



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

The Sizewell C Project

**Natural England's Comments on Monitoring and Mitigation Plan for Sandlings
(Central) and Alde, Ore and Butley Estuaries European Sites**

Planning Inspectorate Reference: EN010012

23rd September 2021

Natural England's Comments on Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites

- 1.1 Natural England has reviewed the Applicant's 'Deadline 5 Submission - 9.56 Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites - Revision 1' [REP5-122] and has the following comments.
- 1.2 We recently provided detailed comments on recreational disturbance at Deadline 7 ('Deadline 7 Submission - 9.94 Statement on Recreational Disturbance Numbers - Revision 1.0' [REP7-087]). We perceive recreational disturbance to be a high-risk issue with the potential for significant impacts on protected sites in proximity to the development which needs to be considered in greater detail. We do not believe that the Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites and associated recreational disturbance mitigation strategies currently have the capacity to exclude adverse effects on integrity beyond reasonable scientific doubt, therefore our comments on this document are on the basis that further work is required in conjunction to this plan to progress this issue further.
- 1.3 As we have outlined in previous responses we believe that while the aforementioned Monitoring and Mitigation plans go some way towards addressing the impacts of recreational disturbance, we do not believe that they are sufficient to address the potential scale of impact in isolation (Natural England Deadline 6 Submission - Written Representations (WR's) - Comments on Terrestrial Ecology Documents [REP6-042] & NNB Generation Company (SZC) Limited, Deadline 7 Submission - 9.94 Statement on Recreational Disturbance Numbers - Revision 1.0 [REP7-087]). We therefore reiterate our previous advice that we believe a suitable alternative natural green space (SANG) is required in addition to the mitigation outlined in the monitoring and mitigation plans.

Assessment of no adverse effect on integrity

- 1.4 We disagree the evidence in Shadow HRA (Doc Ref. 5.10. [APP-145 to APP-149]) that reaches a conclusion on no adverse effect on integrity. As we have outlined in our previous response in the Joint Statement on Recreational Disturbance Numbers (NNB Generation Company (SZC) Limited, Deadline 7 Submission - 9.94 Statement on Recreational Disturbance Numbers - Revision 1.0 [REP7-087]). We believe that

the evidence basis for this conclusion is flawed and unreliable and consequently the mitigation proposed is not fit for purpose.

Issues needing further consideration

- 1.5 Natural England advises that further consideration is given to impacts on vegetated shingle habitats within this plan and mitigation provided from the outset.
- 1.6 We note that little tern is not included in the plan addressing impacts on the Alde-Ore Estuary SPA which we would expect to see included.
- 1.7 We note that no wardening resource is proposed initially. We advise that considering the high level of uncertainty regarding impacts having a warden in place from the outset would provide an agile response to potential impacts, which is fundamental to preventing an adverse effect of integrity.