



The Sizewell C Project

9.56 Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites

Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

July 2021

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009



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1 INTRODUCTION

- 1.1.1 This monitoring and mitigation plan sets out how monitoring and, if necessary, mitigation with respect to recreational disturbance will be implemented at three European sites¹ to ensure that adverse effect on the integrity (AEol) of the sites does not arise as a consequence of this effect pathway.
- 1.1.2 The three sites within the scope of this monitoring and mitigation plan (referred to collectively in this monitoring and mitigation plan as the “European sites”) are (see **Figure 1**):
- Alde–Ore Estuary Special Protection Area (SPA).
 - Alde–Ore Estuary Ramsar site.
 - Sandlings SPA (the area comprising Tunstall Forest and Snape Warren, referred to as Sandlings (Central) in this monitoring and mitigation plan).
- 1.1.3 This plan is named the ‘**MMP for Sandlings (Central) and Alde-Ore Estuary**’ which means the monitoring and mitigation plan for the Sandlings SPA (the area comprising Tunstall Forest and Snape Warren), Alde-Ore Estuary SPA and Alde–Ore Estuary Ramsar site.
- 1.1.4 A separate monitoring and mitigation plan has been developed for the Minsmere European sites (Minsmere to Walberswick SPA and Ramsar site and Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC)) and the northern part of the Sandlings SPA at North Warren and Aldringham Walks. The plan for these sites is now titled the ‘**MMP for Minsmere – Walberswick and Sandlings (North)**’ which means the monitoring and mitigation plan for the northern part of the Sandlings SPA at North Warren and Aldringham Walks), the Minsmere-Walberswick SPA, the Minsmere-Walberswick Heath and Marshes SAC and the Minsmere-Walberswick Ramsar site. An updated version of that plan is submitted at Deadline 5. An earlier draft of that plan was titled the **Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and**

¹ Special Areas of Conservation (SAC), Special Protection Areas (SPA) and sites that are in the process of designation (proposed SACs, candidate SACs and potential SPAs)). Under planning policy in England, Ramsar sites are treated in the same way as European sites. SACs and SPAs in the UK no longer form part of the EU’s Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs.
- new SACs and SPAs designated under the 2019 Regulations.

Any references to Natura 2000 in The Conservation of Habitats and Species Regulations 2017 and in guidance now refers to the new national site network.’ See <https://cieem.net/brexit-changes-to-the-habitats-regulations/>

Sandlings (North) European Site (Doc Ref. 9.18) [REP2-118] and was submitted to examination at Deadline 2.

- 1.1.5 The reason for the preparation of two plans covering the various European sites is to reflect the different approach required to monitoring and mitigation across the European sites in light of the conclusions of the **Shadow Habitats Regulations Assessment (HRA) Report** (Doc Ref. 5.10 [APP-145 to APP-149]) and **Shadow HRA Second Addendum** (Doc Ref. 5.10 [REP2-032]).
- 1.1.6 The **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) concludes that during the construction of Sizewell C there could be displacement of recreational users to European sites and recreational visits from the construction workforce.
- 1.1.7 For the European sites included in this monitoring and mitigation plan, the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) does not rely on the implementation of site-specific mitigation measures in order to reach a conclusion of no AEoI. However, because there is the potential for additional users of areas within the Alde–Ore Estuary SPA and Ramsar site and the central parts of Sandlings SPA, a precautionary approach has been adopted and this plan sets out how a monitoring regime will be established to determine whether mitigation measures may be necessary and how they would be secured and delivered.
- 1.1.8 For the bird qualifying features of the Alde–Ore Estuary SPA and Ramsar site (see section 2 of this plan), the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) concluded that overall, while there could be an increase in the number of visits to some locations around the Alde-Ore Estuary, limited accessibility to habitats used by breeding and wintering waterbirds and seabirds indicates that it is unlikely that an increase in recreational pressure would lead to an increase in direct or indirect effects of disturbance, so that an adverse effect on the populations of SPA or Ramsar site qualifying features is considered unlikely.
- 1.1.9 With regard to Criterion 2 of the Alde–Ore Estuary Ramsar site (see section 2 of this plan), the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) concludes that the habitat that may be affected by an increase in recreational pressure is vegetated shingle. This is a nationally rare and relatively fragile habitat which supports a highly specialised flora. However, the estimated increase is small (less than 10%) relative to the existing annual recreational visits and any increase in pressure would be diffuse and spread across a large number of potential car park access points.
- 1.1.10 For the Sandlings SPA, the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) proposes that existing arrangements to manage recreational

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access at Aldringham Walks and North Warren (i.e. the northern part of Sandlings SPA) should be enhanced in these areas to minimise the potential for any increase in disturbance pressure on breeding nightjar and woodlark, but no other mitigation is proposed for other areas of Sandlings SPA. It is for this reason that the northern part of Sandlings SPA is included in a separate monitoring and mitigation plan, together with the Minsmere European sites (Doc Ref. 9.18) [REP2-118]).

- 1.1.11 A number of measures have already been proposed through the DCO process, or have already been secured, which will reduce potential recreational displacement to European sites. These include Public Right of Way (PRoW) and access improvement proposals around the main development site, keeping the coast path open at all times except in rare circumstances when it may need to be closed for short periods if it is unsafe to keep it open, and the designation of 27 hectares of Open Access land where dogs will be allowed to be exercised off-lead, a new PRoW and a new car park at Aldhurst Farm (see **Appendix A**). In 2019 fewer than two people were recorded per hour over a 30 hour survey period at Aldhurst Farm, making use of parts of the areas that are to be dedicated Open Access land where dogs can be exercised off-lead all year, indicating that this site has a good capacity to absorb much more use without disturbing wildlife in other parts of Aldhurst Farm where ecological enhancement works have successfully established habitats for wildlife. Further visitor surveys at Aldhurst Farm will be undertaken in 2021 and 2022 (pre-construction), and during the construction phase to monitor baseline use and any changes during construction due to the Sizewell C Project.

[Report Structure](#)

- 1.1.12 The structure of this plan is as follows:
- Section 2: Scope: sensitive species and habitats.
 - Section 3: Governance.
 - Section 4: Monitoring.
 - Section 5: Mitigation Measures.

2 SCOPE: SENSITIVE SPECIES AND HABITATS

2.1.1 The species and habitats relevant to the European sites covered by this monitoring and mitigation plan, based on the findings of the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]), are:

- Alde–Ore Estuary SPA - non-breeding avocet, redshank and ruff².
- Alde–Ore Estuary Ramsar site - nationally-scarce plant species (Ramsar criterion 2), notable assemblage of breeding and wintering wetland birds (Ramsar criterion 3)³.
- Sandlings SPA - breeding nightjar and woodlark.

² The breeding Sandwich tern, little tern, lesser black-backed gull, avocet and marsh harrier populations of the Alde-Ore Estuary SPA and Ramsar site are not considered sensitive species given the inaccessibility of their breeding areas and the low level of potential change in recreational visits to the vicinity of those areas.

³ The Ramsar site also qualifies under Ramsar criterion 6 (bird species/populations occurring at levels of international importance) on the basis of the breeding population of lesser black-backed gull but as per footnote 3 this not considered a sensitive species.

3 GOVERNANCE

3.1 Deed of Obligation

- 3.1.1 The monitoring requirements specified in this plan are secured via the draft Deed of Obligation [\[REP3-024\]](#) (see paragraph 6 of Schedule 11 (Natural Environment)), which makes provision for a financial contribution payable by SZC Co. to East Suffolk Council on or prior to commencement of construction to carry out the monitoring required at Sandlings SPA and Alde-Ore Estuary SPA in accordance with this plan.

3.2 Ecology Working Group

- 3.2.1 The Ecology Working Group (constituted in accordance with the draft Deed of Obligation [\[REP3-024\]](#)) is responsible for:
- a) reviewing the monitoring and (potential) mitigation undertaken in accordance with this plan; and
 - b) identifying whether appropriate triggers have been exceeded for any relevant designated site included in the plan (i.e. Alde–Ore Estuary SPA, Alde–Ore Estuary Ramsar site and Sandlings (Central) SPA) and whether further investigation or mitigation measures are required, having carried out an assessment of data produced by monitoring to determine any linkage with the construction and operation of Sizewell C in accordance with **Sections 4.2.12ii** and **5** of this plan.
- 3.2.2 If the Ecology Working Group identifies that mitigation measures are required in accordance with this plan, the Ecology Working Group shall:
- a) agree, in consultation with land managers, including but not limited to the RSPB, Natural England, the National Trust, Suffolk Wildlife Trust and Forestry England, how and when the further investigation and/or mitigation measures shall be implemented;
 - b) make written requests to the Environment Review Group to access monies from the European Sites Access Contingency Fund to carry out the further investigation and/or mitigation measures;
 - c) provide further information on request to the Environment Review Group, make recommendations to and advise the Environment Review Group on how the European Sites Access Contingency Fund

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should be spent based on its technical expertise and involvement in the monitoring;

- d) report to the Environment Review Group on the approved expenditure from the European Sites Access Contingency Fund and the effectiveness of such expenditure; and
- e) any other tasks agreed by the Ecology Working Group.

3.3 Environment Review Group

3.3.1 The Environment Review Group (constituted in accordance with the Deed of Obligation [\[REP3-024\]](#)) will receive reports and recommendations from the Ecology Working Group as to what further investigation and/or mitigation measure(s) are necessary and appropriate based on the monitoring undertaken in accordance with this plan.

3.3.2 The Environment Review Group shall:

- a) consider the reports and recommendations from the Ecology Working Group and decide whether the recommended further investigation and/or mitigation measure(s) are necessary and appropriate in all the circumstances; and
- b) in the event that it decides the further investigation and/or recommended mitigation is necessary and appropriate, may approve written requests from the Ecology Working Group for monies to fund the recommended mitigation measure(s); or
- c) defer its decision on such requests from the Ecology Working Group until the next meeting of the Environment Review Group, pending the provision of further information by the Ecology Working Group, if requested by the Environment Review Group.

3.3.3 Payments from the European Sites Access Contingency Fund to fund mitigation measures shall only be made following approval by the Environment Review Group of a request received in writing from the Ecology Working Group detailing the amounts requested to be paid and details of the relevant further investigation and/or mitigation measures.

3.3.4 In addition, the Environment Review Group shall:

- a) define the triggers in accordance with the principles in **Section 4.2.12ii** of this plan and revise them from time to time, if necessary in

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accordance with this plan to ensure they remain appropriate in light of the monitoring data;

- b) provide guidance to the Ecology Working Group on any issues that are referred to it; and
- c) refer any matter which it cannot agree to the Delivery Steering Group (the group constituted in accordance with Schedule 17 of the Deed of Obligation [\[REP3-024\]](#) which shall provide assistance and resolution on matters referred to it by the Environment Review Group) where necessary.

4 MONITORING

4.1 Introduction

- 4.1.1 The purpose of the monitoring programme would be to determine the scale and nature of use of the European sites before construction (to establish a baseline) and then any net change in use during the construction and operational phases. Mitigation measures and/or further investigation would be considered if monitoring during the construction and operational phases identifies additional users above agreed triggers. The potential for that increase in users to result in consequential changes in disturbance to habitats or bird species at the European sites would then be investigated with the benefit of existing monitored information and any further monitoring directed by the Ecology Working Group in order to identify mitigation measures which should be implemented to address the impact or risk of impact arising from increased visitor numbers and which is reasonably attributable to the displacement effects of Sizewell C.
- 4.1.2 In accordance with the framework set out in the Deed of Obligation, East Suffolk Council would organise and procure the monitoring programme.
- 4.1.3 The key principle underpinning the monitoring approach is to identify and measure potential changes in recreational use and behaviour arising from the Sizewell C Project as soon as possible so that action can be taken (via mitigation) before negative effects on qualifying interest features of European sites arise.
- 4.1.4 Pre-construction ecological monitoring is proposed in order that the baseline ecological and visitor behaviour conditions can be established against which the effect of possible changes in recreational user numbers and behaviour can be detected.
- 4.1.5 Subject to reaching the trigger level (see **section 4.3**), ecological monitoring during construction will be carried out at the direction of the Ecology Working Group to help determine the need to implement mitigation measures defined in this plan. Monitoring may also be undertaken to assess the effectiveness of any mitigation measures put in place.
- 4.1.6 Three survey methods will be employed:
- **Observation and questionnaire surveys** to record numbers of people and dogs and their behaviour at selected times of year.

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- **Automatic counters** set up on paths and the access roads to the European sites to record people movements continuously throughout the year.
- **Ecological surveys** to establish baseline ecological conditions, determine whether any ecological effects are occurring and to assess the effectiveness of mitigation measures, if such measures are deemed necessary.

4.1.7 These three approaches are described further in **Section 4.2**.

4.2 Survey Method

a) Observation and Questionnaire Surveys

- 4.2.2 Initial visitor surveys (observations and questionnaires) undertaken before commencement of construction will record the number of visitors and the specific use in the vicinity of the survey locations illustrated on **Figure 1** and listed in **Table 4.1** and measure the frequency of use, types of activity and behaviour, and responses to any existing signage, footpaths and facilities.
- 4.2.3 The surveyors will record the types of behaviour that might disturb breeding and non-breeding birds and damage habitats (see **Section 4.4**).
- 4.2.4 In relation to dog walkers, whether a dog is on or off lead will be recorded. In addition, it will be recorded whether a dog is on the path or in the vegetation further than 2m to the side of the path (i.e. beyond the distance it is likely to toilet before returning to the path).
- 4.2.5 Comparable construction and operational phase observation surveys of recreational user activity will be undertaken at the same locations and same seasons as the initial surveys and provide comparable data over different years. This approach will permit comparisons to be made and assessment of the appropriateness of the proposed trigger levels to inform the investigation of mitigation measures.
- 4.2.6 The interaction with recreational users (answering the questionnaire surveys face to face or completing the survey form given to them on site and returning by post, or completing the survey online) will provide the opportunity to promote and direct users to the enhanced access facilities at the less sensitive sites including Kenton Hills and Aldhurst Farm.
- 4.2.7 Methods for data collection will be standardised and designed to be readily repeatable to allow changes and trends to be identified and permit valid comparison from one survey period to the next. Survey methods will be

reviewed by the Ecology Working Group and adjusted at the Group's direction if necessary from time to time to enhance their effectiveness.

b) Automatic Counters

- 4.2.8 'Automatic counters' will be used at paths and entry points at the locations shown on **Figure 1** and listed in **Table 4.1**. These will record use 24 hours a day and 365 days a year, and provide accurate information on levels of use.
- 4.2.9 The survey locations will be subject to minor location refinement on site to ensure most effective locations are used.

Table 4.1: Visitor Survey Locations

Survey location	
Survey locations at European sites – observation and questionnaire surveys, and automatic people counters (blue dots on Figure 1)	
o	Iken car park
p	Blaxhall Common
q	Sandgalls Plantation
Survey locations at European sites – automatic people counters only (purple dots on Figure 1)	
8	Snape Warren north
9	Snape Warren south
10	Snape Bridge

c) Ecological Surveys

- 4.2.10 The baseline ecological monitoring will be undertaken prior to construction. This will include establishing a baseline for the various pressures that represent potential routes for impact on qualifying interest features of European sites (referred to in **Table 4.2** and **Section 4.4**); a proposed approach to this monitoring is set out in **Table 4.2**.

i. Alde–Ore Estuary Ramsar site (habitat qualifying criterion)

- 4.2.11 The **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]) concludes that the habitat that may be affected by an increase in recreational pressure on the Alde–Ore Estuary Ramsar site is vegetated shingle (Ramsar criterion 2). Baseline habitat monitoring, focussed on this particular habitat that forms

part of Ramsar criterion 2, is proposed. This proposed monitoring is summarised in **Table 4.2**.

- 4.2.12 The proposed locations for habitat monitoring will be discussed and agreed with Natural England and other stakeholders, including land owners and land managers as relevant and reviewed from time to time by the Ecology Working Group.

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Table 4.2: Proposed Monitoring In Relation To Vegetated Shingle Forming Part Of Ramsar Criterion 2 Of The Alde-Ore Estuary Ramsar Site

Habitat type	Potential impact / pressure	Proposed monitoring
Vegetated shingle (part of Ramsar criterion 2)	<ul style="list-style-type: none"> - Trampling - Nutrient enrichment 	<ul style="list-style-type: none"> - Targeted habitat surveys at selected locations undertaken prior to construction. - Monitoring would follow the JNCC Common Standards Monitoring guidance as appropriate to the habitat type. - Fixed point photography.
	<ul style="list-style-type: none"> - Burnt areas - Path widening - Formation of new routes - Littering 	<ul style="list-style-type: none"> - Visual monitoring of baseline broad-scale habitat condition, potentially using transect-based approach.

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ii. **Alde–Ore Estuary Ramsar site (bird qualifying criterion) and Alde–Ore Estuary SPA**

- 4.2.13 No ecological monitoring is proposed in connection with the bird qualifying features of the Alde–Ore Estuary SPA and Ramsar site.
- 4.2.14 The Alde-Ore Estuary SPA and Ramsar site covers a large area with relatively few direct access points. The key intertidal habitats used by the non-breeding waterbirds of the SPA and Ramsar site are remote from, or inaccessible via, access locations at Snape Maltings, Iken and Sailor's Path.
- 4.2.15 The main area of importance for non-breeding waterbirds and where there is potential for an increase in recreational usage is the upper Alde-Ore Estuary in the vicinity of Iken and Snape, particularly where the Suffolk Coast Path and other public rights of way run adjacent to the European site.
- 4.2.16 The proposed approach for the Alde–Ore Estuary SPA and Ramsar site is to monitor visitor numbers and behaviour (as described in **sections 4.2 a and b** and **section 4.5**) at the locations shown in **Figure 1** and implement mitigation measures should the monitoring and governance process confirm that such measures are necessary.
- 4.2.17 The above approach would ensure that adverse effect on integrity would not occur and is considered proportionate given the low level of change predicted at the above locations and taking into account the precautionary nature of the predictions reported in the **Shadow HRA Report** (Doc Ref. 5.10 [APP-145 to APP-149]).

iii. **Sandlings (Central) SPA**

- 4.2.18 A baseline survey of the distribution of breeding nightjar and woodlark is proposed for Sandlings (Central) (Tunstall Forest and Snape Warren) to understand the pre-construction situation for the breeding population of these species. The same approach to monitoring of visitor numbers and behaviour would be applied as described under point ii) above for the Alde–Ore Estuary SPA and Ramsar site, with particular attention given to any changes in visitor numbers or behaviour in areas where breeding nightjar and woodlark are relatively abundant (as determined from the survey information and consultation with key stakeholders).
- 4.2.19 In the event that the visitor monitoring indicates the potential for an increased disturbance effect, mitigation or further investigation would be deployed, targeted to areas of risk as defined by the baseline survey of breeding distribution.

4.3 Use of Trigger Levels

- 4.3.1 Other than the initial trigger level defined below, trigger levels will be set and reviewed by the Environment Review Group (see **Section 3**), in accordance with the following principles.
- 4.3.2 The identification of a trigger level of net increased recreational use is considered important because this will be the earliest indication that there may be increased risk of negative effects on qualifying interest features (i.e. changes in recreational user numbers could indicate both the potential for increased disturbance and a change in visitor profile, which could lead to changes in behavioural patterns, such as increased littering).
- 4.3.3 Notwithstanding the role of the Environment Review Group in setting trigger levels, an initial trigger level of a 5% increase of visitors to a site, over baseline visits, is proposed as a precautionary level at which the need for further investigation and potential mitigation measures would be assessed by the Environment Review Group in consultation with the Ecology Working Group. It will be open to the Environmental Review Group to refine or modify that initial trigger. The mitigation measures to be considered for implementation at this point would be selected from the measures in Error! Reference source not found..
- 4.3.4 The identification / agreement of further trigger levels needs to reflect a combination of factors, including:
- whether the net increase or changes in behaviour and pattern of use relates solely or primarily to the Sizewell C Project, or if the Sizewell C Project is making a significant contribution to the increase or change, in combination with one or more other factors. This will be based on recorded survey observations and discussions with visitors, in combination with the observation, questionnaire and habitat surveys.
 - whether the increase in net use or changes in behaviour and pattern of use is likely to be temporary or prolonged and is likely to be or is considered detrimental.
 - the time of year, whether in or outside the breeding and non-breeding season for birds.
 - the types of users, e.g. off road/night time cyclists, dogs quartering land where birds are nesting, roosting or feeding, unauthorised campers, walkers.

- whether the increase or changes in behaviour and pattern of use is likely to negatively affect qualifying interest features of the European sites.

4.4 Recording Signs of Human Disturbance

4.4.1 If the trigger level is reached for any site, the Ecology Working Group will direct the need for further investigations to be made to assess signs of changes in visitor patterns and behaviours which may cause actual or potential negative effects to relevant qualifying interest features of European sites. Such signs might include, but are not limited to, additional:

- trampling of habitats.
- burnt habitat caused by barbeques, fires, cigarettes, etc.
- widening of paths.
- formation of new routes close to sensitive habitats or species.
- littering and dog waste.

4.5 Survey Programme

4.5.1 The programmes for surveys at specific years are described below.

a) Visitor Surveys Programme

4.5.2 In order to determine if the Sizewell C Project construction activity (or subsequent operational phase) is increasing the risk of negative effects due to net additional visitors or changes to behaviour at the European sites, the following programme is proposed for monitoring:

- Pre-construction initial monitoring of the current situation (2021 and 2022).
- Annual monitoring during early years of construction up to (and including) peak years (construction years 1 to 7).
- Monitoring every two years during construction, after the early / peak years (construction years post year 7).
- Monitoring during early years of operation. Operational years 1 or 2 initially, but if the Environment Review Group considers that continuing visitor pressure as a result of Sizewell C requires monitoring beyond this

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initial period, monitoring will be continued for a further period to be determined by the Environment Review Group.

- 4.5.3 Visitor surveys will be undertaken three times a year in a monitoring year, in April/May, August and November to reflect peak and non-peak periods. This reflects spring / early summer as birds are actively nesting and breeding and when visitor numbers are likely to be high, August to record summer peak visitor use and November to record winter use.
- 4.5.4 The timing of these surveys is aligned with the periods when a change in visitor activity could result in increased disturbance effects on breeding nightjar and woodlark and non-breeding waterbirds.
- 4.5.5 Monitoring during the construction early years will identify any changes in visitor numbers or behavioural patterns so that potential problems (i.e. signs of human disturbance and potential harm to qualifying interest features) are identified at an early stage before they become established in the behaviours of visitors. The monitoring strategy would be adapted over the monitoring period if necessary, as the evidence accrues and to allow for relevant data gathering.
- 4.5.6 The initial monitoring surveys under this plan will be undertaken from summer 2021 or as soon as the Covid-19 rules allow.
- 4.5.7 The initial pre-construction recreation monitoring will be undertaken using visitor surveys to gather information on how, when and why people use the European sites for recreation. These visitor surveys will use the same method of observation and questionnaire surveys used in 2014 and adapted for these surveys at European sites (e.g. to record more information on behaviour of people and dogs), informed by ongoing stakeholder engagement. The method and report of the 2014 surveys can be seen at Sizewell C Development Consent Order application document **Volume 2 Chapter 15, Appendix 15A** of the **ES** [\[APP-268\]](#).
- 4.5.8 An alternative pattern of surveys may be determined by the Environment Review Group (advised by the Ecology Working Group) in the light of reported experience from the surveys; including potential cessation of the surveys if it is apparent that little or no impact is identified or likely.

b) Ecological Surveys

- 4.5.9 The monitoring proposed in **Section 4.2 c i** and **iii** would be undertaken pre-construction (2022).

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4.5.10 Should an agreed trigger level be reached (and, therefore, the need for mitigation and/or further investigation be considered), and subject to further investigation and the agreement of the ERG, it is proposed that further ecological survey would be instigated as follows:

- Alde-Ore Estuary Ramsar site (vegetation shingle): targeted habitat surveys at selected locations undertaken every 3 years.
- Sandlings (Central) SPA: annual monitoring of breeding nightjar and woodlark distribution up to (and including) peak years (construction years 1 to 7).

5 MITIGATION MEASURES

5.1 Introduction

- 5.1.1 As explained in **Section 1**, no initial mitigation measures are deemed necessary in order to reach a conclusion of no AEoI for the European sites covered by this monitoring and mitigation plan. The need for mitigation measures will be monitored through the observation and questionnaire surveys and automatic people and vehicle counters. The survey results will be reviewed by the Ecology Working Group and the arrangements defined for identifying and delivering mitigation measures would be followed as defined in **Section 3**.
- 5.1.2 The mitigation approach comprises a range of potential measures which seek to address and mitigate potential effects on European sites. The approach is adaptive and will evolve and react as necessary, throughout the construction and early operational phases, to ensure that appropriate measures are implemented, if they are required and reasonably attributable to the effects of Sizewell C.
- 5.1.3 Mitigation measures are identified in **The Ecology** Working Group will review the monitoring undertaken in accordance with **Section 4** of this plan and assess whether the Sizewell C Project is creating additional recreational disturbance which requires mitigation and/or further investigation. The Ecology Working Group may recommend to the Environment Review Group that any one or more of the measures identified in Error! Reference source not found. should be implemented to mitigate additional recreational disturbance arising from the Sizewell C Project, although the matters listed in **Table 5.1** are not exhaustive.
- 5.1.4 The Environment Review Group will consider the recommendations from the Ecology Working Group and determine what measures should be implemented. These measures would be funded by accessing funding from the European Sites Access Contingency Fund in the Deed of Obligation [PDB-004] (see paragraph 6 of Schedule 11 (Natural Environment) in the draft Deed of Obligation) following approval from the Environment Review Group in accordance with **Section 3** of this plan.
- 5.1.5 Table 5.1 and will be developed in detail and implemented through the governance arrangements described in **Section 3** of this plan.
- 5.1.6 Mitigation measures required as a result of Sizewell C impacts will be additional to management measures currently in place and maintained by the landowners and managers, or that arise from causes other than Sizewell C.

- 5.1.7 Mitigation approaches are aligned with relevant measures in Section 8 of the Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (Reference 1) (referred to as the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)) but adapted to the specific site requirements of the European sites and potential for disturbance due to Sizewell C. The Suffolk Coast RAMS identifies the importance of a mix of measures to give certainty, stating “*A suite of mitigation measures should function together to have confidence that adverse effects arising from recreation have been prevented. Each measure taken alone is unlikely to give that certainty. A combination of measures, developed and targeted after analysis of available and gathered information has the potential to give the necessary certainty because of the combination of measures working together, reducing risk and building in contingency.*” (Paragraph 8.2.). This monitoring and mitigation plan follows the same principle.
- 5.1.8 SZC Co. will seek to align mitigation measures within this plan so that they are complementary with the site access measures already in use by landowners and managers of the relevant European sites.
- 5.1.9 Potential mitigation measures have been proposed by landowners and managers and, where appropriate, incorporated into the mitigation measures described in **Section 5.2**.

5.2 Mitigation Measures

- 5.2.1 **The Ecology** Working Group will review the monitoring undertaken in accordance with **Section 4** of this plan and assess whether the Sizewell C Project is creating additional recreational disturbance which requires mitigation and/or further investigation. The Ecology Working Group may recommend to the Environment Review Group that any one or more of the measures identified in Error! Reference source not found. should be implemented to mitigate additional recreational disturbance arising from the Sizewell C Project, although the matters listed in **Table 5.1** are not exhaustive.
- 5.2.2 The Environment Review Group will consider the recommendations from the Ecology Working Group and determine what measures should be implemented. These measures would be funded by accessing funding from the European Sites Access Contingency Fund in the Deed of Obligation [PDB-004] (see paragraph 6 of Schedule 11 (Natural Environment) in the draft Deed of Obligation) following approval from the Environment Review Group in accordance with **Section 3** of this plan.

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5.2.3 Table 5.1 sets out the potential mitigation measures and the locations at which they may apply within the Alde-Ore Estuary and Sandlings (Central) European sites. These are in addition to other mitigating measures which have either already been secured or that will be secured through the DCO or other means including other Deed of Obligation funds as detailed below, which will combine to reduce the potential for additional recreational visits to European sites due to the Sizewell C Project. For example, committed mitigating measures include:

- New recreational access provision at Aldhurst Farm including a car park, a definitive Public Right of Way, approximately 27ha of new designated Open Access Land where dogs can be exercised off-lead all year round, and informal footpaths. Additional improvements to be introduced in future include:
 - expanding the existing car park by up to 15 spaces as set out in the Deed of Obligation (Schedule 11, paragraph 7);
 - a bird hide within the south eastern field for local residents and visitors, subject to the need to obtain any necessary planning permission;
 - ‘family benches’ and ‘perching benches’ at strategic locations across the site;
 - improvements to the existing PROW that runs adjacent to the sewage works and the northern boundary of the eastern field; and
 - adaptive and differential mowing regimes will be used to give a managed mosaic of surface vegetation that is good for people and nature.
- Improvements and enlargement to Kenton Hills car park (see Work No.1A(cc) of the draft DCO) [\[AS-143\]](#).
- Other improvements within the main development site including a new off-road bridleway from Sizewell Gap in the south to Eastbridge Road in the north, a new PROW (footpath) linking existing PROW and the B1122 south of the green rail route, and a new connection between Aldhurst Farm and Kenton Hills permissive footpath network (see DCO Articles 14 -16 (Rights of Way) Requirement 2 (PW: CoCP) Requirement 6A (MDS: Rights of Way Strategy).
- There will be a financial contribution to the Suffolk Coast RAMS to mitigate potential recreational impacts from construction workers,

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targeted towards an agreed suite of measures from the Suffolk Coast RAMS mitigation package specific to the potential Sizewell C development impacts (see Schedule 11 (Natural Environment) of the draft Deed of Obligation).

- A suite of improvements to PRow is being agreed with Suffolk County Council and East Suffolk Council which will be funded through a financial contribution within the Rights of Way fund that are also relevant to this monitoring and mitigation plan. These include improvements to the Eastbridge to Minsmere sluice footpath (PRow E-363/020/0) to improve the surface and avoid flooding, to keep people to the right of way and prevent people diverting from the path where they may affect habitats or species (see Schedule 10 (Leisure, Public Rights of Way and Amenity) of the draft Deed of Obligation).

5.2.4 The Ecology Working Group will review the monitoring undertaken in accordance with **Section 4** of this plan and assess whether the Sizewell C Project is creating additional recreational disturbance which requires mitigation and/or further investigation. The Ecology Working Group may recommend to the Environment Review Group that any one or more of the measures identified in Error! Reference source not found. should be implemented to mitigate additional recreational disturbance arising from the Sizewell C Project, although the matters listed in **Table 5.1** are not exhaustive.

5.2.5 The Environment Review Group will consider the recommendations from the Ecology Working Group and determine what measures should be implemented. These measures would be funded by accessing funding from the European Sites Access Contingency Fund in the Deed of Obligation [\[PDB-004\]](#) (see paragraph 6 of Schedule 11 (Natural Environment) in the draft Deed of Obligation) following approval from the Environment Review Group in accordance with **Section 3** of this plan.

Table 5.1 Potential Mitigation Measures

Mitigation Measure	Location	How funded / secured
Wardening, signage, interpretation and awareness training		
New wardening resource (see Section 5.3) to educate visitors about desired behaviours, impacts of disturbance, impacts of dogs off leads, give out dog waste bags, suitability of routes for different uses	Upper Alde-Ore (e.g. Snape, Iken).	Financial contribution in Deed of Obligation

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Mitigation Measure	Location	How funded / secured
<p>and location of sensitive areas, and promote alternative locations to visitors.</p> <p>Engagement with dog walkers on the use of leads (of max 2m length) or on the paths at sensitive times and places, along with suggesting alternative, accessible and attractive routes and areas that can better accommodate off-lead exercise.</p> <p>Also new signage on desired behaviours, impacts of disturbance, impacts of dogs off leads, suitability of routes for different uses and location of sensitive areas.</p>	<p>Tunstall Forest and Snape Warren.</p> <p>Beach frontage south of Aldeburgh, fronting the River Alde.</p>	
Signage to educate visitors re importance of vegetated shingle and nesting birds and requesting avoidance	<p>Tunstall Forest and Snape Warren.</p> <p>Beach frontage south of Aldeburgh, fronting the River Alde.</p>	Financial contribution in Deed of Obligation
Signage to educate visitors re fire risk and request no BBQs/fires, care with cigarettes etc.	Tunstall Forest and Snape Warren.	Financial contribution in Deed of Obligation
Signage to educate visitors and request that waste is taken home as appropriate to the protocol in place at the given site.	<p>Upper Alde-Ore (e.g. Snape, Iken).</p> <p>Tunstall Forest and</p>	Financial contribution in Deed of Obligation

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Mitigation Measure	Location	How funded / secured
	<p>Snape Warren.</p> <p>Beach frontage south of Aldeburgh, fronting the River Alde.</p>	
Where there is no right of access, access restrictions (e.g. locked gates, mesh on gates to restrict dog access), signage to reduce access onto sensitive habitats. Provision of information on where to go instead.	<p>Upper Alde-Ore (e.g. Snape, Iken).</p> <p>Tunstall Forest and Snape Warren.</p> <p>Beach frontage south of Aldeburgh, fronting the River Alde.</p>	Financial contribution in Deed of Obligation
Leaflets on sites and at public buildings	<p>Upper Alde-Ore (e.g. Snape, Iken).</p> <p>Tunstall Forest and Snape Warren.</p> <p>Beach frontage south of Aldeburgh, fronting the River Alde.</p>	Financial contribution in Deed of Obligation

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Mitigation Measure	Location	How funded / secured
Website and social media posts	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh, fronting the River Alde.	Financial contribution in Deed of Obligation
Sizewell C interpretation signage	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh, fronting the River Alde.	Financial contribution in Deed of Obligation
Free compostable dog waste bags, overprinted with key information or (e.g. behaviour messages, alternative locations to walk dogs)	Various popular visitor locations at European sites to be defined. Local vets, pet shops, dog groomers, dog training clubs.	Financial contribution in Deed of Obligation

Mitigation Measure	Location	How funded / secured
Measures to paths and access		
Adaption of access routes to guide appropriate uses (surfacing, barriers, signage)	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh, fronting the River Alde.	Financial contribution in Deed of Obligation

- 5.2.6 The visitor surveys conducted at the start of the breeding season in April/May will ensure that any measures which are deemed necessary as a result of those surveys can be instigated during the same breeding season to secure an immediate effect. Whether a measure would need to be in place on a temporary or permanent basis will be assessed by the Ecology Working Group and confirmed by the Environment Review Group at intervals to be agreed by the Environment Review Group. The Environment Review Group will review the appropriateness of the trigger levels from time to time and adjust them as necessary in accordance with advice received from the Ecology Working Group based on its assessment of the monitoring data.

5.3 Monitoring Resources

- 5.3.1 SZC Co. will provide funding for the monitoring described in **Section 4** via a financial contribution in the Deed of Obligation [\[REP3-024\]](#) which is due prior to commencement of construction. The monitoring funded would cover:
- Observation and questionnaire surveys (described in Section 4.2 a).
 - Automatic counters (described in Section 4.2 b).
 - Ecological surveys (described in Section 4.2 c).

- The investigation and recommendation of mitigation measures attributable to Sizewell C (described in section 5).

5.4 Warden Resources (if required)

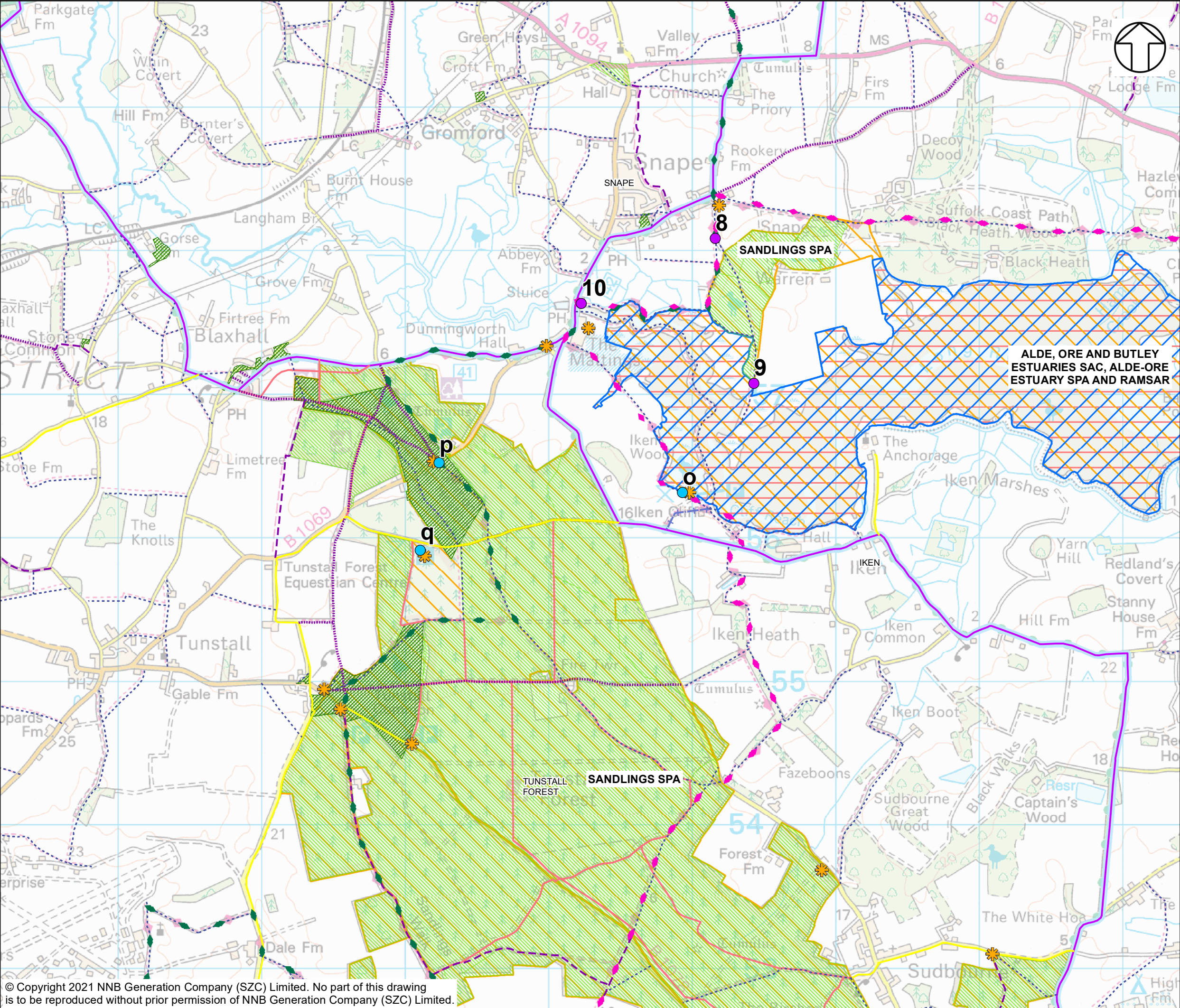
- 5.4.1 If it is determined to be warranted, by the monitoring and investigations defined above, SZC Co. will provide funding for the new wardening resource specified in **The Ecology** Working Group will review the monitoring undertaken in accordance with **Section 4** of this plan and assess whether the Sizewell C Project is creating additional recreational disturbance which requires mitigation and/or further investigation. The Ecology Working Group may recommend to the Environment Review Group that any one or more of the measures identified in Error! Reference source not found. should be implemented to mitigate additional recreational disturbance arising from the Sizewell C Project, although the matters listed in **Table 5.1** are not exhaustive.
- 5.4.2 The Environment Review Group will consider the recommendations from the Ecology Working Group and determine what measures should be implemented. These measures would be funded by accessing funding from the European Sites Access Contingency Fund in the Deed of Obligation [PDB-004] (see paragraph 6 of Schedule 11 (Natural Environment) in the draft Deed of Obligation) following approval from the Environment Review Group in accordance with **Section 3** of this plan.
- 5.4.3 Table 5.1 via the European Sites Access Contingency Fund committed to in the Deed of Obligation [\[REP3-024\]](#). The warden resource would work closely with existing site managers, wardens and volunteers. The warden resource would be responsible for, or involved in, a number of tasks including:
- Leading survey and monitoring work (visitor surveys and ecological monitoring).
 - Observing and recording visitor levels and behaviour, and species and habitats, all year round, including between the main visitor and ecological survey and monitoring periods.
 - Attendance at Environment Review Group meetings.
 - Liaising with RSPB, National Trust, Suffolk Wildlife Trust and Natural England's site managers, wardens and rangers to ensure work is co-ordinated with existing site objectives and practices, to gather information on issues, need for mitigation and success of mitigation.

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- Regular reports to the Ecology Working Group on the findings of survey and monitoring work, whether changes in visitors is, or is at immediate risk of, causing disturbance to habitats or species and whether this is due to the Sizewell C Project or other reasons – Lead Warden.
- Recommendations and advice on when, where and how mitigation to prevent any disturbance caused by the Sizewell C Project should be implemented.
- Overseeing implementation of mitigation.
- Observing success of mitigation and the need for further mitigation.
- Engaging with the public and construction workers to encourage recreational use that does not harm species or habitats at European sites.

REFERENCES

1. Hoskin, R., Liley, D. & Panter, C. (2019). Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Footprint Ecology.
[<http://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>. Accessed 12/3/21]



NOTES
PROPOSED SURVEY AND AUTOMATIC COUNTER LOCATIONS ARE PROVISIONAL AND WILL BE REFINED FOLLOWING DETAILED SITE WORK TO ENSURE THAT THE MOST EFFECTIVE LOCATIONS ARE USED

KEY

SPECIAL AREA OF CONSERVATION (SAC)

SPECIAL PROTECTION AREA (SPA)

RAMSAR

CAR PARK ACCESS SITE LOCATIONS AT EUROPEAN SITES

PROPOSED OBSERVATION AND QUESTIONNAIRE SURVEY AND AUTOMATIC PEOPLE COUNTER LOCATIONS

PROPOSED AUTOMATIC PEOPLE COUNTERS

PUBLIC RIGHTS OF WAY AND PUBLIC ACCESS

RECREATIONAL ROUTE: SANDLINGS WALK (LONG DISTANCE WALKING ROUTE)

RECREATIONAL ROUTE: SUFFOLK COAST PATH (LONG DISTANCE WALKING ROUTE)

FOOTPATH

BRIDLEWAY

BYWAY

RESTRICTED BYWAY

SUSTRANS REGIONAL CYCLE ROUTE (RCR) (42)

SUFFOLK COASTAL CYCLE ROUTE

ALTERNATIVE CYCLE ROUTES/SHORT CUTS/DETOURS ON ROAD

OFF ROAD CYCLE ROUTES

REGISTERED COMMON LAND


OPEN ACCESS LAND

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DOCUMENT:
SIZEWELL C
MONITORING AND MITIGATION PLAN FOR
SANDLINGS (CENTRAL) AND ALDE, ORE AND
BUTLEY ESTUARIES

DRAWING TITLE:
FIGURE 1:
PROPOSED SURVEY LOCATIONS

DRAWING NO:
6839_SK_111

DATE:	DRAWN:	SCALE:	REV:
APR 2021	V.W.	1:25,000 @A3	02

SCALE BAR
0 0.2 0.4 0.6 0.8 1 KM

APPENDIX A: ALDHURST FARM ACCESS PROVISION



INTERNAL BUSINESS COLLABORATOR REFERENCE
NOT APPLICABLE FOR ALL FIGURES

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KEY

PROPOSED

CAR PARKING SPACES

PEDESTRIAN ACCESS POINT

SURFACED PATH

MOWN PATH

FENCE

EXISTING

LOWLAND HEATH MOSAIC

INDICATIVE SCRUB, BROADLEAF AND CONIFEROUS WOODLAND PLANTING

OPEN WATER

HABITAT CREATION (WET REEDBED)

HABITAT CREATION (DRY REEDBED)

WATERCOURSE

EXISTING TREES AND HEDGES

PUBLIC RIGHT OF WAY

FENCE

DOCUMENT:

ALDHURST FARM HABITAT CREATION SCHEME

DRAWING TITLE:

ACCESS AND RECREATION PROPOSAL - CONDITION 25

DRAWING NO:

6839_10005A

DATE:

NOV 2020

DRAWN:

MM

SCALE:

1:3,500 @A3

SCALE BAR

0 100M

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