for at least 12 years, after the Marsh Harrier foraging area was no longer required. Bearing in mind the very

short lives of most invertebrates, they would have long since died out before a compensatory habitat had been provided for them.

The limitations of the wet woodland strategy

Only very recently, in May 2021, well after the beginning of the examination, was a 'Wet Woodland Strategy' produced (REP1-020). This proposes creation of additional wet woodland at two of the fen meadow compensatory sites, namely at Benhall and Pakenham. This strategy is very short on detail and remains unsatisfactory, due in large part to the distance from Sizewell. Even the new wet woodland proposed for the north of the site, beyond the construction area and permanent access road, would leave the remaining habitat within the SSSI isolated. Specialist invertebrates here would not be able to disperse to find mates and populations are likely to become weakened as a result. These would have no hope of re-colonising 40 miles away at Pakenham.

A further concern is that this strategy proposes creation of W5 plant community only, i.e. Common Alder with Greater Tussock-sedge, *Alnus glutinosa – Carex paniculata* woodland, whereas, according to the JNCC/Defra definition, this habitat is classified by five other plant communities also: W1 *Salix cinerea – Galium palustre*; W2 *Salix cinerea – Betula pubescens - Phragmites australis*; W3 Salix pentandra – Carex restrata; W4c *Betula pubescens – Molinia caerulea: Sphagnum* sub-community; W6 *Alnus glutinosa – Urtica dioica*; and W7 *Alnus glutinosa – Fraxinus excelsior – Lysimachia nemorum*. (JNCC/Defra, 2008.) The particular invertebrates associated with all these other habitats would not be catered for. Then there is W126 – seepage. Where this is deep in organic matter and shaded by Alder or Willow, craneflies are abundant, for example the Red Data Book 2 *Prionocera subserricornis* is recorded within the SSSI triangle.

Another problem is that we do not know precisely which invertebrates are dependent upon the wet woodland to be felled, as there have been no specific surveys exclusively for this habitat. The situation is confused by the use of ISIS (now Pantheon) in the Sizewell C documents. This adds up the number of invertebrate species recorded within a particular NVC plant community and scores them for their rarity, to determine whether or not the area concerned has high conservation value. Yet individual species can be placed within a particular plant community that is not necessarily wet woodland. For example the scarce Alder Signal moth *Strathmopoda pedella*, that feeds on the fruits of Alder, is assigned to A1 – Arboreal canopy, a grouping of trees that is not necessarily dependent upon damp ground.

Some invertebrates require more than one habitat. The Hairy dragonfly, for example, needs floating decaying plant material in standing or slowly moving water for the eggs, while the larvae develop in the water. The adults need the presence of trees for shelter and resting from foraging. How does the Applicant propose to supply the necessary mosaic of habitats?

A varied age structure of the woodland is crucial for some species. Historically the trees would have been coppiced, providing young shoots and branches, yet leaving the old stands intact. The scraptid beetle *Anaspis thoracica,* also found in the SSSI triangle, requires damp, red rotten oak wood for its larvae, yet the adults feed on the foliage and blossom of a variety of thriving broad-leaved trees.

Some invertebrates feed on fungi, which flourish in the humid atmosphere of the wet woodland. However, the Applicant has not supplied any fungi surveys at all. Only after complaints from the Suffolk Recorder, ourselves and others has Sizewell C Co finally agreed to put these surveys in place. Unfortunately these will not be available until after the examination has finished.

The requirements of rare, specialist invertebrates are extremely complex. Planting some Common Alder would only fulfil the most basic of requirements. The specialist niches occupied by rare and uncommon invertebrates would be entirely missing. How would the success (or failure) of the creation of compensatory wet woodland for these species be assessed? Specific surveys should already have been completed by now, together with detailed plans for the woodland creations and long-term monitoring and management plans. Why was all of this not put in hand two years ago, when the matter was raised by our members?

REFERENCES

JNCC/Defra, 2008. 'Wet woodland.' UK Biodiversity Action Plan Priority Habitat fact sheet.

NNB GenCo, 2020. The Sizewell C Project: Consultation on Proposed Changes.