



**Interested Party ID: 20025904**

**The Sizewell C Project: EN010012**

**Deadline 7 submission (03/09/21)**

**Written submission of oral case (ISH10)**

**Agenda item 4. b:**

**WET WOODLAND**

*Rachel Fulcher, BA(Hons), MPhil  
Coordinator*

As a result of the Hearing ISH10 on Biodiversity & Ecology, Friends of the Earth wish to make the following important points regarding wet woodland.

## **1. Wet woodland and associated invertebrates as special interest features of Sizewell Marshes SSSI.**

During the Hearing the Applicant tried, incorrectly, to convince the Examiners that the invertebrates of wet woodland were not a special interest feature of the SSSI. He quoted certain passages from the citation out of context and failed to include the most relevant phrases, which clearly indicate that 'alder carr' (this is wet woodland) and associated invertebrates are indeed special interest features. These are the correct phrases that demonstrate this:

*Sizewell Marshes are important for their large area of lowland, **unimproved wet meadows which support outstanding assemblages of invertebrates ....**  
**In the areas of unimproved wet meadow ... several areas of** reedbed dominated by Common Reed *Phragmites australis* and **alder carr occur.***

This citation makes it very clear that both the wet woodland of alder carr and their associated invertebrates are special interest features of the SSSI. Indeed, within Sizewell C Co's own documents, namely the Wet Woodland Strategy, Document 9.8, [REP1-020](#), this is how they understand the citation:

*1.1.2. Although wet woodland in the SSSI is of value in its own right, **it is the importance of wet woodland as part of the habitat mosaic for invertebrates which is regarded as being of greater importance.***

The above statement is reaffirmed at 4.1.5.

2.1.2 The document refers again to the citation:

*Sizewell Marshes are of exceptional interest for their invertebrate fauna, supporting a wide range of taxa and many nationally rare or scarce species.*

At 2.1.3 Sizewell C Co concludes:

*... The 'exceptional... invertebrate fauna' is likely to be at least partly dependent on wet woodland habitats.*

We agree with this statement.

During the various Community Forums, EDF Energy led us to believe that they would put compensation in place because the wet woodland was a BAP habitat (as mentioned in our ISH7 report)– not that it was a special interest feature of the SSSI. Here again, they were trying to downplay its importance. There seems to be a disconnection between what they say and what their documents tell us, which we find confusing.

Matt Shardlow of the charity Buglife says:

*Wet woodland is an extremely rich invertebrate habitat, supporting a very large number of species, many of which are now rare in Britain.*

It is deeply concerning, bearing in mind the very high biodiversity value of wet woodland and associated invertebrates, that the Applicant should attempt to downgrade these features in the Hearing. With a direct loss of this valuable habitat at 3.06ha, we need to be reassured that it would be properly compensated for. At the Hearing we were not convinced that this would be the case.

## **2. Timing and amount of the compensatory works**

The question was raised at ISH10 about the length of time before these works would be put in place. In our written submission at ISH7 under 'Requests for compensation' paragraph 3, we refer to the December 2020 report when only 0.7 ha of replacement wet woodland was being offered. This would not be started until after the marsh harrier foraging area was no longer required, for at least another 12 years. Proposals for Benhall and Pakenham had not at that point been put forward.

During ISH10, the Applicant confirmed that preliminary works at Benhall and Pakenham would be commenced at year 1. However, according to 6.1.8 of [REP1-020](#) these would be only the ground works, stripping of topsoil to reduce nutrients and readjustment of water levels – work that would have to be done in any case as preparation for the compensatory fen meadow. The hope was that natural succession of wet woodland would follow from the nearby existing woodlands.

It is rather worrying that no decision would be made as to whether or not this was showing signs of success until year 10. The Applicant admits in the Strategy at 7.1.6 that a 'diverse insect assemblage' is a 'long term process' that would only begin to manifest itself beyond year 10.

If unsuccessful, then the 0.7 ha at the north of the site would be put in hand and/or some wet woodland creation at Aldhurst Farm. However, Natural England does not favour work in these areas due to the loss of reedbed. So it seems likely that, at best, only 2.36 ha of compensatory habitat would be provided, falling short of the 3.06 ha required at a minimum.

### **3. Quality of the new wet woodland habitat**

Quite simply, the existing woodlands at both Benhall and Pakenham are not of SSSI quality and have no such designation. Any succession from these, therefore, would not be up to the biodiversity standards of Sizewell Marshes SSSI.

As mentioned in our previous report, the distance from the lost wet woodland at Sizewell is a serious problem. There would be a total loss of connectivity and no hope whatever of the rare invertebrates re-establishing themselves at such a distance. The invertebrate interest at the new sites would inevitably be of poorer quality. Why was compensatory wet woodland not established at Aldhurst Farm as part of the new habitat creation there? At least there would have been some opportunity for dispersal of the rare insects, before the felling of the Sizewell woodland.

#### REFERENCES

Shardlow, M. (retr. 2021). *Wet Woodland*. Buglife. <https://www.buglife.org.uk>.

R. Fulcher 29/08/21