

## **Community, Amenity, Recreation and Human Health**

### **Oral Contibution and Commentary**

from : Regan Scott for S.A.G.E. (Suffolk Alternative Green Environment Community Monitoring Group)

### **References**

- The Environment Statement 6.3, Volume 2 - Main development Site Chapter 15 Amenity and Recreation May 2020 (App 267)15.6.30 passim, Table 15.6 at 15.6.34, and Appendices 15A and 15 B, and comments during the Hearing.
- For SANGS, Natural England's Guidelines to SANGS of 15.06.08 arising from the Thames Basin Heaths Planning Zone project.
- ISH 13 raised similar issues for the Associated Developments. Our observations might be regarded as applicable to both sessions in respect of the equivalence of the underlying principal issues of amenity and a holistic approach.
- We are attaching an Anglian newspaper cutting requested by Mr Brock on "*Carnage*" on A12 as overturned lorry sees eight hour road closure", Tuesday September 14<sup>th</sup>, 2021. Notable in the text is the 5 mile impact radius - "gridlock" - around the A12, an indication of the scope of the A12 "corridor", a matter we have suggested needs a specific metric. This has been avoided so far by the developer's representatives.

### **Poor quality of assessments**

We contributed to the Hearing on the poor quality of assessment of lost amenity from the main site and construction works, and noted the response of developer representative Mr Phillpot that the assessment methodology was "adequate". Our view was that a wider basis of assessment was necessary for lost amenity. Rhetoric aside, the developer has relied on an elementary and small sample questionnaire at two visitor locations. For this longlasting project's construction period of 8 to 12 years plus a 3 year impact overspill - elsewhere already volunteered by the developer – this defies "cumulative and combined" tests. The overspill years are, in our view, more than justified, although maybe not long enough given the likely difficulty of

rebuilding market sensitive visitor habits after a long period of damage, even if that level of damage might not necessarily be understood or anticipated at the outset.

### **Loss to many communities as receptors, not just direct IPs**

The 29% overall likely loss of visitor amenity at the two sites can only be seen as substantial in its own right, but while we recognise it is for the parties to the prospective compensatory funding (Minsmere, AONB, ESC etc) to decide whether this might be proportionate, we feel the need to put on record the likely wider concerns of ordinary receptor citizens/council tax payer/nature trust members and civil society categories such as parents and children, school age children, the elderly, the disabled and otherwise socially challenged.

Our specific observation, arising from this Inspection narrative, is that the displacement statistics show minimal countervailing amenity – 1 extra visitor to local town Woodbridge from a dataset of about 500 visitors.

We further note that the 29% loss is likely to be a serious underestimate for the two sample locations of the Sizewell B visitor centre and RSPB's Minsmere. The Sizewell B Visitor Centre is also a reception centre for commercial visitors. If the proportion of actual amenity (tourism/private interest) visitors is assumed to be say half of the sample basis, and that the commercial visitors will be supportive/neutral about amenity, the proportionate lost amenity to actual visitors could be of the order of double 29%. The displacement positive footfall elsewhere, on the same basis, might double from 1 person to 2.

For Minsmere we suggest a similar distinction might reasonably be drawn about the sample base between RSPB members – community and “twitcher” professionals from further afield - and casual tourist day visitors. While committed RSPB visitors might be prepared to navigate alternative routes to the site during the heavy traffic period of construction, cumulative impact assessment could be reasonably expected to show a reduction in this core client base compared to the secular trend. The casual visitor loss might be much higher than 29% even if membership based numbers held up. These questions bear much fuller examination for an important local and national asset.

### **Designated impact zones as proper assessment basis**

An appropriate assessment might have been based on the two nominated impact zones chosen by the developer. There has been no shortage of time or opportunity, or indeed, apparently cash to fund such professional assessments on other issues. And we note that the Visitor Centre figures date from 2014. If traffic assessments and workforce daily commute assessments can stretch to the A14 and nearby Coddanham, the baseline presented here of two snapshot, small questionnaires – the Sizewell B one

maybe even derived from routine statistics rather than a customised survey – cannot be credibly offered as at all adequate.

### **Tourism methodology through a wider community lens**

We have been concerned previously about amenity impact assessment methodology. This concerned tourism amenity and the widely cited DMO (Destination Marketing Organisation) report about tourism levels and impacts. While serious and substantial in the results it produced, it was nevertheless merely a marketing questionnaire to DMO members in East Suffolk. Although it was based on an established Cambridge model, this model is a marketing tool, not an economic assessment methodology. We suggest it underestimates the lost tourism “amenity” most importantly in respect of the local Suffolk and regional population’s tourism spending and footfalls. The area’s disproportionate retirement population and second home metric, and rapidly expanding higher value pre-retirement housing development are major dynamics. These categories constitute resident day tourists - as opposed to overnights and stay-cationers. They deserve to be factored into any credible assessment. We suggest that non-resident family and friends of residents might further boost the amenity baseline numbers.

### **Monitoring without result**

Another reflection is that the developer’s proposed monitorings – let alone the cash compensation funds – can only be seen as mitigations without effect or result, because once started, the construction is unlikely by its very nature to be halted or re-engineered or reduced because of unanticipated negative results from monitoring. We make the point over and above narratives about Levels 1 to 3 of mitigation.

This suggests very strongly that appropriate assessment needs to exhaustively complete before the draft DCO, and be overwhelmingly precautionary. Follow-up monitoring is a separate matter, and best viewed as a requirement, not a mitigation.

The developer’s Mr Rhodes’ observation later in the Examination to the effect that on ecology “we know a lot” does not match well with the developer’s actual assessment narrative on amenity issues. The developer’s attachment to an untenable approach was later signalled in their letter to the ExA of 3<sup>rd</sup> September 21, in Appendix A, p 15. This states that Document 9.94 on Recreational Numbers Disturbance was “committed to” at ISH7, well before this ISH 12 hearing. This confirms that the developer’s assessment being examined at ISH 12 and 13 and supported orally as above are a definitive position, notwithstanding intermediate elaborations. They are either “adequate” or, as we suggest, quite simply inadequate.

**Green Space - SANGS** Our sole comment is that access to them is an overriding consideration. For this project, traffic conditions are likely to substantially reduce any benefit from any that might be proposed.

## **Amenity and holistics**

We further note that a “holistic” approach was commended and seemed to be consensual for assessing the impact on the AONB. We suggest that amenity is inherently a holistic concept, and that it requires exhaustive assessment which cannot be attained by a dependency on footfall displacement datasets, snapshots surveys and the assertions of prior knowledge and experience in the developer’s team. The foreseeable ownership and control changes of the project, maybe even prior to completion, require a high level of security and certainty which in different circumstances might not be necessary.

## **Some contextual authorities**

We suggest that there are some contextual legal and policy authorities for a broadly based – “holistic” - approach to amenity and environmental loss:

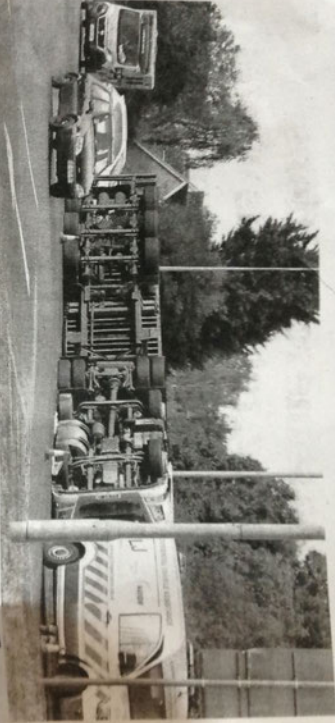
- Navitus Bay 2015, (SoS Decision- DECC, Ref ENO 10024 ) – insufficiently robust case for outweighing negative effects on tourism and heritage amenity of proposed offshore wind farm.
- Thorpe Hall, Tendring (2020 EWHC 44 (Admin) Ouseley JL) - local planning re SAC, SPA, Ramsar and recreational use.
- Norfolk Vanguard/Boreas/Vattenfall (EWHC 326 (Admin) & CO/2386/2020, Holgate JL ) - cumulative environmental impacts.
- Stonehenge (EWHC 2161 (Admin) CO/4844/2020 Holgate JL, July 2021) - no evidence of impact on the significance of each individual asset at the site, natural capital assets and historic meanings and alternatives.

## **ISH 13 Note: Rail Disturbance**

Re the noise and vibration item, a distinction was not noted about the different effects of loaded and unloaded train movements. We can also report that parishes along the southern parts of the line have expressed concern about night noise which may not have been registered to the ExA. Playford and Little Bealings will be particularly susceptible to night noise reverberating in the valley of the River Fynn.

*Ends*

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## 'Carnage' on A12 as overturned lorry sees eight-hour road closure

JOHN Y. GRIFFITH  
Hemel Hempstead Correspondent

The A12 was closed for around eight hours yesterday following a lorry overturning at Hemel Hempstead.

Initially, the incident forced the closure of one lane of the westbound carriageway of the A12, but as the lorry was not recovered until late in the afternoon, a full closure was put in place to allow recovery of the vehicle just before noon.

Emergency services were also called to the scene to assist the ambulance service in recovering the driver from the cab of the lorry.

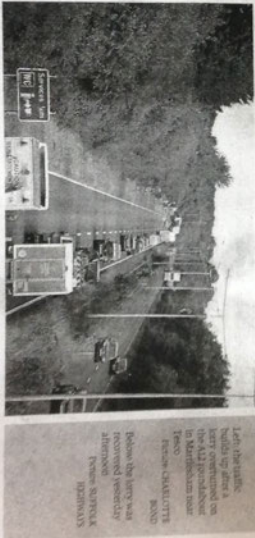
The extent of any injuries is not yet known.

In an update on Twitter, Suffolk Highways wrote: "The lorry is now being removed from the carriageway to allow traffic to pass." On Facebook, motorists shared the scene was "carnage" as traffic built up as a result of the overturned lorry.

Stuart Copley said: "Saw that lorry overturned this morning. It looked dreadful, but I hope the driver was OK." Another user said: "I wish it's carnage, traffic backed for miles."

Jayne Wirt shared she was caught in delays for more than two hours. She said: "I was stuck in traffic for this for over two hours as I didn't see this had happened."

Joanna Harper estimated at least a "thousand miles" of gridlock issues as a result of the lorry.



Let's be realistic. Nobody after a lorry overturned on the A12, particularly in Hemel Hempstead, is going to say it was a 'carnage'.

BOND  
Below the lorry was recovered yesterday afternoon.

TOWN SERVICE  
Hemel Hempstead

