Issue Specific Hearing 10: Biodiversity and Ecology

These submissions are made by Josie Bassinette on behalf of the Walberswick Parish Council. Number: 20025708

The following is a summary of oral submissions and other issues of concern being provided in writing.

Agenda Item 4: Terrestrial Ecology

a. Fen Meadow Proposals. We would like to associate and support the statements made by Friends of the Earth, Suffolk Wildlife Trust and the RSPB in relation to the difficulty of recreating successfully the special and species rich habitat being lost at the development site at the 3 proposed replacement sites. In particular, the applicant appears to have under-represented the loss and scale of destruction at the construction site and, simultaneously, has failed to provide a long enough and in-depth enough set of data on the appropriateness of the proposed fen replacement sites. The existence of nitrates and phosphates at the replacement sites already acknowledged by the applicant will materially impact the success of recreation of the fen meadows and must be assessed and confirmed over the course of at least a year, rather than in a single month, in order to provide any meaningful understanding on whether the lost fen can be replaced. Full confidence on the likely success of the replacement sites would be needed prior to approval of or start of construction as the harm at the construction site cannot be undone.

Agenda Item 5: HRA Issues

- f. Marsh harrier compensatory measures. We acknowledge that the absence of Natural England at the hearings made it difficult to complete this item. Nevertheless, Mr Brock raised a key point which we, and many IPs, are concerned with which is the timing of the proposed mitigation measures. Whilst we have not changed our view, expressed at ISH 5 that the mitigation proposed by EDF is inappropriate, we agree with the points made by Miss Miller of the RSPB under this agenda item. Specifically, for any mitigation to reach a level of some acceptability, it would have to meet the following requirements:
 - a. Only wetlands, not dry inland former agricultural land, can be considered a replacement for the loss of the Sizewell Marsh as March Harrier habitat. Therefore, the land at Westleton is inappropriate and should be rejected.
 - b. A wetland must be created and functionable PRIOR to any construction. Obviously, land that is not ready when the Harriers are disturbed and displaced by activity at the construction site cannot be considered mitigation.
 - c. Unless EDF can construct this wetland and it is fully appropriate to host the harriers that will be displaced, the Sizewell C project must not go ahead.
 - d. Even meeting these requirements present significant risks as EDF itself stated at the hearings, there is no assurance that the mitigation habitat will successfully maintain the Marsh Harrier population in the AONB that is at risk from the proposed development.