

EDF Energy
By email only

26th September 2019

Dear Sir/Madam

RSPB Response to the Sizewell C Stage 4 Public Consultation

The RSPB has reviewed the Stage 4 public consultation documents for Sizewell C and is pleased to provide the following comments. We note that, due to our particular expertise and charitable remit, our comments are limited to potential impacts on nature conservation. It should also be noted that these comments are in addition to those within our Stage 3 consultation response of 26th March 2019, and therefore our response at Stage 3 still applies.

Transport strategy

Chapter 2 describes various transport routes proposed as part of the development. We note that several of these routes are likely to pass through farmland with Countryside Stewardship schemes in place. These may incorporate options targeted towards priority species, which in this area could include turtle dove, stone curlew and lapwing. We recommend that an assessment of the presence of these species is carried out, with mitigation provided for loss of habitat if necessary.

Under the integrated transport strategy described in Section 3.6.7, five freight trains would run on the newly constructed green rail route each night. It will be necessary to assess the effects of noise/vibration on ecological receptors, including those of the Minsmere-Walberswick SSSI, SPA, SAC and Ramsar site, as some (e.g. birds) could be sensitive to disturbance at night (i.e. while roosting). Previous assessments of noise impacts will therefore require updating.

Effects on Sizewell Marshes SSSI

Figures 5.3 and 5.4 show changes to 'temporary loss' of land within Sizewell Marshes SSSI to carry out the works required to connect Sizewell C to the substation. The changes result in a 0.294ha reduction comprising:

- 0.664ha reduction south of Dunwich Forest, west of Goose Hill
- 0.37ha increase west of the Sizewell C platform

Whilst we welcome the overall reduction in SSSI loss described in Section 5.3.3, we request that further justification is provided regarding the conclusion that the additional SSSI loss described in Section 5.3.2 is temporary. We also note that the increase in land required west of the main platform will require assessment with regard to the habitats likely to be affected by this and the likelihood that these can be restored to SSSI standard. If this is not possible, further compensatory habitat may be required.

Sections 2.3.16 and 5.4 describe the option of an additional fifth Sizewell C pylon to enable reductions in height. We query the impact this would have on the SSSI corridor?

Recreation strategy

Table 5.1 explains that there will be a loss of 0.49ha of habitat from Aldhurst Farm as part of the Public Right of Way strategy, partly due to the installation of “a bridge or boardwalk across a length of the drain and adjacent reedbed”. Given that the wetland habitats are intended to compensate for the loss of part of Sizewell Marshes SSSI, we query how much habitat would be lost through this installation, and whether any disturbance effects on the neighbouring habitat may arise from its use?

Marsh harrier mitigation areas

We welcome the consideration being given to increasing the extent of mitigation habitat provided for foraging marsh harriers from the Minsmere-Walberswick SPA, however, we note that the suitability of the site options proposed will need to be carefully assessed. We recommend that checks of existing site use are made as some of the proposed areas of land identified are likely to be unsuitable or could have indirect impacts on designated nature conservation sites (e.g. part of Site 3 near Eastbridge is currently a camp site, and part is used for cattle which also graze Minsmere).

As we have noted with regard proposed transport infrastructure, the areas identified for marsh harrier mitigation may form part of farm Countryside Stewardship schemes targeted at other priority species. The effects of the proposals on these species should be assessed and alternative habitat provided if loss of habitat for priority species is likely to arise.

Once suitable sites have been identified, we look forward to seeing further detail regarding the habitats planned, and how these will complement the existing areas being developed within EDF’s estate.

5.10.13 states that these proposed additional mitigation sites could be brought forward if the new habitat on the EDF estate “provides insufficient foraging habitat”. We query how this will be assessed and the implications this would have for the timing of any works to establish the additional habitat. We recommend that additional habitat should be established before construction starts to avoid a shortfall in foraging habitat availability.

We note that section 5.10 (and other references in the document) discusses marsh harrier ‘compensation’ land. Whilst we understand that this term may have been used to aid clarity and provide consistency with discussion of other compensation areas, we note that as these are measures required

as a result of the Habitats Regulations Assessment, the measures should be referred to as mitigation rather than compensation (which has a specific definition in this context).

SSSI fen meadow compensation

Whilst our previous comments regarding the need to justify loss of SSSI still apply (see Section 6.1.1 of our response to the Stage 3 public consultation) we welcome the proposals in section 5.11 to develop compensation areas for proposed loss of SSSI fen meadow habitat. We note that up to 0.5ha of fen meadow is proposed to be lost from Sizewell Marshes SSSI. Section 5.11 identifies two possible locations which could provide appropriate compensation for the loss of fen meadow habitat within the Sizewell Marshes SSSI; Site 1 south of Benhall, and Site 2 east of Halesworth. We note that prior to further developing any plans for these sites, an assessment should be made of any existing ecological interest. We would welcome further details of this assessment.

Due to the high value of fen meadow habitat (and the likely difficulty of recreating it) and the relatively small amount of habitat it is considered possible to create at each of the two sites proposed individually, we recommend that both sites should be considered further for habitat creation. We also note that if long term monitoring shows that fen meadow habitat creation is not successful, further measures will be required.

Table 5.4 should include assessment of the construction work and proposed hydrological changes on any existing ecological interest within the two sites and on conservation sites adjacent/nearby, including Manor Fam Meadows County Wildlife Site (CWS) and the RSPB reserves at Abbey and Botany Farm.

In addition, we have the following comments regarding the proposed sites.

Site 1 south of Benhall

We query whether inputs to the site from the nearby sewage treatment works (STW), road and caravan site could affect water quality within the site. We recommend that future plans for development in this area (affecting both neighbouring land use and any need for expansion of the STW) are checked. The history of flooding at the site should also be investigated given the potential for river flooding to bring water of lower quality onto the site.

We recommend that opportunities to provide habitat enhancements which would link the compensatory habitats with the neighbouring Manor Fam Meadows CWS should be explored. This site is also in the upper catchment that feeds the reedbed restoration site at Abbey and Botany Farm, Snape that RSPB are managing on behalf of EA. Whilst this site is not designated in its own right, it provides compensation for reedbed loss for regional European sites and should be treated as having the same status. There is therefore a need to ensure that any requirement to retain water at the fen meadow compensation site would not have an impact on the RSPB's ability to manage target water levels at Abbey and Botany Farm.

Site 2 east of Halesworth

We recommend that the potential for this site to be influenced by treated effluent from the large STW to the west of the site during flood events is assessed. As with Site 1, we also recommend that future development plans within this area (including any plans to increase capacity of the STW) are checked, especially given this site's proximity to Halesworth. We also note the proximity of this site to roads, a railway line and an industrial estate and recommend that any potential for the site to receive runoff from these (particularly during winter) is investigated.

We acknowledge that no plans to encourage public access to this site are stated but given the proximity to an area used by walkers (including dog walkers) and the large residential area nearby, we recommend that consideration should be given to avoidance of impacts from public access.

Flood compensation sites

Section 5.12 identifies additional land to compensate for the loss of floodplain within the main development site. Site 1 is located next to the marsh harrier mitigation area and is aimed at compensating anticipated impact on Sizewell Marshes. This site will drain through the IDB drain alongside Minsmere South Levels and it should be noted that the hydrological function of the South Levels is linked to this IDB drain. It is therefore necessary to assess the potential eco-hydrological impact on Minsmere South Levels arising from the proposed change to the location of flood storage. We would welcome further discussion of this issue.

Section 5.12 notes that the flood compensation sites also provide the potential opportunity to establish valuable wildlife habitats similar to those in the surrounding areas. We welcome the proposal that these sites would include valuable wildlife habitats, such as wet woodland, and that site 1 would be designed to enhance the proposed marsh harrier mitigation land. We recommend that opportunities to provide linkages and wildlife corridors to adjacent habitats are explored.

Given the proximity of the proposed flood compensation sites to Sizewell Marshes SSSI and the Minsmere-Walberswick SSSI, SPA, SAC and Ramsar site, Table 5.5. should include assessment of construction impacts on designated wildlife sites and the proposed marsh harrier mitigation land.

Operational masterplan

Section 2.3.19 refers to the inclusion of ecological mitigation within the operational masterplan. Whilst we welcome the ecological mitigation areas that have been proposed so far, we consider that it would be possible for this project to make further contributions to the Suffolk coast's priority species and habitats through provision of additional habitat creation as biodiversity enhancements, in line with government ambitions for projects to achieve biodiversity Net Gain. We would welcome the opportunity to discuss the masterplan and the development of a mitigation *and enhancement* strategy which could make a meaningful contribution to landscape-scale biodiversity conservation in Suffolk.

We trust that these comments are helpful, and look forward to further discussion of these issues, and those raised in our Stage 3 consultation response, in the near future.

Yours faithfully

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