



The Sizewell C Project

9.94 Statement on Recreational Disturbance Numbers

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1 STATEMENT ON RECREATIONAL DISTURBANCE NUMBERS

1.1 Introduction

1.1.1 This report sets out the positions of the following parties on figures for the additional numbers of people who may visit European sites due to the construction of the Sizewell C Project, arising from displaced people and construction workers:

- SZC Co.
- Natural England.
- The Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust (SWT).
- The National Trust.

1.1.2 SZC Co. submitted estimated numbers of additional people who may visit named locations within or near European sites within the original DCO application:

- Table 3.5 from the Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [\[APP-148\]](#) (pdf page 439)). This table shows estimated numbers of visitors who may displace to European sites to avoid disturbance due to the construction of the Sizewell C Project.
- Table 2.1 from the Recreational Disturbance Assessment (Shadow HRA Report Volume 1 Appendix E [\[APP-148\]](#) (pdf page 320)). This table shows estimated numbers of displaced people (from Table 3.5) plus estimated numbers of construction workers who may visit European sites during the construction of the Sizewell C Project, to give total potential additional numbers.

1.1.3 SZC Co. submitted updated estimated figures for Tables 3.5 and 2.1, to respond to comments received from the RSPB and SWT and National Trust, as part of SZC Co.'s responses to the ExA's First Written Questions, (Volume 3 - Appendices Part 1 of 7, Appendix 6A [\[REP2-108\]](#) (see Annex to Appendix 6A on pdf page 571)). This was submitted at Deadline 2.

1.1.4 On 23rd July 2021 SZC Co. sent further updated figures for Tables 3.5 and 2.1 to Natural England, the RSPB and SWT and the National Trust to respond

to two comments that had been made by the National Trust, and following a further review by SZC Co. of the method for calculating the estimated numbers. The updated numbers of people visiting European sites were lower than the numbers submitted at Deadline 2 (Volume 3 - Appendices Part 1 of 7, Appendix 6A [\[REP2-108\]](#)). The figures were discussed at the following meetings:

- Meeting between SZC Co. and the National Trust on 28th July 2021.
- Meeting between SZC Co, Natural England and the RSPB (also representing SWT) on 30th July 2021.

a) [Meeting between SZC Co. and the National Trust on 28th July 2021](#)

1.1.5 The National Trust agreed with SZC Co.'s updated approach to calculating estimate displacement numbers issued on 23rd July 2021, with one exception. National Trust consider that, in order to follow the most precautionary approach, the 56 of respondents of the 2014 Sizewell C visitor questionnaire survey who stated that they would stop using the area around Sizewell C during construction but did not name a displacement location, should all be assumed to displace to six locations that were most frequently named by the 95 respondents who did name displacement locations.

1.1.6 SZC Co. had assumed in the updated figures submitted at Deadline 2, that these 56 respondents who did not name displacement locations would displace to locations in the same pattern and same frequency to the 95 respondents who did name displacement locations.

1.1.7 The final figures presented in Section 1.2 have been revised as requested by the National Trust.

b) [Meeting between SZC Co, Natural England and the RSPB \(and SWT\) on 30th July 2021](#)

1.1.8 At this meeting it was agreed to prepare a statement setting out the higher estimated figures advocated by Natural England and the RSPB and SWT, and lower estimated figures advocated by SZC Co., and statements from each party (including the National Trust) on which figures they agree or disagree with, to provide clarity for the Examining Authority.

1.2 [Final figures for the Examining Authority](#)

1.2.1 The spreadsheet in Appendix A (a stand-alone Excel spreadsheet) presents the two approaches to estimating the additional numbers of people who may visit European sites due to the construction of the Sizewell C Project, arising

from displaced people and construction workers. The full spreadsheet is provided in Excel format to provide complete transparency of the calculations.

1.2.2 A summary of the estimated displacement figures and additional construction workers for the two approaches (1st and 2nd Approaches), drawn from Appendix A, is provided in Table 1.1.

a) 1st approach – higher figures

1.2.3 The 1st approach (black figures in Appendix A and Table 1.1) presents the figures submitted at Deadline 2 (Volume 3 - Appendices Part 1 of 7, Appendix 6A [[REP2-108](#)] (pdf page 571)) with the following amendments.

- Baseline estimated visitor numbers revised from 500,000 to 517,246 visits per year in the Sizewell area (to respond to a comment by the National Trust in their Written Representation submitted at Deadline 2 (paragraph 6.9) [[REP2-150](#)]).
- The inclusion of numbers for construction workers who have dogs in Table 2.1 which had been inadvertently omitted from previous calculations (to respond to a comment by the National Trust in their Written Representation submitted at Deadline 2 (paragraph 6.17 third bullet point) [[REP2-150](#)]).
- The 56 respondents who stated that they would stop using the area around Sizewell C during construction but did not name a displacement location, have now all been allocated to the six locations named most frequently by the 95 respondents who did name displacement locations, as requested by the National Trust in SZC Co.'s meeting with them on 28th July 2021. The six most frequently named locations were Thorpeness (named 20 times), Minsmere (19) (which was divided into Minsmere core and Minsmere outer in the Shadow HRA), Aldeburgh (15), Dunwich/Beach (meaning Dunwich village and its beach) (16), Dunwich Heath (12) and Sizewell Beach (10).

b) 2nd approach – lower figures

1.2.4 The 2nd approach (red figures in Appendix A and Table 1.1) presents the figures submitted at Deadline 2 with the three amendments described in paragraph 1.2.3 above, and with two further adjustments to the calculations of displaced people. A detailed description of these adjustments is included in Appendix B.

c) Summary of figures

- 1.2.5 The total estimated figures for displaced people and construction workers to each of the European sites, using figures from Appendix A, is summarised in Table 1.1 below.

Table 1.1: Total estimated figures for displaced people and construction workers to each European site

European site	1st approach				2nd approach			
	1st-1	1st-2	1st-3	1st-4	2nd-1	2nd-2	2nd-3	2nd-4
	Displacement additional visits / year	Construction workers additional visits / year	Total increased visits / year (1st-1 + 1st-2)	% increase over existing visits	Displacement additional visits / year	Construction workers additional visits / year	Total increased visits / year (2nd-1 + 2nd-2)	% increase over existing visits
Alde-Ore Estuary SPA and Ramsar site	39,378	8,503	47,881	8.3%	23,735	8,503	32,238	5.6%
Sandlings SPA	52,503	7,195	59,698	9.5%	31,646	7,195	38,841	6.2%
Minsmere-Walberswick SPA and Ramsar site; Minsmere to Walberswick Heaths and Marshes SAC	123,470	5,232	128,702	11.6%	76,535	5,232	81,767	7.3%

- 1.2.6 The figures for displaced people differ between the 1st and 2nd Approach. The figures for construction workers (columns 1st-2 and 2nd-2 of Table 1.1) are the same for both approaches.
- 1.2.7 The figures for construction workers presented in Table 1.1 and Appendix A are calculated by adding together the fourth column (Total construction worker visits to location/yr (construction workers who do not have dogs)) and the fifth column (construction workers who have dogs) of Table 3.9 of the Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148] (pdf page 450)), for each of the named locations in Table 2.1. The total figures are given in column ‘f’ of Appendix A.
- 1.3 SZC Co.’s position on these figures
- 1.3.1 SZC Co.’s position is that the 2nd Approach provides the precautionary estimation of additional numbers of people who may visit European sites due to the construction of the Sizewell C Project that should be used to inform the Shadow HRA. However, to date SZC Co. has been working to the higher numbers submitted at Deadline 2 which has already brought an additional level of precaution into our work.
- a) Displaced people – Table 3.5
- 1.3.2 SZC Co. considers that the figures summarised in column 2nd-1 (2nd Approach) of Table 1.1 provides a highly precautionary estimation of numbers of people who may be displaced to these European sites during the construction of the Sizewell C Project.
- 1.3.3 SZC Co. considers that the figures summarised in column 1st-1 (1st Approach) of Table 1.1 are incorrect, and over-estimate numbers, for reasons explained in Appendix B.
- 1.3.4 The reasons why SZC Co. consider that figures presented in the 2nd Approach are highly precautionary are the same as given in detail in Responses to the Examining Authority’s First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [REP2-108], and in SZC Co.’s Written Summaries of Oral Submissions made at ISH7: Biodiversity and Ecology Parts 1 and 2 (15-16 July 2021) [REP5-112] paragraph 1.2.84. The figures are highly precautionary for four principal reasons:
- It assumes that all 29% of visitors surveyed in the 2014 Sizewell C Visitor Surveys (Volume 2, Chapter 15, Appendix 15A of the Environmental Statement) [APP-268] who said they would stop using the area around Sizewell C during construction would in fact be

displaced. Surveys of this nature tend to be pessimistic (i.e. a lower percentage would actually displace), for reasons explained in Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [\[REP2-108\]](#) (paragraph 3.3.3 on pdf page 553).

- It assumes that all those visitors who said they would stop using the area around Sizewell C during construction would be displaced and that they would be displaced to European sites. There are two particularly cautious aspects of this assumption:
 - many visitors named locations that were near but not within a European site as an alternative destination, giving answers such as Southwold, Walberswick, Thorpeness or Aldeburgh. For the purposes of the precautionary assessment, however, it was assumed that they would not only visit the town or the beach but they would in fact (instead or as well) access the nearest European site. For example, in the case of Southwold and Walberswick they would go to Minsmere-Walberswick, in the case of Thorpeness they would go to Sandlings and in the case of Aldeburgh they would go to the Alde-Ore estuary. This is explained in SZC Co.'s Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [\[REP2-108\]](#) (section 3.2 on pdf page 550).
 - only 63% of respondents who said that they would stop using the area around Sizewell C during construction actually named a displacement location. For the purposes of the figures presented in the 1st and 2nd approaches, however, it was assumed that the remaining 37% would visit European sites, with all being allocated to the six most frequently named locations (see paras 1.1.5 to 1.1.7). This is notwithstanding approximately half of the people surveyed lived outside the area and (if displaced) may well choose entirely different locations in different parts of the country.
- The assessment took no account of those who may be displaced from European sites, notwithstanding two of the seven 2014 survey locations were within European sites (Aldringham Walks and Dunwich Heath). Some of those respondents surveyed within European sites indicated that they would be displaced but that has not been factored into the assessment. This is explained in SZC Co.'s Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [\[REP2-108\]](#) (section 3.4 on pdf page 554).

No account is made either of the assertion from some interested parties that the construction of SZC would deter visitors and tourists from coming to the area. No reduction has been made for those purposes.

1.3.5 No account was taken in the assessment of the measures which SZC Co. has since put in place or to which it is committed in the draft Deed of Obligation (Doc Ref. 8.17(E)) or committed to during the Examination, a number of which are designed to reduce displacement. These include the creation of a recreational resource at Aldhurst Farm; a commitment to a RAMs payment in accordance with ESC's recreation and avoidance mitigation strategy; enhancing local rights of way and reducing the risk of beach closures. These matters were not factored into the precautionary figures. This is explained in SZC Co.'s Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [[REP2-108](#)] (section 3.6 on pdf page 556).

b) Construction workers – included in Table 2.1

1.3.6 SZC Co. considers that the figures of construction worker visits summarised in columns 1st-2 and 2nd-2 of Table 1.1, and in column 'f' of Appendix A, provide precautionary estimates to inform the Shadow HRA. SZC Co. considers that they are precautionary for reasons given in Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [[REP2-108](#)] (sections 3.7 and 3.8, pdf pages 556, and 560, and section 3.2 on pdf page 550) which are summarised as follows:

- Construction workers would favour formal / organised sport and gym use to outdoor informal recreation activities;
- Work commitments are a significant reason for not undertaking recreation activity;
- A proportion of shifts will be during the day with 'time off' during the hours of darkness when outdoor informal recreation at European sites would be less attractive;
- The majority of non-home based construction workers would be living alone and not with families (including those staying at the accommodation campus and caravan site). The majority of non-home based construction workers would return home at weekends / at the end of their working period when they are more likely to, for example, go for walks and cycle than during their working periods;

NOT PROTECTIVELY MARKED

- The majority of non-home based construction workers would not have dogs (including all in the accommodation campus and caravan site) and would therefore not undertake regular daily dog walks;
- Non-home based construction workers staying in private rented sector or tourist accommodation would principally occupy existing tourist or private accommodation, in place of others (including holiday makers) who are more likely to visit European sites and who are more likely to have dogs which would need regular daily dog walks;
- Construction workers assumed to visit locations such as Southwold, Walberswick, Thorpeness and Aldeburgh were assumed to all access the nearest European site, and not only visit the town or the beach, similar to the assumption for displaced people explained in the second bullet of paragraph 1.3.4.
- The estimation of numbers of construction workers recreating at European sites is precautionary because it is based on the largest potential numbers of workers at peak of construction (i.e. when construction workers, and consequently numbers potentially visiting European Sites, are likely to be at their highest) across the full 12 year construction phase. In reality numbers of construction workers who could potentially visit European sites would be lower than factored into the sHRA for the majority of the construction phase.

c) Conclusion

- 1.3.7 SZC Co. emphasises that the estimates used to inform the Shadow HRA are broad numbers and not precise numbers.
- 1.3.8 The higher figures presented in the 1st Approach are of a similar order of magnitude to the figures submitted at Deadline 2 (Volume 3 - Appendices Part 1 of 7 Chapter 6, Appendix 6A Response to AR.1.12 [[REP2-108](#)]) where, at paragraph 4.2.10, SZC Co. concluded that the revised numbers (in Appendix 6A) will not lead to an adverse impact on the integrity of: the Alde-Ore Estuary SPA, Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick Ramsar site, and Sandlings SPA. The same conclusion applies to the figures presented in both the 1st Approach and the 2nd Approach in this document.
- 1.3.9 Whichever figures are used (1st or 2nd Approach), SZC Co.'s conclusions in the Shadow HRA, and the commitments to monitoring and mitigation in the two Monitoring and Mitigation Plans for these European sites, remain the same.

- 1.4 Natural England’s position on these figures
 - 1.4.1 Natural England’s position on these figures is presented in Appendix C.
- 1.5 The RSPB and SWT’s position on these figures
 - 1.5.1 The RSPB and SWT’s position on these figures is presented in Appendix D.
- 1.6 The National Trust’s position on these figures
 - 1.6.1 The National Trust’s position on these figures is presented in Appendix E.

APPENDIX A: FULL CALCULATIONS

A.1.1. See separate Excel spreadsheet titled:

- Appendix A: Tables from the recreational evidence base to the HRA revised - full detailed spreadsheet

Appendix A: Tables from the recreational evidence base to the HRA revised - full detailed spreadsheet

Updated to show two alternative approaches of estimating potential numbers of additional people visiting European sites due to the construction of the Sizewell C Project

Table 3.5 Extrapolated visitor numbers for locations given by survey respondents as sites to which they would relocate during construction of SZC (Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148]))

Table 3.5 updated. 1st Approach figures in columns 1, 3, 4 and 5 in black, 2nd Approach figures in columns 1A, 3A, 4A and 5A in red.

Column No.	Precautionary approach inc. those who did not give location								
	1	1A	2	3	3A	4	4A	5	5A
Location	% of survey visitors displaced to location inc. those who did not name a location (1st Approach)	% of survey visitors displaced to locations not named in the 1st Approach. Locations listed in this table only	Existing visitor numbers to location	Extra visits / yr based on 517,246 visits in Sizewell area (1st Approach)	Extra visits / yr based on 517,246 visits in Sizewell area (2nd Approach)	Extra visits / day (1st Approach)	Extra visits / day (2nd Approach)	% extra over existing visits (1st Approach)	% extra over existing visits (2nd Approach)
Alde-Ore Estuary SPA and Ramsar site									
Aldeburgh	4.69%	3.07%	150000	24283	15856	66.5	43	16.2%	10.57%
Butley	0.19%	0.10%	10000	1006	525	2.8	1	10.1%	5.25%
Iken	0.58%	0.30%	60000	3019	1576	8.3	4	5.0%	2.63%
Orford	0.78%	0.41%	150000	4025	2101	11.0	6	2.7%	1.40%
Sailors Path	0.39%	0.20%	60000	2013	1051	5.5	3	3.4%	1.75%
Snapes	0.97%	0.51%	150000	5032	2626	13.8	7	3.4%	1.75%
Sandlings SPA									
Aldringham Walks	0.58%	0.30%	60000	3019	1576	8.3	4	5.0%	2.63%
North Warren	0.58%	0.30%	60000	3019	1576	8.3	4	5.0%	2.63%
Rendlesham	0.78%	0.41%	150000	4025	2101	11.0	6	2.7%	1.40%
Sandlings Walk	0.58%	0.30%	150000	3019	1576	8.3	4	2.0%	1.05%
Thorpeness	6.26%	4.09%	60000	32377	21141	88.7	58	54.0%	35.23%
Tunstall Forest	1.36%	0.71%	150000	7044	3677	19.3	10	4.7%	2.45%
Minsmere-Walberswick SPA and Ramsar site; Minsmere to Walberswick Heaths and Marshes SAC									
Dunwich Heath	3.76%	2.45%	175934	19426	12684	53.2	35	11.0%	7.21%
Dunwich/Beach	5.01%	3.27%	150000	25902	16913	71.0	46	17.3%	11.28%
Eastbridge	1.56%	0.81%	38871	8051	4202	22.1	12	20.7%	10.81%
Minsmere Core (i)	1.19%	0.78%	103,844	6152	4017	16.9	11	5.9%	3.87%
Minsmere Outer (i)	4.76%	3.11%	30000	24607	16067	67.4	44	82.0%	53.56%
Sizewell Beach	3.13%	2.04%	195557	16189	10570	44.4	29	8.3%	5.41%
Southwold	1.75%	0.91%	150000	9057	4727	24.8	13	6.0%	3.15%
Walberswick	1.17%	0.61%	150000	6038	3152	16.5	9	4.0%	2.10%
Westleton	1.36%	0.71%	60000	7044	3677	19.3	10	11.7%	6.13%
Westwood Marshes	0.19%	0.10%	60000	1006	525	2.8	1	1.7%	0.88%
TOTALS	41.63%	25.50%		215351	131916				

Total extra annual visits to each European site	Existing	1st Approach	2nd Approach	1st & 2nd Approaches
Alde-Ore Estuary SPA and Ramsar site	580000	39378	23735	8503
Sandlings SPA	630000	52503	31646	7195
Minsmere-Walberswick SPA and Ramsar site; Minsmere to Walberswick Heaths and Marshes SAC	1114206	123470	76535	5232

(i) RSPB Minsmere - 19 respondents named Minsmere as a potential displacement location but did not specify if it was to the RSPB Minsmere core area around the bird hides, or to the outer areas. A split of 20% to the core area and 80% to the outer area has been assumed.

Calculations to inform columns 1 (1st Approach) and 1A (2nd Approach) of Table 3.5 updated

a	b	c	d	e			
1st Approach	2nd Approach	1st Approach	2nd Approach	1st Approach	2nd Approach		
Number who said would displace to this location (Table 14 of 2014. Vis for survey report (Appendix 15A in APP-288)). 95 people gave 182 responses naming locations within and outside European sites. This column only includes responses naming locations within or near European sites (158)	Number that named this location (a) as a % of the total number of people who said they would be displaced and gave a named location (95)	Column b 1st Approach: the number of all those who said would displace, including those who did not name a location (151). All 56 who didn't name a location allocated to the 6 most frequently named sites.	Column b 2nd Approach: the number of all those who said would displace, including those who did not name a location (151). All 56 who didn't name a location allocated to the 6 most frequently named sites.	Number who said would displace to this location and a proportion of those who did not name a location (column 'c' 1st Approach), as a percentage of total questionnaire respondents (514)	Number who said would displace to this location and a proportion of those who did not name a location (column 'c' 2nd Approach), as a percentage of total questionnaire respondents (514)		
15	15.79%	9.49%	24.13	18.15	4.69%	3.53%	3.07%
1	1%	0.63%	1.00	0.60	0.19%	0.12%	0.10%
3	3%	1.90%	3.00	1.80	0.58%	0.35%	0.30%
4	4%	2.53%	4.00	2.41	0.78%	0.47%	0.41%
2	2%	1.27%	2.00	1.20	0.39%	0.23%	0.20%
5	5%	3.16%	5.00	3.01	0.97%	0.58%	0.51%
3	3%	1.90%	3.00	1.80	0.58%	0.35%	0.30%
3	3%	1.90%	3.00	1.80	0.58%	0.35%	0.30%
4	4%	2.53%	4.00	2.41	0.78%	0.47%	0.41%
3	3%	1.90%	3.00	1.80	0.58%	0.35%	0.30%
20	21%	12.66%	32.17	24.20	6.26%	4.71%	4.09%
7	7%	4.43%	7.00	4.21	1.36%	0.82%	0.71%
12	13%	7.59%	19.30	14.52	3.76%	2.82%	2.45%
16	17%	10.13%	25.74	19.36	5.01%	3.77%	3.27%
8	8%	5.06%	8.00	4.81	1.56%	0.94%	0.81%
3,8	4%	2.41%	6.11	4.60	1.19%	0.89%	0.78%
15,2	16%	9.62%	24.45	18.39	4.76%	3.58%	3.11%
10	11%	6.33%	16.09	12.10	3.13%	2.35%	2.04%
9	9%	5.70%	9.00	5.41	1.75%	1.05%	0.91%
6	6%	3.80%	6.00	3.61	1.17%	0.70%	0.61%
7	7%	4.43%	7.00	4.21	1.36%	0.82%	0.71%
1	1%	0.63%	1.00	0.60	0.19%	0.12%	0.10%
158	166%	100.00%	214.00	151.00	41.63%	29.38%	25.50%

1ST APPROACH

Table 2.1 Estimated additional visits to locations in the study area as a result of displacement of existing users from the Sizewell area and the construction workforce (Recreational Disturbance Assessment (Shadow HRA Report Volume 1 Appendix E [APP-148]))

Precautionary approach figures revised to include revised (black) displacement figures in Table 3.5 and construction workers who have dogs

Based on 517,246 visits to Sizewell area				
Increased visits / year	Increased total visits / day	% increase over existing visits	Total increase in no. of annual visits to this European site	Percentage increase to this European site
Alde-Ore Estuary SPA and Ramsar site				
32,786	89.8	21.9%	47,881	8.3%
1,006	2.8	10.1%		
3,019	8.3	5.0%		
4,025	11.0	2.7%		
2,013	5.5	3.4%		
5,032	13.8	3.4%		
Sandlings SPA				
4,000	11.0	6.7%	59,698	9.5%
3,019	8.3	5.0%		
4,679	12.8	3.1%		
3,019	8.3	2.0%		
37,283	102.1	62.1%		
7,698	21.1	5.1%		
Minsmere-Walberswick SPA and Ramsar site; Minsmere to Walberswick Heaths and Marshes SAC				
19,753	54.1	11.2%	128,702	11.6%
26,556	72.8	17.7%		
8,051	22.1	20.7%		
6,282	17.2	6.0%		
25,130	68.8	83.8%		
16,189	44.4	8.3%		
12,000	32.9	8.0%		
6,365	17.4	4.2%		
7,371	20.2	12.3%		
1,006	2.8	1.7%		
20930			236,281	

2ND APPROACH

Table 2.1 Estimated additional visits to locations in the study area as a result of displacement of existing users from the Sizewell area and the construction workforce (Recreational Disturbance Assessment (Shadow HRA Report Volume 1 Appendix E [APP-148]))

Precautionary approach figures revised to include revised (red) displacement figures in Table 3.5 and construction workers who have dogs

Based on 517,246 visits to Sizewell area				
Increased visits / year	Increased total visits / day	% increase over existing visits	Total increase in no. of annual visits to this European site	Percentage increase to this European site
Alde-Ore Estuary SPA and Ramsar site				
24,359	66.7	16.2%	32,238	5.6%
525	1.4	5.3%		
1,576	4.3	2.6%		
2,101	5.8	1.4%		
1,051	2.9	1.8%		
2,626	7.2	1.8%		
Sandlings SPA				
2,557	7.0	4.3%	38,841	6.2%
1,576	4.3	2.6%		
2,755	7.5	1.8%		
1,576	4.3	1.1%		
26,047	71.4	43.4%		
4,331	11.9	2.9%		
Minsmere-Walberswick SPA and Ramsar site; Minsmere to Walberswick Heaths and Marshes SAC				
13,011	35.6	7.4%	81,767	7.3%
17,567	48.1	11.7%		
4,202	11.5	10.8%		
4,148	11.4	4.0%		
16,590	45.5	55.3%		
10,570	29.0	5.4%		
7,670	21.0	5.1%		
3,479	9.5	2.3%		
4,004	11.0	6.7%		
525	1.4	0.9%		
152,846			152,846	

APPENDIX B: RECREATIONAL DISPLACEMENT CALCULATIONS – EXPLANATION BY SZC CO.

B.1. Introduction

B.1.1. This Appendix provides SZC Co.'s explanation of updated figures for the additional numbers of displaced people who may visit European sites due to the construction of the Sizewell C Project, presented in the 2nd Approach in Section 1.2. It also describes why the figures presented in the 1st Approach are inaccurate and an over-estimate.

B.1.2. The updated figures in the detailed Excel spreadsheet at Appendix A are referred to.

B.1.3. Some key results from the 2014 visitor surveys that are used to inform the calculations are:

- The estimated annual level of visits to the Sizewell area is 517,246 visits per year (Table 8 of Volume 2, Appendix 15A of the ES (2014 Sizewell C Visitor Surveys) [[APP-268](#)] (pdf page 24)).
- 514 questionnaire responses were submitted (paragraph 4.1.2 of the 2014 Sizewell C Visitor Surveys [[APP-268](#)] (pdf page 25)).
- 151 of the questionnaire respondents said that they would stop using the area around Sizewell C during construction (29.4% (approximately 29%) of 514 of the questionnaire respondees) (paragraphs 4.1.17 and 4.1.23 of the 2014 Sizewell C Visitor Surveys [[APP-268](#)] (pdf pages 33 and 35)).
- 95 of these 151 respondents named locations to where they may displace. 56 of these 151 respondents did not name locations to where they may displace. (Paragraph 4.1.23 of the 2014 Sizewell C Visitor Surveys [[APP-268](#)]).
- The 95 respondents who named locations gave 182 responses naming a total of 40 locations within and outside European sites. Some people therefore named more than one location. Not all of these locations were at or near European sites. The 40 named locations and the total of 182 responses can be seen in the first and second columns of Table 14 of the 2014 Sizewell C Visitor Surveys [[APP-268](#)] (pdf pages 36 and 37).
- 158 (approximately 86.8%) of the 182 responses naming locations were to a total of 21 locations (increased to 22 in Table 3.5 due to dividing 'Minsmere' into Minsmere Core and Minsmere Outer) within or near European sites, where visitors may visit European sites and are

therefore included in Table 3.5 to inform the Shadow HRA (Appendix A). (See cell K38 of Appendix A for the 158 number.)

- B.1.4. The left Table 3.5 in Appendix A shows the displacement figures for the 1st Approach and the 2nd Approach. The figures in black in columns 1, 3, 4 and 5 Table 3.5 Appendix A are the 1st Approach, and the figures in red in columns 1A, 3A, 4A and 5A are the 2nd Approach.
- B.1.5. The figures in the grey columns 'a' to 'e' show the detailed calculations to provide the percentage figures in columns 1 (1st Approach) and 1A (2nd Approach) in Table 3.5.
- B.1.6. The figures in the right-hand two Tables 2.1 in Appendix A are all updated to reflect changed figures in Table 3.5 (displacement) and the addition of the number of construction workers who have dogs. The first table 2.1 (black figures) shows the 1st Approach and the second table 2.1 (red figures) shows the 2nd Approach.
- B.2. **Description of the two adjustments to the calculations of displaced people to provide corrected numbers (Table 3.5 in Appendix A, 2nd Approach)**
- B.2.1. The text below explains how the updated red figures in columns headed 'b 2nd Approach' to 'e 2nd Approach', and column '1A' are calculated, referring to Aldeburgh as an example.
- B.2.2. These changes have the effect of reducing estimated visits to European sites compared to Deadline 2, and lower figures than the 1st Approach.
- B.2.3. Column a shows the number of times each location was named by the respondents who named a displacement location (from Table 14 of the 2014 Sizewell C Visitor Surveys [APP-268]). Aldeburgh was named 15 times. This remains the same as at Deadline 2, and is the same for both the 1st and 2nd Approaches.
- B.2.4. Column b 2nd Approach shows the number of times that each location was named (15 at Aldeburgh) as a percentage of the total number of times places within or near European sites were named (158). $15/158 = 9.49\%$. An explanation of the reason for the difference between columns 'b 1st Approach' and 'b 2nd Approach' is given in the first bullet point at paragraph B.2.11 below.
- B.2.5. Column c 2nd Approach shows the total number of people who might visit each location out of the total 151 respondents (approximately 29.4% of 514 people who completed questionnaires) who said that they would stop using the area around Sizewell C during construction (and therefore may displace). The 56 people who said that they would stop using the area around Sizewell C during construction but did not name a location are allocated to the six

most frequently named locations, as discussed in paragraph 1.2.3, third bullet point.

- B.2.6. Column c 2nd Approach adds up to 151 (Cell O38) matching the number who said that they would stop using the area around Sizewell C during construction, rather than the incorrect figure of 214 following the 1st Approach (Cell N38).
- B.2.7. Column d 2nd Approach shows the percentage of the 514 people who submitted questionnaire responses who might visit each location. For Aldeburgh, this is 18.15 number from column 'c 2nd Approach' as a percentage of 514 = 3.53%. Column 'c 2nd Approach' totals 29.38% (Cell Q38), accurately representing the approximate 29.4% of people who said that they would stop using the area around Sizewell C during construction.
- B.2.8. Column e 2nd Approach is a new column, to account for the fact that only 158 of the 182 responses (from 95 respondents) named locations within or near European sites. I.e. 158 as a percentage of 182 = approximately 86.8%. The percentage in column 'd 2nd Approach' is therefore multiplied by 86.8%. For Aldeburgh 86.8% of 3.53% = 3.07%.
- B.2.9. The percentages in 'column e 2nd Approach' are copied to column 1A of Table 3.5, and used for calculating the updated displacement figures in Table 3.5 columns 3A, 4A and 5A, which are then carried through to the updated Table 2.1.
- B.2.10. The 2nd Approach displacement calculations for Aldeburgh in the updated Table 3.5 are therefore based on 3.07% of the estimated existing number of visits to the Sizewell area (517,246) displacing to Aldeburgh (15,856 in column 3A), equating to approximately 43 extra visits per day (column 4A) and an increase over existing estimated visits of approximately 10.57% (column 5A).
- B.2.11. The displacement figures following the 1st Approach are over-estimated because:
- When calculating 'the percentage of those who said they would be displaced to a location' (column 'b 1st Approach'), the percentage was calculated by dividing the responses for each location (e.g. 15 named Aldeburgh) by the number of people who named one or more locations to which they may displace (95), which gave a total of 166% (see Cell L38 of the Excel spreadsheet in Appendix A), rather than the updated and correct percentage of 100% which is now used (Cell M38). The corrected calculation used in column 'b 2nd Approach' is based on 95 people naming locations 158 times within or near European (Cell K38) which correctly adds up to 100% (Cell M38). At Deadline 2, and following the 1st Approach, this leads to a 66% overestimate. This error carries through and leads to a total of 41.63% of people displacing

(Column 'd 1st Approach' (Cell P38)) rather than 29.38% (Column 'd 2nd Approach') (Cell Q38)) which matches the survey responses ($151/514=29.38\%$).

- Column e 2nd Approach has been added to take into account the fact that some of the responses naming displacement locations were to locations away from European sites, as described above (see column 'e 2nd Approach' description at paragraph B.2.8 above).

B.2.12. The over-estimation in the 1st Approach can also be checked because the total number of displaced annual visits to all 40 named locations (including those away from European sites) from the 2014 visitor surveys is approximately 29.4% of 517,246 = approximately 152,070, but following the 1st Approach the total number of displaced annual visits to the fewer (22) locations at or near European sites listed in Table 3.5 comes to 215,351 (Cell E38 of Appendix A); considerably more than 152,070 which is incorrect. The updated total number of displaced annual visits to the 22 locations in Table 3.5 now comes to 131,916 (Cell F38), which is less than 152,070 because named locations away from European sites are not included. Displacement visits following the 1st Approach are therefore approximately 83,435 ($215,351 - 131,916$) or approximately 63% greater than the updated correct figure following the 2nd Approach.

APPENDIX C: NATURAL ENGLAND'S POSITION ON DISPLACEMENT AND CONSTRUCTION WORKER FIGURES

Date: 16 August 2021
Our ref: DAS/363894



Alan Lewis
For EDF Energy

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

████████████████████
BY EMAIL ONLY

Dear Alan,

Discretionary Advice Service (Charged Advice)

Sizewell C – HRA Recreational disturbance impact evidence base

Thank you for your consultation on the above dated 06 August 2021, which was received the same day.

This advice is being provided as part of Natural England's Discretionary Advice Service. As outlined in the consultation email, NNB Generation Company (SZC) Limited has asked Natural England to provide advice upon:

- Natural England's position on recreational disturbance numbers to be presented to the Examination and included in the Statement of Common Ground (SoCG) between NNB Generation Company (SZC) Limited and Natural England.

The following advice is based upon the information within:

1. *STATEMENT ON RECREATIONAL DISTURBANCE NUMBERS* (SHRA_NUMBERS_SATEMENT.docx, undated)
2. *Appendix A: Tables from the recreational evidence base to the HRA revised - full detailed spreadsheet* (AppendixA.xlsx, undated)

Natural England's advice

Natural England have previously provided much advice on this issue through our DAS response to the 'Sizewell C – HRA Recreational disturbance impact assessment, mitigation and monitoring approach' meetings on the 18th and 22nd February 2021 (our ref: 343933, dated 19th March 2021), and through our statutory responses to the Examining Authority including our Relevant Representation [RR-0878], Written Representation [REP2-153] and Statement of Common Ground [REP2-071]. Issue 29 of these responses outlines our overall advice on recreational disturbance impacts to European designated sites in terms of the evidence base, impact assessment, and mitigation and monitoring approach required to avoid an adverse effect on the integrity (AEoI) of the relevant sensitive sites which we reiterate at this time.

The advice given below largely focussed on the evidence which feeds into the impact assessment and mitigation and monitoring strategies, and is based on the documents listed above, following the numbering set out in the '*STATEMENT ON RECREATIONAL DISTURBANCE NUMBERS*'.

1.4 Natural England's position on these figures

a) Displaced people – Table 3.5

1.4.2 Natural England's review of the methodologies and data gathered to inform the estimates of displaced people has found a number of limitations which we consider affects their reliability. The major limitations include but are not limited to low sample size, age of survey data and duration of surveys (only two months surveyed in a single year). Consequently, the quality of data informing these estimates are likely to have a wide margin of error and the methodologies selected to calculate displacement should therefore aim to reflect the highest level of precaution possible.

1.4.3 We consider that the figures summarised in column 1st-1 (1st Approach) of **Error! Reference source not found.** provides the most precautionary estimation of numbers of people who may be displaced to these European sites during the construction of the Sizewell C Project, and should be used to inform the Shadow Habitats Regulations Assessment (sHRA), on a precautionary basis.

a) Construction workers – included in Table 2.1

1.4.4 Natural England's primary concern on the issue of recreational disturbance is the estimates produced by the applicant on the predicted use by construction workers of nearby nature conservation sites of international and national importance for wildlife (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and Sites of Special Scientific Interest (SSSIs) for recreation, some of which are both highly attractive and readily accessible in this regard. We consider these figures to be a potentially vast underestimation, informed by limited and unreliable evidence. Consequently, we consider that the proposed mitigation and monitoring strategies (i.e. without provision of an alternative green space integrating Suitable Alternative Natural Greenspace (SANG) principles as part of the package) are inadequate to address the potential scale of impacts which are unprecedented in this location.

1.4.5 The estimates produced by the applicant are based on a small number of sources which we consider vary in quality and appropriateness of use. The primary source of evidence within the Shadow HRA (Shadow HRA Report Volume 1 Appendix E Annex A [[APP-148](#)], paragraph 3.3.14) appears to be a survey conducted in 2003 by East of England Tourist Board (2004). The applicant appears to have reverse engineered the data collected at survey locations relevant to this assessment to conclude an approximate figure of 1.5% for the average resident, while also disregarding more recent data in the preceding paragraph which estimates 62% of adults living in England reported taking visits to the countryside at least once a week (Natural England, 2018). While it is unclear exactly how the 1.5% figure was calculated, reverse engineering estimates are unlikely to provide reliable and accurate baselines considering the age of data (18 years old) and that national trends have shown progressively increasing utilisation of outdoor recreation across all demographics (O'Neil, 2019¹).

1.4.6 Further evidence used by the applicant to justify estimates of low percentages of construction workers predicted to utilise nearby designates sites (SACs, SPAs, Ramsar sites and SSSIs) draws on demographic data procured from Sport England (2010). In addition to being published 11 years ago, this study was focused on organised sports as opposed to outdoor recreation and therefore has limited value in profiling construction workers in this context.

1.4.7 A 2016 survey by Quod which interviewed Sizewell B outage workers has suggested that the

¹ O'Neill, R. (2019). *Monitor of Engagement with the Natural Environment – The national survey on people and the natural environment. Headline report 2019* (NECR No. 275). Natural England and the Office for National Statistics.

number of visitors to informal outdoor recreational areas will be low. We currently do not have access to this report and are therefore unable to scrutinise it in any detail. However, we would suggest that information garnered from these surveys should be used cautiously as there appear to be considerable differences in workforce profiles. Sizewell B outage workers (850 no.) are predominantly (85%) based off-site in private or tourist accommodation for approximately 6 weeks. In comparison, the Sizewell C construction workforce at peak consists of approximately 5,900 workers new to the area across various accommodation arrangements for a wide variety of tenures, with many individuals being contracted for years rather than weeks.

- 1.4.8 Sizewell C is located within a part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) that is highly attractive to recreational users. We consider that the applicant has failed to fully consider the excellent access the footpaths at the Eastbridge campus accommodation offer to numerous designated sites with high recreation value (beach, woodland and heathland, much of which is open access) which are also particularly sensitive and already under significant pressure from the current levels of recreational use. We also advise that national trends for increasing levels of outdoor informal recreational use of the countryside have not been properly considered, instead relying on older data which is less likely to reflect these increases.
- 1.4.9 On this basis, Natural England do not consider that the figures of construction worker visits summarised in columns 1st-2 and 2nd-2 of Appendix A provide a suitably precautionary estimate.
- 1.4.10 The applicant has rightly acknowledged the uncertainty and the reliability of using a range of methodological approaches, but have nonetheless produced a rather arbitrary figure of 10% of construction workers who are likely to participate in outdoor recreation once a week, which we consider is likely to be a vast underestimation and lacking precaution.

a) **Conclusion**

- 1.4.11 The current mitigation strategies are designed to reduce the impact of recreational disturbance based on the applicant's estimation of displaced recreational users and construction workers. Natural England's view is there is significant uncertainty regarding these estimates, particularly those of construction workers likely to be participating in outdoor recreation locally.
- 1.4.12 We advise that, on this basis and in accordance with the precautionary principle which is enshrined in the Habitats Regulations², adverse effects on the integrity of the nearby designated sites (as agreed within scope) cannot be ruled out beyond reasonable scientific doubt based on the mitigation which is currently proposed by the applicant. To address the significant amount of residual uncertainty regarding impacts from construction workers, we advise that an alternative green space integrating Suitable Alternative Natural Greenspace (SANG) principles should also form part of the package, specifically to address impacts from workers within close proximity of the worker's accommodation.
- 1.4.13 Natural England acknowledges that the recreational needs of workers are slightly different to typical housing residents (e.g. most will not be allowed dogs) but consider that an alternative green space is required given that the worker's accommodation is proposed so close to the highly attractive designated sites and that the construction period is long term at 10-12 years during which time adverse effects could occur. We consider that the size and design of the alternative green space is open for debate in terms of SANGS guidelines (as partially listed in issue 29 of our Relevant Representations, Written Representations and SOCG), but that it would need to be specifically designed to mitigate impacts from workers, targeted at the types of recreation they are likely to undertake. We would be keen to work with the applicant

² Conservation of Habitats and Species Regulations 2017 (as amended)

to develop and agree this.

This concludes Natural England's advice at this stage which we hope you will find helpful. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Niall Walkden using the details given below.

The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England advisers named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours sincerely

Jack Haynes
Senior Adviser
Norfolk & Suffolk Area Team

Email: [REDACTED]

[REDACTED]

Niall Walkden
Lead Adviser
Norfolk & Suffolk Area Team

Email: [REDACTED]

[REDACTED]

APPENDIX D: THE RSPB AND SWT'S POSITION ON DISPLACEMENT AND CONSTRUCTION WORKER FIGURES

RSPB and Suffolk Wildlife Trust Position on the Statement on Recreational Disturbance Numbers

Displaced people – Table 3.5

The RSPB and SWT consider that the figures summarised in column 1st-1 (1st Approach) of Table 1.1 provides the most precautionary estimation of numbers of people who may be displaced to these European sites during the construction of the Sizewell C Project, as, of these two approaches, they represent the worst case scenario. The key difference between the two approaches is around the treatment of those people who named more than one site to which they may be displaced. The first approach represents the worst-case scenario for each individual site as the calculations assume each site named receives the maximum number of visits. We do not support any approach which implies any kind of weighting (even an average) where a person has named more than one site as participants were not asked for their preferences nor about the proportion of time they would spend at each site and would have been unaware that their responses would be used in this way. Without information regarding preferences and weighting, we therefore do not agree that the approach in column 2nd-1 is appropriate in the context of Habitats Regulations Assessment as the level of precaution within this approach is unknown.

We also note that, whilst we have stated a preference for approach 1st-1 of the two approaches presented, we have other concerns around the survey data and assessment approach that are relevant to both approaches described here. In particular, we remain concerned that the levels of displacement indicated by the survey responses may have been underestimated as participants were given no visual representations of the construction site and may therefore have underestimated their likelihood of being displaced. We also note our concerns around the baseline figures presented for the existing numbers of visits to each location (column 2, or spreadsheet column D, in Appendix A) as these in many cases appear to be estimated and may mean that the projections for each site of percent increases over existing visits are not accurate. We also note the footnote in the Appendix A spreadsheet regarding visitors who stated they would be displaced to Minsmere and their allocation to either the Minsmere core or outer area. The footnote explains that a split of 20% to the core area and 80% to the outer area has been assumed although no evidence is presented to support this assumption. We consider that the worst-case scenario would be to assume all visitors are displaced to Minsmere outer as this area is more sensitive to increased recreational pressure. Please also note our support for the points raised by National Trust in relation to recreational displacement.

Construction workers – included in Table 2.1

The RSPB and SWT consider that the figures presented for construction worker use of designated sites are likely to be significantly underestimated. We do not agree with the assumption in paragraph 3.3.15 of Appendix 5.10E to the Shadow HRA [APP-148] that only 10% of workers will undertake informal recreation in the countryside around Sizewell once a week and do not consider that sufficient comparable and recent evidence has been presented to support this figure. Given the attractiveness of the area around Sizewell and the potential for active and sporting outdoor recreation (e.g. mountain biking, running, watersports) we consider that outdoor recreation levels are likely to be significantly higher than projected with over a third of workers likely to walk for leisure and around 15-20% likely to cycle (see Appendix 2b to our Written Representations [REP2-506] for supporting evidence¹). We also consider that the assumptions around dog walking by

workers (those in private accommodation) are under-precautionary and lack evidential support, again as set out in Appendix 2b to our Written Representations.

Conclusion

The RSPB and SWT consider that the estimates of additional recreational use of designated sites presented are likely to be under-estimated (with the approach in column 2nd-1 for displaced visitors likely to represent a greater under-estimate than that in column 1st-1). We consider it would not be possible to rule out adverse effects on the integrity of the Minsmere-Walberswick European sites and Sandlings SPA arising from the potential recreational effects of the Application without adequate mitigation. We have welcomed the development of the Monitoring and Mitigation Plans for the Minsmere-Walberswick, Sandlings and Alde-Ore Estuary designated sites, but remain of the view that alternative greenspace is still required to reduce the potential impacts of construction workers on those sites.

APPENDIX E: THE NATIONAL TRUST'S POSITION ON DISPLACEMENT AND CONSTRUCTION WORKER FIGURES

National Trust response to EDF's 'Statement on Recreational Disturbance Numbers' and Recreational Displacement email received 6th August 2021.

- i. The comments below are provided in response to a request made by EDF on the 6th August 2021 to provide comments on their approaches to estimating numbers associated with recreational displacement that would arise as a consequence of the proposed SZC development. The request was supported by a draft Statement on Recreational Disturbance Numbers and a spreadsheet containing calculations and tables associated with the recreational evidence base to the Shadow HRA. Our comments below are based on these documents.
- ii. The National Trust has previously provided comments on the recreational disturbance evidence base as part of our Relevant Representation, Written Representation and responses to ExAQ1 and Deadline 3 submissions.

a) Displaced people

- 1.6.1. The National Trust are pleased that the Estimate approach now uses the 517,246 visits to the Sizewell area given the figures previously used were based on a rounded down number.
- 1.6.2. The National Trust is not convinced that the survey responses provided by people who said they would be displaced and gave a named location are being processed in a manner that would provide a robust precautionary view on recreational displacement. In arriving at our view we understand that all mentions of locations have been treated equally by EDF. This means that if 1 respondent provided 1 named location as part of the survey that their view would be weighted as 0.55% of the total number of responses naming locations within and outside European sites (182) or 0.63% of the total number of responses naming locations within or near European sites (158) despite the fact they are 1.05% of the total number of respondents (95).
- 1.6.3. It is unclear if respondents to the survey would have understood how their responses would be used and weighted to estimate impacts on European sites. This is particularly relevant as we are still receiving iterations of this data at this late stage in the examination. This emphasises concerns we have previously highlighted regarding the limitations of the low sample size of the survey data being used including the age of the survey data and the duration of surveys. The age of the data is of particular concern given the wealth of information still being submitted through the examination process that would not have been able to accompany the original questionnaires and survey. Furthermore, respondents may have responded differently had they been presented with information and images of the nature and scale of development now being considered.
- 1.6.4. The calculation of the % of survey visitors that would be displaced to location and the use of this figure as a multiplier of the total estimated visits to the Sizewell area to arrive at a figure that represents the extra visits per year to each location is clearly crucial. Whilst EDF have highlighted to the National Trust that they feel these figures are less relevant as mitigation is proposed to address issues arising from recreational displacement, we feel this underplays the important role these figures have in supporting the assessment of impacts through the Shadow HRA process as well as the need for the figures to be truly precautionary. This is

particularly relevant when there is likely to be a wide margin of error associated within the primary survey data collected given the small sample size.

- 1.6.5. In this respect the Trust would see precautionary to mean that the figures should represent a worst-case scenario that informs the assessment of the likelihood and severity of impacts on European sites as well as the appropriateness and need for mitigation and subsequent triggers for intervention. As such the figures should represent a peak rather than an average and should explore what the worst-case impact for each location would be.
- 1.6.6. It is of note that whilst for Dunwich Heath the visitor numbers used in column 2 titled 'Existing visitor numbers to location' align broadly with our understanding of historic visitor numbers, that other sites figures are based on broad assumptions that provide estimated visitor numbers that fall into bandings of 60,000 and 150,000 visits per annum to each location.
- 1.6.7. The early 'precautionary' figure used by EDF for recreational displacement at Dunwich Heath (submitted at D2) is based on 12 mentions of the site by the 95 respondents who said they would be displaced and included named locations in their response. This figure was expressed as a percentage (2.33%) and applied to a theoretical 500,000 visits to the Sizewell area. ($500,000 / 100 \times 2.33$) This provides a figure of 11,650 additional visits per annum to Dunwich Heath. This figure did not make any allowance for;
 - The 56 respondents (10.89% of the total no. of respondents) who stated they would be displaced but did not name a location - Para 4.1.23, PDF page 35, printed page 33, SZC Public Access Visitor Surveys 2014 [Link](#)
 - The 13 respondents (2.5% of the total no. of respondents) who said they were not sure they would be displaced by the development - See p.33 Figure 4.6 of above linked doc
 - The 18 respondents (3.5% of the total no. of respondents) who did not provide a response on displacement – this is a reverse calculation of the % remaining of the total as in some tables the bullet point is expressed as either 2.5% or 3%. When expressed as 2.5% no account is made for the missing 0.5% anywhere in the documentation. – for example Para 5.1.18, PDF page 60, printed page 58, SZC Public Access Visitor Surveys 2014 [Link](#)
- 1.6.8. It is clear the 56 respondents who stated they would be displaced need to be accounted for in any precautionary assessment of visitor displacement. Furthermore, given the small sample size and the age of data of the survey to represent a truly worst-case scenario it would be useful to ensure that people who were not sure they would be displaced should be accommodated also. It is difficult to know the rationale behind why those who provided no response did so. However again, it is difficult to understand why they should all be discounted given the lack of understanding on their reasoning.
- 1.6.9. As stated previously it is important to understand the worst-case scenario for all sites regarding recreational displacement so it would be useful to present an understanding of a range of scenarios and to articulate the worst case for each location. For example, it is possible to divide the cohorts who did not name a location in their response by the 6 principle locations identified as being most visited. This would provide a theoretical worst case (based on current survey data) for these sites. It would also be worth dividing them in accordance with the span of responses received by those who did name a location as this would likely provide a worst-case for those sites outside of the most popular locations. This

is reasonable as the exercise is not to arrive an average year for each site but a worst case for each location so as to determine the potential for adverse impacts. Some example calculations for Dunwich Heath are presented below for the scenario that divides these cohorts by the six most popular locations mentioned in Para 4.1.22, PDF page 35, printed page 33, SZC Public Access Visitor Surveys 2014 [Link](#).

Scenario	Variables considered	% used and equations to get to %	Equation to arrive at result	Result
1	The no. of mentions of a site by 95 respondents who stated they would be displaced	2.33 $100/514 \times 12 = 2.33$	$517,246 / 100 \times 2.33$	12,052
2	As above + an equal division (across the most popular 6 sites) of the 56 respondents who stated they would be displaced but didn't give a location	4.15 $56/6 = 9.33'$ $100/514 \times 9.33' = 1.82$ $2.33 + 1.82 = 4.15$	$517,246 / 100 \times 4.15$	21,466
3	As scenario 1&2 + an equal division (across the most popular 6 sites) of the 13 respondents who were not sure they would be displaced	4.57 $13/6 = 2.17$ $100/514 \times 2.17 = 0.42$ $4.15 + 0.42 = 4.57$	$517,246 / 100 \times 4.57$	23,638
4	As scenario 1,2&3 above + an equal division (across the most popular 6 sites) of the 18 respondents who did not provide a response on the issue of displacement	5.15 $18/6 = 3$ $100/514 \times 3 = 0.58$ $4.57 + 0.58 = 5.15$	$517,246 / 100 \times 5.15$	26,638

1.6.10. The National Trust notes that SZC Co. have asked us to indicate which of their 2 approaches we support. However, we feel unable to answer at this stage because whilst approach 1 provides the highest values of the two approaches, it has yet to fully account for all the variables we have identified in this and previous responses. As such we would wish to see appropriate amendments to approach 1 that accommodate our comments or a more comprehensive and up-to-date dataset on which to base their calculations.

b) Construction workers

- 1.6.11. In the email of the 6th August 2021 two actions related to constructions worker figures were highlighted;
2. Provide reference to SZC Co.'s stated position on 10% of construction workers who do not have dogs visiting countryside locations such as European sites once a week.
 3. Provide reference on the Sizewell B Outage worker surveys referred to for informing locations SZC construction workers are likely to visit.
- 1.6.12. It is the Trust's view that this was not an accurate reflection of the request discussed. The Trust asked specifically for evidence that supported EDFs assertions regarding the 10% figure used for construction workers who do not have dogs visiting countryside locations such as European sites once a week. We believe the use of the 10% figure is very low and would question whether it represents a precautionary approach to estimating the number of additional visits to the countryside that could be made by the construction workforce. EDF's email of the 6 August 2021 does not highlight any specific evidence supporting the 10% figure other than demographic data (published in 2010) that we were previously aware EDF had procured from Sport England. This data refers to organised sports not outdoor recreation in a wider context. Therefore, as stated in our Written Representation we remain unclear as to the evidence on which the 10% figure has been based and feel more up-to-date evidence that relates to construction workers should be provided to justify the use of this figure. Furthermore, as stated in our Written Representation it is of note that the 2018/19 MENE report (Monitor of Engagement with the Natural Environment: Headline report and technical reports 2018 to 2019) states 65% of adults spend time in the natural environment at least once a week. The use of this figure would clearly increase the number of estimated visits to Dunwich Heath by the construction workforce without dogs by 6.5 times. We remain unclear as to the justification and evidence on which the 10% figure has been based.
- 1.6.13. In addition, whilst reference to the Outage worker surveys is useful the Trust have previously referred to these in our earlier submissions, specifically our Written Representation. The question asked in the latest meeting with EDF was in line with our position set out in the Written Representation that sought to understand why the figures provided are reliant on a single survey of outage workers. As stated in our Written Representation "Given the applicant's unique position to access this type of audience the Trust would have expected the applicant to draw on a more comprehensive evidence base in support of estimates contained within its submission." On the basis that no new information or evidence has been forthcoming on this matter since the submission of our Written Representation the National Trust remains of the view that we do not consider that the figures of construction worker visits are precautionary and are indeed concerned they represent a vast underestimation.

c) Conclusion

- 1.6.14. The National Trust believes that recreational displacement and visits to designated sites by the construction workforce have been underestimated. Specifically, EDFs figures in the 2nd approach seem likely to be a larger underestimate than the 1st approach highlighted. We have yet to see any further information that would change ours views as articulated in our Written Representation and other submissions.

1.6.15. We welcome the continued development of the Minsmere – Walberswick and Sandlings (North) Monitoring and Mitigation plan and its aim to ensure that adverse effect on the integrity of the referenced European sites does not arise as a consequence of recreational disturbance. However, we remain concerned that this document needs to be informed by a truly precautionary approach to estimating the level of recreational pressure arising as a consequence of the development. Furthermore, as stated in our Deadline 3 submission, the National Trust believes that recreational displacement and additional visits to the countryside by construction workers arising from the development should not all be directed to designated sites and as such would wish to see adequate Suitable Alternative Natural Green Space (SANG) provision included as mitigation. We also support the points raised by the RSPB and SWT in relation to recreational displacement and visits by the construction workers.

National Trust, 19th August 2021