

RELEVANT REPRESENTATION OF MINSMERE LEVELS STAKEHOLDERS GROUP (MLSG)

Minsmere Levels

The Minsmere Levels are marshes starting south east of Reckford Bridge and finishing at the Minsmere Sluice. They drain the area of land either side of the Minsmere River starting at Sibton Lake. Sizewell Marsh drains through the southern Minsmere Levels to Minsmere Sluice and has a significant hydrological influence on the southern levels as a result.

Representation

MLSG is concerned that the Sizewell C (SZC) Development Consent Order Application (DCO) submitted by EDF remains significantly incomplete and fails to provide answers to questions raised consistently during four rounds of consultation. In short,

- Assessment of coastal geomorphological impacts over time, the role of the Sizewell-Dunwich Bank and coastal breach
- The platform is well below the expected 30 hectares per nuclear reactor envisaged in EN-6 and has required unacceptable compromises on long term site safety
- The platform requires the Hard Coastal Defence Feature (HCDF) to be very close to the beach and subject to early exposure by wave action
- There is no proposed design for the HCDF, yet EDF have unevidenced confidence about its likely exposure
- EDF do not evidence an understanding of the relationship between ground and surface water despite being a Scoping Report Opinion requirement
- The platform requires redirection of existing drainage in Sizewell Marsh, permanent loss of SSSI marsh, wet woodland, and fen meadow with un-evidenced expectations for simplistic water level controls as mitigation
- Dewatering of the platform and changes to surface water runoff conditions will alter the natural hydrological relationship of the complex Sizewell Marsh and Minsmere Levels systems and is likely to impact water quality and have a negative impact on Minsmere Sluice
- Hydrological impacts of the proposed Causeway and Culvert crossing are not properly assessed
- The overall ecology of both Sizewell Marsh and Minsmere Levels are reliant on the annual cycle of ground and surface water changes, any disturbance will have direct impacts on bird, insect, reptile and mammal species
- Some habitat assessments are out of date and, as a result, impacts are likely to be missed or wrongly interpreted
- No clear plan exists to satisfy the water requirements of the development and impact assessments of water resource options are missing
- Borrow pits and spoil heaps have great potential for introducing fugitive dust problems and pollution to groundwater and surface water runoff
- Using the borrow pits as a destination for disposal of unusable materials from excavations, including acidic peat, pose a long-term threat for pollution of groundwater and localized settling over time
- Significant environmental impact assessments dismissed with undefined monitoring and mitigation
- Reports relied upon not available for assessment

MLSG endorse the Relevant Representations of,

- Theberton and Eastbridge Action Group on Sizewell (Stop Sizewell C)
- Suffolk Coast Action for Resilience
- Nick Scarr

- Royal Society for the Protection of Birds
- Suffolk Wildlife Trust
- Suffolk Coastal FOE

MLSG believe that the Sizewell C DCO is totally unsuitable for a digital or virtual examination process.

Under Rule 14(3) of The Infrastructure Planning (Examination Procedure) Rules 2010, MLSG may wish to call expert witnesses in support of this representation or subsequent written representations