

Issue Specific Hearing 10 (ISH10) on Biodiversity and Ecology

Theberton and Eastbridge Parish Council, B1122 Group and Stop Sizewell C

Oral Contribution by Cllr. Paul Collins

Biodiversity and Ecology

Our oral submissions appear bulleted and in italics.

Please note any text highlighted with bold and italic emphasis in the following submission represents additional information not conveyed in the oral submission.

2. Ecology – general and policy a. To understand and explore compliance (or otherwise) with EN-1 (applied by para 3.9.5 of EN-6), in particular: (i) para 5.3.5 (and Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (ODPM 06/2005, Defra 01/2005)); (ii) para 5.3.13 and County Wildlife Sites; (iii) para 5.3.14 and deterioration in relation to Foxburrow Wood; (iv) para 5.3.5 and beneficial biodiversity; para 5.3.18 and opportunities for enhancement of habitats where practicable.

- o *I want to talk about the in terms of overall compliance to what has been said in particular for this point (iv).*

It's not actually possible to reference the locations to which the claims and assessments are related in that biodiversity net gain document. There are no maps of the various sites that are cross referenced into the tables for prior and post development assessments.

(For additional emphasis and to counter Mr Lewis's later response, a simple example of the inadequacy of the maps in the biodiversity net gain document is that the map shows 31 Arable fields in the construction area. There are only 2 references in the assessment tables to Arable fields. This is an issue that has been raised by RSPB/SWT and Suffolk Coast FOE in their submissions and is not new to the applicant).

So taking this one stage further, we've not been presented with the calculations either so we cannot see these claims translate into the various assessments. We find this reluctance to provide complete assessments in this area are unfathomable, particularly when you consider the amount of detail presented elsewhere on other subjects. So we request that the Examination Authority require the applicant to make all the pertinent information, location details via maps, etc., along with the actual spreadsheets available for full examination by the examining authority and interested parties.

*It also has to be said the various calculations that the applicant has made don't always add up to their 19% or 18%. In terms of the main site, it is not clear from where they get some of these numbers from and there appear to be arithmetical errors. **Indeed in RSPB/SWT Written submission [[REP2-506](#)] Section 5 this has been covered already and is also summarised in [REP6-075](#)***

*If you look at it in the round, and I am thankful to Mr. De Keyser (**SCC**), as well as Rosie Sutherland (**RSPB/SWT**) bringing this up as well. If you consider the construction and the operational phase, it's clear that biodiversity net gain is minimal at less than three and a half percent and that for the important ecological connectivity across the corridor in Sizewell Coast and Heaths AONB between Sizewell Marsh and Minsmere SSSIs, the permanent loss in biodiversity net gain is in the region of 25% by EDF own figures. So, it's not an increase in connectivity as Mr. Lewis claims.*

Examining this assessment **in detail** is still difficult because of the lack of **complete location** information provided by the applicant.

It's also the case that much of the already created habitat is of low quality, and evidence of appropriate management is not there. Some of the things that are being done, particularly on Aldhurst Farm, are not really being done to create the sort of lowland heath habitat or acid grassland that they're wanting, it's just turning into low quality, grassland and nothing else. And in fact, recent topping of the entire area, because it was full of ragwort won't have done anything good. In fact, it probably will have destroyed some of the heather brashings and other plant life that actually was being put on there.

So at this point in time, now, compliance to this and their actions are not really feeding into a positive result. And I would ask you that you get all of this information out.

When we talk about metric three assessments, that that is provided in full as well, if it is indeed done.

- **As I have discussed above, there is insufficient information in the maps provided with [REP1-004](#) to be able to relate the mapped areas to the individual line items in the three tables documenting Baseline, Loss and Retention or Post Development Enhancement.**
- **Attempts have been made to reproduce the spreadsheet based on the information given in the above submission but simply cannot be successfully recreated. This will be submitted by others at Deadline 7.**
- **We are concerned that unlike many other submissions of assessments and data to the examination, the original work by Arcadis has not been submitted, presumably where more detailed maps and relationships to physical settings within the development site have been elaborated. We request that this report along with the accompanying metric 2 assessment be provided as soon as possible to verify locations and the appropriate use of quality metrics which can very quickly turn an increase into a decrease of biodiversity units or vice versa.**
- **Whilst Mr. Philpott response would have us all believe that unless the power station is built, none of this biodiversity increase will be available, it is always good to remember that the main development site is ~25% less diverse following development, according to the reported biodiversity metrics provided by the applicant, than exists before the applicant intervenes with the power station construction. So not only is there 12 years of total loss there is an on-going permanent loss too.**

b. To understand and explore compliance (or otherwise) with EN-6 Part II Annex A paras Sizewell C.8.59, C.8.63 and C.8.67 (pages 207 and following) and whether the Applicant's proposals have sufficiently taken into account the issues identified in the Appraisal of Sustainability, and

c. To be clear where the matters in a and b are addressed, brought together and discussed in the Application documentation

3. Marine ecology

No comment or submission

4. Terrestrial ecology

a. Fen meadow proposals, including Pakenham – to understand in particular Natural England's position on need, quantum and the likelihood of success

- *We have asked questions about natural England funnily enough about the Pakenham River water quality, but it's equally as pertinent to ask the applicant. What we'd like to know is whether the water quality at Pakenham is such that it would actually be good for supporting the transferred habitat, which will be attempted of fen meadow/M22 to the Pakenham site, and whether there is any issue with mixing coastal species with what is currently on the site in the Pakenham catchment, and indeed whether the difference in water quality between the sites is likely to be supportive of the coastal fen Meadow transfer. The question about inland versus current coastal meadow and the potential issues with attempting such a transfer is the same whether we look at Benhall Halesworth or Pakenham as they're all well away from the coast, well away from the potential saline influence, etc, etc. And if these do fail, coming back to that whole point about compensation, even if there may be other sites around East Anglia, are any coastal locations, that would be an appropriate replacement for what we're seeing today as loss?*

b. Wet woodland

No comment or submission

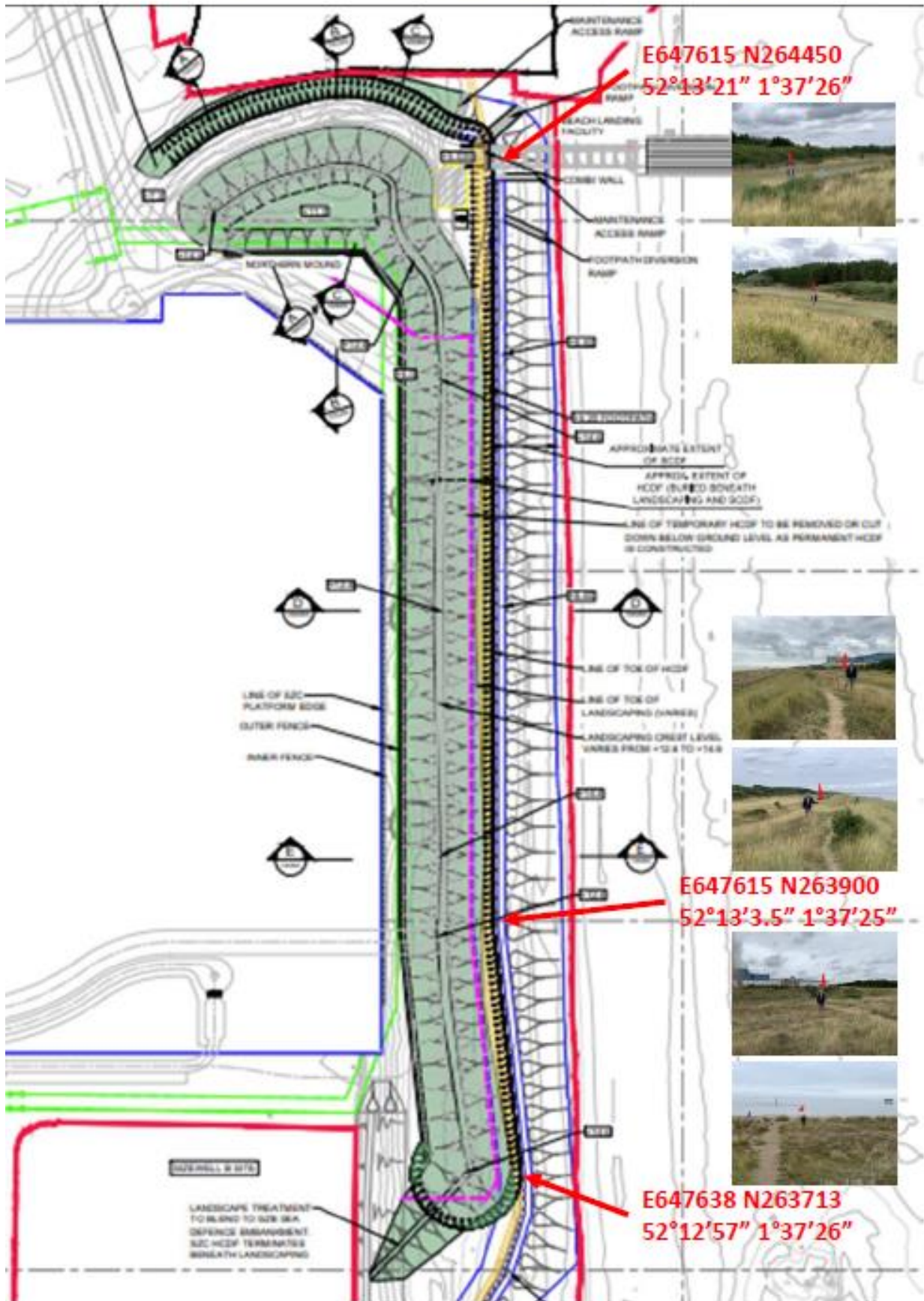
c. Designated sites including County Wildlife Sites, Foxburrow Wood and veteran trees

- *To get to go back to the Country Wildlife Sites the vegetated shingle issue, I think it's good to realise that when you look at the shingle habitat that exists right now most of it is flat. There's a very large area of flat shingle or which actually sits on top of the groyne, which the Sizewell B outfall has created along the beach line. When you start looking at the profile of the soft coastal defence, which starts at 6.4 metres high and then then grades down to the mean high water springs tidemark, it's going to be a very different environment than that which is currently in place. Currently, this is where a lot of this vegetated shingle habitat is. If you also then start to look at the applicant's biodiversity net gain for the two areas of shingle habitat and also the dune habitat. There's a 94% loss in their biodiversity measurement between what is exists now and what will be there 20 years after the new habitat is put in place. That to me doesn't sound like it's going to be a particularly effective replacement for what is currently there. Considering they're also going to be doing occasional beach recharges, the ability of the applicant to actually create or recreate and then maintain a vegetated shingle habitat that is required, then this is going to be a pretty poor effort. So quite honestly, I just cannot see how they can say that this is actually going to be a replacement when their own assessment says completely the opposite.*
- ***The applicant also maintains they will manage beach recharge from the sea and not use vehicles on the beach. Given the height and the Soft Coastal Defence and the shingle sloping from close to 6mAOD to Mean High Water Springs, such a recharge will be a challenge and presumably will require grounding of a barge close to the MHWS and significant disturbance of the shingle by mechanical digger, thus destroying any nascent recolonisation by shingle species.***
- ***During the Accompanied Site visit across the SZC beach frontage, which I wasn't able to attend, unfortunately, I saw pictures of the positions that the applicant demonstrated where the toe of the Hard Coastal Defence and where the slope up to the 14m apex of the defence would start, in between which two points the coastal path and access track would be. What perhaps was not illustrated was the position that these two points would be at the permanent***

beach landing facility and at the southern end of the development where the HCDF/SCDF moves back towards the existing Sizewell B defences.

- **Of course the position of the BLF has recently been moved significantly towards the east so had that been marked for you, the exact position would have changed. The southern end has not changed. So on Monday 23rd August, I took the applicants latest plan having converted their Ordnance Survey references to compass northings and eastings to determine approximately where these two positions were, along with a point some 150-200m north of the southernmost point where there is the HCDF makes a slight turn eastward to finish it's travel to the BLF. The annotated map below shows the three positions with their compass points and with two pictures of the actual positions relative to the beach and the existing sacrificial dune. You will also note that the person in the picture is holding a thin pole with a red marker at the top. This roughly represents the level that the coastal path will be relative to the existing ground. It should be noted that to the seaward side of those positions the new sacrificial dune and shingle beach will be an additional metre higher. A snapshot of the document is given below but the original with the original high resolution photographs will be submitted separately.**
- **From the southernmost position, the pictures clearly show the extent to which the HCDF toe and built up defence will completely remove the large area of vegetated shingle on the SZB hydraulic groyne. You can see the SZB outfall in the distance in one of the two photos and the other looks back to the existing sacrificial dune.**
- **The middle point at the "inflexion" point of the HCDF toe is right on the existing sacrificial dune apex.**
- **The BLF point actually now sits behind the current sacrificial dune having been brought westward by the recent redesign.**
- **The underlying plan, which is blurry in this document, can be accessed at page 4 of [REP5-015](#)**

Edge of the HCDF and position of future footpath



d. Protected species including bats and progress with draft licence submissions to Natural England – see also their response in their post-ISH7 submission [REP5-160]

- o *Just a brief comment, and I understand part of the mitigation is a Bat Barn. I just like to remind you of the question and answer we had at the Hinkley Point site. I asked how the Bat Barn was getting on? And the answer was the owls love it.*

e. District licensing – changes and effects

No comment or submission

f. SSSI crossing (including landscape and visual aspects)

- o ***At all stages the SSSI Crossing structure is surrounded by sheet pile which is inappropriate considering the location within the SSSI and where eventually the restored Sandlings Path long distance route will be.***

The final 1:1 slope to the west of the structure will be completely incongruous in this location and there are concerns that it will not sustain good vegetation cover in the long term.

The concrete wings of the crossing initially supporting both main access and haul road/conveyor access cannot be disguised and are inappropriate in this location within the AONB and at the junction of the two SSSIs and Minsmere's other designations. Once the haul road crossing structure is removed, the concrete wings will become even more obvious in the landscape.

These comments simply go to reinforce the position of Stop Sizewell C and others that a more appropriate design is the 3 span bridge originally proposed at consultation 1.

g. Biodiversity net gain – the effect of the new metric and assessment of SSSIs

- o ***No comment or submission other than to say if the metric 3 assessment was to be made that full submission of the calculations and all associated documents and maps should be provided alongside those already requested for the metric 2 calculations***

5. HRA issues

No comments or submissions

6. Timescale for the submission of further documents and the use of the Examination Library

- a. What further documents (not revisions) are envisaged?
- b. What further revisions are envisaged?
- c. When will they be submitted?
- d. The importance of using Examination Library references