

RSPB and SWT Response to Sizewell C Consultation on Proposed Changes

November – December 2020

The RSPB and Suffolk Wildlife Trust (SWT) have reviewed the consultation materials regarding the proposed changes to the Sizewell C Application and have prepared the following joint response to the proposals, using the headings and subheadings in the Consultation document and focusing on key areas of concern.

1. Comments on the Introduction

Paragraph 1.1.4 describes the pre-application consultation carried out by the Applicant and how this was used to finalise the Application. We believe the need for this additional consultation on proposed changes following the Application confirms our concerns regarding the adequacy of the DCO Application, as raised in our previous letter to the Planning Inspectorate (PINS)¹.

Paragraph 1.1.7 and Section 1.4 describe the process for proposing changes to the Application before the Examination starts. We understand the formal change application following this consultation along with its significant additional impact assessments will be submitted to the Planning Inspectorate in January 2021. We do not believe that there is sufficient time in the process for the Applicant to adequately consider the responses received to this consultation and incorporate these into the revised detailed information for that Application to be made in January. We are also concerned about the timescales for further modelling and assessment work to be conducted by the Applicant (for example, with regard to potential impacts on coastal processes) and for statutory and non-statutory consultees to adequately review and respond to the significant additional impact assessments that will be provided at that time. We are therefore concerned there is insufficient time available to conduct this process adequately to ensure PINS and Interested Parties have adequate information to assess the Application at the start of the Examination.

Paragraph 1.1.6 proposes the establishment of an independent environmental trust to oversee the re-wilding and biodiversity of the Sizewell estate. We would need to understand this proposal in more detail. Plans for governance, implementation and ongoing financing will be required and we note that in order to be of most benefit to Suffolk's wildlife, plans for the estate should be targeted at declining locally-relevant habitats and species and should aim to increase connectivity with the wider landscape. We consider that this may sit better under EDF's corporate environmental and community responsibilities and other instruments would be more appropriate to address the impacts of the Sizewell C project. There is a need to ensure that legal requirements regarding protected sites and species are not compromised and that this aspiration is providing benefits over

¹Concerns relating to likely adequacy of application documentation. Available at <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-Advice-00133-1-RSPB%20SWT%20letter%20to%20PINS%20re%20SzC.pdf>

and above statutory requirements. We also request clarification of how this links in with the approach to biodiversity net gain.

2. Comments on the proposed changes to the Freight Management Strategy

2.1 Increase in the frequency of freight train movements to facilitate bulk material imports by rail

Paragraph 3.2.8 notes that additional trains overnight may travel either to the construction area via the green rail route or stop at Land East of Eastlands Industrial Estate (LEEIE). From an ecological viewpoint, the worst-case scenario (WCS) for noise modelling should be based on trains continuing to the temporary construction area due to its proximity to designated sites and sensitive species.

Additional trains to the construction area overnight have the potential to significantly increase disturbance to bats and to sensitive bird species of the Minsmere-Walberswick protected sites² and Sizewell Marshes SSSI. Based on the proposal to add two (or four) train movements overnight and the associated unloading and shunting required (it appears from Table 3.2, page 32, that this could be for up to two years) it appears that significant additional noise could be created at night when background noise is relatively low.

Table 3.5 shows the preliminary environmental information for the additional rail movements. This table only shows impacts on residential and other human receptors and therefore does not cover the expected noise and vibration arising from train movements and unloading within the temporary construction area (Appendix 1, paragraph 1.1.3 acknowledges that this has not yet been reassessed). Appendix 1 expands somewhat on the information presented in Table 3.5 but again does not include any reference to ecological receptors.

Paragraph 3.2.12 also notes that discussions are continuing with regard to the potential to increase the payload of each train. If changes are made, this should again be taken into account in the noise modelling due to the potential for increased noise levels (or a longer duration of elevated noise levels) during the unloading of each train.

Any increase in noise levels or duration from additional trains and any associated activities resulting from this must be included in revised noise modelling to inform both the Habitat Regulations Assessment (HRA) and Environmental Impact Assessment (EIA) and for the consideration and design of necessary mitigation. These details are required to enable review of the relative ecological impacts of the proposed changes to the freight management strategy.

2.2 Enhancement of the permanent Beach Landing Facility (BLF) and options for a new temporary BLF facility to facilitate material imports by sea

2.2.1 Impacts on coastal processes

We consider that there are four potential sources of impact on coastal geomorphology within the revised proposals:

1. re-profiling of seabed between deliveries to the permanent BLF (paragraph 3.3.5);

² These are the Minsmere to Walberswick Special Protection Area (SPA), the Minsmere/Walberswick Heaths and Marshes Special Area of Conservation (SAC), the Minsmere/Walberswick Heaths and Marshes Ramsar site and the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI).

2. permanent works to the seabed (the addition of 'grillage') at the permanent BLF (paragraph 3.3.10 & 11);
3. enhancement to the permanent BLF structure by increasing its length (paragraph 3.3.12); and
4. provision of additional temporary BLF (options 1-4)

Without a full assessment of the coastal geomorphological impact of the four options for the additional BLF we are unable to comment on the relative merits of each proposal. Table 3.7 explains that temporary BLF Options 1,2 and 3 have potential for moderate effects on the inner bars and the beach. Option 3 has a large number of barges docking per year, potentially with one barge present all of the time which is likely to lead to a moderate (significant) effect on the outer bar. Option 4 is claimed to have smaller impacts than options 1, 2 and 3, although would involve the installation of additional pier piles and self-elevating platforms. Therefore, as an additional structure would apparently increase the likelihood of impacts on coastal geomorphology, on the basis of the currently available information, we cannot support the proposed additional temporary BLF.

We agree that there is a need for appropriate modelling and assessment of the potential impact of the proposed changes to the permanent BLF and the additional temporary options on coastal processes. We also assume there is a need to include different temporary BLF options along with the permanent structure in the modelling to understand differences between the options and synergistic effects with the permanent structure. However, we are seriously concerned that there is insufficient time available prior to commencement of the Examination to undertake appropriate modelling and expert stakeholder evaluation.

2.2.2 Impacts on marine ecology

Paragraph 3.3.3. notes that barges will be loaded at a transshipment port. To enable an adequate assessment, the location of the transshipment port needs to be identified. If it lies within or requires movements through the Outer Thames SPA, this requires assessment of the potential impact of increased vessel movements within the SPA and potential for displacement of non-breeding red-throated divers.

We note that the annual "campaign" period during which sea conditions make operation of the BLFs possible was originally defined as 1st April – 31st October. Paragraph 3.3.30 indicates that the campaign may be extended to include deliveries in the winter months (dependent on the BLF option chosen). If the campaign is extended, this has the potential to cause further lighting and noise related disturbance to non-breeding red-throated diver of the Outer Thames SPA and must be considered within the HRA. Should it be considered that it is in principle possible to avoid deliveries during the winter months, we are still concerned that it would not be possible to fully avoid this risk without a consent condition precluding this, given that the viability of daily movements will be affected by tides and weather. In either case, a realistic WCS must be assessed.

Paragraph 3.3.31 states that all the temporary BLF options have the capacity to operate during the night as well as the day. Night-time use will require lighting of the temporary BLF and conveyor and we assume that this would be difficult to screen (although we welcome the intention to minimise light spill noted in paragraph 3.3.34). This along with the noise associated with operation of the enhanced BLF and the additional temporary BLF will require assessment for potential impacts on marine ecology and particularly species of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA.

Observations of red-throated diver from Thorpeness³ illustrate that this species can have large roost movements in the early morning and suggest that the birds move from roosting to feeding areas in relation to tide. These indicate a need to understand the diurnal movements of red-throated diver given the need to assess impacts at night as well as daytime. Likewise, the indication that vessel movements will be influenced by tides and weather introduces a need to understand the impacts of tide and weather on the red-throated diver population to be able to adequately assess impacts.

Paragraph 3.3.21 explains that the capacities presented for the BLF options are initial estimates and that actual capacities (and hence number of potential deliveries) may be greater. Whilst we understand the reasons for presenting these figures in this consultation, the WCS from an environmental standpoint (in terms of disturbance impacts on marine species and impacts on coastal processes) is the maximum capacity and greatest daily and seasonal duration of each option, and hence this should be used as the basis for the environmental assessments.

Paragraph 1.2.5 in Appendix 2 suggests that the increase in vessel traffic arising from the changes to the permanent BLF and the addition of the temporary BLF will not give rise to any significant environmental effects. No evidence is presented to justify this conclusion. We consider that assessment of the effects of displacement arising from vessel movements on red-throated divers from the Outer Thames SPA should be carried out following the standard methodologies used for offshore windfarm and cable route assessments and more detailed consideration of potential mortality (through increased density-dependent mortality elsewhere in the SPA) is needed.

Table 3.7 sets out the preliminary environmental information for the enhanced and temporary BLFs. The marine ecology section suggests that, for both the enhanced and temporary BLFs, impacts will be no worse than the original assessment. Given that this section also explains that there will be increases in suspended sediment, noise, lighting and physical disturbance, we cannot agree with the conclusions that impacts will be of no greater significance than those of the original assessment. These conclusions will require further evidence and justification.

Paragraph 1.3.1 in Appendix 2 explains that dredging may use a backhoe method which could result in increased levels of suspended sediment affecting a larger area when compared with the original proposals. The potential for this to affect foraging birds and their prey species should be assessed.

The Habitats Regulations Assessment section of Table 3.7 and section 1.3 of Appendix 2 provide slightly more information regarding the potential effects of the BLFs on features of the Outer Thames Estuary SPA and Minsmere-Walberswick SPA. However, in order to understand the full potential impacts of the proposed BLF options it will be necessary to understand the levels of noise and visual disturbance from all elements of each option's construction, operation and maintenance, including the comparative frequency and duration of e.g. piling and dredging activities and the increased number of vessel movements (and their routes). The HRA should be updated to assess these potential effects on breeding little tern associated with the Minsmere-Walberswick SPA and Ramsar site and the populations of breeding little tern, breeding common tern and non-breeding red-throated diver associated with the Outer Thames Estuary SPA and on the marine bird qualifying features of the Alde-Ore Estuary SPA.

Insufficient information has been presented at this stage to draw conclusions as to the relative impacts of the each of the BLF options and hence it is not possible to judge whether the potential changes to the proposals are acceptable in HRA terms or to express any preference for an option

³ Thurlow, D. 2009. Wintering Red-throated Divers, Thorpeness, Suffolk 2000/01 – 2008/09. Suffolk Birds 2008. Accessible online here: <https://issuu.com/suffolknaturalistsociety/docs/sb58a>

from an ecological standpoint. Whilst the need for further assessment is acknowledged, we are very concerned that this information has not been made available and therefore consultation responses cannot consider it nor include comments on choices for the change proposals to be submitted to the Planning Inspectorate. We fear that there is the potential for an environmentally damaging option to be proposed as a result.

2.2.3 Recreational impacts

Paragraph 2.2.18 explains the aim to keep beach access open during the construction and operation of the BLFs. This could reduce recreational displacement, but visitor experience alongside and beneath construction infrastructure will be very different to the current experience, and so it is not possible to assume that use of this route will continue at current levels.

Paragraph 3.3.14 proposes that the coast path will be redirected up and down the shoreline to facilitate construction. This requires an assessment of the potential to introduce more visits to the shoreline of RSPB Minsmere and the Minsmere – Walberswick protected sites if those visitors continue on this route northwards. The potential for additional use to increase impact on shingle flora, the dune frontage (and therefore the natural protection of the site) and ground-nesting birds such as ringed plover should be assessed. The assumption that disruption to this access from construction would be slight compared to the original Application remains to be proven and requires assessment to determine whether users would continue to visit walking alongside and underneath infrastructure associated with the BLFs.

We agree with the need for further assessment of the impact on recreational use as acknowledged in Table 3.7. Alongside the construction infrastructure, the removal of the shingle feature described in the terrestrial ecology section of Table 3.7 influences the experience for users and this needs to be considered in the evaluation of the experience.

Table 3.7 indicates that the temporary BLF may increase the significance of effects on visual receptors along the coast. Assessment of visual impacts on visitors to RSPB Minsmere will therefore also be required.

2.2.4 Other impacts

As noted in Table 3.7, any potential for additional noise and visual disturbance to terrestrial ecological receptors (in addition to marine/coastal impacts, as discussed above) will require assessment. As an example, consideration will need to be given to potential impacts on the roost flights of white-fronted geese between RSPB Minsmere and RSPB North Warren.

We query the accuracy of the conclusion that the temporary BLF options have no additional impact on the County Wildlife Site (CWS) shingle. Although this would be removed as part of the construction of the sea defences, the consultation document indicates the temporary BLF options may be operational up to 2030. We assume therefore that the CWS shingle would be removed until 2030. This does appear to be a significant impact on this vegetation community, which we understand to be of at least national importance. We query what evidence is available that seeds from shingle flora will remain fecund when stored in a large pile for up to 10 years? Also, given the apparent extended storage time, we query what measures are in place to prevent the piles from getting contaminated over this time with ruderal seeds such as dock and nettle?

Repeated reference is made to the northern mound in the discussions of the construction of the permanent BLF and sea defences. Despite reference to detailed designs being progressed, we have still yet to see any detailed designs of this element of the infrastructure which abuts the southern

boundary of RSPB Minsmere. We remain to be assured that this part of the development (including associated public access provision) will not encroach on land in our ownership or impact on the Minsmere – Walberswick protected sites.

3. Comments on the proposed changes to the Main Development Site

3.1 Greater flexibility as to where certain Sizewell B facilities are relocated to potentially avoid the need for car parking on Pillbox Field

With reference to paragraph 2.3.18, we are concerned that the Sizewell B relocated facilities under Option 2 would again revert to parking on Pill Box Field, resulting in concerns as raised during the previous consultation. In particular, we are concerned about potential noise and light impacts on bats and Sizewell Marshes SSSI and direct SSSI loss and fragmentation due to the pedestrian crossing. All the options considered need to reduce operational noise and light spill onto the SSSI. Whilst it is welcomed that the height of the buildings is reduced to two storeys, it is important that the number of windows in the new buildings facing the SSSI is kept to a minimum due to light spill from them.

We query whether Option 2 would result in further SSSI loss due to the need for pedestrian access from the car park, which would appear to require routing straight across the SSSI?

Table 4.1 acknowledges that construction work associated with the Sizewell B relocated facilities will take place in close proximity to Sizewell Marshes SSSI. As above, the potential impacts on this site from construction noise and lighting should therefore be assessed.

Paragraph 4.2.4 explains that the proposed redesign of the landscaping scheme on Pillbox Field will include ecological enhancement and mitigation planting. We query whether there may be opportunities for enhancements to provide habitat for protected species of bats, birds, reptiles and invertebrates?

3.2 Change to certain parameter heights and activities on the main development site to facilitate the construction process

Table 4.2 discusses the effects of the increased parameter heights in the beach area associated with the marine tunnelling works and the temporary BLF on amenity and recreation. It acknowledges that some recreational users may be affected, and we agree that the significance of any resulting displacement of users will require further assessment, including for the purposes of HRA. Assessment of visual impacts on visitors to RSPB Minsmere will also be required.

Paragraph 2.3.25 describes an additional stockpile area up to 15m in height. Fig 4.6 indicates that this will be adjacent to the proposed marsh harrier foraging habitat compensation site. Table 4.2 makes no reference to ecology but should acknowledge that assessment of potential noise and visual disturbance on marsh harriers using this site will be required to ensure that the site would continue to function as compensatory habitat.

With reference to paragraph 4.3.10, we remain concerned regarding the impact on barbastelle bats within Ash Wood due to the lack of buffer zones and the ingress of light and noise around 75% of the wood. The extension of the stockpile zone will increase this, and we strongly urge the inclusion of an appropriate buffer zone wide enough to fully mitigate these impacts within the wood and preserving connectivity to the main Upper Abbey Farm bridleway commuting route.

3.3 Change to the location of the water resource storage area and the addition of flood mitigation measures to lower flood risk

Despite repeatedly raising our concerns regarding potential for increased water levels within RSPB Minsmere, the assessments have to date not provided a satisfactory response. The apparent conclusion in the consultation document (paragraphs 2.3.26 and 4.4.3 – 5) that fluvial flood mitigation is required within the catchment adjacent to RSPB Minsmere suggests that there is a potential risk. Given these concerns, we welcome consideration of a potential fluvial flood mitigation area. However, we need to understand the modelling that has concluded that this location can function to adequately mitigate impacts arising from the main construction site as proposed in the consultation document. Therefore, we require further information to understand the justification for these proposals.

We support in principle the creation of wetland habitats and the opportunity to further mitigate for impacts on marsh harrier and impacts on the Sizewell Marshes SSSI. We note that the timing of the ground works for these wetland habitats should be compared to the timings of peak noise levels from the main construction area to assess whether the main marsh harrier compensation area could be detrimentally affected by increased noise levels from both sources. Paragraph 2.3.26 states that the proposed water storage area ‘provides high quality foraging habitat for marsh harrier during construction’. Noise contour modelling for this area is not presented here but it should be reviewed as this area will deliver little benefit to marsh harrier if noise levels exceed 70dB. We therefore remain concerned as to whether proposals for marsh harrier foraging habitat are appropriate and would need to see more detail to address these concerns.

We also believe that the proposals to address impacts on the Sizewell Marshes SSSI at this location are rather vague and it is not clear what contribution this would make. We are concerned that the suggestion to introduce wet woodland after the construction period will mean that functioning compensatory habitat would not be provided until several decades after the original loss.

We also request that more evidence is provided regarding the habitat quality that can be achieved and the construction methods required to create wetland habitats in this area, particularly relating to the ground works required to ensure that the area will be sufficiently wet. We are concerned that significantly steep slopes will be required and that this could limit the achievable habitat quality in this area.

Given the proximity of the proposed wetlands to the neighbouring Minsmere-Walberswick protected sites, potential impacts of the construction on the hydrology of these sites will require assessment. For example, with regard to the points in Table 4.3 regarding ecological impacts and IDB Drain no 7; it should be noted that these receptors are linked. The assessment in Table 4.3 does conclude that there would be ‘minor adverse changes’ to IDB Drain no 7. This drain potentially influences water levels on the Minsmere South Levels, as the ditch network in this area is gravity drained via IDB Drain no 7 to the Leiston Main Drain. Therefore, adverse impacts on IDB Drain no 7 could have impacts on water levels on the Minsmere South Levels and wider Minsmere-Walberswick protected sites and could have ecological impacts on species that rely on the current water level management regime.

3.4 Change to the SSSI crossing design to a single span bridge with embankments

Whilst the proposed bridge to cross Sizewell Marshes SSSI appears to be an improvement on the plans presented in the Application (from an ecological standpoint), we still consider that the bridge should be designed more sensitively as a three span bridge to further reduce SSSI loss from the

crossing and to provide greater connectivity for species/groups including invertebrates, water voles, otters and bats, thereby reducing the potential for fragmentation of populations.

We note the commitment in paragraph 4.5.8 to the provision of a ledge to allow otters to pass and the incorporation of bat roosts into the structure, however, detailed designs and full assessment of the potential impacts from the proposed bridge over the Sizewell Marshes SSSI are required. We also note that whilst the revised design may improve connectivity for some species (e.g. otters) compared to the design in the Application, some species (in particular, certain species of invertebrates) will still be significantly negatively affected by the proposals. Again, our preference would be for a three-span bridge which would result in higher light levels reaching the watercourse below and hence greater connectivity for all affected species.

Paragraph 4.5.7 notes that the revised design will reduce land-take from Sizewell Marshes SSSI by 450m². Whilst this intention is welcomed, the sections of SSSI remaining in the bridge section would be impacted during the construction period, potentially over a continuous period of a number of years and more evidence is required to demonstrate how well they could be restored in such close proximity to the causeway structure. We also still have concerns around the principle of the proposed loss of part of the Sizewell Marshes SSSI and its assessment against the tests set out in EN-1 (Overarching NPS for Energy). Our concerns include the justification for the proposed design to cross the Sizewell Marshes SSSI despite the higher land take from the SSSI than more sensitive designs.

Table 4.4 concludes that there are moderate adverse significant impacts on barbastelle bats. Whilst this might be the case regarding the SSSI crossing in isolation, when combined with impacts across the landscape the effect is likely to be highly significant. As a result of these single-issue conclusions, there continues to be an underestimate of overall cumulative impacts and hence insufficient provision of enhanced connectivity and other mitigation for bats.

Paragraph 4.5.10 states that the alignment of the SSSI crossing and the Sandlings Path will need to move eastwards. The current alignment of the path is relatively close to the RSPB Minsmere boundary and the Minsmere – Walberswick protected sites boundaries. We therefore require greater clarity on these proposals.

We welcome the potential for the revised design to reduce flood risk impact to Minsmere (noted in paragraph 4.5.12) and request that revised flood modelling is provided to quantify this. However, Table 4.4 notes that, with the inclusion of flood measures, the flood risk to Sizewell Belts is slightly raised. We query the nature of the flood relief measures as these do not appear to be explained in the document and note that any potential effect needs to be quantified and assessed as a result of revised flood risk modelling.

3.5 Revisions to tree retention on the main development site

We disagree with the conclusion in Table 4.5 of 'not significant' for fragmentation for bats, especially barbastelle, which as a species is known for its sensitivity to changes in its environment. Whilst the removal of 45 metres of hedge line and trees to the north of Kenton Hills is unlikely to be significant in itself, it will only exacerbate the highly significant impacts overall and further consideration and assessment is required.

3.6 Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall

We have some concerns regarding the impact of the temporary outfall on the beach and potential for impacts on coastal processes and recreational users. Based on the information in Table 4.6, it is unclear why it is proposed that a minor but adverse alteration of surface water flow does not require further assessment to confirm the conclusion and determine if mitigation is required.

3.7 Change to the sea defence to make the scheme more efficient and resilient to climate change

3.7.1 Temporary sea defence

Figure 4.18 presents too little detail on this option to enable us to understand the potential environmental impacts of the proposed change. The reason for the change is led by engineering detail relating to marine shafts and tunnelling works. It is not clear from the detail presented whether there could be environmental impacts that would suggest a different engineering solution should be considered. In particular, we query whether this change will result in additional loss to the Suffolk Shingle Beaches CWS and if so, how this loss will be offset? At this stage, we cannot reach a conclusion as to whether we support the reasons for the change based on the evidence provided.

3.7.2 Permanent sea defence

Raising the height of this feature and the subsequent need to move the toe of the defences seaward raises significant concerns with regard to coastal processes. Despite assurances in paragraphs 4.8.9 and 4.8.10 that design details have been progressed further, the consultation still only provides indicative details in Figure 4.19, so the concerns expressed in our Relevant Representations (RR-1059 (RSPB) and RR-1180 (SWT)) regarding the absence of detailed designs remain.

The justification given is that this change is required following updated UKCP18 sea level predictions and provides embedded mitigation, reducing reliance on secondary measures to alleviate coastal flood risk. As the revised proposal potentially introduces significantly more impact on coastal processes, and potentially affects shingle vegetation on the shore to the north (a feature of the Minsmere-Walberswick SAC), to the south (part of the Leiston-Aldeburgh SSSI) and in front of the station (Suffolk Shingle Beaches CWS), we would need to see more detail regarding the secondary measures to alleviate coastal flood risk alluded in paragraph 4.8.14 to understand the justification for the change more clearly.

We also do not agree with the Hard Coastal Defence Feature (HCDF) being assessed as a terrestrial feature, as it will become part of the coastline within the operational phase of the power station. We therefore consider that further assessment of the future impact of coastal processes and the potential to accelerate coastal change needs to be undertaken. We are also concerned about potential impacts on the Soft Coastal Defence Feature (SCDF) and the associated value of this feature for shingle flora.

3.8 Extension of the Order Limits to provide for fen meadow habitat at Pakenham as further mitigation for fen meadow loss

Paragraph 2.3.38 discusses the need for additional fen meadow compensation. Whilst the provision of more SSSI compensatory habitat is welcome, the distance from the area of loss at Sizewell Marshes SSSI is of concern. Compensation sites should be as close to the lost habitats as possible and given the distance of Pakenham from Sizewell, there is a clear limitation of Pakenham in terms of compensation for the loss of the Sizewell Marshes SSSI. Consideration should be given to

increasing the compensation ratio to take account of the distance of the compensation site from Sizewell Marshes SSSI.

Compensation habitat should be functional before habitat loss occurs. We request evidence from similar schemes is provided to demonstrate it is feasible to successfully create species-rich fen/fen meadow habitat. We also request clarification of the next steps mentioned in paragraph 4.9.16 if it is found that it is not feasible to create this habitat.

With regard to the plans to transfer green hay to the Pakenham site discussed in paragraph 4.4.9, in terms of ecological best practice these transfers should be from the Pakenham Meadows SSSI.

We recommend surveys of existing fen meadow local to the compensation site, including Pakenham Meadows SSSI, to identify species (e.g. invertebrates) present locally and then target measures to encourage their colonisation of the newly created fen meadow habitat.

The potential impacts of the proposed Pakenham Fen site on the features of the adjacent Pakenham Meadows SSSI need to be assessed. Ecological, groundwater and surface water surveys of the Pakenham Meadows SSSI should be undertaken to establish its condition before construction of the Pakenham compensation area. The SSSI should be monitored during and after construction to detect any potential impacts from groundwater and surface water changes on its features, allowing rapid deployment of mitigation measures should any changes occur.

4. Comments on the proposed changes to the Two Village Bypass

4.1 Extension of the Order Limits for works on the two village bypass, change to the public right of way around Walk Barn Farm and additional habitat mitigation proposals

The continued lack of an innovatively designed green bridge is disappointing, despite being raised in previous consultations. The cutting provides an ideal location linking Foxburrow Wood CWS with the woodland to the west.

The proposal would result in a small loss of woodland at the eastern end of Nuttery Belt. We recommend additional tree planting to strengthen wildlife corridors.

5. Comments on the proposed changes to Sizewell Link Road

5.1 Extension to and reduction of the Order Limits for works on the Sizewell link road

Sizewell Link Road remains a concern with regard the impact on barbastelle bats. In our view, the importance of this area to the wider barbastelle population has been underestimated and some of the planting proposed is unlikely to mitigate the fragmentation caused to such a sensitive species.

Additional short lengths of hedgerow and approximately 0.17ha of additional woodland would be permanently lost as a result of the proposed changes. This additional habitat loss further reduces habitat connectivity for bats and birds. We recommend additional hedgerow and tree planting to strengthen wildlife corridors.