



The Sizewell C Project

9.10.24 Statement of Common Ground - Royal Society for the Protection of Birds and Suffolk Wildlife Trust

Revision: 3.0
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October 2021

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SIZEWELL C PROJECT – STATEMENT OF COMMON
GROUND – SZC CO. AND THE RSPB / SWT

NOT PROTECTIVELY MARKED

SIZEWELL C PROJECT

PINS REF: EN010012

STATEMENT OF COMMON GROUND BETWEEN

(1) NNB GENERATION COMPANY (SZC) LIMITED ('SZC CO.')

AND

(2) THE ROYAL SOCIETY FOR THE PROTECTION OF BIRDS ('the RSPB')

AND

(3) SUFFOLK WILDLIFE TRUST ('SWT')

REVISION: 05

DATE: 12th October 2021

NOT PROTECTIVELY MARKED

DOCUMENT CONTROL

Revision history / Record of comments

Revision	Amendment	By	Date
01	SZC Co. (RC) internal draft for CV review	Rebecca Calder / James Hanson / Stephen Roast	10/02/2021
01	First draft issue to RSPB (version numbers will be changed for external issue only)	Updated with SWT / RSPB comments on hydrology and resilience fund, as noted by RC in 12/2/21 meeting	12/02/2021
02	Second draft issue to incorporate full set of RRs from both parties	Stephen Mannings (SZC Co) / Rosie Sutherland (RSPB) / Ben McFarland (SWT)	24/03/2021
03	Third draft issue for submission to PINS at Deadline 2	Stephen Mannings (SZC Co) / Rosie Sutherland (RSPB) / Ben McFarland (SWT)	28/05/2021
04	Fourth draft issue for submission to PINS at Deadline 9	Stephen Mannings (SZC Co) / Rosie Sutherland / Adam Rowlands (RSPB) / Ben McFarland (SWT)	30/09/2021
05	Fifth and final version for submission to PINS at Deadline 10	Stephen Mannings (SZC Co) / Rosie Sutherland / Adam Rowlands (RSPB) / Ben McFarland (SWT)	12/10/2021

SIGNATURES

This Statement of Common Ground is agreed between SZC Co. and The Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust (SWT) on the day specified below.

Sign 
Print Name: Rosie Sutherland _____
Job Title: Head of Environmental Law and in house solicitor
Date: 12 th October 2021 _____
Duly authorised for and on behalf of the RSPB and SWT

Signed: 
Print Name: Carly Vince
Job Title: Chief Planning Officer
Date: 12.10.2021
Duly authorised for and on behalf of SZC Co.

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1 INTRODUCTION

1.1 Status of the SOCG

1.1.1 This Statement of Common and Uncommon Ground ('SoCG') has been prepared in respect of the application for a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This final Deadline 10 version of the SoCG (Revision 5) has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant, the Royal Society for the Protection of Birds (the RSPB) and Suffolk Wildlife Trust (SWT) and agreed on 12th October 2021.

1.1.3 This SoCG has evolved through a programme of engagement and series of versions as detailed in Section 2.

1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties, so far as they relate to the matters of concern for the RSPB and SWT, arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and the proposed associated development (hereafter referred to as 'the Sizewell C Project').

1.2.2 This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.3 Paragraph 58 of the DCLG Guidance states:

"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence"

1.2.4 This SoCG identifies areas of common ground, whether the parties are agreed, as well as remaining areas of uncommon ground where the parties

remain in disagreement. The document is based on issues raised by RSPB/SWT in their relevant representation to PINS, received by PINS on 30-9-20 and published here: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/?ipcsection=relreps&relrep=41810>.

- 1.2.5 Any area, topic, subject etc not covered should not be taken as the RSPB/SWT being agreement with it and having no concerns. Due to limited resources the RSPB/SWT are focusing on their key areas of concern and unable to review every aspect.
- 1.2.6 The aim of this SoCG is to inform the Examining Authority and provide a clear position of the state and extent of discussions, agreement and concerns between SZC Co. and the RSPB and SWT on matters relating to the Sizewell C Project.
- 1.2.7 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website (<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).

1.3 Parties to this Statement of Common Ground

- 1.3.1 SZC Co. has submitted an application for development consent to build and operate a new nuclear power station, Sizewell C, along with the associated development required to enable construction and operation.
- 1.3.2 The Royal Society for the Protection of Birds (the RSPB) was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of more than 1.1 million. The RSPB manages 220 nature reserves in the UK covering an area of over 158,725 hectares. The Society attaches great importance to the conservation of the European Sites network (made up of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) and due to Government Policy Ramsar sites)¹, and the national network of Sites of Special Scientific Interest (SSSIs) notified by Natural England.
- 1.3.3 Suffolk Wildlife Trust (SWT) is the county's local Wildlife Trust. We have over 28,000 members and are part of the UK network of 47 Wildlife Trusts. We are committed to protecting Suffolk's most precious habitats and rarest species, creating Nature Recovery Networks that are rich in wildlife, where

¹ Now known as the National Protected Sites network in England, Northern Ireland and Wales. For completeness in Scotland the same network is now called UK Protected Sites Network

species can expand their range and move out of protected sites into the wider countryside. We care for over 3,000 hectares of Suffolk's most precious habitat in our 50 nature reserves, which are all free to enjoy and we advise landowners, communities and individuals on improving their land for wildlife.

1.3.4 The RSPB and SWT will work together during the examination on issues of joint concern including impacts on protected sites and species and ecology more generally. This will include where appropriate joint submissions or support for each other's positions to minimise repetition and save Examination time.

1.3.5 Collectively SZC Co. and the RSPB and SWT (the RSPB/SWT) are referred to as 'the parties'.

1.4 Structure of this Statement of Common Ground

1.4.1 Chapter 2 provides schedules which detail the matters of concern to the RSPB and SWT and SZC Co.'s response. It identifies where agreement has been reached between the parties, where the parties are still in disagreement and also identifies where discussions will continue post-examination.

1.4.2 Next steps/actions are only being identified where both parties consider there is a reasonable prospect of narrowing the degree of differences between them; i.e. where there is no 'in-principle' difference in the parties' positions.

1.4.3 **Appendix A** provides a summary of engagement undertaken to establish this SoCG. **Appendices B-E** evidence additional information provided to RSPB and SWT in recent discussions that has been taken into account.

2 POSITION OF THE PARTIES

2.1.1 Table 2.1 summarises the position of the parties based on information submitted at Deadline 9. All key areas of concern to RSPB/SWT are RAG rated on this basis (see definitions at the head of the table overleaf). Further engagement was held between Deadline 9 and Deadline 10, which both parties agree was helpful and enabled either agreement to be reached, or areas of disagreement to be narrowed down further, in a number of areas. An extra column has been added to the table with a RAG rating following these discussions, assuming that all matters agreed in these meetings are reflected in SZC Co's Deadline 10 submission. SZC Co. confirms that all such matters are included. Where appropriate, evidence is appended to this SoCG. It should be noted that the RAG ratings have been decided by RSPB/SWT. Where SZC Co. disagrees with this interpretation, this is identified and an explanation is provided in the SZC Co. column.

Table 2.1 Position of the Parties - SZC Co. and the RSPB/SWT as of Deadline 9 (as submitted at Deadline 10)

Previous SoCG: Revision 4 [REP9-019]

RAG	Definition
Green	Main concerns resolved
Yellow	Moderate concerns remain (or progress made towards resolution of significant concerns)
Red	Significant concerns remain

Ref	Category/Item	RAG based on Deadline 8 submissions (as submitted in REP9-019)	Updated RAG based on Deadline 9 submissions	RSPB & SWT Position based on Deadline 9 submissions	RSPB/SWT Comment based on further engagement with SZC Co. since Deadline 9	SZC Co. Comment	RAG (subject to confirmation of measures proposed since Deadline 9 in Deadline 10 submissions)
General							
G1	Legal & Policy			Concerns remain about the robustness of compliance with all legal and policy requirements including for example general duties, legal certainty of mitigation and compensation. Following further meetings with the Applicant and both D8 submissions and additional changes we will update our position once reviewed all.	<p>Following further engagement prior to submission of final version at D10, several of our concerns have been removed including on the DoO and the language within the DCO requirements.</p> <p>However there remain issues with legal and policy requirements and considerations for example the cumulative, interproject, conservation objectives general duties considerations and in our view too much being left to be determined after the Examination. Although we have full confidence in the public bodies involved it is the ensuring there is sufficient detail and clarity now for the ExA to be legally (and ecologically) confident in measures proposed that remains an issue especially when other landowners are involved and the Examination being able to consider issues together. These remaining concerns are set out in our D10 submissions</p>	As explained in ISH14, the TEMMP, Water Monitoring and Management Plan, the Fen Meadow Plan, Wet Woodland Plan and the Marsh Harrier Implementation Plan provide a set of controls that provide guarantees on the outcomes assessed and predicted as part of the Environmental Statement. These are secured by DCO Requirement and are effective and enforceable controls. They provide clear proposals for how impacts would be monitored, including how the exact scope and timing would be approved with ESC. These provide the highest degree of certainty over the delivery of mitigation for these ecological related impacts.	
G2.1	Adequacy EIA			Examples of remaining concerns include:	Further engagement held prior to submission of final version at D10.	At the request of the RSPB/SWT, further engagement was held on marine aspects	

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				<ul style="list-style-type: none"> - Construction noise/visual disturbance to waterbirds on Minsmere South Levels - Operational cooling water effects on predator-prey relationships for red-throated diver and terns 	But despite helpful changes made to D10 version of TEMMP, DCO and DoO issues set out remain. We will set out our concerns in our final submissions.	(including predator-prey relationships) on 4 th October and on bats on 6 th October. No meetings were requested on construction noise/visual disturbance to waterbirds.	
G2.2	Adequacy HRA			<p>Examples of remaining concerns include:</p> <ul style="list-style-type: none"> - Minsmere Walberswick SPA, SAC and Ramsar site (noise/visual disturbance to waterbirds on Minsmere South Levels and effects of proposed Soft Coastal Defence Feature/CPMMP on strandline vegetation) and adequacy of marsh harrier compensation - Outer Thames Estuary SPA (operational cooling water system effects on predator-prey relationships for terns and red-throated diver) 	<p>Further engagement held prior to submission of final version at D10.</p> <p>But despite helpful changes made to D10 version of TEMMP, DCO and DoO issues set out remain.</p>	<p>At the request of the RSPB/SWT, further engagement was held on coastal aspects (including the effects of the proposed Soft Coastal Defence Feature/CPMMP on strandline vegetation and predator prey relationships) on 4th October. The adequacy of marsh harrier compensation was discussed at a meeting on 1st October and in subsequent email correspondence between the parties.</p> <p>No meetings were requested on construction noise/visual disturbance to waterbirds.</p>	
G3	Adequacy CIA/EIA			<p>Examples of remaining concerns include:</p> <ul style="list-style-type: none"> - Some aspects of the 'within project' assessment on bats, especially barbastelle at a population level - The cumulative assessment in respect of red throated diver (disturbance from vessel movements in combination with other plans and projects) is limited (although mitigation is now proposed for project alone effects) 	<p>Further engagement held prior to submission of final version at D10.</p> <p>But despite helpful changes made to D10 version of TEMMP, DCO and DoO issues set out remain.</p>	<p>At the request of the RSPB/SWT, further engagement was held on bats (including effects on barbastelle at a population level) on 6th October. Discussions on the outline Vessel Management Plan were held on 4th October.</p>	
G4	Adequacy In-combination/ HRA			<p>Examples of remaining concerns include:</p> <ul style="list-style-type: none"> - The in-combination assessment in respect of red throated diver (disturbance from vessel movements in combination with other plans and projects) is limited (although mitigation is now proposed for project alone effects) - no further progress has been made regarding potential in-combination noise 	<p>Further engagement held prior to submission of final version at D10.</p> <p>But despite helpful changes made to D10 version of TEMMP, DCO and DoO issues set out remain.</p>	<p>At the request of the RSPB/SWT, further engagement was held on the outline Vessel Management Plan were held on 4th October. D10 versions of the TEMMP, DCO and DoO have also been provided for review.</p>	

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				impacts of this Application along with the Sizewell B Relocated Facilities project.			
G5	Adequacy of MMPs						
G5.1	Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site [REP5-105 d8 version]			Significant progress including increase of wardening resource. Some concerns regarding provisions for little tern and stone curlew remain, as well as clarity regarding timing of provision of wardening resource and ability to deploy additional mitigation rapidly for key issues (e.g. little tern disturbance).	These concerns are expected to be addressed in the revised submissions at Deadline 10.	Further discussions were held with RSPB/SWT on 1 st October, following which updated iterations were shared for review a number of times until agreement was reached. The updated version (Revision 7, dated 12 October 2021) attached as Appendix B to this SoCG is agreed between the parties. SZC Co. will engage with ESC & SCC to update the current version attached to the DoO (Revision 6, dated 24 September 2021, submitted at Deadline 8) with this agreed version prior to commencement of the proposed development. An 'unless otherwise agreed' clause has been included in the final, signed version of the DoO for this purpose.	
G5.2	Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary European Sites [Rep5-122 d8 version]			Clarity requested regarding whether coverage of vegetated shingle south of Aldeburgh includes the Slaughden area.	Clarified that coverage of vegetated shingle south of Aldeburgh includes Slaughden area – although awaiting confirmation of this.	Further discussions were held with RSPB/SWT on 1 st October. The updated version (Revision 2, dated 12 October 2021) attached as Appendix C to this SoCG is agreed between the parties. SZC Co. will engage with ESC & SCC to update the current version attached to the DoO (Revision 1, dated 24 September 2021, submitted at Deadline 8) with this agreed version prior to commencement of the proposed development.	
G5.3	Terrestrial Ecology Monitoring and Mitigation Plan [REP5-			The concerns in relation to for example Sizewell Marshes SSSI relate to the mitigation. If changes occur, there is considerable doubt over whether a change in grazing and cutting will be able to prevent fundamental changes in	Despite further discussions, our concerns remain. We have consulted with experts and they confirm the risk to the SSSI remains, that the method of monitoring change in groundwater within the SSSI is flawed and that the mitigation proposed is unlikely to	The RSPB/SWT's concern is in relation to water quality impacts caused by perceived changes in the water balance of the marsh. They suggest that groundwater of a particular chemistry will be replaced by surface water resulting in a change in groundwater	

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	088 d8 version]			community caused by poor water quality. We still maintain the SSSI is at risk from poor water quality and the damage caused will be irreparable and note that these significant concerns may not be resolved before the end of the Examination.	<p>work if the changes are significant. The expert consultants working for us and Friends of the Earth, have provided a succinct synopsis of the key issues in time for D10.</p> <p>Please note the SSSI 2021 condition assessment did not include fen and the last condition assessment of the fen was on 16/09/2009. Amber at D9 pending further discussions. Red at D10 because significant concerns remain.</p>	<p>chemistry that could make conditions unfavourable for sensitive plant species within the fen meadows. SZC Co. has submitted compelling evidence in the Environmental Statement including baseline surveys and groundwater/surface water modelling studies that demonstrate water quality will be unaffected. SZC Co. believes that the RSPB/SWT’s concerns stem from a fundamental misunderstanding about the ‘Conceptual site model’: in other words, how the hydrology of the marshes works. The RSPB/SWT believe that there is significant upwelling of calcium-rich groundwater from the Crag deposits that underlie the peat. This is not supported by the evidence. Further information in terms of water chemistry and water balance was submitted in [REP3-042] in an attempt to reassure RSPB/SWT why they can be confident that groundwater chemistry will be unaffected. It does not appear that this evidence has been taken into account.</p> <p><i>It should be of some comfort to RSPB/SWT that Sizewell B also dewatered the deep excavations within a cut-off wall that extended down into the London Clay. It would therefore have had very similar impacts on water levels and water chemistry as the proposed Sizewell C development is likely to have. There is no suggestion by RSPB/SWT that groundwater quality was in any way impaired. It is also a matter of fact that the fen feadow withing Sizewell Marshes is assessed by Natural England to be in “favourable condition” last autumn.</i></p>	

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						<p>Nevertheless, SZC Co. will continue to engage with RSPB/SWT on this matter after the close of the examination if that would be helpful.</p> <p>In relation to monitoring of the Sizewell Marshes SSSI, Table 3.1 of the TEMMP states Table 3.1 states <i>“In the event of the botanical monitoring detecting an adverse floristic change, the need for mitigation must be discussed and agreed with Natural England and Suffolk Wildlife Trust. Mitigation could include additional stock grazing or a cutting regime to remove excess vegetation. The wider ecology stakeholder group must be consulted as part of this review process through the Environment Review Group and any further measures must be discussed and agreed in advance”</i>. RSPB/SWT’s position is that such measures are unlikely to mitigate any significant deterioration in groundwater quality. SZC Co. agrees with this statement. These measures are designed to mitigate and potential effects on vegetation structure and composition resultings from changes in water levels noting that it is common ground between the parties that groundwater levels within the SSSI are currently too high (despite being in favourable status) which can make it difficult to optimise the grazing pressure.</p>	
G5.4	Draft Coastal processes monitoring and mitigation plan [REP5-059 d8 version]			Whilst our geomorphological concerns have been resolved we still have concerns around potential impacts on the designated strand line vegetation along the Minsmere frontage	Further discussions regarding the SCDF and the modal native particle size; inaccurate statements relating to the annual driftline vegetation on the Minsmere frontage and approach to adaptive mitigation with some progress made, but we have still not received reassurance that these issues have been resolved and we cannot conclude no AEol on	During a helpful meeting on coastal matters on 4 th October the RSPB confirmed that their concerns round potential impacts on the designated strand line vegetation along the Minsmere frontage stemmed from any proposed coarsening of the particle size of the proposed soft coastal defence structure (SCDS) as suggested in Section 2.4 of the original version of the design and	

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					the annual driftline vegetation SAC/Ramsar feature.	<p>maintenance report [REP2-115] based on preliminary one-dimensional beach erosion modelling that was available at that time. However, SZC Co's position on this matter has evolved over the course of the examination, as the results of more detailed 2 dimensional modelling became available which demonstrate viability of the SCDF using the native particle size within the beach (i.e. no coarsening). The d10 versions of [REP2-115] and the dCPMMP [REP8-069] make a clear commitment to use the native particle size, and that in the unlikely event of future modelling indicating that this may no longer be considered as being feasible, agreement for any proposed change in approach must be agreed with the MTF established under Schedule 11 of the DoO (Doc. Ref. 8.17(G)). Both submissions also clearly state that drift line vegetation exists along the Minsmere frontage. Whilst this was not SZC Co.'s original understanding, the RSPB's evidence was acknowledged and accepted in Section 2.8 b) of [REP6-024]. Drafting of relevant sections of both d10 submissions have been shared with the RSPB for review over a number of iterations. SZC Co. does not disagree with the RSPB on this matter and we do not therefore concur with the RAG rating.</p>	
G6	Adequacy of evidence			<p>Examples of remaining concerns include:</p> <ul style="list-style-type: none"> - Misleading statements within the ES and Coastal Processes documents about the 	<p>Further engagement planned prior to submission of final version at D10. Progress made with adequacy of baseline survey data for bats but some concerns over spatial and temporal coverage of crossing point surveys. We are awaiting further confirmation that the</p>	<p>In relation to concerns around misleading statements within the ES on driftline vegetation it was agreed at the 4th October meeting with the RSPB that provided the d10 versions of the dCPMMP [REP8-069] and the design and maintenance report for the SCDF</p>	

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				<p>presence of standline vegetation feature along Minsmere frontage</p> <ul style="list-style-type: none"> - Insufficient monitoring of waterbirds foraging/roosting on Minsmere South Levels 	misleading statements regarding the strandline vegetation will be resolved.	<p>[REP2-115] make it clear that the driftline vegetation exists along the Minsmere frontage, this matter will be resolved.</p> <p>No meetings were requested by the RSPB/SWT on monitoring of waterbirds foraging/roosting on Minsmere south levels.</p> <p>In relation to bats, in the 6th October meeting we discussed the further surveys carried out by SZC Co. at crossing points which was submitted at deadline 7 [REP7-027] and responded informally to a draft d10 submission by the RSPB/SWT setting out their remaining concerns around spatial and temporal coverage as previously outlined in [REP8-173]. SZC Co.'s responses to this draft will be contained in our d10 submission. SZC Co. hopes that this response goes some way to address RSPB/SWT's remaining concerns.</p> <p>In relation to strandline vegetation see response to item G5.4 above. As far as SZC Co. is concerned this matter is resolved.</p>	
SSSI Landtake							
L1.1	Principle			We object to the principle of permanent landtake from a SSSI, do not agree the policy tests in EN-1 and EN-6 have been satisfied and do not agree that the justification not to deploy a triple span bridge to reduce the impact on SSSI are sufficient in relation to EN-1	We still object to the principle of permanent landtake from a SSSI and do not agree that the justification not to deploy a triple span bridge to reduce the impact on SSSI are sufficient in relation to EN-1.	<p>The vast majority of the estimated 5.74 ha of permanent land-take set out in Section 2.13 of [REP8-120] would be to construct the platform on which Sizewell C would be sited. EN1 & EN6 and the AoS anticipate potential landtake from the SSSI for such a purpose.</p> <p>The only remaining disagreement between the parties is in relation to the additional permanent landtake that will be required to construct the applicant's proposed 'single span' bridge, compared to the triple span</p>	

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						alternative favoured by the RSPB/SWT. The extra landtake required by the single span bridge is less than 0.02ha. SZC Co.'s position is this marginal increase in land-take is outweighed by the public interest benefit of reducing the construction programme for Sizewell C by between 6-12 months.	
L1.2	Permanent			Whilst we note that SZC Co have taken measures to seek to reduce the permanent land take, we still believe that the justification provided for a causeway option, as opposed to the less damaging three-span bridge, is not sufficient. We also believe the threat to the remaining SSSI Fen Meadow habitat presented by potential changes in Water Quality has not been adequately addressed, increasing the potential for permanent damage to the SSSI Fen Meadow habitat and note that these significant concerns may not be resolved before the end of the Examination.	Amber at D9 pending further discussions. Despite further discussions our concerns remain. Red at D10 because significant concerns remain- we still believe that the justification provided for a causeway option, as opposed to the less damaging three-span bridge, is not sufficient.	<p><i>SZC Co. welcomes the acknowledgement of RSPB and SWT that we have taken measures to seek to reduce the permanent land take.</i></p> <p>See our response to L1.1 in relation to the RSPB/SWT's continued concerns around the landtake associated with the SSSI crossing.</p> <p>SZC Co. considers that RSPB/SWT are conflating two separate issues in this d10 version of the SoCG by referring both to concerns around direct habitat loss (which is the subject of this topic) and potential indirect effects of assumed water quality impacts on fen meadow habitat that would be retained (which bears no relation to permanent land-take and is covered separately in item H1.2. SZC assumes that this accounts for the change in RAG rating for this topic from 'amber' at d9 to 'red' at d10. We do not concur with this.</p>	
L2	Temporary			We remain concerned that the proposed measures to protect the fen meadow habitat during the temporary works are insufficient to prevent damage to the fragile fen meadow communities and so are unable to support SZC Co's conclusions and note that these significant concerns may not be resolved before the end of the Examination.	We would like confirmation of the length of time bog matting will be covering the M22 fen habitat. Anything more than a couple of weeks may risk long term damage. If the Applicant confirms no more than 2 weeks it would be green. We understand from the Applicant it will be longer than 2 weeks therefore this significant concern has not been resolved and will be red.	<p>SZC Co. understands from discussions at a meeting on 1st October 2021 that the RSPB and SWT are satisfied that we have minimized temporary land-take within the 'SSSI triangle', and that where access is required for short periods, for example to complete ditch tie-ins, the use of bog matting as proposed would likely reduce impacts to acceptable levels.</p> <p>A new SSSI landtake plan has been included in the d10 update to the Construction Method Statement that is secured by requirement 13</p>	

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						<p>of the Draft DCO. This plan is appended to this SoCG at Appendix D. Requirement 21 then secures a SSSI Method Statement to be prepared and approved for any works within the SSSI and these method statements must be prepared in general accordance with the plan. The method statements must be submitted and agreed with ESC in advance of any such temporary land-take taking place.</p> <p>The only remaining concern in relation to temporary land-take is the length of time that bog matting will need to be laid for when restringing the overhead cables in Area B of the appended SSSI landtake plan. There is a risk that if it needs to be retained for more than a few weeks it could damage sensitive fen meadow communities due to shading. Details of the routing, extent and duration of bog matting in this area are unknown and will be the subject of method statements to be submitted to and agreed by ESC in advance. It is assumed that where feasible, access routes will track across less sensitive habitat such as wet woodland, rather than fen meadow. SZC Co. considers that this will provide an effective control to minimise harm to the retained SSSI. Impacts will therefore be less than assessed in the ES, which assumed all land between the order limits and edge of the permanent landtake within Area B will be required temporarily during the construction phase.</p>	
L3	SSSI Compensation						
L3.1	Reedbed/ditches			We are satisfied that Aldhurst farm compensates for the proposed loss and damage to reedbed, open water and lowland ditch habitat. We supported the applicant's decision to create the new	None	We welcome RSPB/SWT's comments and are grateful for the specialist advice that we received from them in the design process to ensure that the habitats were of the highest possible quality to maximise their biodiversity.	

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				wetlands in advance and await further detail on the floral and invertebrate assemblage to determine whether the site is functional SSSI replacement. Amber because we await further detail on the floral and invertebrate assemblage to determine whether the site is functional SSSI replacement. Where there is uncertainty it is appropriate to adopt a precautionary approach.		<p>SWT's suggestion to 'innoculate' the newly created wetlands with slubbings recovered from ditch maintenance carried out within the neighbouring Minsmere to Walberswick Heaths and Marshes SSSI were especially welcome. This was carried out to speed up colonisation of the new wetlands by the plant and invertebrate assemblage of established ditches within the SSSI. No recent aquatic plant or invertebrate surveys; if the DCO is consented future surveys will be carried out as specified in the TEMMP (DCO Requirement 4).</p> <p>SZC Co is puzzled why the RSPB and SWT do not consider this compensation is 'green' as it was designed with their specialist input (all of their advice, without exception, being taken on board) and was created in 2014/15, which will be more than 7 years before any SSSI landtake occurs, should the DCO be granted.</p>	
L3.2	Fen meadow			We agree with the proposed 9:1 quantum that the applicant proposes but have significant concerns around the feasibility of creating fen meadow. We also remain of the firm view that the compensation habitat should be functional before landtake occurs.	None	We consider that we have demonstrated feasibility. We note RSPB/SWT's concerns around timing of habitat replacement. However, it is has not been possible to create it in advance because of the need to follow due process in terms of compulsory purchase of the land [see REP7-051 Bio 2.2]. This has been demonstrated by the reduced order limits change we proposed at Deadline 8.	
L3.3	Wet woodland			We wish to review the updated wet woodland strategy and draft wet woodland plan submitted at D8 in more detail before updating our views about the quantum or feasibility of the wet woodland strategy proposed by the applicant but remain of the firm view that the compensation habitat should be functional before landtake occurs and this is therefore red.	None	See response to L3.2 above.	

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Hydrology/Drainage							
H1	Groundwater levels/chemistry effects on Sizewell Marshes SSSI						
H1.1	Groundwater levels			Following submission of the Water Monitoring Plan [REP7-075] at D7 we are concerned that the approach to managing groundwater levels may have impacts on water chemistry captured in H1.2 below and note that these significant concerns may not be resolved before the end of the Examination.	Despite further discussion our concerns remain. We refer you to the written submissions from the FoE experts, but in essence, the only way to maintain water levels across the peat with a high degree of confidence, is to raise the influence of surface water. Therefore this significant concern remains.	This updated position from the RSPB and SWT is almost as disappointing as it is puzzling. As recently as Deadline 9 their position was “Following submission of the Water Monitoring Plan [REP7-075] at D7 we are satisfied that impacts on groundwater levels within Sizewell marshes SSSI can be reduced to acceptable levels using the measures set out in the ES and assuming the concerns regarding the primary mitigation (drainage strategy) are resolved satisfactorily. However, the approach to managing groundwater levels may have impacts on water chemistry captured in H1.2 below and note that these significant concerns may not be resolved before the end of the Examination”. The RSPB and SWT appear to be attaching considerable weight to the water control structure that will be installed at the downstream end of the diverted Sizewell drain. The primary driver for this is to maintain hydrological conditions within the diverted drain, to compensate for its reduced length once it has been diverted. However, it will have fine tuning capability so will allow water levels within the ditch to be optimised to reduce the assessed localised and short-term drawdown effects still further. This proposed new control structure would be one of a considerable number of existing control structures within the SSSI that SWT (on EDF’s behalf) use to maintain water levels within the fen meadow within optimum levels. So not only is the RSPB and SWT’s concerns around potential impacts on groundwater quality flawed and without evidence, they appear to suggest that a single new water control	

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						<p>feature at the north-eastern end of a single drain presents a high risk to groundwater quality across the SSSI as a whole, whereas the existing battery of weirs and syphons presents no risk at all.</p> <p>See also response to G5.3 above.</p> <p>For the avoidance of doubt, it is SZC Co's understanding, using the comments of the RSPB and SWT in the Deadline 9 version of this SoCG that <i>"we are satisfied that impacts on groundwater levels within Sizewell marshes SSSI can be reduced to acceptable levels"</i>. There has been no new evidence arising between Deadline 9 and Deadline 10 that would justify any change to this conclusion.</p>	
H1.2	Groundwater chemistry			Significant concerns regarding potential impacts on water quality remain. to Sizewell Marshes SSSI remain. There is uncertainty the proposed mitigation will have any influence on fen habitat suffering from poor water quality.	Despite further discussion our concerns remain.	See H1.2 and G5.3 above.	
H2	Adaptive management/ TEMMP			The real risk lies in water quality not water level. It might be possible to maintain water levels through an engineered solution but that will compromise the water quality that will then potentially impact on Sizewell Marshes SSSI. There is significant uncertainty the proposed mitigation will have any influence on fen habitat suffering from poor water quality.	Despite further discussion our concerns remain.	See H1.2 and G5.3 above.	
H3	Borrow pit leachate			Concerns have been resolved.	None	No comments	

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H4	Minsmere Sluice (water levels)			See Appendix M [REP6-024] We would still like to see a commitment, to be included within the Deed of Obligation, to monitor levels via water level monitoring points G1 and G8 and a commitment to adaptive mitigation should unexpected impacts be identified. Risk that primary mitigation (both for water levels and pollution) via Outline Drainage Strategy is insufficient as per concerns expressed by SCC.	Position to be revisited subject to confirmation from SCC that their main concerns in relation to the drainage strategy have been resolved. The RSPB would welcome a discussion with the applicant to ensure appropriate agreements can be agreed to permit the water level monitoring during the constructions period.	SZC Co. agreed to continue water level monitoring at G1 & G8, within RSPB land, as shown in Annex 1 of our draft Water Levels Monitoring Plan submitted at d8 [REP8-107]. We have been engaging closely with SCC to address their main concerns in relation to the drainage strategy for the main development site before the examination close as noted above. The final SoCG with ESC and SCC submitted at Deadline 10 states “Following ISH11 the parties agreed an ‘Action Plan’ to respond to SCC’s concerns in relation to the Deadline 8 version of the Drainage Strategy. Whilst good progress has been made, it has not been possible to complete this work before close of the examination. An acceptable drainage strategy must: <ul style="list-style-type: none"> • Demonstrate that proposals provide for the effective drainage of all development sites; • Demonstrate that the proposals do not increase off-site surface water flood risk; and • Demonstrate that proposals do not increase risk of surface water pollution”. Notwithstanding the RSPB and SWT should be assured that the primary mitigation is secured by Requirement 5 of the DCO.	
H5	Increased flood risk to Minsmere			We await further detail from the applicant to resolve our concerns with regard to increased flood risk.	We confirm our agreement with SZC Co. that the increased flood risk is insignificant. We are continuing discussions with SZC Co. but currently can see no reason not to give consent.	No comments	
H7	Invertebrates			We still do not believe the proposals for fen meadow and wet woodland are	None	Please note that the precise details for these areas is secured by requirements 14A and	

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				adequate to ensure the re-establishment of the invertebrates lost from these habitats. This is a consequence of the distance of the compensation sites from the area of loss, particularly for species with poor dispersal and also the timing, with the replacement habitats not functional until some time after the loss occurs.		<p>14B. The details of these works need to be submitted to and approved by ESC prior to the relevant works commencing.</p> <p>SZC Co. notes that the invertebrate assemblage associated with the reedbed habitat is also important and includes species that disperse poorly. This was one of the principal reasons for siting Aldhurst farm adjacent to the SSSI from which land-take would occur and for inoculating the newly created reedbeds with ditch slubbings harvested from the Minsmere to Walberswick Heaths and Marshes SSSI (see response to L3.1 for further detail).</p> <p>Unfortunately, there are no feasible sites for fen meadow creation in the vicinity of Sizewell Marshes SSSI, but they are all located close to other designated wetland sites. It is therefore likely that the compensation sites will be colonised as the habitat develops.</p>	
H8	Minsmere sluice (claims on)			Concerns have been resolved	None	No comments	
Protected Species							
P1	Bats			Although helpful to clarify remaining areas of concern. Please see update in next column.	Following further discussion we are now satisfied that the roost provision is adequate assuming that the SSSI triangle roost survey is accounted for if the proposed roost provision is submitted at D10. We are also satisfied that the buffer surrounding Ash Wood is sufficient, assuming that the narrowest point between the edge of the road and the edge of the wood remaining over 20 metres. We have remaining concerns over the buffer with Kenton Hills and the width of the dark corridor	<p>A helpful meeting was held with the RSPB and SWT on bats on 6th October. Further clarifications were provided over the following days by email correspondence.</p> <p>SZC Co understands that concerns in relation to the width of the 'buffer' with Kenton Hills and the width of the dark corridor along Bridleway 19 have now also been resolved. SZC Co. provided RSPB and SWT with indicative cross sections through Ash Wood,</p>	

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					<p>along Bridleway 19. We are satisfied that there is adequate planned mitigation for juvenile and female barbastelle, with ride creation in Kenton Hills. We understand an extra monitoring point at southern end of Bridleway 19 and Kenton Hills opposite the rail depot will be included at D10. We understand the phrase ‘...unless it is required for safety purposes’ will be deleted from the Lighting Management Plan at D10.</p> <p>We are hopeful that our remaining concerns may be addressed in the D10 submissions. However without sight of those final versions we cannot confirm that these are now resolved. We will have to make it clear in our final submissions what those outstanding concerns are.</p>	Kenton Hills and Bridleway 19 – attached to this SoCG at Appendix D for clarity.	
P2	Natterjack toads			Concerns have been resolved	None	No comments	
P3	Water Management Zones			Concerns have been resolved	None	No comments	
P4	Mitigation bats and natterjack toads						
P4.1	Bats			We remain concerned that the buffer along Kenton Hills is not wide enough. We remain concerned the dark corridor along Bridleway 19 is not wide enough and too fragmented.	See P1	See P1	
P4.2	Natterjack Toads			Concerns have been resolved	None	No comments	
Coastal processes							
C1	Design information			We are reviewing the additional information provided at D8 in relation to our concerns expressed in section 3 of REP6-046 .	We welcome the further detail provided at D8 in REP8-096 which has resolved our design concerns.	No comments	

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C2	Marine transport facilities			Although assessments conclude no significant impact, they do acknowledge the potential for impact on the southern Minsmere frontage and propose that these are monitored by the CPMMP. We do not believe that the CPMMP has identified appropriate mitigation should additional impacts arise and therefore cannot conclude that this is adequately addressed.	We remain concerned regarding the potential for impacts on the strandline vegetation and the absence of any detail regarding an appropriate approach to mitigation should this impact arise.	See response to G5.4 and G6 above. Section 6.6 of the d10 version of the dCPMMP [REP8-069], an advance copy of which was shared with the RSPB and SWT, clearly sets out the approach to mitigation (beach recharge) recognising the presence of fragile coastal habitats immediately to the north of the development site within Minsmere. Subsection a) Para 6.6.5-6.6.8 considers the potential implications on the Minsmere site. We believe that we have resolved all of the RSPB and SWT's concerns in this regard therefore don't concur with the 'red' rating.	
C3	CDO/FRR outfalls			The applicant proposes to monitor the offshore banks in relation to this infrastructure and believes there will be no significant impacts, but we remain to be assured that there is an appropriate mitigation strategy should unexpected impacts be identified	There remains an absence of any detail regarding an appropriate approach to mitigation should this impact arise.	The Environmental Statement does not predict an impact associated with the CDO/FRR outfalls, and it is therefore not possible to develop a mitigation strategy. However, SZC Co. are committed to monitoring under the CPMMP, which provides for adaptive mitigation in the unlikely event that unpredicted impacts were to occur. We do not therefore concur with the 'Red' rating. SZC Co's considers this should be 'Green'.	
C4	Effect of sea defences			Current proposal for shingle particle size to be at upper limit of native size distribution for SCDF and indication that decisions will be led by engineering merit lead to the conclusion that this cannot be resolved due to our concerns re impacts on supra-tidal shingle and associated ecological interest.	We welcome the reassurances that SZC Co are seeking to deploy the local native particle size for the SCDF, but note that this has not yet been secured so our concern has not been fully resolved. Due to the potential impact to the SAC and Ramsar site we cannot change this to amber.	The d10 versions of [REP2-115] and the dCPMMP [REP8-069] make a clear commitment to use the native particle size, and that in the unlikely event of future modelling indicating that this may no longer be considered feasible, agreement for any proposed change in approach must be agreed with the MTF that is to be established under Schedule 11 of the DoO (Doc. Ref. 8.17(G)) and reflected in the CPMMP that must be submitted for approval by ESC under Requirement 7A in Schedule 2 of the DCO	

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						prior to the construction of Work No. 1A(n) (soft coastal defence feature) and Work No. 1A(o) (hard coastal defence feature); and by the MMO under Condition 17 of the Deemed Marine Licence in Schedule 20 of the DCO, unless requirement 7A has already been discharged to the satisfaction of the MMO.	
C5	CPMMP			Remaining concerns (as per section 10 of REP7-154 and section 4 of REP6-046) regarding the approach to supra-tidal shingle in the Minsmere-Walberswick SAC, Ramsar and SSSI and the approach to governance of the CPMMP	We remain concerned regarding the potential for impacts on the strandline vegetation and the absence of any detail regarding an appropriate approach to mitigation should this impact arise.	See G5.4 and G6 above. We believe that all of the RSPB and SWT's concerns have been resolved and therefore question why the RAG rating isn't green (at least subject to confirmation of measures proposed since Deadline 9 in the Deadline 10 submissions, multiple drafts of which have been shared with RSPB for their review).	
Noise/Visual Disturbance to Birds							
NV1	Breeding marsh harrier – compensation for temporary loss foraging habitat						
NV1.1	Approach – Terrestrial and wetland components, proximity to Minsmere reedbeds			We welcome the proposals for compensation to include wet habitats given our concerns regarding prey uplift achievable with dry habitats	n/a	SZC Co. engaged closely with the RSPB on the compensation approach and design of the compensation habitats both in terms of the necessary types and abundance of prey species and their availability for predation. Only recently was the approach updated to include wet habitats in addition to the dry. This on-site compensation scheme covers approximately 47 ha and is located next to Minsmere which will maximise its value as a 'food resource' to foraging marsh harriers breeding at Minsmere, given its proximity.	
NV1.2	Quality/ quantum			We continue to have concerns regarding the required prey uplift and whether this is achievable on dry habitats, noting our concern that the wetland will not be effective in the early stages of construction. The issues around prey uplift therefore remain amber	n/a	SZC Co. engaged closely with the RSPB on the design of the dry habitat during the evidence plan process, in order to maximise the abundance and availability of prey. A number of options were considered and it was agreed with RSPB and other stakeholders that the current option (which was created in 2016 and	

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						<p>has been developing under conservation management ever since as witnessed by the ExA during the accompanied site visit) was preferred over the others that were set aside.</p> <p>Estimates of prey uplift are derived from published evidence set out in the sHRA [REP2-119 & APP-259]. The compensation habitats were created on intensively farmed arable land on which crops were typically grown under polythene. The prey uplift is therefore significant and the compensation foraging resource is significantly greater than the temporary loss of Sizewell Marshes to breeding marsh harriers given their close proximity to the nest sites at Minsmere.</p> <p>Notwithstanding, SZC Co. considers that adding wetland will increase prey uplift within the temporary compensation land still further.</p> <p>SZC Co. understands from helpful discussions with the RSPB in the 1st October meeting that is concerns around prey uplift are resolved subject to addition of the wetland habitat. If the RSPB still maintains this position then in SZC Co.'s opinion this topic should be 'Green'. This is because any concerns around the availability of the habitat relative to the impacts occurring are covered in NV1.4.</p>	
NV1.3	Adaptive approach			We are concerned that there are no details of alternative measures available under the proposed adaptive management approach, should the dry habitats not prove sufficient in terms of prey uplift. We do not consider that the TEMMP contains sufficient detail	No further progress, but we remain keen to discuss this issue with the Applicant	SZC Co.'s position is that there is no evidence to suggest that existing dry (and proposed wet) habitats will not provide sufficient prey uplift. However, should the Secretary of State decide that further compensation habitat is required, an extra 54 ha dry habitat is available near Westleton [REP8-101].	

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				regarding this approach and the measures to be deployed.		<p>There will also be opportunities to adapt the conservation management of the on-site (and any off-site) compensation habitats, such as modifying the cutting regime for the vegetation along linear features that will increase the availability of prey to harriers. The TEMMP which would be secured under Requirement 4 of the DCO sets out the detailed monitoring that must be carried out of foraging marsh harrier activity, as well as vegetation structure and prey uplift within the compensation habitat. If any such adaptive mitigation is deemed to be required, proposals must be submitted to the EWG for approval and implemented as agreed.</p> <p>SZC Co. understands from helpful discussions with the RSPB in the 1st October meeting that its concerns around marsh harrier compensation revolve around the habitat (including the proposed wetland) being functional before impacts occur. If the RSPB still maintains this position then in SZC Co's view this topic should be 'Green', notwithstanding the adaptive mitigation approach outlined above that is secured in the TEMMP under DCO Requirement 4.</p>	
NV1.4	Programme			Wet habitats at Abbey Farm must be provided and established in advance of impact to ensure compensation is sufficient, otherwise areas set aside for wet habitats at Abbey Farm represent a loss from the compensatory habitats available if they are not effective during Phase 1 of construction.	Discussion regarding potential opportunities to address this concern, but no confirmed actions at this stage.	<p>The vast majority of the dry habitat was created in 2016 and has been under conservation management ever since.</p> <p>SZC Co's position is that the wet habitats at Abbey farm will provide further enhancement of the foraging habitat. We understand that this is common ground between the parties. This wetland component will be created at the earliest opportunity (i.e. over the first winter) following DCO consent. During this initial</p>	

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						<p>period it is not likely that the temporary construction area will form a barrier to the movement of foraging marsh harriers between Minsmere and Sizewell marshes, but if it does the dry habitat will be available.</p> <p>Given that the dry habitats were created in 2016 and will therefore have been in existence for approximately 7 years before noise and visual impacts could start to affect marsh harrier foraging in Sizewell Marshes, it is difficult to understand why the RSPB and SWT consider this topic to be coded Red. The ExA saw the compensation habitat in the Accompanied Site Visit to the Sizewell site.</p>	
NV3	Noise impact on waterbirds			<p>Significant concerns regarding noise/visual disturbance and resulting high level of predicted displacement of breeding and non-breeding waterbirds using functionally-linked land at Sizewell Marshes and Minsmere South Levels. The baseline data may not fully reflect bird distribution on South Levels due to limitations of methodology and single year of data, however we are content with the assumption of even distribution of birds. Mitigation currently proposed (screening and bunds – both initial and adaptive measures) are not sufficient to address this. Concern that no monitoring of noise levels on the South Levels is proposed. We do not agree that AEOI on the Minsmere-Walberswick SPA arising from this impact can be excluded.</p>	n/a	<p>In relation to the monitoring of waterbirds, SZC Co. disagree that the monitoring data relied on for the assessments in the shadow HRA [APP-145] (and shadow HRA Addendum [AS-173]) are insufficient. In particular, SZC Co. point to the facts that for:</p> <p>(i) Breeding waterbirds – assessments are based upon 7 years of survey data (providing abundance estimates) for the Minsmere South Levels and Sizewell Marshes. The distributional data on breeding birds within these areas of functionally linked land are limited to one year (2020). However, although these distributional data usefully highlight that the assessment in the shadow HRA [APP-145] probably overestimates disturbance effects to those birds using on the Minsmere South Levels, critically, the assessment conclusions do not depend upon these further data.</p> <p>(ii) Non-breeding waterbirds - the assessments rely upon over 5 years of</p>	

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						(recent) winters of WeBS count data relating to the SPA and each of the relevant areas of functionally linked land, as well as two full winter seasons and one partial winter season or project-specific survey data which provide distributional information for the key bird species on the Minsmere South Levels and Sizewell Marshes.	
NV4	Night time/evening noise			Concerns remain re potential for noise disturbance to white-fronted geese and other waterbirds at night. As above, insufficient monitoring and mitigation has been proposed.	n/a	As detailed in the Shadow HRA Addendum [AS-173] night-time noise levels would be relatively low and highly unlikely to result in disturbance to waterbirds using the Minsmere South Levels, including white-fronted geese. Further assessment suggests that this conclusion is unaffected by the fact that daytime noise levels would persist beyond dusk, particularly during the winter period (Appendix N of [REP5-119]), whilst the nocturnal flighty surveys indicate that there is limited use of the Minsmere South Levels as by roosting white-fronted goose [REP-125]. The CoCP Part B includes a wide range of measures to reduce impacts on ecology near to the main development site. These are informed by the ES and have been refined following feedback from Interested Parties throughout the Examination. The CoCP is secured by requirement 2 of the Draft DCO.	
NV5	Adequacy of noise modelling			We welcome the commitment on wetland works timing to avoid impact on breeding bitterns. Concerns regarding lack of	n/a	The CoCP Part B includes a wide range of measures to reduce impacts on ecology near	

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				certainty around construction schedule and certain construction processes (as acknowledged in Construction Noise Assessment – APP-204) and resulting effects on noise levels remain.		to the main development site. These are informed by the ES and have been refined following feedback from Interested Parties throughout the Examination. The CoCP is secured by requirement 2 of the Draft DCO.	
NV6	Assessment not precautionary			We welcome the commitment on wetland works timing to avoid additional impacts on breeding waterbirds. Our concerns around the lack of certainty regarding construction timelines and construction processes (and resulting effects on noise), the limited distributional data for waterbirds and the under-estimation of the significance of impacts on breeding and non-breeding waterbirds remain.	n/a	The Applicant's position is that the assessment of potential noise and visual disturbance (including that resulting from the wetland construction works) on breeding and non-breeding waterbirds is a highly precautionary assessment. The reasons for this are as set out in the Shadow HRA Report [APP-145], Shadow HRA Addendum [AS-173], the responses that have been provided at [REP3-042] to the RSPB/SWT Written Representations on this issue [REP2-506] and in the Applicant's response to ExA WQ HRA. 2.3 [REP7-051].	
NV7	Visual disturbance of birds			Concerns around effects of lighting (particularly of the BLFs) on red-throated diver have not been addressed in the Lighting Management Plan (REP7-019).	n/a	There is little potential for artificial lighting from the BLFs to have any effects on the SPA red-throated diver population, as is determined in the Shadow HRA Addendum [AS-173]. It is only the temporary BLF which could potentially operate over the winter period, although this is unlikely. This would extend c.500m from shore and so effects of artificial lighting would be restricted to a relatively small area around this BLF, representing a very small part of the SPA only. Furthermore, as detailed in Shadow HRA [APP-145], these potential effects would occur within a part of the SPA where red-throated diver densities tend to be relatively low, compared to other parts of the SPA (so any effects on the population would not be proportionate to the (small) area of the SPA	

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						affected by artificial lighting from the temporary BLF).	
Recreational Pressure							
RP1	Baseline surveys			As raised during pre-application discussions regarding the baseline survey approach and methods, we remain concerned around the lack of visual aids used during the surveys to more accurately explain the likely impact of the construction of SZC leading to potential under-estimation of visitors likely to be displaced.	n/a	<p>The design of the baseline surveys including the survey locations and questionnaires used was discussed and agreed with the RSPB and other stakeholders in advance as part of the evidence plan process carried out for the HRA. The only significant area of disagreement with the RSPB was the use of visual aids in the surveys. SZC Co. showed respondents a plan of the construction site and considered that that was adequate to convey the scale of the project and the likely impacts arising.</p> <p>In SZC Co's view this topic should be 'Green'. The RSPB's suggestion that the whole survey programme was in some way devalued by a minor area of disagreement in the survey approach seems to be disproportionate.</p>	
RP2	Estimates of displacement			<p>We disagree with updated estimates of displacement presented at Deadline 7 due to the lack of precaution in this approach and note that concerns remain regarding under-estimation of displacement within the original estimates (see REP7-087 for details).</p> <p>However, we note that, whilst disagreements remain around these estimates, we are moving towards agreement on an appropriate quantum of mitigation to rule out adverse effects on integrity of the Minsmere-Walberswick and Sandlings European sites from displaced visitors via the MMPs and regarding proposals for additional greenspace for construction workers.</p>	No further discussion of estimates of displacement (but note that further updates to the MMPs are expected at D10 – see RP6 below)	SZC Co.'s position is that the updated estimates of displacement set out in [REP7-087] are the most appropriate for use in the sHRA for the reasons explained in the submission. For transparency, this submission also clearly sets out the positions of all relevant parties, including the RSPB and SWT. It is for the Secretary of State to decide which estimates to use in completing the HRA. It is common ground between the parties that these estimates are by their nature not precise and whichever estimates are ultimately used, the conclusion of no AEOI would be unchanged subject to appropriate mitigation measures being in place.	

Ref	Category/Item	RAG based on Deadline 8 submissions (as submitted in REP9-019)	Updated RAG based on Deadline 9 submissions	RSPB & SWT Position based on Deadline 9 submissions	RSPB/SWT Comment based on further engagement with SZC Co. since Deadline 9	SZC Co. Comment	RAG (subject to confirmation of measures proposed since Deadline 9 in Deadline 10 submissions)
RP3	Vegetation/ beach nesting birds			Progress to manage displacement impacts through provision of 4 wardens and other measures in the MMPs. Additional "active recreation" facilities (including mountain bike trail) proposed to address construction worker impacts. Need for further confidence regarding ability of plan to deploy additional mitigation for little tern quickly in event of disturbance.	Further refinements to MMPs discussed including provision to develop rapid deployment measures for e.g. little tern and further provision to secure monitoring of little tern in areas not covered currently, where required.	Further discussions were held with RSPB/SWT on 1st October, following which updated iterations were shared for review a number of times until agreement was reached. The updated version (Revision 7, dated 12 October 2021) attached as Appendix B to this SoCG is agreed between the parties. SZC Co. will engage with ESC & SCC to update the current version attached to the DoO (Revision 6, dated 24 September 2021, submitted at Deadline 8) with this agreed version prior to commencement of the proposed development. An 'unless otherwise agreed' clause has been included in the final, signed version of the DoO for this purpose.	
RP4	Path from Eels foot			We welcome the measures proposed to address these concerns	n/a	No comments	
RP5	Heathland non-core areas			Progress to manage displacement impacts through provision of 4 wardens and other measures in the MMPs. Additional "active recreation" facilities (including mountain bike trail) proposed to reduce potential for active/sporting use of heathlands by construction workers.	. Further refinements including explicit coverage of non-SPA stone curlew	See response to RP3 above.	
RP6	MMPs			Significant progress regarding MMPs including increase of wardening resource in the Minsmere-Walberswick and Sandlings (North) MMP. Some concerns regarding provisions for little tern and stone curlew remain, as well as clarity regarding timing of provision of wardening resource and ability to deploy additional mitigation rapidly for key issues (e.g. little tern disturbance).	. These concerns are expected to be addressed in the revised submissions at Deadline 10 As discussed we are hoping to update this further once D10 version of TEMMP, DCO and DoO are received and reviewed	See response to RP3 above.	

Ref	Category/Item	RAG based on Deadline 8 submissions (as submitted in REP9-019)	Updated RAG based on Deadline 9 submissions	RSPB & SWT Position based on Deadline 9 submissions	RSPB/SWT Comment based on further engagement with SZC Co. since Deadline 9	SZC Co. Comment	RAG (subject to confirmation of measures proposed since Deadline 9 in Deadline 10 submissions)
Marine Ecology							
ME1.1	Disturbance noise/vessels to red-throated divers			We welcome the statement in the D8 OVMP that the current intention is that no vessel movements in winter will be required and the designation of the mitigation routes (which maximise avoidance of the SPA) as the “preferred routes”, although we question the reasons for deferring final route choice and monitoring options beyond the DCO process and whether it is possible to provide further certainty that impacts will be avoided, through further clarification of the commitment to the preferred routes.	Further discussions have been held and refinements to increase commitment to route selection hierarchy proposed. These are expected to be included in the D10 submissions	Further discussions were held with RSPB/SWT on 4 th October, following which updated iterations of the oVMP [REP8-106] were shared for review a number of times until agreement was reached. The updated version submitted at deadline 10 (Revision 2, dated 12 October 2021) is this agreed update.	
ME1.2	Thermal plume			Concern around impacts of thermal plume on terns and their prey, particularly when considered as part of total marine impacts.	n/a	SZC Co.’s position is that there is no evidence that operation of Sizewell C’s cooling water system will have any significant adverse effects of terns and their prey. This is therefore a matter of uncommon ground.	
ME1.3	Other discharges and abstractions and effects on fish prey			Concerns around effects on distribution of fish prey for birds of the Minsmere-Walberswick, Outer Thames Estuary and Alde-Ore Estuary SPAs remain. Concern that no AFD proposed to mitigate this impact. We do not agree that AEOI on these sites arising from this impact can be excluded. Concern around impacts of chemical plumes on terns and their prey, particularly when considered as part of total marine impacts. Concerns around potential discharges from desalination plant and effects on fish prey	Information was shared around potential benefits of mitigation proposed for fish populations (in the Draft Fish Impingement and Entrainment Monitoring Plan REP8-111), but it was acknowledged that these measures will not benefit SPA birds during the breeding season whose foraging area is confined to the area close to the development (noting the mitigation proposed is outside this area)	SZC Co.’s position is that there is no evidence that operation of Sizewell C’s cooling water system will have any significant adverse effects of terns and their prey. This is therefore a matter of uncommon ground.	

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				should its use extend into commissioning or operation			
ME2	In- combination			The in-combination assessment of impacts of this Application and offshore windfarm projects through disturbance to red- throated divers is still limited (although we note the progress regarding mitigation for impacts from the project alone).	Further progress regarding the Outline Vessel Management Plan reducing impact contribution from project alone (see ME1.1 above)	We acknowledge and welcome the comments made in respect of the oVMP – see ME1.1.	
ME2a	Within-project effects			Concerns remain around project-wide effects conclusions relating to marine ecology for two reasons - 1. where we disagree with the level of significance attributed to single impacts, this means the impact when combined with others is also under-estimated - 2. where impacts considered insignificant alone are not considered further this disregards potential for additive and/or synergistic effects This concern relates to impacts of noise, lighting and vibration and sediment plumes arising from marine construction works and dredging. During operation, combined within-project impacts could arise from impacts on fish prey due to the thermal and chemical plumes, and from fish mortality and water quality effects from the cooling water system. We do not agree that AEOL on the Minsmere-Walberswick, Outer Thames Estuary and Alde-Ore Estuary SPAs arising from this impact can be excluded.		SZC Co's position as stated in the sHRA is that AEOL on the Minsmere-Walberswick, Outer Thames Estuary and Alde-Ore Estuary SPAs arising from this impact can be excluded. This is therefore a matter of uncommon ground.	

Ref	Category/Item	RAG based on Deadline 8 submissions (as submitted in REP9-019)	Updated RAG based on Deadline 9 submissions	RSPB & SWT Position based on Deadline 9 submissions	RSPB/SWT Comment based on further engagement with SZC Co. since Deadline 9	SZC Co. Comment	RAG (subject to confirmation of measures proposed since Deadline 9 in Deadline 10 submissions)
ME3	Assessment methods/ approaches			We welcome the provision of assessments of effects on fish prey species at the local scale (Greater Sizewell Bay) but remain concerned around the levels of mortality predicted and subsequent potential impacts on birds of the Minsmere-Walberswick, Outer Thames Estuary and Alde-Ore Estuary SPAs. As stated above, we do not agree that AEOI on these sites arising from this impact can be excluded.	n/a	The additional assessments of effects on fish prey species at the local scale (Greater Sizewell Bay), which were precautionary, demonstrated that the assessed impacts on prey availability were at least one order of magnitude lower than the annual variation in the population of prey species that occurs naturally which supports the conclusions of the sHRA that AEOI on these designated sites arising from this impact can be excluded. This is therefore a matter of uncommon ground.	
Other Matters							
OM1	Landscape strategy and BNG			We welcome the Applicant seeking to identify a mechanism to show how the Application can create a beneficial effect however we do not agree the Application can achieve BNG due to direct adverse impacts on Sizewell Marshes SSSI and its features. Our concerns in (REP7-153) and written reps remain. We detailed concerns over creation of dry Sandlings grassland on soils impacted by construction in our written representations (REP2-506 paragraph 3.809) and have been asking for evidence since then. The Applicant has still not provided evidence to demonstrate how dry Sandlings grassland can be achieved on post-construction soils.	None	We have simply used the method recommended by Natural England to estimate biodiversity net gain across the project and the calculations have been subject to independent audit. No account has been made in the estimates for creation of compensation habitat. Use of this method indicates a biodiversity net gain of 19% which is significantly higher than the target level recommended by Natural England (10%). This is driven largely by our strategy of restoring sandlings heath and other semi-natural habitats on existing arable following construction. We have been successfully doing this at a landscape scale outside of the temporary construction area since 2012. We are grateful to SWT for supplying us with heather brushings and native seed harvested from their Suffolk reserves that have helped establish these new habitats within Aldhurst farm and across the southern Sizewell estate. SZC Co. is surprised at the request of RSPB and SWT to provide evidence to demonstrate how dry sandlings can be achieved on post construction soils. It would use the same methods used successfully on arable soils.	

Ref	Category/Item	RAG based on Deadline 8 submissions (as submitted in REP9-019)	Updated RAG based on Deadline 9 submissions	RSPB & SWT Position based on Deadline 9 submissions	RSPB/SWT Comment based on further engagement with SZC Co. since Deadline 9	SZC Co. Comment	RAG (subject to confirmation of measures proposed since Deadline 9 in Deadline 10 submissions)
OM2	Ecological fragmentation due to SSSI crossing	Yellow	Red	<p>We appreciate the Applicant has changed the crossing design to reduce ecological fragmentation but still consider the triple span bridge to be the preferable option (REP5-164 epage 3) and refer to our policy objection in L1.1. Notwithstanding that we are satisfied that if the single span bridge is to be used that the optimised design is an improvement for invertebrates and otters/water voles. Remaining concerns for bats.</p>		<p>We welcome the RSPB and SWT’s comment that they are satisfied that if the single span bridge is to be used the optimised design is an improvement for invertebrates and otters/water voles (compared to the original single span design in January 2021 accepted change). This position is in line with the position of the EA, NE and local authorities.</p> <p>Given this position it is SZC Co’s view that this topic should be RAG rated ‘Green’.</p>	Red
OM3	Boundary concerns	Yellow	Yellow	<p>Further engagement on tie in of SCFD to beach/dune system, the alignment of Sandlings Permissive Footpath walk and securing mechanisms for same as expressed in section 3 of REP6-046. The RSPB is under the assumption that the Sandlings path re-alignment will remain within the DCO application boundary.</p> <p>We are grateful that the Applicant has confirmed the access route for the RSPB to the RSPB Minsmere South Levels (Appendix J: Access Routes to RSPB Minsmere and Sizewell Marshes SSSI [REP8-119] Deadline 8 Submission - 9.99 Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 - Appendices Part 1 - Revision 1.0) will remain available throughout the construction period, but note that the formal letter of no impediment, as requested by Natural England, has yet to be received by RSPB.</p> <p>The RSPB is concerned that there is no provision in the draft Deed of Obligation for mitigation / compensation should monitoring show that there is an additional</p>	<p>We welcome confirmation that the realigned Sandlings Path will be entirely within the order limits.</p>	<p>We believe that we have responded to these concerns at d8 [REP8-096]. Cross sections across the northern mound / RSPB and boundary are included that now show the corridor within which sandlings walk would be routed. This falls entirely within the order limits. Measures to avoid potential impacts from rights of way around the main development site are set out in the Rights of Way Strategy and secured by requirement 6A. A footpath Implementation Plan is secured for any diversions needed within this area. The Deed of Obligation then secures the Public Rights of Way Fund and the Public Rights of Way Group to monitor and implement additional measures that may be required.</p> <p>SZC Co looks forward to further discussion with RSPB to put in place permissions to allow for any required monitoring or mitigation outside of the order limits within RSPB land.</p>	Yellow

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				<p>impact on RSPB property from the development.</p> <p>We expect the applicant to put in place permissions to allow for any agreed monitoring outside of the DCO boundary.</p> <p>The RSPB reserves its position concerning possible future impacts on its land holdings resulting from the Application negligence, nuisance or injurious effects that are not yet fully known or might not be known until further down the construction and operation phases.</p>			
OM4	Resilience fund			Scope and sum agreed with applicant to address potential impacts on 'pay-to-enter' visits to RSPB Minsmere	None	No comments	

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and the RSPB / SWT. The relevant meetings are summarised in Table 2.2. It is noted that these meetings were not purely in relation to the SoCG.

Table 2.1 SOCG meetings held between SZC Co. and the RSPB / SWT

Date	Details of the Meeting
12 May 2020	Water level management
7 July 2020	Water level management
20 July 2020	Overarching meeting to provide an overview of the DCO application, including navigating the DCO, the consenting strategy and an overview of the key issues including: <ul style="list-style-type: none"> - Tourism - Ecology - Coastal - Groundwater, Surface Water and FRA - And agree next steps on engagement and the SoCG
10 September 2020	Water level management
15 September 2020	Protected species workshop
FROM 17 September 2020	2-weekly regular interface meetings established to progress matters of concern to RSPB, agree resilience fund, progress SOCG issues. Suffolk Wildlife Trust invited to join from 5 November 2020.
23 September 2020	Marine Technical Forum – Coastal processes. To discuss proposed CPMMP
12 November 2020	Update on the SSSI Landtake and Compensatory Habitat
11 December 2020	A meeting to discuss Biodiversity Net Gain
21 January 2021	Survey briefing for 2021
12 February 2021	Meeting to discuss 1st draft SoCG
18 February 2021	Discussion on the draft Monitoring and Mitigation Plan for Minsmere and Dunwich Heath (recreational displacement)

Date	Details of the Meeting
22 February 2021	A meeting to discuss mitigation for recreational displacement
4 March 2021	Discussion on the draft Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP)
12 March 2021	Meeting to discuss 2nd draft SoCG
15 March 2021	Marine Technical Forum – Coastal processes. Presentation of detailed modelling for enhanced and temporary BLFs.
16 March 2021	Meeting on updated version of TEMMP
3 June 2021	Bat workshop
2 July 2021	Marine Technical Forum – Coastal processes. Discussion on TR544/545
5 July 2021	Meeting on SoCG – across number of issues
9 July 2021	Meeting on recreational displacement / draft Minsmere MMP
21 July 2021	Meeting on SoCG – across number of issues
30 July 2021	Meeting on recreational displacement / draft Minsmere MMP
1 September 2021	Meeting on SoCG – across number of issues
22 September 2021	Meeting on SoCG – across number of issues
27 September 2021	Meeting on SoCG – across number of issues
30 September 2021	Discussions to finalise d9 version of SoCG
1st October 2021	Meeting to discuss: <ul style="list-style-type: none"> - Recreational displacement - SSSI landtake - Groundwater levels/quality - Marsh harrier compensation
4th October 2021	Meeting to discuss: <ul style="list-style-type: none"> - Outline Vessel Management Plan - Coastal processes - Marine ecology
6th October 2021	Meeting on bats to discuss: <ul style="list-style-type: none"> - Buffer zones around Ash Wood - Roost compensation - Assessment of female and juvenile barbastelles

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Date	Details of the Meeting

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APPENDIX B:

MONITORING AND MITIGATION PLAN FOR MINSMERE -
WALBERSWICK EUROPEAN SITES AND SANDLINGS
(NORTH) EUROPEAN SITE

MONITORING AND MITIGATION PLAN FOR SANDLINGS
(CENTRAL) AND ALDE-ORE ESTUARY EUROPEAN SITES -

(REV 7, DATED 12 OCTOBER 2021 AS AGREED
BETWEEN THE PARTIES)

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Figure 1: Location Plan

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Figure 2: Proposed Survey Locations Minsmere-Walberswick European Sites (North)

Figure 3: Proposed Survey Locations Minsmere-Walberswick European Sites (South)

Figure 4: Proposed Survey Locations Sandlings (North) European Site

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1 INTRODUCTION

- 1.1.1 This monitoring and mitigation plan sets out how monitoring and mitigation with respect to recreational disturbance must be implemented at four 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 four sites within the scope of this monitoring and mitigation plan (referred to collectively in this monitoring and mitigation plan as the “European sites”) are:
- Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC), Minsmere–Walberswick Special Protection Area (SPA), Minsmere–Walberswick Ramsar site (collectively referred to as the “Minsmere–Walberswick European sites” in this monitoring and mitigation plan; see **Figures 1, 2 and 3**); and
 - The northern part of the Sandlings SPA at North Warren and Aldringham Walks are collectively referred to as “Sandlings (North) European site”; see **Figures 1 and 4**).
- 1.1.3 This plan is titled the ‘**MMP for Minsmere – Walberswick and Sandlings (North)**’ (Annex U of the DoO Doc Ref. 8.17(G)) 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.
- 1.1.4 A separate monitoring and mitigation plan has been developed for the Alde–Ore Estuary SPA and Ramsar site and the area of the Sandlings SPA comprising Tunstall Forest and Snape Warren (referred to as Sandlings (Central)). The plan for these sites is titled ‘**MMP for Sandlings (Central) and Alde-Ore Estuary**’ (Annex V of the DoO Doc Ref. 8.17(G)) ‘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 and which was submitted to examination at

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/>

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Deadline 5 [[REP5-122](#)], and an update is submitted at Deadline 8 (Annex V of the DoO (Doc Ref. 8.17(G))).

- 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** [[APP-145](#), [APP-146](#), [APP-147](#), [APP-148](#) and [APP-149](#)] and **Shadow HRA Second Addendum** [[REP2-032](#)]. The **Shadow HRA Addendum** (Doc Ref. 5.10 [AS-173]) and **Shadow HRA Third Addendum** (Doc Ref. 5.10 [REP7-279]) assessed Proposed Changes to the Application. Recreational disturbance is not a pathway that is relevant to the assessment of those Proposed Changes and, therefore, the **Shadow HRA Addendum** and **Shadow HRA Third Addendum** are not relevant to this monitoring and mitigation plan. The “Shadow HRA Report” refers to the full shadow habitats regulations assessment as made up by the report and these addendums.
- 1.1.6 The assessments under the Shadow Habitats Regulations Assessment for Sizewell C indicate that during the construction of Sizewell C, there could be displacement of recreational users to European sites, and recreational visits from the construction workforce. There is also potential for a smaller increase in visits to European sites due to Sizewell C during the operational phase. The additional recreational visitors could potentially lead to AEoI of some specific European sites via effects on certain qualifying features unless suitable monitoring and mitigation measures are implemented. The **Shadow HRA Report** () [[APP-145](#)] to [[APP-149](#)] identified that, with suitable monitoring and mitigation measures in place, AEoI due to this effect pathway can be excluded for all European sites.
- 1.1.7 A number of measures have already been secured through the dDCO and DoO, which will reduce potential recreational displacement to European sites. While these measures are listed in **Section 5.2** for context, they are not secured by this plan. These measures include Public Right of Way (PRoW) and access improvement proposals around the main development site, including facilities for “active recreation” for construction workers 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 (secured under discharged condition 25 of planning permission reference DC/14/4224/FUL 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

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parts of Aldhurst Farm where ecological enhancements works have successfully established habitats for wildlife. Further visitor surveys at Aldhurst Farm must be undertaken pre-construction, and during the construction phase to monitor baseline use and any changes during construction due to the Sizewell C Project.

Plan Structure

1.1.8 The structure of this plan is as follows:

- Section 2: Scope: sensitive species and habitats;
- Section 3: Governance;
- Section 4: Monitoring; and
- Section 5: Mitigation Measures.

2 SCOPE: SENSITIVE SPECIES AND HABITATS

2.1.1 In the context of the Shadow HRA, in order to mitigate potential effects due to any net additional users or changes to behaviour due to the Sizewell C Project across these European sites, measures to reduce the potential disturbance to certain qualifying interest features are proposed. The species and habitats of concern for the European sites covered by this monitoring and mitigation plan, based on the findings of the **Shadow HRA Report** [APP-145] to [APP-149] are:

- Breeding nightjar;
- Breeding woodlark;
- European dry heath;
- Annual vegetation of drift lines; and
- Perennial vegetation of stony banks.

2.1.2 In addition to the breeding birds and habitats listed above, the **Shadow HRA Report** assessed the potential for disturbance due to increases in recreational pressure to affect other breeding populations of qualifying interest features of the Minsmere-Walberswick SPA (avocet, bittern, little tern, marsh harrier, gadwall, shoveler; and teal) and the non-breeding populations of gadwall, shoveler, white-fronted goose and hen harrier. For these species, there is limited potential for a direct disturbance effect as a result of recreational activities due to one or more reasons, including:

- relative inaccessibility of the wetland habitats used by populations of these birds within the core areas of the constituent reserves; and
- the predicted minor changes in visitor numbers and existing visitor management practices.

2.1.3 Notwithstanding the above, these species are included within the scope of this plan in order to provide assurance that there will be no adverse effects on these populations as a result of any changes in recreational usage.

2.1.4 Although not a species relevant to the scope of the Shadow HRA, stone curlew is a specially protected species which breeds on acid grassland and farmland across the areas covered by this plan and is considered to be particularly sensitive to disturbance. In addition, a range of heathland bird species, which are not qualifying features of the European sites, are also present and are potentially sensitive to disturbance, including Dartford

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warbler as well as other more common breeding bird species. Measures to mitigate the potential effects of recreational displacement on nightjar and woodlark will also minimise the potential for effects on the other species found within these habitats that are potentially sensitive to this effect pathway. For the avoidance of doubt the measures will also be applied to non-heathland habitat within or adjacent to the European sites on functionally linked land in order to mitigate any additional recreational pressure caused by the Sizewell C Project on stone curlew.

3 GOVERNANCE

3.1 Deed of Obligation

3.1.1 Level 1 control documents will either be certified under the DCO at grant or annexed to the Deed of Obligation (DoO). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and DoO set out the status of each Level 1 document.

3.1.2 This plan is a Level 1 document. The mitigation and monitoring requirements specified in this Plan are secured via the DoO (Doc Ref. 8.17(G) (see paragraph 6 of Schedule 11 (Natural Environment))). Further, the DoO makes provision for the following:

- SZC Co must carry out or procure the carrying out of the Initial Mitigation Measures and the monitoring required at the European sites as detailed in this plan;
- **European Sites Access Contingency Fund** is a fund to be established by SZC Co. for use in the circumstances where Additional Mitigation Measures at the European sites are identified as required (in accordance with this plan) to mitigate the impacts of additional recreational disturbance associated with the Project;
- Governance arrangements for the administration of the European Sites Access Contingency Fund (set out in further detail in the below sections).

3.1.3 Where further documents or details require approval, this plan states which body or governance group is responsible for the approval and/or must be consulted. Any approvals by East Suffolk Council, Suffolk County Council or the MMO will be carried out in accordance with the procedure in Schedule 23 of the dDCO. The DoO establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made. Any updates to these further documents or details must be approved by the same body or governance group and through the same consultation and procedure as the original document or details.

3.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not

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been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the Schedule of Other Consents, Licences and Agreements (Doc Ref. 5.11) [REP3-011].

- 3.1.5 For the purposes of this document the term ‘SZC Co.’ refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by the dDCO), its appointed representatives and the appointed construction contractors.

3.2 Ecology Working Group

- 3.2.1 In relation to this plan the Ecology Working Group (established by Schedule 11 of the DoO), will be responsible for:

- a) reviewing the monitoring 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. Sandlings SPA (Sandlings (North) European site section), the Minsmere-Walberswick SPA and the Minsmere-Walberswick Heath and Marshes SAC (or a constituent part thereof) and then whether further investigation or Additional Mitigation Measures, beyond the Initial 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 4.3 and 5** of this plan; and
- c) within 6 months of commencement of the Project, review the Initial Mitigation Measures and Additional Mitigation Measures specified in Tables 5.1 and 5.2 of this plan and identify any further measures that may be required, and develop a process for the rapid deployment of such measures, for example additional signage and enclosures to protect nesting little tern or other ground nesting birds covered by this plan where there is a risk of imminent harm and the precautionary 5% increase in recreational pressure has been triggered, or is likely to be triggered. It is envisaged that this process would enable the Ecology Working Group to authorise immediate deployment by relevant land managers of such measures up to a cost ceiling [to be agreed] that would be recoverable under the European Sites Access Contingency Fund.

- 3.2.2 If the Ecology Working Group identifies that Additional Mitigation Measures are required in accordance with this plan, the Ecology Working Group will:

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- 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 further investigation and/or Additional Mitigation Measures must be implemented;
- b) make written requests to the Environment Review Group (established by Schedule 11 of the DoO) to access monies from the European Sites Access Contingency Fund (provided for in paragraph 6, Schedule 11 of the DoO) to carry out the further investigation and/or the Additional 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 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 (established by Schedule 11 of the DoO) will receive reports and recommendations from the Ecology Working Group as to what further investigation and/or Additional Mitigation Measure(s) are necessary and appropriate based on the monitoring undertaken in accordance with this plan.

3.3.2 The Environment Review Group will:

- a) consider the reports and recommendations from the Ecology Working Group and decide whether the recommended further investigation and/or Additional 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 Additional 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

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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 Additional Mitigation Measures are secured in Schedule 11 of the **DoO** and will 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 Additional Mitigation Measures, subject to the rapid deployment scheme that is to be defined and implemented under para 3.2.1(c).
- 3.3.4 In addition, the Environment Review Group shall:
- a) define the triggers in accordance with the principles in **Section 4.3** of this plan and revise them from time to time, if necessary in 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 as established by Schedule 17 of the **DoO**) which will 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 is 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. Additional Mitigation Measures and/or further investigation will 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 will then be investigated with the benefit of existing monitored information and any further monitoring directed by the Ecology Working Group in order to identify Additional Mitigation Measures (in addition to proposed initial measures) which must 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 paragraph 6, Schedule 11 of the DoO, SZC Co will carry out or procure the carrying out of the monitoring programme in accordance with this plan.
- 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 additional mitigation) before negative effects on qualifying interest features of European sites arise.
- 4.1.4 Ecological monitoring must be carried out in parallel with monitoring of recreational use and behaviour in order that the ecological conditions at the time of implementation (commencement of construction) can be established and the effect of any changes in recreational user numbers and behaviour can be detected.
- 4.1.5 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;
 - **Automatic counters** set up on paths and the access road to Dunwich Heath Coastguard Cottages to record people movements continuously throughout the year; and

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- **Ecological surveys** to establish baseline ecological conditions, determine whether any ecological effects are occurring and to assess the effectiveness of mitigation measures.

4.1.6 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 specific use in the vicinity of the survey locations illustrated on **Figures 2, 3 and 4** 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. The surveyors will record the types of behaviour that might disturb breeding and non-breeding birds and damage habitats (see **Section 4.4**).

4.2.3 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).

4.2.4 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 Additional Mitigation Measures.

4.2.5 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.

4.2.6 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.

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b) Automatic Counters

- 4.2.7 ‘Automatic counters’ will be used at paths and entry points at the locations shown on **Figures 2, 3 and 4** 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.
- 4.2.8 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 Figures 2 to 4)	
a	Walberswick Common
b	Walberswick Beach (south)
c	Newdelight Walks
d	Dunwich Beach
e	Westleton Heath
f	Cliff House (Suffolk Coast Path and Sandlings Walk)
g	Dunwich Heath (Suffolk Coast Path and Sandlings Walk)
h	Dunwich Heath National Trust car park
i	North Walks (Sandlings Walk)
j	Minsmere outer (Suffolk Coastal cycle route)
k	Minsmere Sluice footpath (Suffolk Coast Path)
l	Sizewell Beach car park
m	Sizewell Common (Sandlings Walk)
n	Aldringham Walks (Sandlings Walk)
Survey locations at European Sites – automatic people counters only (purple dots on Figures 2 to 4)	
1	Wolsey Bridge
2	East Hill
3	Sandymount Covert

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Survey location	
4	Scottshall Coverts
5	Path to Dunwich Beach
6	The Walks
7	Margaret Wood
Survey locations at European Sites – automatic vehicle counter only (red dot on Figure 3)	
50	Access road to Dunwich Heath Coastguard Cottages

c) Ecological Surveys

- 4.2.9 Habitat monitoring, focussed on the qualifying interest features of the Minsmere-Walberswick European sites, is proposed. This monitoring is set out in **Table 4.2**.
- 4.2.10 **Table 4.3** sets out the proposed monitoring in relation to qualifying breeding and non-breeding bird species of European sites.
- 4.2.11 The ecological monitoring will be undertaken in any event and is not linked to trigger levels. SZC Co. will discuss and agree the proposed locations for habitat monitoring with the Ecology Working Group and RSPB, Suffolk Wildlife Trust, National Trust and Forestry England (in relation to Sandlings North) to ensure the monitoring covers those areas of most concern to these organisations. The locations will include Dunwich Heath.
- 4.2.12 The ecological monitoring set out in **Table 4.2** and **Table 4.3** is in addition to the observational monitoring described above for the Observation and Questionnaire Surveys. Monitoring of breeding waterbirds (abundance and distribution for avocet, gadwall, shoveler and teal; indication of extent of usage for bittern) and non-breeding waterbirds (abundance and distribution) will also be undertaken in respect of the Minsmere South Levels in the context of the Minsmere-Walberswick European sites. This monitoring must be carried out by SZC Co. and is defined and secured in the **Terrestrial Ecology Monitoring and Mitigation Plan** (Doc Ref. 9.4(B)) by Requirement 4 of the draft DCO.

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SIZEWELL C PROJECT – MONITORING AND MITIGATION PLAN
FOR MINSMERE – WALBERSWICK EUROPEAN SITE AND SANDLINGS
(NORTH) EUROPEAN SITE

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Table 4.2: Proposed monitoring in relation to qualifying habitat features of European sites

Qualifying interest feature (habitat type)	Potential impact / pressure	Proposed monitoring
European dry heath - Annual vegetation of drift lines - Perennial vegetation of stony banks	- Trampling - Nutrient enrichment	- Targeted habitat surveys at selected locations (covering each qualifying habitat) undertaken every two years. - Monitoring would follow the JNCC Common Standards Monitoring guidance as appropriate to the habitat type. - Fixed point photography. - Observations recorded by new wardens provided under this plan.
	- Burnt areas - Path widening - Formation of new routes - Littering	- Visual monitoring of broad-scale habitat impact, potentially using transect-based approach. - Observations recorded by new wardens provided under this plan.

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Table 4.3: Proposed monitoring in relation to qualifying bird species of European sites

Qualifying interest feature (species)	Proposed monitoring	Timing
Minsmere-Walberswick European sites Breeding nightjar	The RSPB Minsmere Reserve provides the main nesting areas for the species within the SPA, with birds also nesting in the Dunwich Forest parts of the Dingle Marshes Reserve. Data collected by the RSPB and others provide a good understanding of the baseline populations of breeding nightjar and similar data will be used in future to monitor change on an annual basis.	
Minsmere-Walberswick European sites Breeding little tern	The number of little terns breeding within the Minsmere-Walberswick SPA has declined since classification, coinciding with increases at colonies in the Benacre to Easton Bavents SPA, and Kessingland, to the north; as well as North Warren within the Sandlings SPA to the south. Since 2014, the little tern recovery project has operated in this area to protect colonies from disturbance by people and predators, as well as monitoring numbers and breeding success. Data collected via this monitoring provides a good understanding of the baseline populations of breeding little tern. However, it is understood that this monitoring is unlikely (in itself) to provide sufficient information for the purposes of this plan and it will be supplemented as necessary through discussion and agreement with the Ecology Working Group and the relevant land manager(s).	
Sandlings (North) European site	Sandlings (North) overlaps substantially with the RSPB’s North Warren and Aldringham Walks Reserve, for which data on the abundance of breeding nightjar and woodlark are available from 2010 to 2018. These data provide a good understanding of the baseline populations of breeding nightjar and woodlark and similar data will be used in future to monitor change on an annual basis.	

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Qualifying interest feature (species)	Proposed monitoring	Timing
Breeding nightjar and woodlark		

4.2.13 For the avoidance of doubt, where surveys of qualifying bird species are routinely carried out by relevant parties such as the RSPB, SWT or other parties, it is not the intention of this plan to undertake or fund these surveys. It is assumed that relevant land managers will make this survey information available free of charge. However SZC Co. recognises that in some cases surveys that will be required for the purposes of this plan are not carried out routinely and/or are carried out by volunteer groups whose funding is not secure. In addition there may be a need for changes to the geographical coverage or scope of existing surveys to meet the needs of this plan. Under these circumstances SZC Co. will in consultation with the relevant land manager(s) or other parties agree what additional surveys are required under this plan and carry out the surveys or procure them to be carried out. The cost of any such additional surveys shall be borne by SZC Co. directly that is to say they shall not be funded from the European Sites Access Contingency Fund.

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4.3 Use of Trigger Levels

- 4.3.1 Other than the trigger level defined below, trigger levels will be set and reviewed by the Environment Review Group (see **Section 3**), in accordance with the principles set out in this section.
- 4.3.2 The identification of a trigger level of net increased recreational use at which certain Additional Mitigation Measures or further investigation will be instigated 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 Additional Mitigation Measures will 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 will be selected from the measures in **Table 5.2**. Trigger levels linked to other parameters (e.g. evidence of trampling) will also be defined by the Environmental Review Group informed by the Ecology Working Group which, if occurring, will trigger the deployment of mitigation measures.
- 4.3.4 The identification / agreement of further trigger levels needs to reflect a combination of factors, comprising:
- 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 in combination with one or more other factors. This will be based on recorded warden 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;

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- the types of users, e.g. off road/night time cyclists, dogs quartering land where birds are nesting, roosting or feeding, unauthorised campers, walkers; and
- whether the increase or changes in behaviour and pattern of use is, or 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 will be recorded by surveyors led by the SZC Co. funded wardens. 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; and
- littering and dog waste.

4.5 Survey Programme

4.5.1 The programmes for visitor and ecological surveys at specific years are described below. In addition to these formal surveys the wardens will, once appointed, observe and record visitors and their behaviour, and habitats and species, and any changes, throughout the year for each year of the construction phase and the early years of operation of Sizewell C.

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;

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- Annual monitoring during early years of construction up to (and including) peak years (construction years 1 to 7);
- Monitoring every two years during construction and after early / peak years (construction years post year 7; and
- 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 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 breeding waterbirds) and non-breeding waterbirds.

4.5.5 Monitoring during the construction early years will identify any changes in visitor numbers or behavioural patterns leading to potential problems (i.e. signs of human disturbance and actual or potential harm to qualifying interest features) at an early stage before they become established in the behaviours of visitors. The monitoring strategy will be adapted over the monitoring period if necessary, as the evidence accrues and to allow for relevant data gathering.

4.5.6 Baseline data is available on levels of use and types of users from the 2014 visitor observation and questionnaire surveys at seven locations close to the main development site (Book 6, Volume 2, Chapter 15, Appendix 15A of the Environmental Statement (ES) [\[APP-268\]](#)). In addition to identifying the levels and types of users, the 2014 surveys identified whether people are likely to displace to alternative locations during the construction phase to avoid the construction zone and, if they are, the alternative areas they would be most likely to visit instead. These surveys were undertaken in August and November 2014 and discussed with consultees including the RSPB, National Trust, Suffolk Wildlife Trust and Natural England, and were used to inform the Shadow HRA Recreational Disturbance Assessment (Book 5 Volume 10 Appendix E [\[APP-148\]](#)).

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4.5.7 The initial monitoring surveys under this plan commenced in Summer 2021.

4.5.8 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 [\[APP-268\]](#).

b) Ecological Surveys Programme

4.5.9 With regard to monitoring the potential effect of trampling and nutrient enrichment on habitats, the monitoring proposed in **Table 4.2** will be undertaken according to the following programme, with seasonal timing aligned with the timing of the visitor surveys described in **Section 4.5a)**:

- Initial pre-construction monitoring ;
- Monitoring during construction year 1; and
- Construction years 4 and 7.

4.5.10 For the other potential impact / pressures referred to in **Table 4.2** (burnt areas, path widening, formation of new routes and littering), the survey programme will align with that identified in **Section 4.5a)** for the visitor survey programme.

5 MITIGATION MEASURES

5.1 Introduction

- 5.1.1 The mitigation approach comprises a range of 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 (beyond the Initial Mitigation Measures) are implemented, if they are required by the results of monitoring and reasonably attributable to the effects of Sizewell C.
- 5.1.2 Mitigation measures will comprise two types:
- **Initial Mitigation Measures** deployed at the commencement of construction on the basis that impacts may occur unless mitigation is implemented (Shadow Habitats Regulations Assessment Volume 1: Screening and Appropriate Assessment, Appendix E: Recreational Disturbance Assessment and Annex A: Recreational Disturbance Evidence Base [[APP-148](#) and [APP-149](#)]); and
 - **Additional Mitigation Measures** will be deployed as necessary and will be dependent on any triggers that might be reached or evidence of changes in visitor numbers and behaviour which may increase the risk of disturbance to qualifying habitats and/or species, as determined by monitoring. These measures could be extensions to the Initial Mitigation Measures or entirely new measures to react to particular circumstances.
- 5.1.3 Potential mitigation measures are identified in **Table 5.1** and **Table 5.2** below, and will be developed in detail and implemented through the governance arrangements described in **Section 3** of this plan.
- 5.1.4 Any mitigation measures that are deemed to be required as a result of Sizewell C impacts will be additional to those currently in place and maintained by the owners and managers of land within European sites, or that arise from causes other than Sizewell C.
- 5.1.5 The need for Additional Mitigation Measures will be monitored through the observation and questionnaire surveys, automatic people and vehicle counters and ecological surveys, and through on-the-ground wardening (described further in **Section 5.3**). The survey results will be reviewed by the Ecology Working Group and the arrangements defined for identifying and delivering Additional Mitigation Measures will be followed as defined in **Section 3**.

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- 5.1.6 Wardening, to observe and record potential disturbance and impacts, to communicate with and educate visitors on, inter alia, ecological sensitivities, appropriate behaviours, and alternative locations for recreation which would avoid sensitive areas at European sites, is an integral part of the mitigation strategy (see **Table 5.1**), and is designed to ensure that issues are identified and reacted to quickly and to minimise the risk of negative effects on qualifying interest features. Given that it will be difficult to separate impacts which might be attributable to recreational disturbance arising from the Sizewell C Project from impacts arising from other causes, the gathering of warden feedback in combination with the observation, questionnaire and habitat surveys will form part of the monitoring (e.g. through regular observation records) (as noted in **Table 4.2** and **Table 4.3**).
- 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 with the site access measures already in use by RSPB, National Trust, Suffolk Wildlife Trust, Natural England and other landowners and managers of the relevant European sites.
- 5.1.9 Mitigation measures have been proposed by landowners and managers and, where appropriate, incorporated into the potential mitigation measures described in **Section 5.2**.

5.2 Mitigation Measures

- 5.2.1 **Table 5.1** and **Table 5.2** set out the Initial Mitigation Measures and Additional Mitigation Measures respectively, and the locations which they may apply within the Minsmere-Walberswick and Sandlings (North) European sites.

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These would be in addition to other mitigating measures which SZC Co. has committed to and are secured through other consents, the dDCO and the DoO 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 secured outside this Monitoring and Mitigation Plan 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, secured under discharged condition 25 of planning permission reference DC/14/4224/FUL (see Appendix A).
- Aldhurst Farm Enhancement Works – pursuant to paragraph 10, Schedule 11 of the **DoO** (Doc Ref. 8.17(G)), SZC Co. will use reasonable endeavours to prepare and submit a planning application for these works which include:
 - expanding the existing car park by up to 15 spaces;
 - 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 and Schedule 11 of the DoO (Doc Ref. 8.17(G) [\[AS-143\]](#)) and creation of a new off-road mountain bike skills trail for construction workers through the coniferous woodland at Kenton Hills. This must be signposted from the construction workers accommodation campus and caravan site, the new off-road cycle route within Aldhurst Farm, and from Kenton Hills car park. The skills trail must be designed sensitively to avoid impacts on the reptile receptor sites that have been created in Kenton Hills, as well as reptiles, especially adder,

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present outside of the enclosures, associated in particular with the clearings and rides within the woodland. The advice must be sought of a specialist adder ecologist to optimise the design of the skills trail.

- 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 (secured pursuant to Requirement 6A of the **dDCO** (Doc Ref. 3.1(I))).
- SZC Co. must make a financial contribution to the Suffolk Coast RAMS to mitigate potential recreational impacts from construction workers, targeted towards an agreed suite of measures from the Suffolk Coast RAMS mitigation package specific to the potential Sizewell C development impacts (paragraph 7, Schedule 11 of the DoO.).
- A suite of improvements to PRoW will be funded through a Deed of Obligation financial contribution from SZC Co. to Suffolk County Council through the Rights of Way Fund. 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 (paragraph 16, Schedule 16 of the DoO).

5.2.2 Initial Mitigation Measures set out in **Table 5.1**, that are proposed to reduce the risk of additional recreational disturbance arising from the Sizewell C Project, will be implemented at the commencement of construction. SZC Co. must carry out or procure the carrying out of these measures as set out in the Deed of Obligation (Doc Ref. 8.17(G)) (see paragraph 6 of Schedule 11 (Natural Environment) of the draft Deed of Obligation), or they are secured through the Sizewell C **Code of Construction Practice (CoCP)** (Doc Ref. 8.11(E)) (by Requirement 2 of the draft DCO) as noted in **Table 5.1**.

Table 5.1 Initial Mitigation Measures

Initial Mitigation Measure	Location	How funded / secured
Wardening, signage, interpretation and awareness training		

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Initial Mitigation Measure	Location	How funded / secured
<p>New wardening resource (see Section 5.3) to educate visitors (e.g. walkers, dog walkers, picknickers, runners and mountain bikers) about desired behaviours, impacts of disturbance, impacts of dogs off leads, give out dog waste bags, suitability of routes for different uses and location of sensitive areas, and promote alternative locations to visitors, for example Aldhurst Farm and Kenton Hills.</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>	All areas ²	European Sites Access Contingency Fund
Signage to educate visitors re importance of vegetated shingle and beach nesting birds and requesting avoidance	Minsmere beach, Dingle frontage, Dunwich Heath's beach	European Sites Access Contingency Fund
Signage to educate visitors re fire risk and request no BBQs/fires, care with cigarettes etc.	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham	European Sites Access Contingency Fund

² 'All areas' means all land within the Minsmere-Walberswick European sites and Sandlings (North) European site

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Initial Mitigation Measure	Location	How funded / secured
	Walks and North Warren	
Signage to educate visitors and request that waste is taken home as appropriate to the protocol in place at the given site. For example, some locations have bins suitable for bagged dog waste where signs to take dog waste home would not be appropriate.	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham Walks and North Warren	European Sites Access Contingency Fund
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.	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham Walks and North Warren	European Sites Access Contingency Fund
Information pack provided to Sizewell C campus and LEEIE caravan park residents. Make aware of wildlife friendly locations that are especially suitable for walking and cycling outside European sites. Inform and educate about sensitive species and habitats, threats and appropriate behaviours.	All areas	This plan
Code of conduct information included in induction materials for all Sizewell C construction workers (not just those at campus and LEEIE caravan park). Oral briefings at worker inductions or toolbox talks. Inform and educate about sensitive species	All areas	This plan

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NOT PROTECTIVELY MARKED

Initial Mitigation Measure	Location	How funded / secured
and habitats, threats and appropriate behaviours.		
Leaflets on sites and at public buildings	All areas	European Sites Access Contingency Fund
Website and social media posts	All areas	European Sites Access Contingency Fund
Sizewell C interpretation signage	Dunwich Heath Coastguard Cottages, Sizewell beach car park	European Sites Access Contingency Fund
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.	European Sites Access Contingency Fund
Parking		
Review and definition of informal parking areas at Westleton Heath and the periphery of RSPB Minsmere marked O and N on Figure 3 and at Aldringham Walks and North Warren marked S, T and X on Figure 4. Proactive management of informal parking to focus parking in desired areas.	Westleton Heath, the outer areas of RSPB Minsmere, Aldringham Walks and North Warren	European Sites Access Contingency Fund

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Initial Mitigation Measure	Location	How funded / secured
Subsidise parking at Sizewell beach car park during the construction phase so that it is free or reduced cost to the public, to increase its attractiveness as a recreational location away from European Sites.	Sizewell beach, potentially benefiting all areas	European Sites Access Contingency Fund
Measures to paths and access		
Adaption of access routes to guide appropriate uses (surfacing, barriers, signage)	All areas	European Sites Access Contingency Fund

5.2.3 A strategy to identify, justify, approve and implement Additional Mitigation Measures, to ensure that there is no delay to their delivery, and that the measures ensure that no AEoI of European sites occur, will be developed post-consent and pre-construction. The process identified at this stage is as follows, unless otherwise agreed with the Ecology Working Group.

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 further mitigation. The Ecology Working Group may recommend to the Environment Review Group that any one or more of the measures identified in **Table 5.2** should be implemented to mitigate additional recreational disturbance arising from the Sizewell C Project. The Environment Review Group will consider the recommendations from the Ecology Working Group and determine what measures should be implemented. These additional measures will be funded by accessing funding from the European Sites Access Contingency Fund (paragraph 6, Schedule 11 of the DoO) following approval from the Environment Review Group in accordance with **Section 3** of this plan.

Table 5.2 Additional Mitigation Measures

Additional Mitigation Measure	Location	How funded / secured
Wardening, signage, interpretation and awareness training (implemented at relevant trigger level)		

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NOT PROTECTIVELY MARKED

Additional Mitigation Measure	Location	How funded / secured
Additional warden resource	All areas	European Sites Access Contingency Fund
Additional signage to educate visitors about specific issues which arise and alternative locations for wanted activities	All areas	European Sites Access Contingency Fund
Additional signage to inform and educate visitors re importance of vegetated shingle nesting birds and requesting avoidance	Minsmere beach, Dingle frontage, Dunwich Heath beach	European Sites Access Contingency Fund
Dog walking champions to model positive behaviour, engage with other dog walkers, give out dog waste bags (printed with desired messages), advise 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.	All areas	European Sites Access Contingency Fund
Measures to paths and access		
Additional exclosures around vegetated shingle patches and/or nests	Minsmere beach, Dingle frontage, Dunwich Heath beach	European Sites Access Contingency Fund
Additional path improvements or provision of new routes to encourage people to keep to specific routes, focussing access away from sensitive locations	All areas	European Sites Access Contingency Fund
Eastbridge to Minsmere sluice footpath re-routing and barriers to physical access (e.g. locked gates,	Eastbridge to Minsmere sluice footpath	European Sites Access

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NOT PROTECTIVELY MARKED

Additional Mitigation Measure	Location	How funded / secured
mesh on gates to restrict dog access) to reduce access onto sensitive habitats. Maintain the route of the definitive PRoW.	PRoW E-363/020/0	Contingency Fund
Creation/maintenance of firebreaks	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham Walks and North Warren	European Sites Access Contingency Fund
Provision of dual use bins to accept both general litter and bagged dog waste (including regular emptying)	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham Walks and North Warren	European Sites Access Contingency Fund
Parking		
Additional proactive management of informal parking to focus parking in desired areas. Closing off new informal parking areas if they develop.	Westleton Heath, the outer areas of RSPB Minsmere, Dunwich Heath, Aldringham Walks and North Warren	European Sites Access Contingency Fund
Additional bespoke measures		
Additional bespoke mitigation measures which are identified at any time, which may be necessary but cannot be identified now.	All areas	European Sites Access Contingency Fund

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NOT PROTECTIVELY MARKED

- 5.2.5 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 will 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 Staff Resources

- 5.3.1 SZC Co. must provide funding for the new wardening resource specified in **Table 5.1** via the European Sites Access Contingency Fund committed to in the Deed of Obligation (Doc Ref. 8.17(G)) [\[REP3-024\]](#). Funding is provided for a minimum of four FTE wardens over the period of construction and for the first two years of the operational period whose key purpose will be to ensure the protection of sensitive habitats and species across the Minsmere-Walberswick European site and Sandlings (North) European site from potential negative effects arising from the Sizewell C Project will be funded specifically to carry out monitoring and mitigation work and public engagement in accordance with this plan. The financial contribution secured via the **Deed of Obligation** (Doc Ref. 8.17(G)) [\[REP3-024\]](#) must employ one full time Lead Warden and three field wardens within six months of commencement. Deployment of wardens will be reviewed by the Ecology Working Group at six monthly intervals from initial deployment. The wardens will work closely with existing site managers, wardens, volunteers and the public. This must include at least one public-facing, educational focussed full-time role.

- 5.3.2 The wardens will 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 – Lead Warden;

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- 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;
- 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 – Lead Warden;
- Overseeing implementation of mitigation;
- Observing success of mitigation and the need for further mitigation; and
- Engaging with the public and construction workers to encourage recreational use that does not harm species or habitats at European sites.

REFERENCES

1. Department of Energy and Climate Change (July 2011). National Policy Statement for Nuclear Power Generation (EN-6).
2. 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]

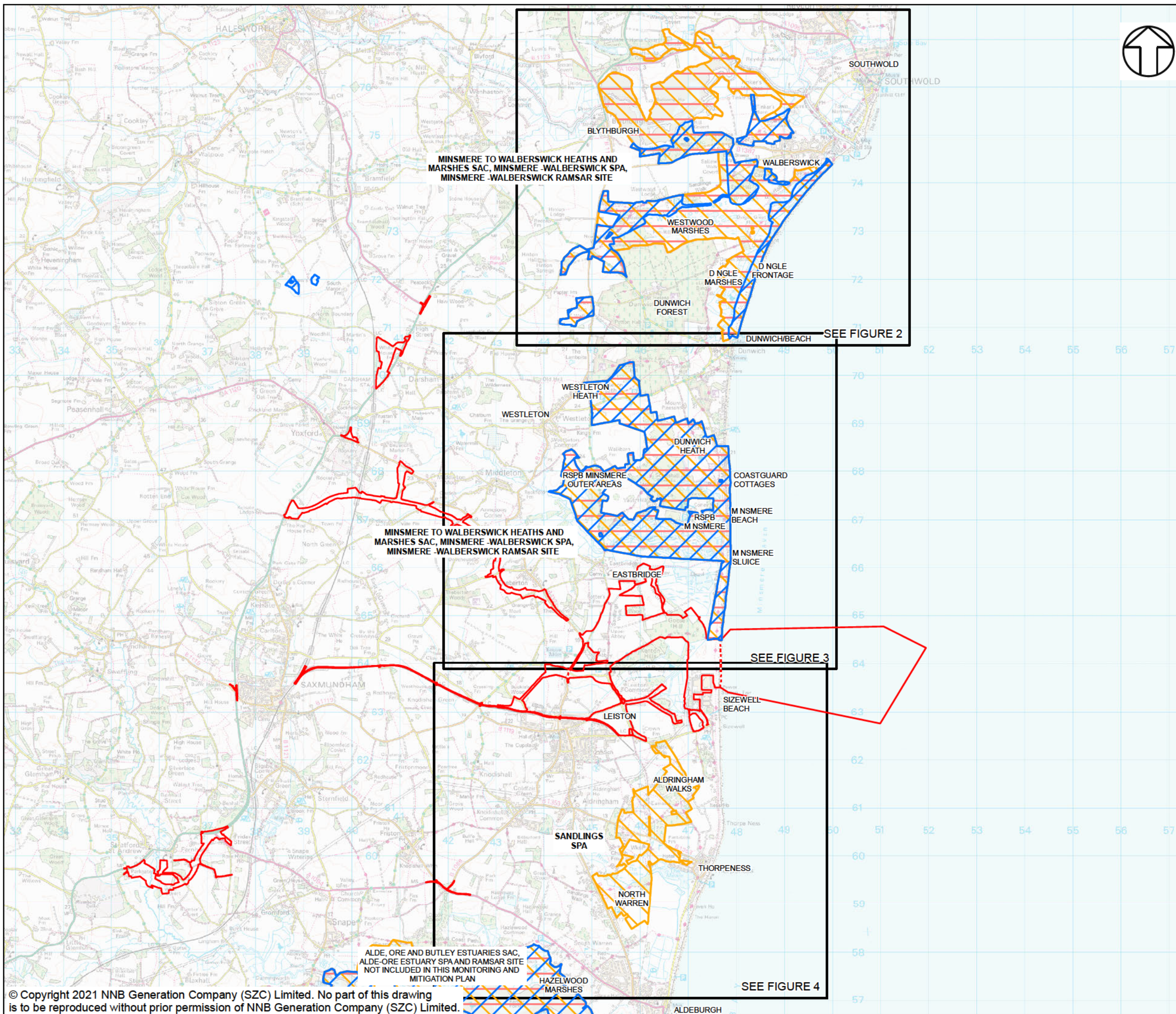
FIGURES

Figure 1: Location Plan

Figure 2: Proposed Survey Locations Minsmere-Walberswick European Sites (North)

Figure 3: Proposed Survey Locations Minsmere-Walberswick European Sites (South)

Figure 4: Proposed Survey Locations Sandlings (North) European Site



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**
- SIZEWELL C AND ASSOCIATED DEVELOPMENT SITE BOUNDARIES
 - - - DEMARCATION LINE
 - SPECIAL AREA OF CONSERVATION (SAC)
 - SPECIAL PROTECTION AREA (SPA)
 - RAMSAR

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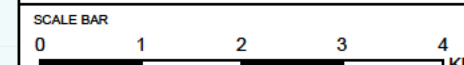


DOCUMENT:
 SIZEWELL C
 MONITORING AND MITIGATION PLAN FOR
 MINSMERE - WALBERSWICK EUROPEAN SITES
 AND SANDLINGS (NORTH) EUROPEAN SITE

DRAWING TITLE:
 FIGURE 1:
 LOCATION PLAN

DRAWING NO:
 6839_SK_116

DATE: APR 2021 **DRAWN:** V.W. **SCALE:** 1:75,000 @A3 **REV:** 02



ALDE, ORE AND BUTLEY ESTUARIES SAC,
 ALDE-ORE ESTUARY SPA AND RAMSAR SITE
 NOT INCLUDED IN THIS MONITORING AND
 MITIGATION PLAN

HAZELWOOD
 MARSHES

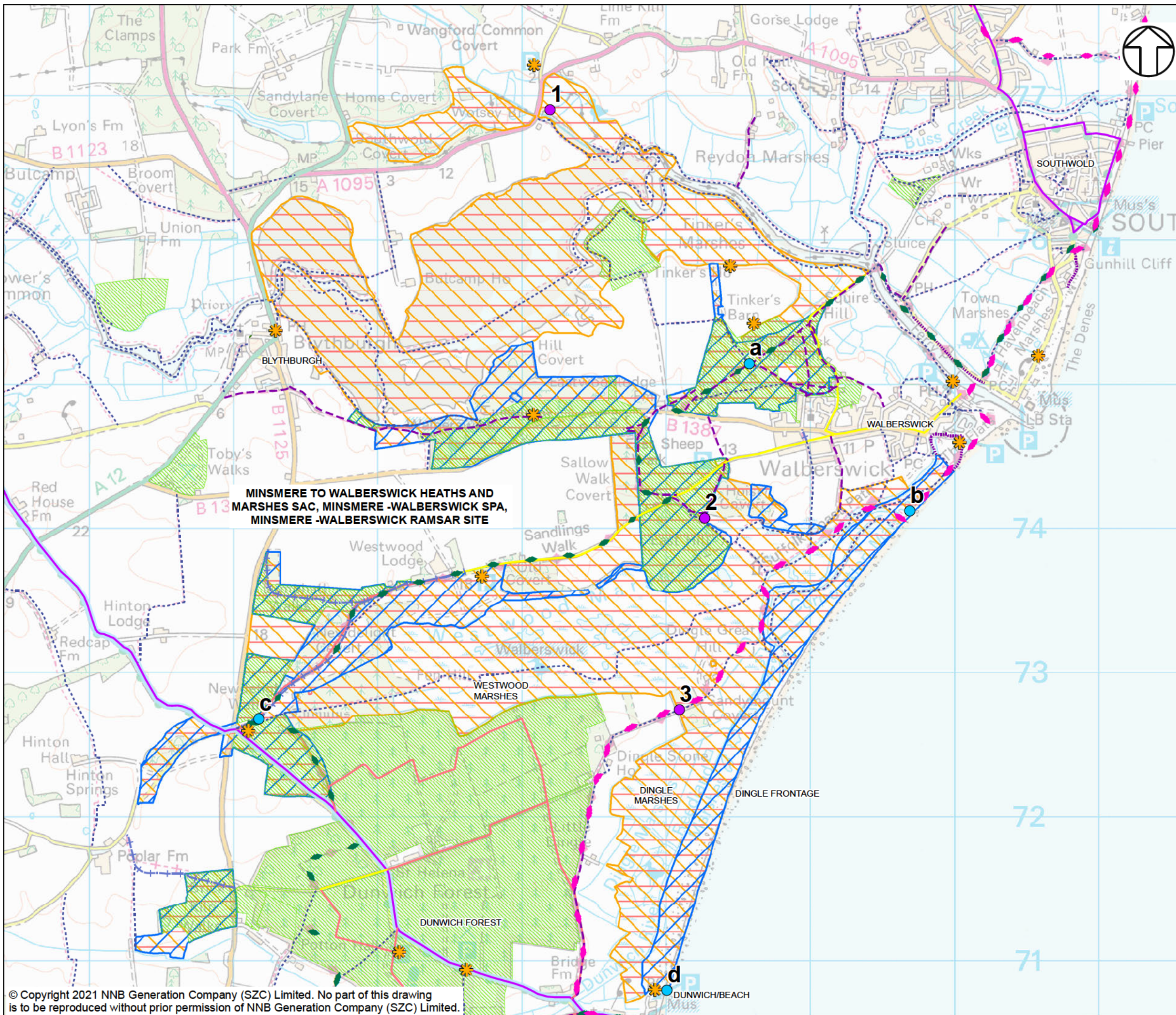
SEE FIGURE 4

MINSMERE TO WALBERSWICK HEATHS AND
 MARSHES SAC, MINSMERE - WALBERSWICK SPA,
 MINSMERE - WALBERSWICK RAMSAR SITE

SEE FIGURE 2

MINSMERE TO WALBERSWICK HEATHS AND
 MARSHES SAC, MINSMERE - WALBERSWICK SPA,
 MINSMERE - WALBERSWICK RAMSAR SITE

SEE FIGURE 3



MINSMERE TO WALBERSWICK HEATHS AND MARSHES SAC, MINSMERE-WALBERSWICK SPA, MINSMERE-WALBERSWICK RAMSAR SITE

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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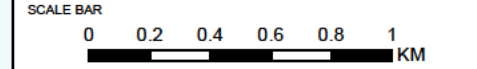


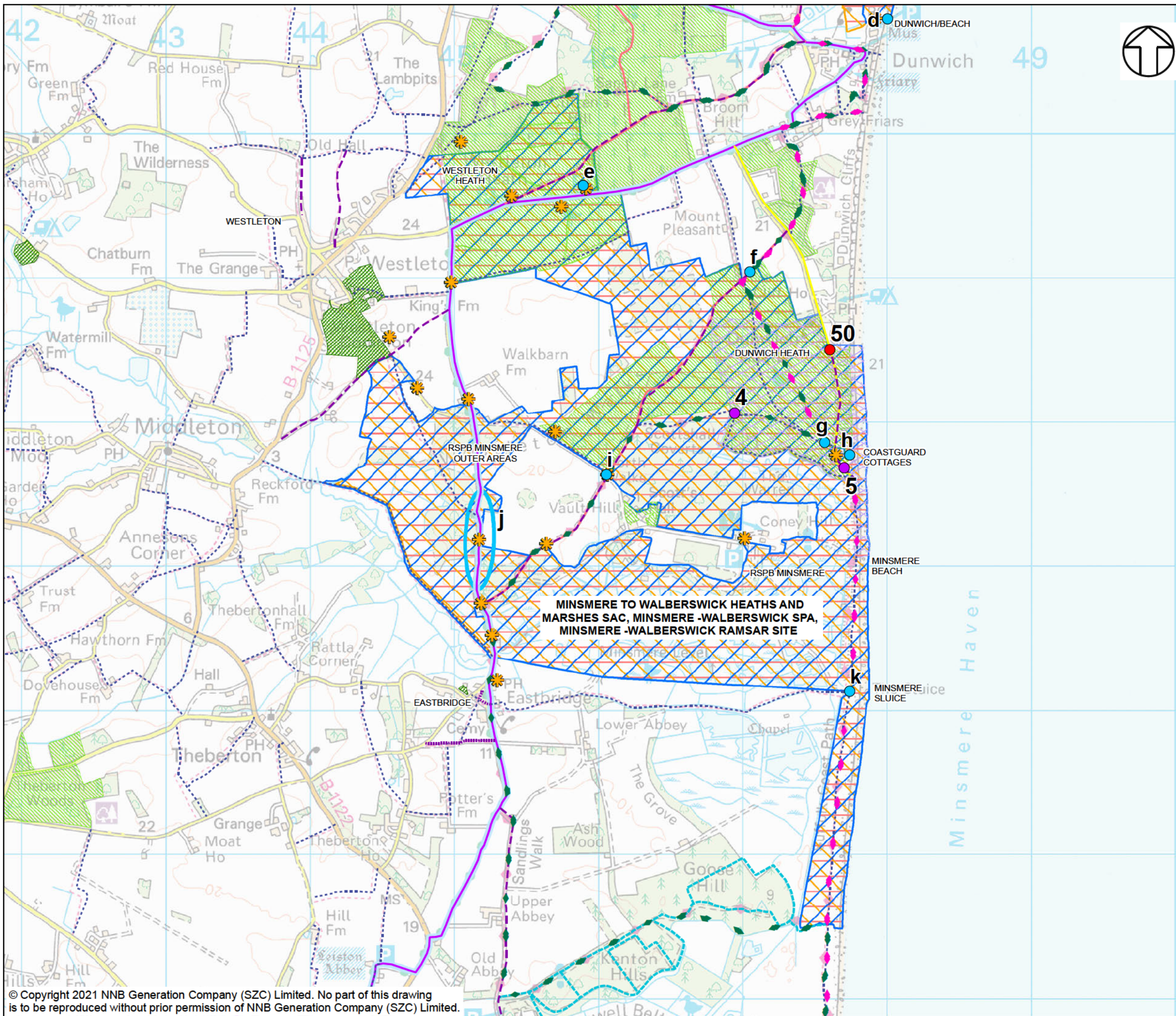
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 MONITORING AND MITIGATION PLAN FOR
 MINSMERE - WALBERSWICK EUROPEAN SITES
 AND SANDLINGS (NORTH) EUROPEAN SITE

DRAWING TITLE:
 FIGURE 2:
 PROPOSED SURVEY LOCATIONS
 MINSMERE-WALBERSWICK EUROPEAN SITES
 (NORTH)

DRAWING NO:
 6839_SK_108

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





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
- PROPOSED AUTOMATIC VEHICLE COUNTER

- 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
 - - - RESTRICTED BYWAY
 - - - PERMISSIVE PATHS IN EDF ENERGY ESTATE (ADAS)
 - 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
 - NATIONAL TRUST OPEN ACCESS 24HRS

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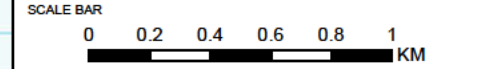


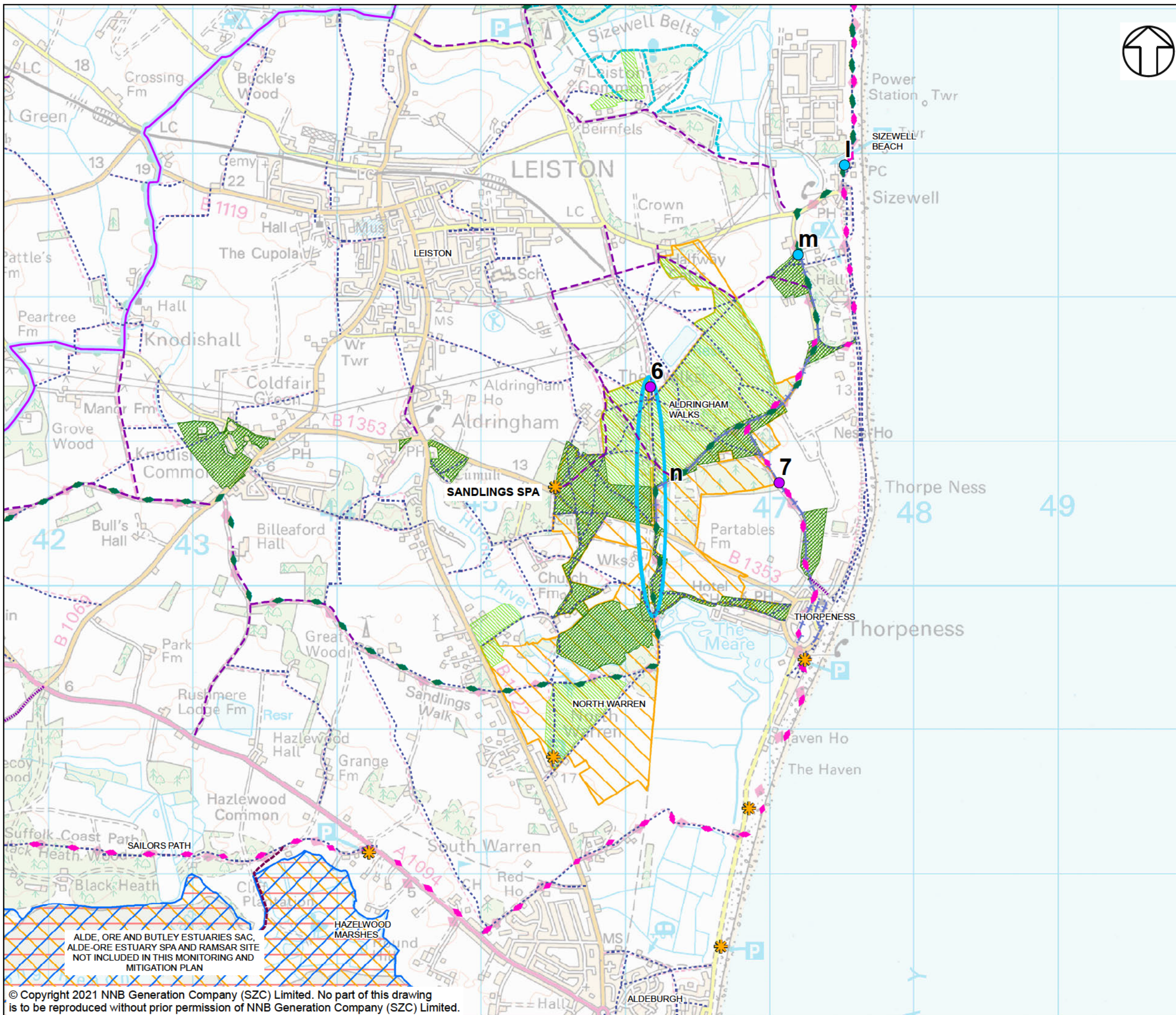
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 MONITORING AND MITIGATION PLAN FOR
 MINSMERE - WALBERSWICK EUROPEAN SITES
 AND SANDLINGS (NORTH) EUROPEAN SITE

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 FIGURE 3:
 PROPOSED SURVEY LOCATIONS
 MINSMERE-WALBERSWICK EUROPEAN SITES
 (SOUTH)

DRAWING NO:
 6839_SK_109

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





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
- PERMISSIVE PATHS IN EDF ENERGY ESTATE (ADAS)
- SUSTRANS REGIONAL CYCLE ROUTE (RCR) (42)
- SUFFOLK COASTAL CYCLE ROUTE
- REGISTERED COMMON LAND
- OPEN ACCESS LAND
- TRAIL TO BIRD HIDE

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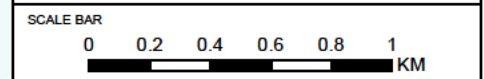
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 FIGURE 4:
 PROPOSED SURVEY LOCATIONS
 SANDLINGS (NORTH) EUROPEAN SITE

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



ALDE, ORE AND BUTLEY ESTUARIES SAC, ALDE-ORE ESTUARY SPA AND RAMSAR SITE NOT INCLUDED IN THIS MONITORING AND MITIGATION PLAN



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APPENDIX A: ALDHURST FARM ACCESS PROVISION

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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 CON FEROUS 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

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Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary European Sites

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APPENDICES

APPENDIX A: ALDHURST FARM ACCESS PROVISION 31

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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 must be implemented at three European sites¹ to ensure that adverse effect on the integrity (AEoI) 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**’ (Annex V of the DoO Doc Ref. 8.17(G)) 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)**’ (Annex U of the DoO (Doc Ref. 8.17(G))) 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 was submitted at Deadline 5 [REP5-105], and a further update is submitted at Deadline 8. An earlier draft of that plan was titled the

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/>

Monitoring and Mitigation Plan for Minsmere - Walberswick European Sites and Sandlings (North) European Site [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 any mitigation across the European sites in light of the conclusions of the **Shadow Habitats Regulations Assessment (HRA) Report [APP-145 to APP-149]** and **Shadow HRA Second Addendum [REP2-032]**. The **Shadow HRA Addendum [AS-173]** and **Shadow HRA Third Addendum** (Doc Ref. 5.10 [REP7-279]) assessed Proposed Changes to the Application. Recreational disturbance is not a pathway that is relevant to the assessment of those Proposed Changes and, therefore, the **Shadow HRA Addendum** and **Shadow HRA Third Addendum** are not relevant to this monitoring and mitigation plan. The “Shadow HRA Report” refers to the full shadow habitats regulations assessment as made up by the report and these addendums.
- 1.1.6 The **Shadow HRA Report** 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** 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 must be established to determine whether mitigation measures may be necessary and how they will 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** 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** 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

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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** proposes that existing arrangements to manage recreational access at Aldringham Walks and North Warren (i.e. the northern part of Sandlings SPA) 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 (Annex U of the DoO (Doc Ref. 8.17(G))) .

1.1.11 A number of measures have already been secured through the dDCO and DoO which will reduce potential recreational displacement to European sites. While these measures are listed in **Section 5.2** for context, they are not secured by this plan. These measures 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 (secured under discharged condition 25 of planning permission reference DC/14/4224/FUL 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 must be undertaken before and throughout construction to monitor baseline use and any changes during construction due to the Sizewell C Project.

Plan 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** 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 Level 1 control documents will either be certified under the DCO at grant or annexed to the Deed of Obligation (DoO). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and DoO set out the status of each Level 1 document.

3.1.2 This plan is a Level 1 document. The monitoring requirements specified in this plan are secured via the draft Deed of Obligation (Doc Ref. 8.17(G)) (see paragraph 6 of Schedule 11 (Natural Environment)), which requires that SZC Co must carry out or procure the carrying out of monitoring as required at Sandlings (Central) and Alde-Ore Estuary in accordance with this plan. Further, the DoO makes provision for the following:

- **European Sites Access Contingency Fund** is a fund to be established by SZC Co. for use in the circumstance where Additional Mitigation Measures at the European sites is identified as required (in accordance with this plan) to mitigate the impacts of additional recreational disturbance associated with the Project;
- Governance arrangements for the administration of the European Sites Access Contingency Fund (set out in further detail in the below sections).

3.1.3 Where further documents or details require approval, this plan states which body or governance group is responsible for the approval and/or must be consulted. Any approvals by East Suffolk Council, Suffolk County Council or the MMO will be carried out in accordance with the procedure in Schedule 23 of the dDCO. The DoO establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made. Any updates to these further documents or details must be approved by the same body or governance group and through the same consultation and procedure as the original document or details.

3.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are

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described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(B)) [REP3-011].

- 3.1.5 For the purposes of this document the term ‘SZC Co.’ refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by the dDCO), its appointed representatives and the appointed construction contractors.

3.2 Ecology Working Group

- 3.2.1 In relation to this plan, the Ecology Working Group (established by Schedule 11 of the DoO) is responsible for:

- a) reviewing the monitoring 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 will:

- 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 must be implemented;
- b) make written requests to the Environment Review Group (as established by Schedule 11 of the **DoO** (Doc Ref.8.17(G))) to access monies from the European Sites Access Contingency Fund (provided for in paragraph 6, Schedule 11 of the DoO) 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 (established by Schedule 11 of the DoO) 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 will:

- 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 are secured in Schedule 11 of the **DoO** and will 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 will:

- 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 (as established by Schedule 17 of the **DoO**) which will 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 is 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 will 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 will 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 must 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 paragraph 6, Schedule 11 of the DoO, SZC Co will carry out or procure the carrying out of the monitoring programme in accordance with this plan.
- 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 will establish the baseline ecological and visitor behaviour conditions 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 must 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 at the direction of EWG or ERG.
- 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

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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** 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**.

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- 4.2.12 SZC Co. will discuss and agree the proposed locations for habitat monitoring with the Ecology Working Group and RSPB, Suffolk Wildlife Trust, National Trust and Forestry England..

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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 will ensure that adverse effect on integrity will 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** .

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 must 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 must be deployed, targeted to areas of risk as defined by the baseline survey of breeding distribution.

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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 principles set out in this section.
- 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 will 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 will 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.

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

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- 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 will 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 commenced during summer 2021.
- 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** must be undertaken prior to the commencement of construction.
- 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 Environment Review Group, further ecological surveys will be instigated as follows:

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- 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 AEol 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 will 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 must be implemented. These measures will be funded by accessing funding from the European Sites Access Contingency Fund in paragraph 6, Schedule 11 of the **DoO** 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 Any mitigation measures that are deemed to be required as a result of Sizewell C impacts will be additional to those currently in place and maintained by the owners and managers of land within European sites , or that arise from causes other than Sizewell C.

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- 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 potential 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 must be implemented. These measures will be funded by accessing funding from the European Sites Access Contingency Fund in paragraph 6, Schedule 11 of the **DoO** 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 would be in addition to other mitigating measures which SZC Co. has committed to and are secured through other consents, the dDCO and the DoO 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, secured under discharged condition 25 of planning permission reference DC/14/4224/FUL (see Appendix A).
 - Aldhurst Farm Enhancement Works – pursuant to paragraph 10, Schedule 11 of the **DoO** (Doc Ref. 8.17(G)), SZC Co. will use reasonable endeavours to prepare and submit a planning application for these works which include: expanding the existing car park by up to 15 spaces
 - 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 and Schedule 11 of the DoO (Doc Ref. 8.17(G))) [\[AS-143\]](#).
- 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 (secured pursuant to Requirement 6A of the **dDCO** (Doc Ref. 3.1(I))).

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- SZC Co. must make a financial contribution to the Suffolk Coast RAMS to mitigate potential recreational impacts from construction workers, targeted towards an agreed suite of measures from the Suffolk Coast RAMS mitigation package specific to the potential Sizewell C development impacts (paragraph, 7 Schedule 11 of the **DoO**(Doc Ref. 8.17(G)).
- A suite of improvements to PRoW will be funded through a financial contribution from SZC Co. to Suffolk County Council through the Rights of Way Fund. These will 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 (paragraph 16, Schedule 16 of the **DoO**).

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 must be implemented. These measures will be funded by accessing funding from the European Sites Access Contingency Fund in paragraph 6, Schedule 11 of the **DoO** 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 and location of sensitive areas, and	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and	European Sites Access Contingency Fund

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Mitigation Measure	Location	How funded / secured
<p>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>Snape Warren.</p> <p>Beach frontage south of Aldeburgh.</p>	
<p>Signage to educate visitors re importance of vegetated shingle and nesting birds and requesting avoidance</p>	<p>Tunstall Forest and Snape Warren.</p> <p>Beach frontage south of Aldeburgh⁴.</p>	<p>European Sites Access Contingency Fund</p>
<p>Signage to educate visitors re fire risk and request no BBQs/fires, care with cigarettes etc.</p>	<p>Tunstall Forest and Snape Warren.</p>	<p>European Sites Access Contingency Fund</p>
<p>Signage to educate visitors and request that waste is taken home as appropriate to the protocol in place at the given site.</p>	<p>Upper Alde-Ore (e.g. Snape, Iken).</p> <p>Tunstall Forest and</p>	<p>European Sites Access Contingency Fund</p>

⁴ While the Orfordness to Shingle Street SAC is not within the scope of this plan, the potential mitigation measures stated as being relevant to the beach frontage south of Aldeburgh would also be of benefit to the Orfordness to Shingle Street SAC (noting that the Shadow HRA concludes that mitigation is not required for this SAC). The fact that this SAC is not within the scope of this plan does not preclude the potential implementation of the mitigation measures within the boundaries of the SAC.

NOT PROTECTIVELY MARKED

Mitigation Measure	Location	How funded / secured
	<p>Snape Warren.</p> <p>Beach frontage south of Aldeburgh.</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.</p>	European Sites Access Contingency Fund
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.</p>	European Sites Access Contingency Fund
Website and social media posts	<p>Upper Alde-Ore (e.g. Snape, Iken).</p> <p>Tunstall Forest and Snape Warren.</p>	European Sites Access Contingency Fund

NOT PROTECTIVELY MARKED

Mitigation Measure	Location	How funded / secured
	Beach frontage south of Aldeburgh.	
Sizewell C interpretation signage	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh.	European Sites Access Contingency Fund
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.	European Sites Access Contingency Fund
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.	European Sites Access Contingency Fund

NOT PROTECTIVELY MARKED

Mitigation Measure	Location	How funded / secured
	Beach frontage south of Aldeburgh.	

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 will 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. must carry out or procure the carrying out of the monitoring described in **Section 4** under Schedule 11 of the **DoO** (Doc Ref. 8.17(G)). The monitoring funded must 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. must 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

NOT PROTECTIVELY MARKED

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 must be implemented. These measures will be funded by accessing funding from the European Sites Access Contingency Fund in paragraph 6, Schedule 11 of the **DoO** 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 paragraph 6, Schedule 11 of the DoO. The warden resource will work closely with existing site managers, wardens and volunteers. The warden resource will 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.
 - 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.

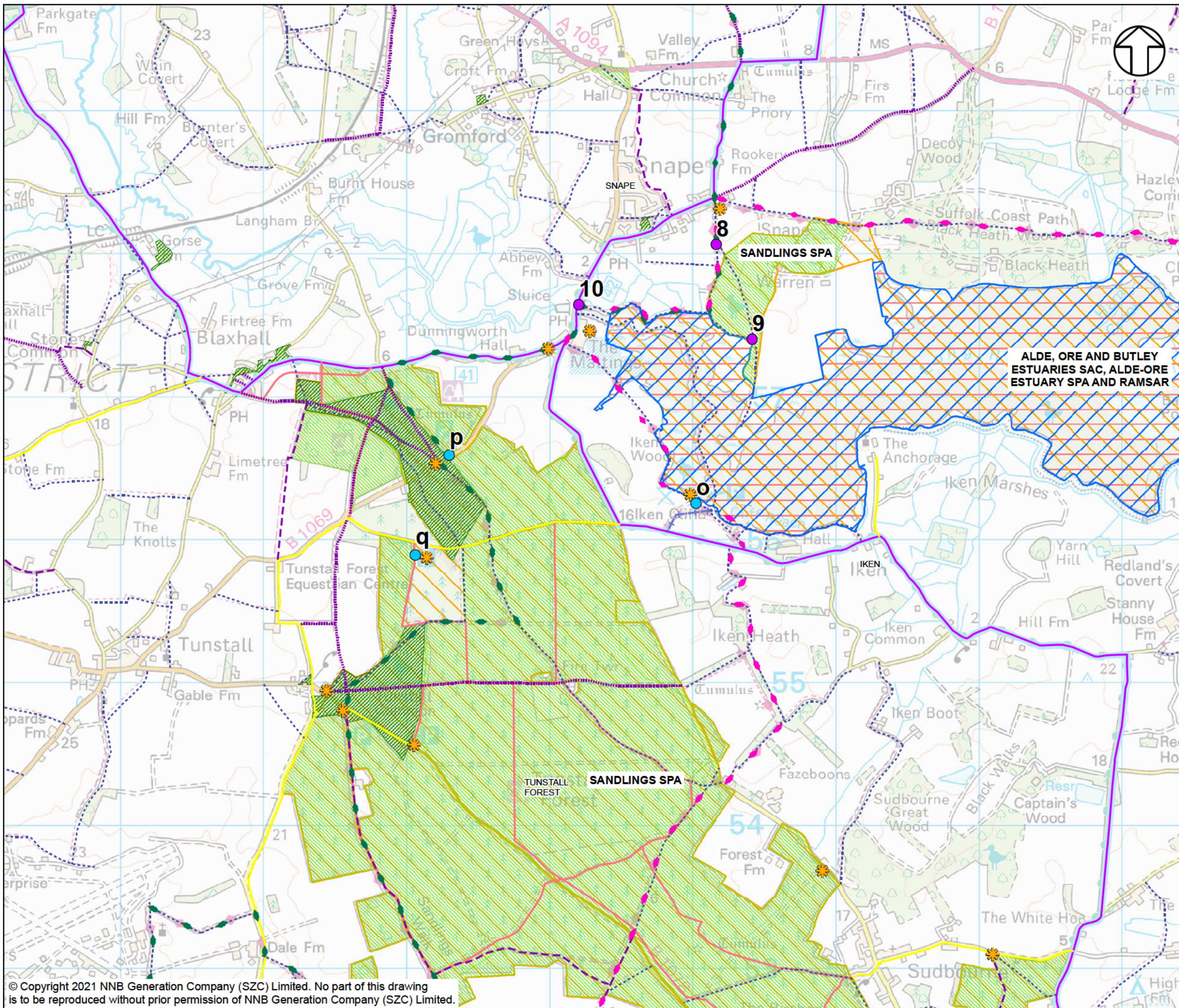
REFERENCES

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]

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FIGURE

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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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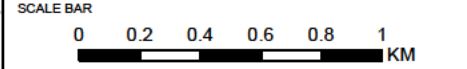


DOCUMENT:
 SIZEWELL C
 MONITORING AND MITIGATION PLAN FOR
 SANDLINGS (CENTRAL) AND ALDE-ORE ESTUARY

DRAWING TITLE:
 FIGURE 1:
 PROPOSED SURVEY LOCATIONS

DRAWING NO:
 6839 SK 111

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



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APPENDIX A: ALDHURST FARM ACCESS PROVISION

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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 CON FEROUS 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

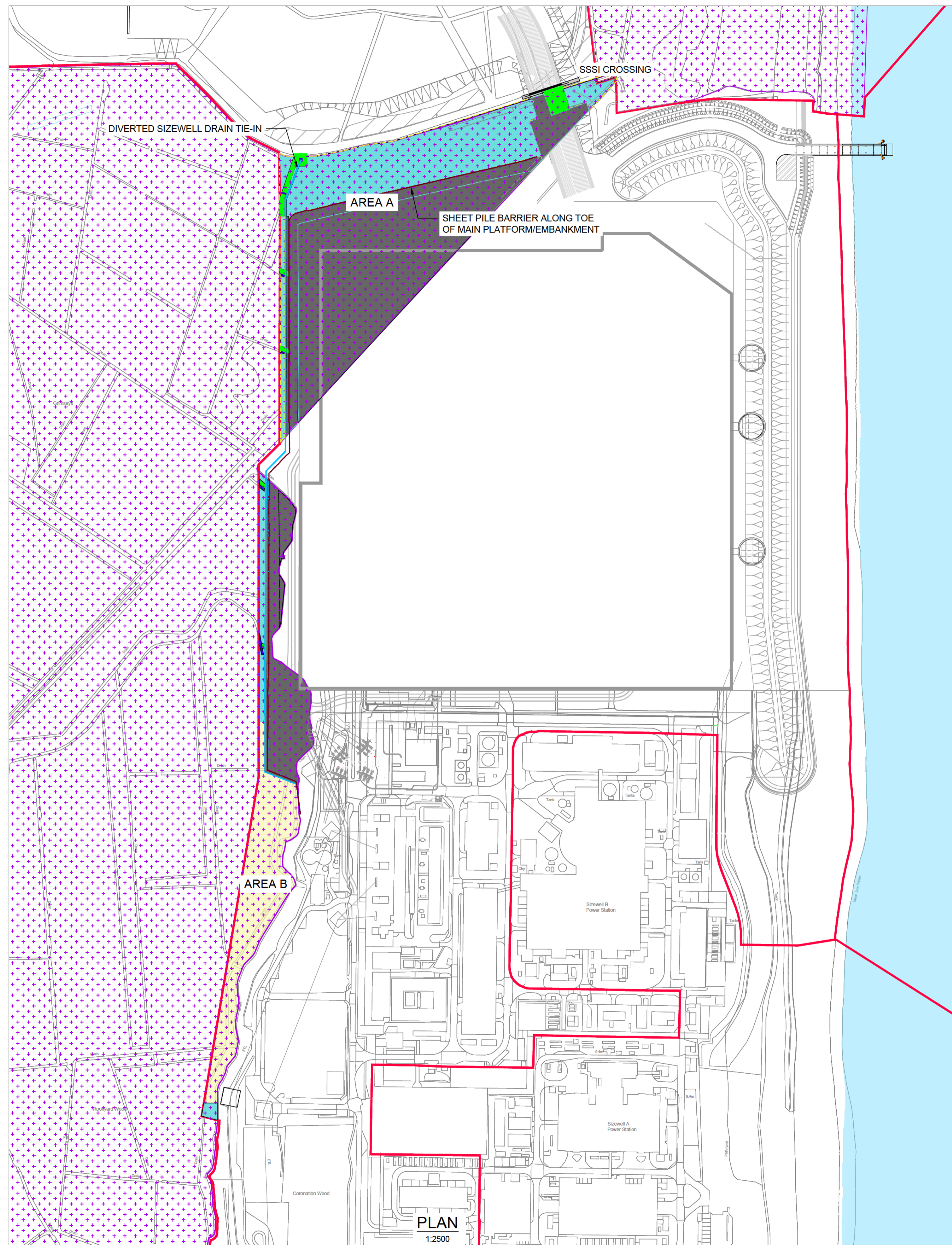
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DRAWING SECURITY CLASSIFICATION:
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 NOT PROTECTIVELY MARKED

APPENDIX C: SSSI LAND-TAKE PLAN



NOTES:



LEGEND:

	DEVELOPMENT CONSENT ORDER LIMITS
	SIZEWELL MARSHES SSSI
	DRAIN
	PERMANENT LAND TAKE
	TEMPORARY LAND TAKE (IN AREA A)
	TEMPORARY LAND TAKE (IN AREA B)
	SAFEGUARDED SSSI AREA (NO LAND TAKE)
	PERMANENT WATER CONTROL FEATURES /DITCH TIE-IN
	SSSI TRIANGLE AREA
	MAXIMUM EXTENT OF TEMPORARY LAND TAKE WITHIN FEN MEADOW AREA

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DOCUMENT:

ENVIRONMENTAL STATEMENT
VOLUME 2, APPENDIX 3D
CONSTRUCTION METHOD STATEMENT

DRAWING TITLE:

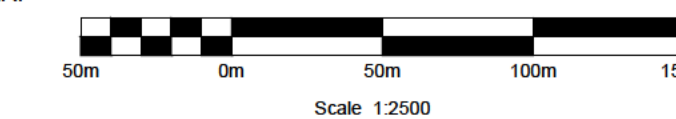
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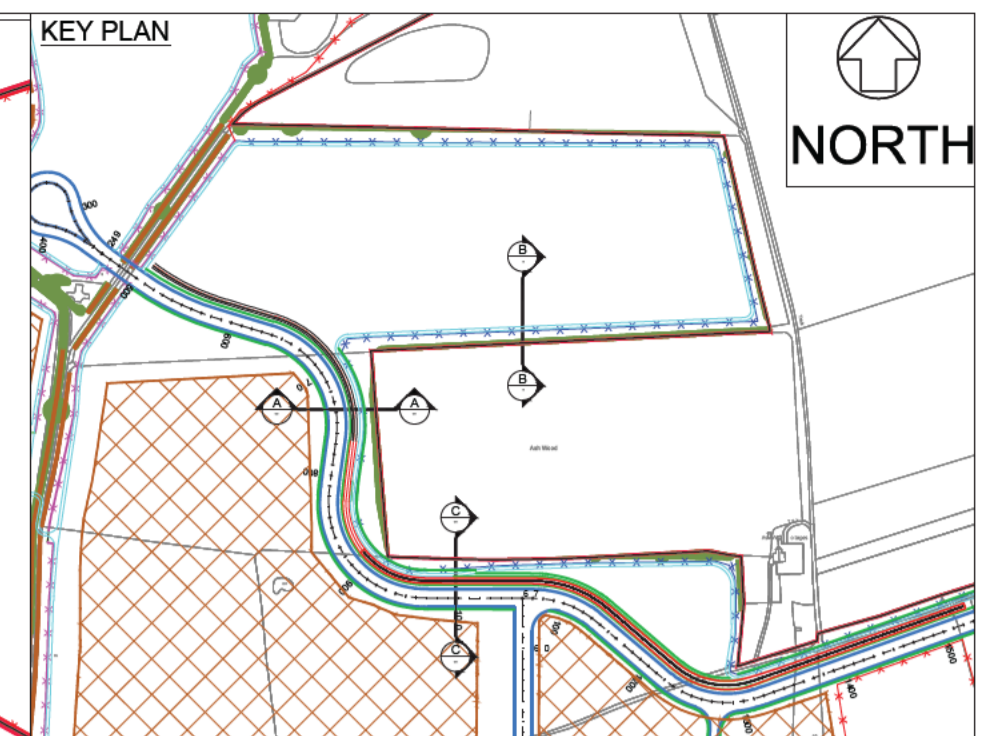
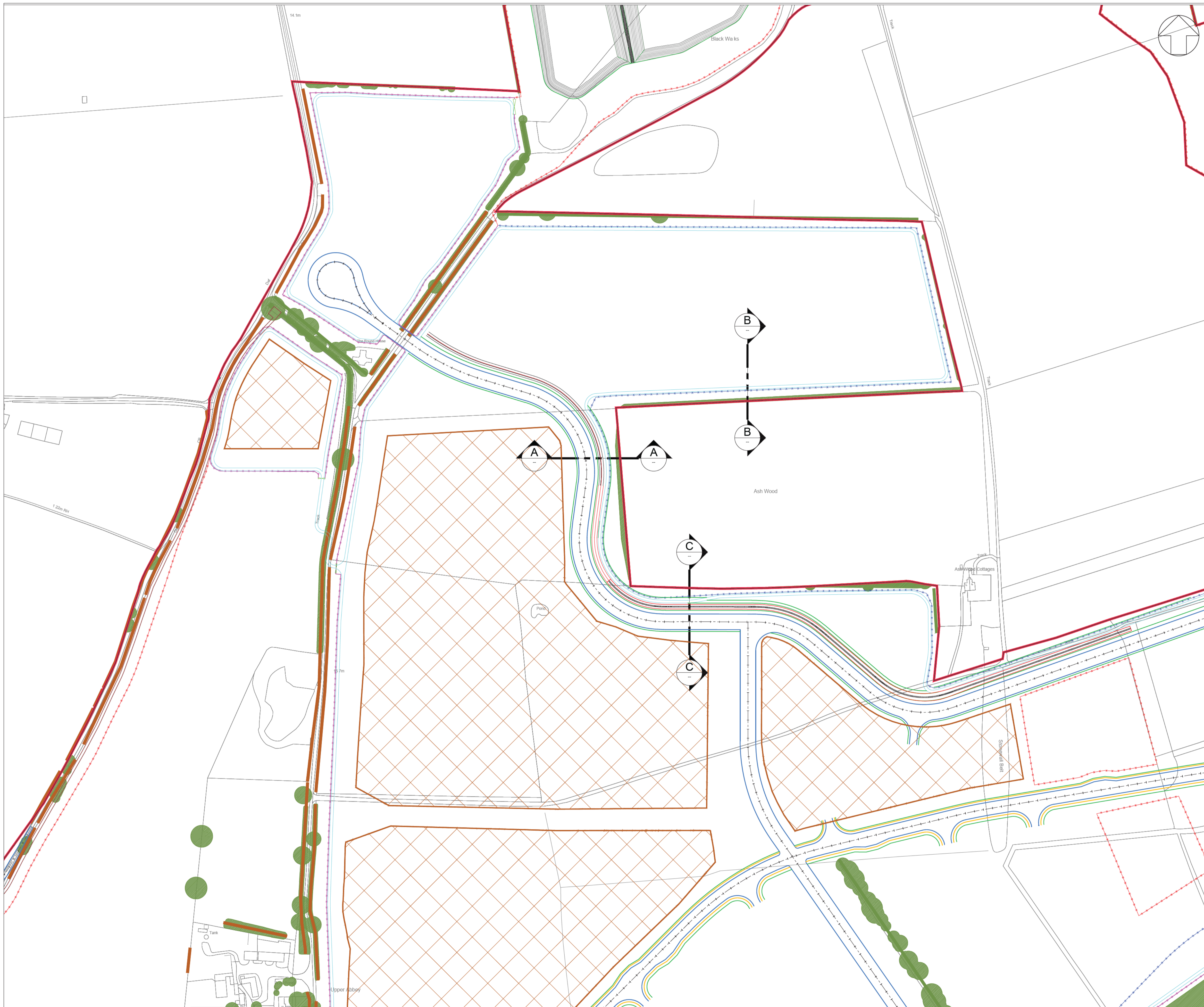
FIGURE 3D.29

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APPENDIX D: INDICATIVE CROSS SECTIONS THROUGH THE PERIMETER OF THE CONSTRUCTION SITE AT ASH WOOD, KENTON HILLS AND ALONG BRIDLEWAY 19



NORTH

NOTES:
ALL DIMENSIONS IN METERS UNLESS OTHERWISE STATED

- KEY:
- INDICATIVE SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
 - ACOUSTIC FENCE
 - MATERIALS STORAGE AREAS
 - EXISTING VEGETATION
 - PROPOSED ROAD
 - PROPOSED SWALE

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REVISION	DATE	DRAWN/CHECKED	REASONS FOR REVISION / COMMENTS	APPROVED	SZC Co
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PROJECT:
SIZEWELL C

DOCUMENT:
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REGULATION 5(2)(o)

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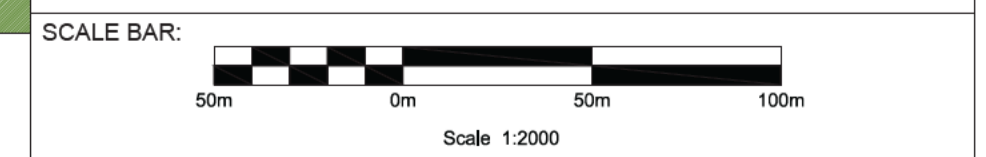
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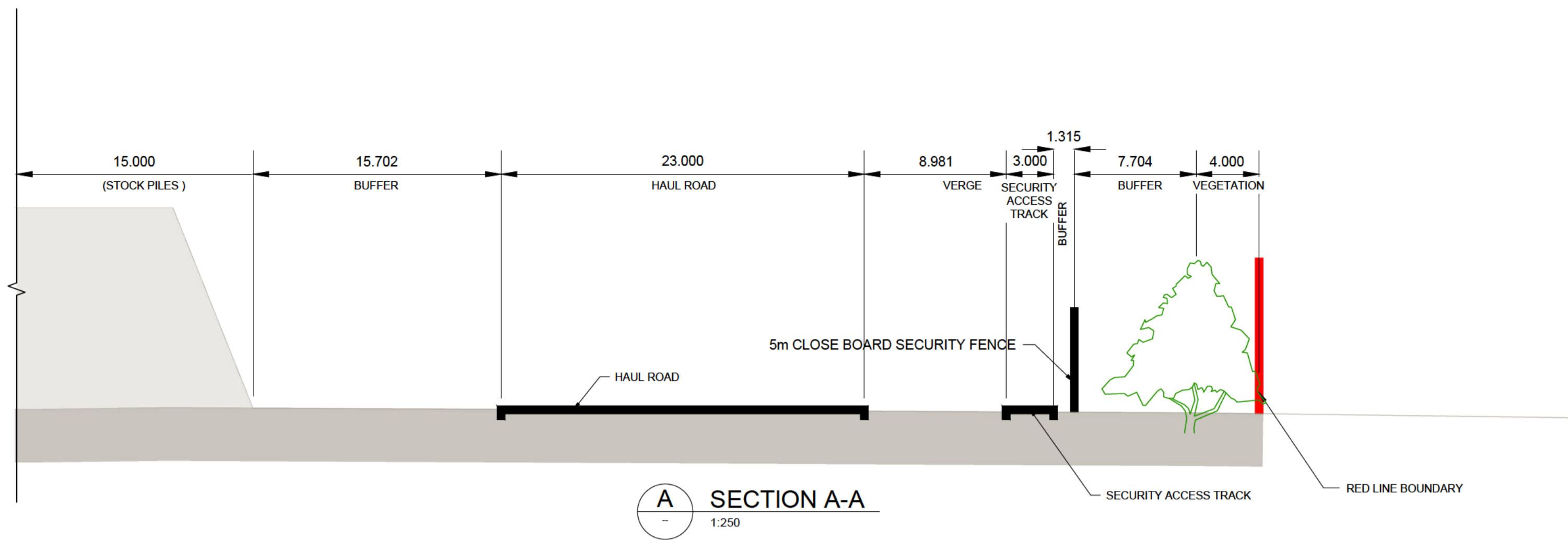
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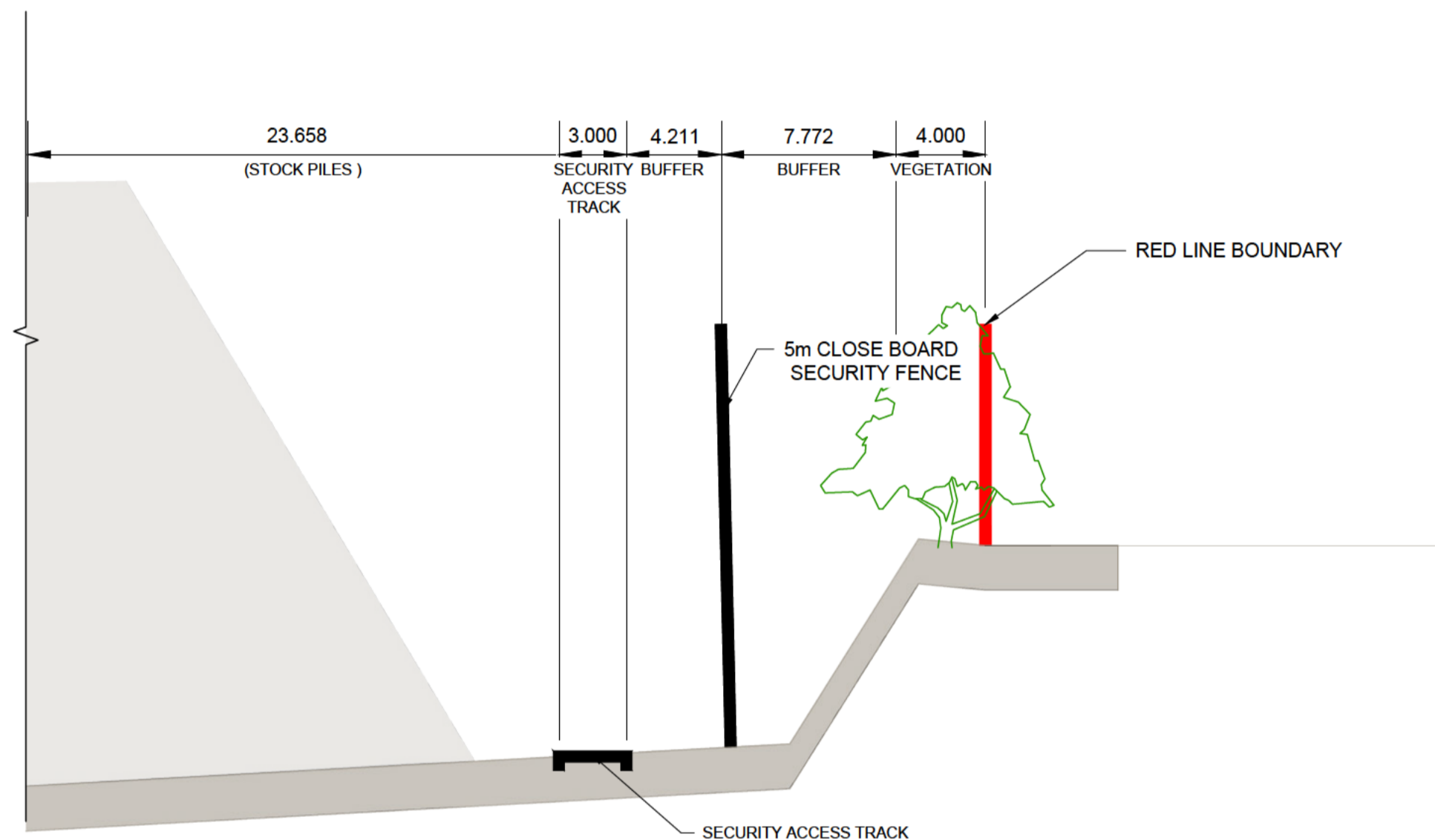
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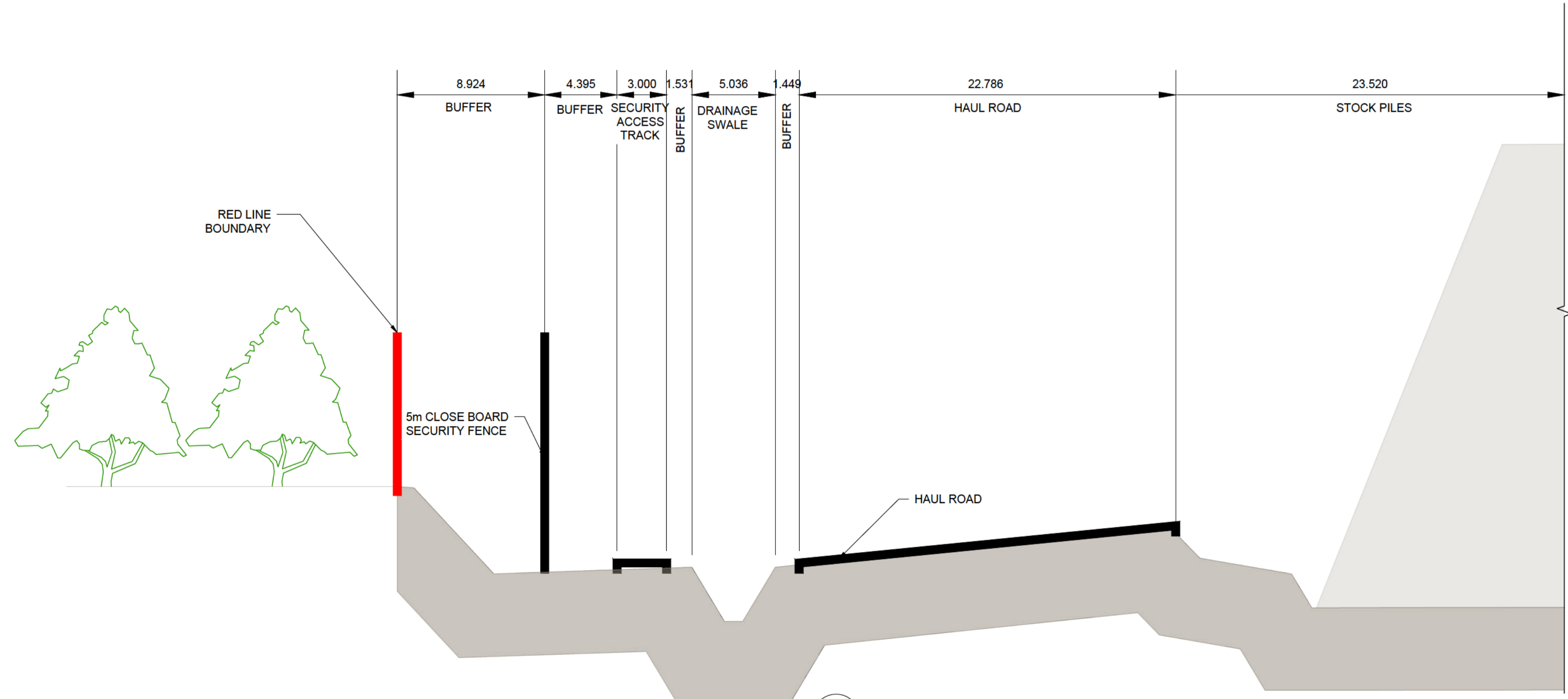




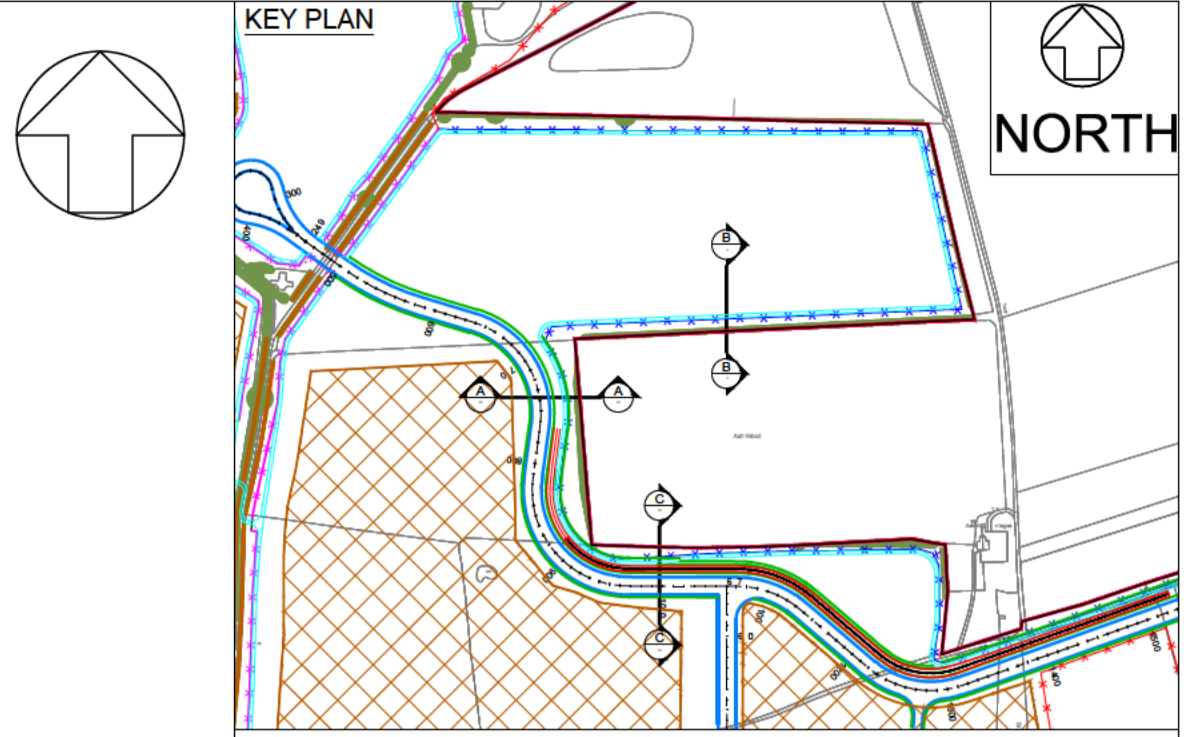
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B SECTION B-B
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C SECTION C-C
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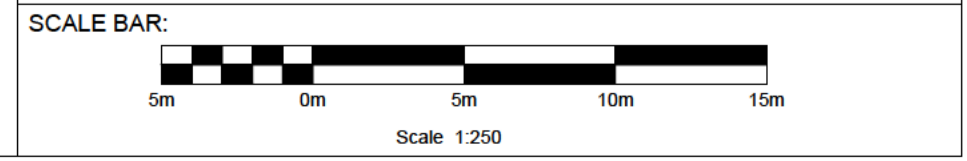
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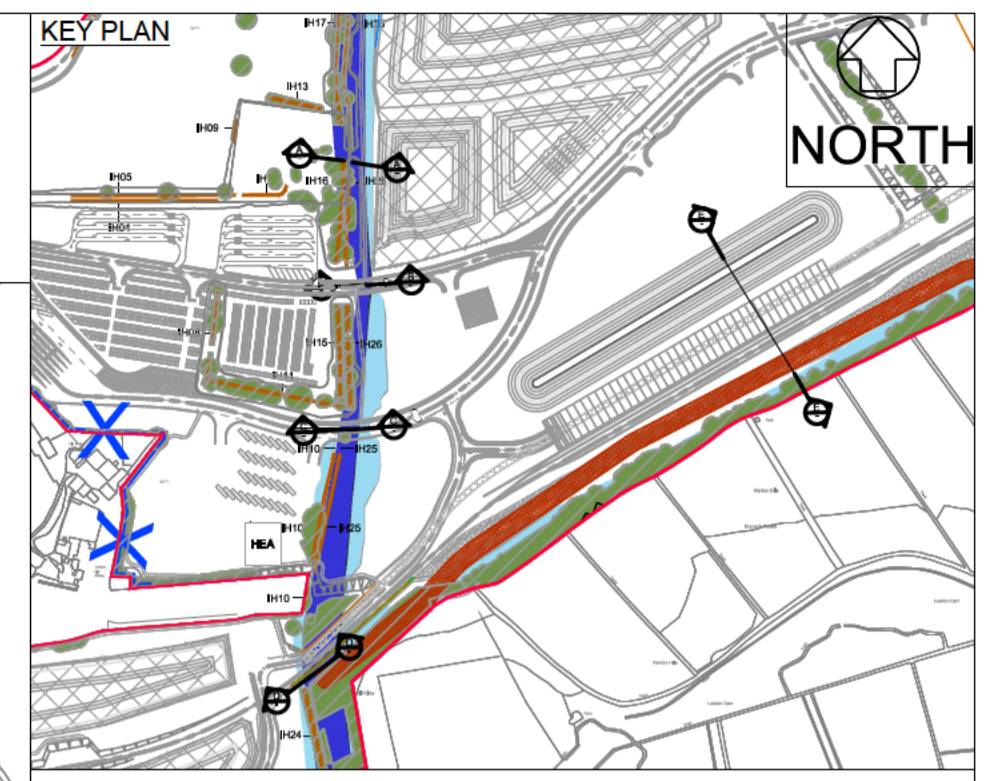
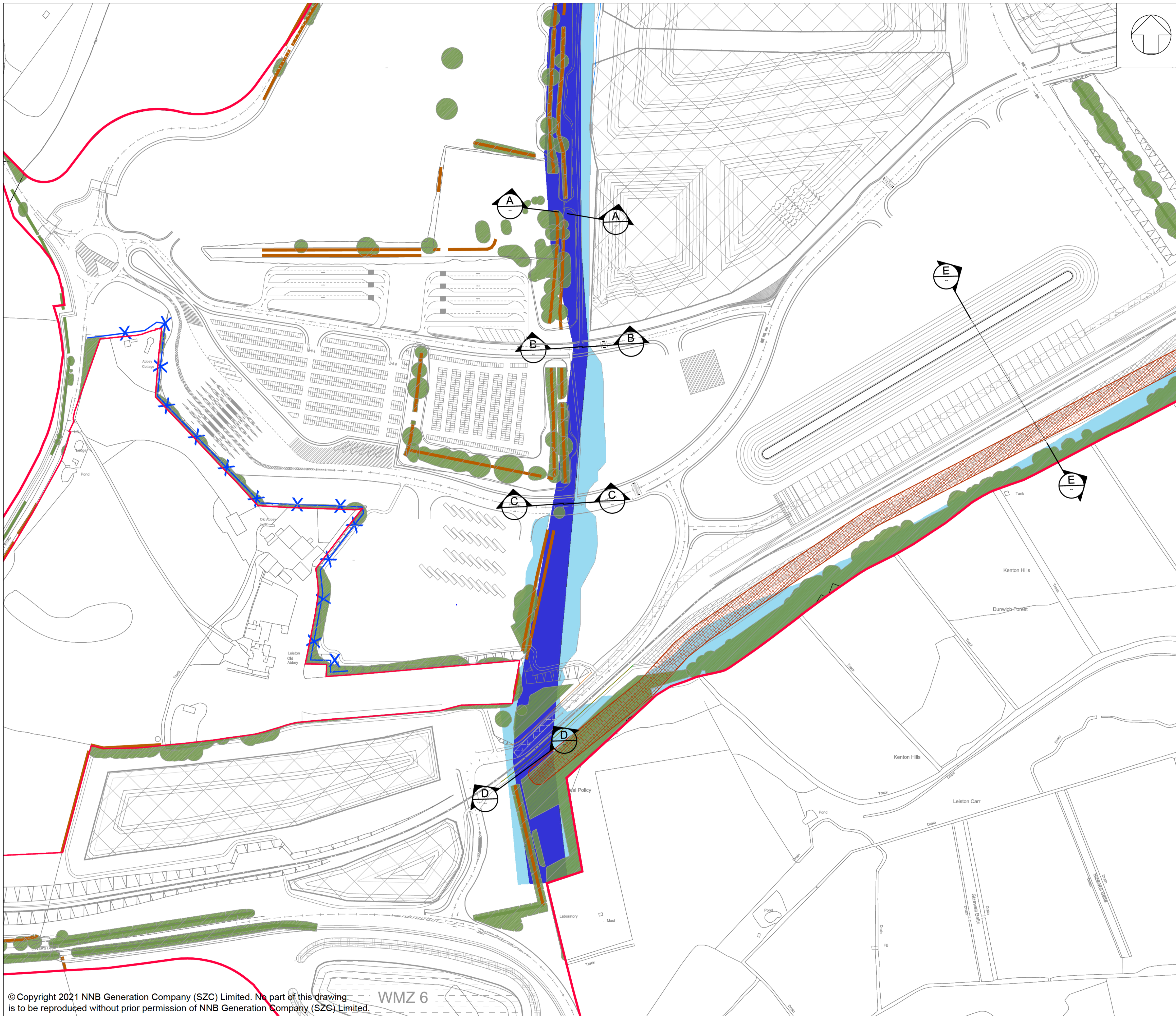
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REGULATION 5(2)(o)

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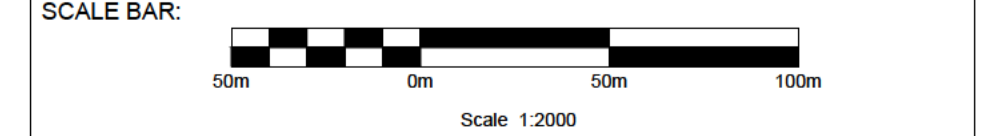


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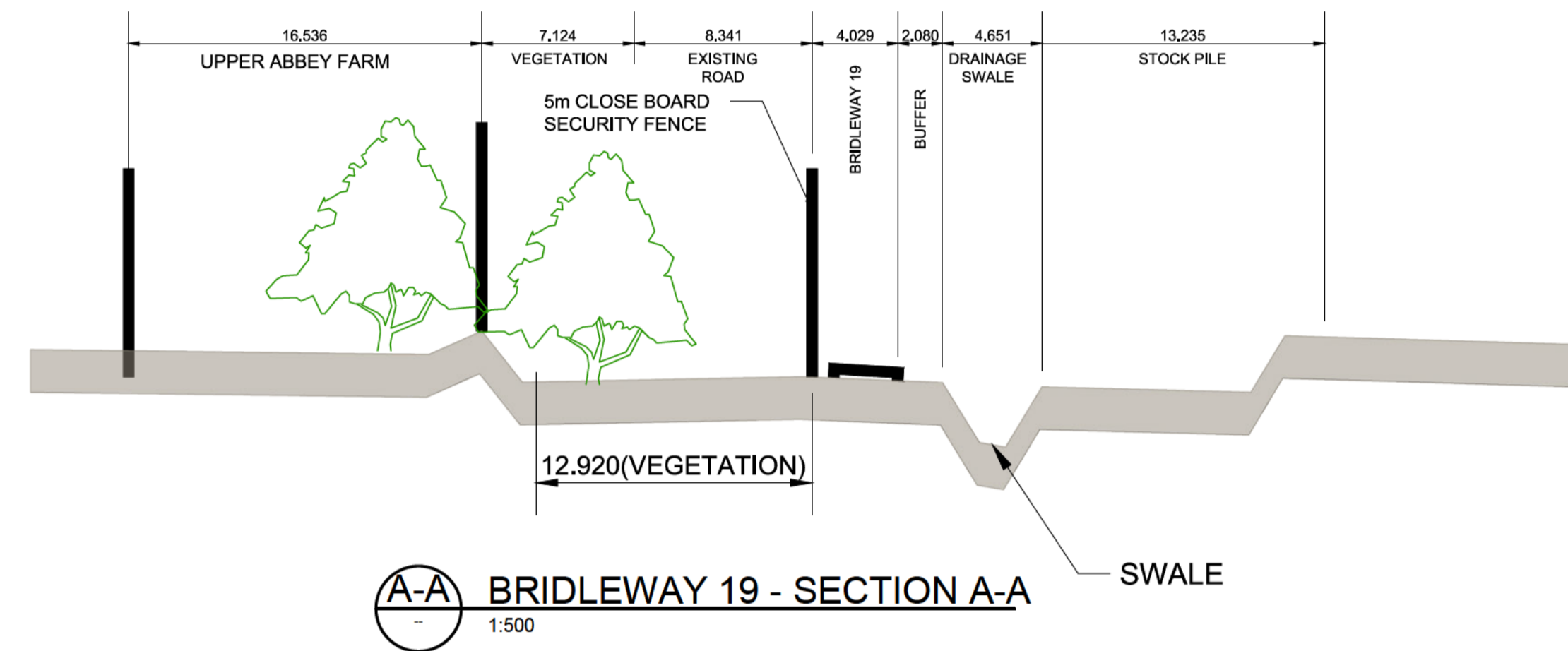
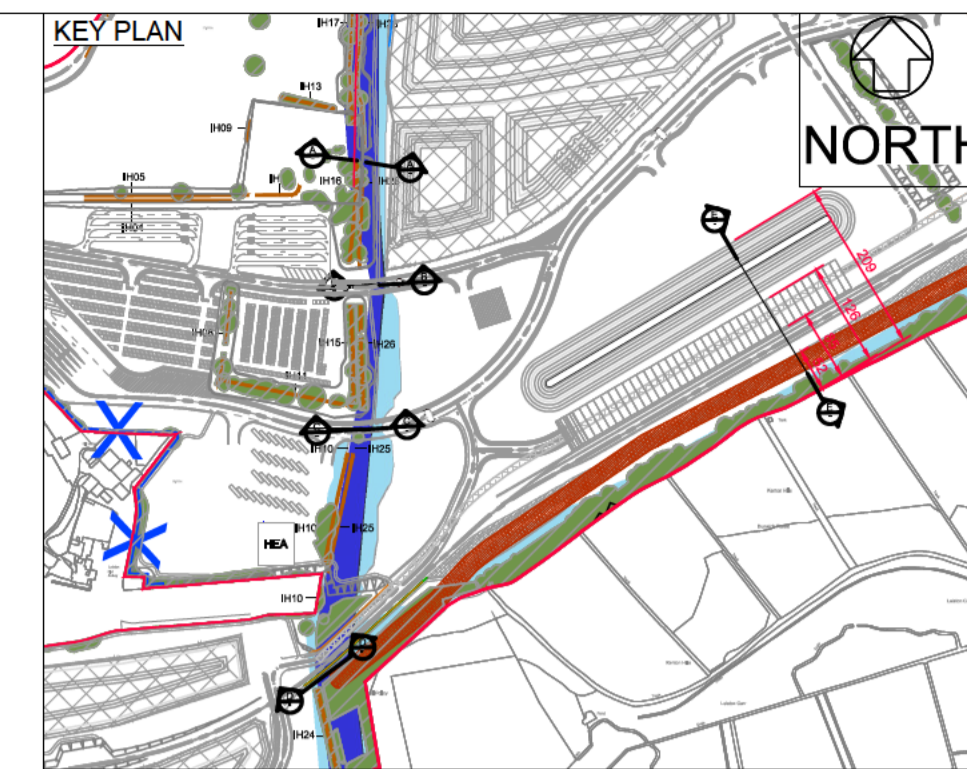
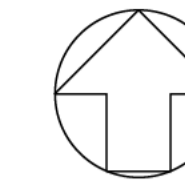
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 BRIDLEWAY 19 / KENTON HILLS PLAN

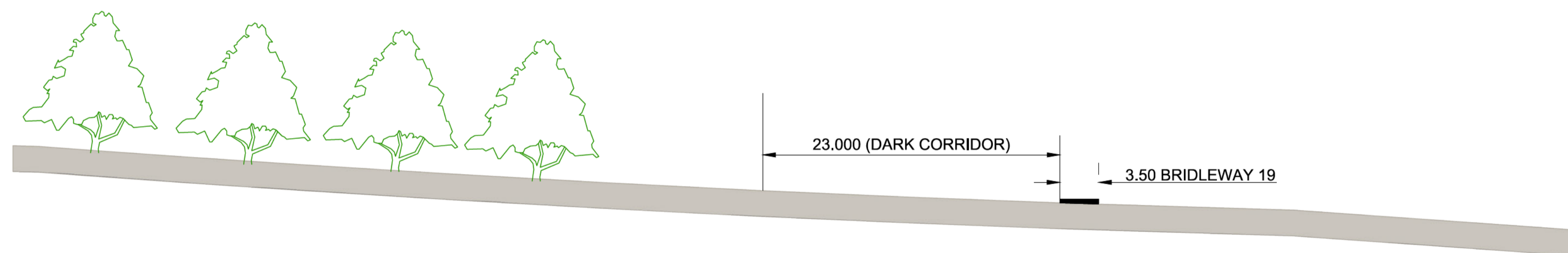
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WMZ 6



VEGETATION



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SIZEWELL C

DOCUMENT:
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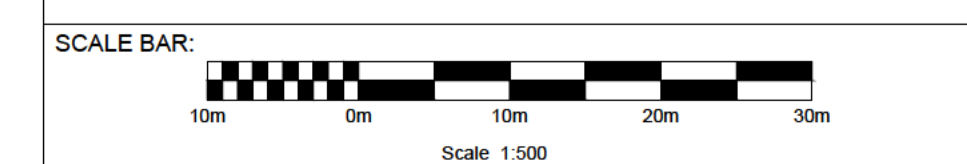
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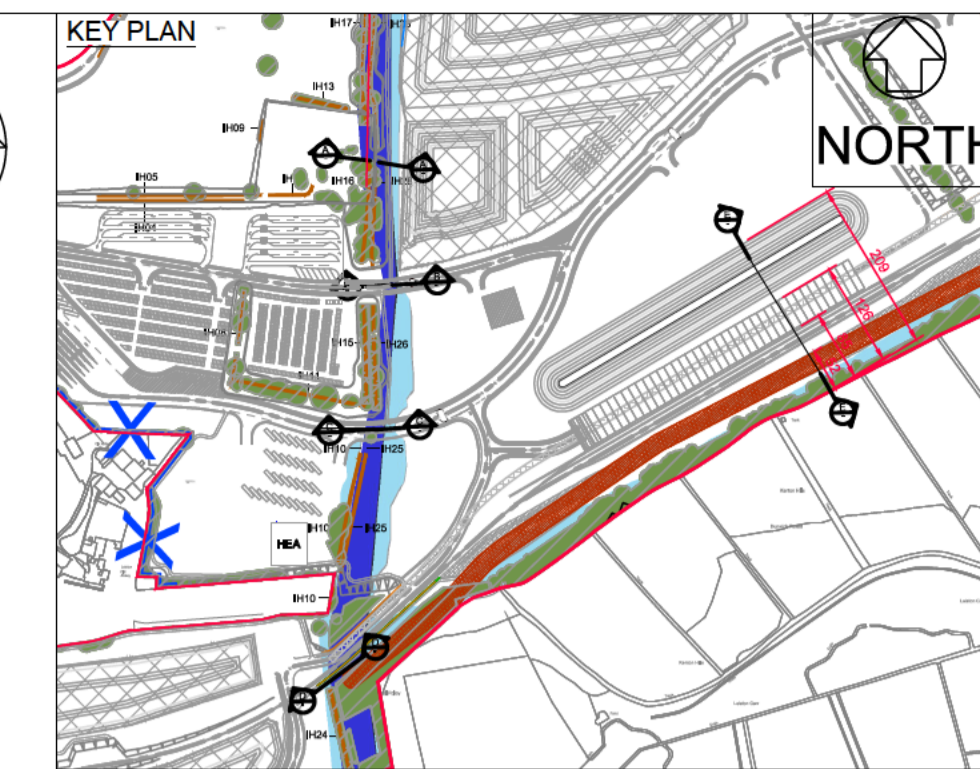
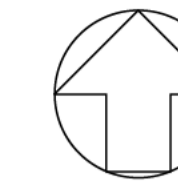
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REVISION:
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DATE: 07/10/2021
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1. ALL DIMENSIONS IN METERS UNLESS OTHERWISE STATED

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PROJECT:
SIZEWELL C

DOCUMENT:
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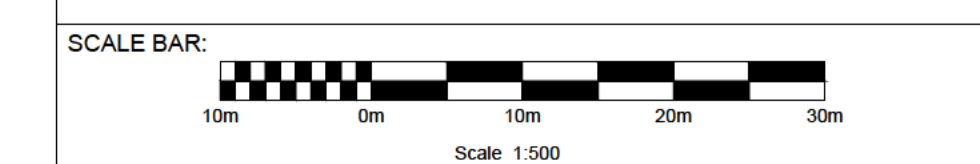
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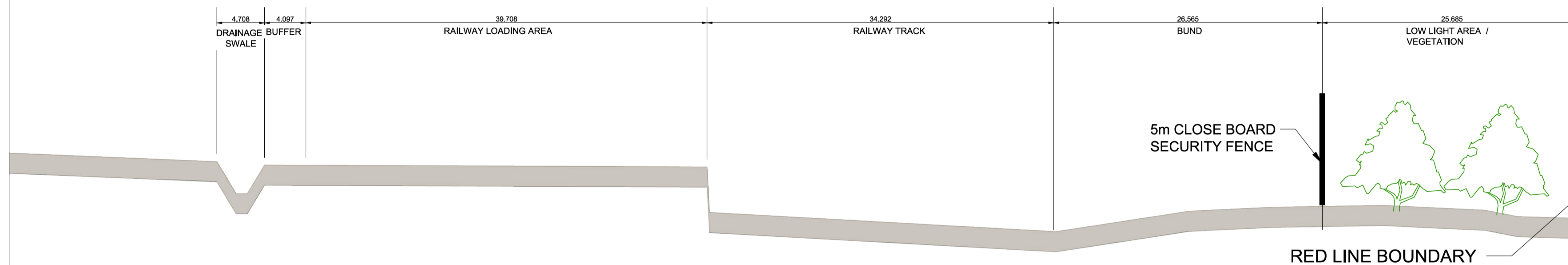
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DATE: 07/10/2021 DRAWN: SN SCALE: 1:500 @A1



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E-E KENTON HILLS - SECTION E-E
1:500

APPENDIX E: INFORMAL RECREATION AND GREEN SPACE PROPOSALS (REVISION 1) AGREED WITH RSPB AND SWT

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1 INTRODUCTION

- 1.1.1 This document sets out the proposals for additional and improved accessible green space and recreational routes within the Sizewell Estate. These proposals are to address concerns raised by Natural England (NE), the Natural Trust (NT), the Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust (SWT) about the potential recreational disturbance arising from displaced people and Sizewell C construction workers as a consequence of the construction of the Sizewell C Project.
- 1.1.2 The proposals identified within this document would deliver substantial additional accessible green space and recreation routes, and improvements to existing green space and routes, within an area close to the accommodation campus, the caravan site at the Land East of Eastlands Industrial Estate (LEEIE), and Leiston, adding and connecting to the existing and already committed network of recreational routes and areas.
- 1.1.3 The proposals would provide and enhance a mix of recreation activities at Kenton Hills, Leiston Common, Reckham Pits Wood, Rookyard Wood, Halfway Field and Broom Covert. This area already benefits from a diverse range of accessible recreational landscapes close to the locations of construction worker accommodation and Leiston. These improvements would enhance the network of safe and well connected accessible green spaces and routes where users would be able to participate in a range of activities including cycling, running, walking, off and on-lead dog walking, and nature watching. This would help to reduce potential pressure on European sites, by providing attractive alternative options for recreation. New and improved signage will help promote routes within these areas and manage users and activities.
- 1.1.4 This report demonstrates that these proposals, combined with the existing recreational network and improvements already committed to, will provide an excellent recreational network for construction workers and other people that meets and exceeds Natural England's 'Site Quality Checklist for a SANG' within Natural England's updated 'Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) – August 2021' (see Appendix B).

2 WHY SZC CO. IS PROPOSING FURTHER IMPROVEMENTS

2.1 Introduction

2.1.1 SZC Co.'s position, as stated in previous submissions and most recently in Comments at Deadline 7 on Submissions from Earlier Deadlines and Subsequent Written Submissions to ISH1-ISH6 - Appendices Part 1 of 3 [[REP7-060](#)] (see Appendix A paragraph 3.1.13) is that the proposed diverse package of mitigation measures already proposed will mitigate potential Adverse Effects on the Integrity (AEol) of European sites, and that additional SANGS, or further green space provision following the SANGS principles, is not necessary. However, the consultees, as noted below, remain concerned about the potential for AEol of European sites arising from displacement and construction workers. SZC Co. is committed to avoiding potential adverse effects on these sensitive sites, and as such is committing through this document (the terms of which will be added to the Deed of Obligation) to provide additional recreational green space and access improvements as a further mitigation measure.

2.2 Comments from Consultees

2.2.1 There has been extensive consultation with Natural England and other consultees throughout the process which led to the mitigation proposals to avoid recreational disturbance at European sites put forward within the DCO application.

2.2.2 Since the DCO application discussions with consultees have continued in order to reach agreement on the proposals.

2.2.3 Natural England's Written Representation [REP2-153], at Key Issue Reference 29, explains that Natural England is "*not yet satisfied*" that an adverse effect on the integrity of nearby European sites from increased recreational disturbance arising from the project can be ruled out. Natural England advised that a precautionary approach should be taken and considers that provisions necessary to mitigate impacts from Sizewell C include a SANG "*within or in close proximity to the development redline boundary*". Natural England has provided further clarity in correspondence received on 16th August 2021 (submitted at Deadline 7 in the 'Statement on Recreational Disturbance Numbers' Appendix C [[REP7-087](#)]):

"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.***” (Bold emphasis added.)

2.2.4 Natural England go on to say:

“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 to develop and agree this.”

2.2.5 The RSPB and SWT also consider that SANG should be provided to mitigate for construction workers, as stated in their Deadline 6 Submission [[REP6-046](#)] at paragraph 7.8:

“7.8 ... we accept that Aldhurst Farm is likely to provide alternative greenspace which will provide a contribution to a reduction of recreational impacts of the Application. However, we do not consider it sufficient in extent or recreational features provided to provide acceptable mitigation of impacts of both construction workers and displaced existing recreational users. Given the recreational features accommodated by Aldhurst Farm, we recommend that its development for families, walkers and dog walkers is continued with the aim of reducing

recreational visits to designated sites by displaced existing recreational users and that alternative outdoor ‘active’ recreational provision is sought for construction workers in addition to this.” (Bold emphasis added.)

- 2.2.6 In paragraph 1.6.15 of their submission at Deadline 7 (Comments on any additional information/submissions received by D6 [\[REP7-137\]](#) the National Trust state that:

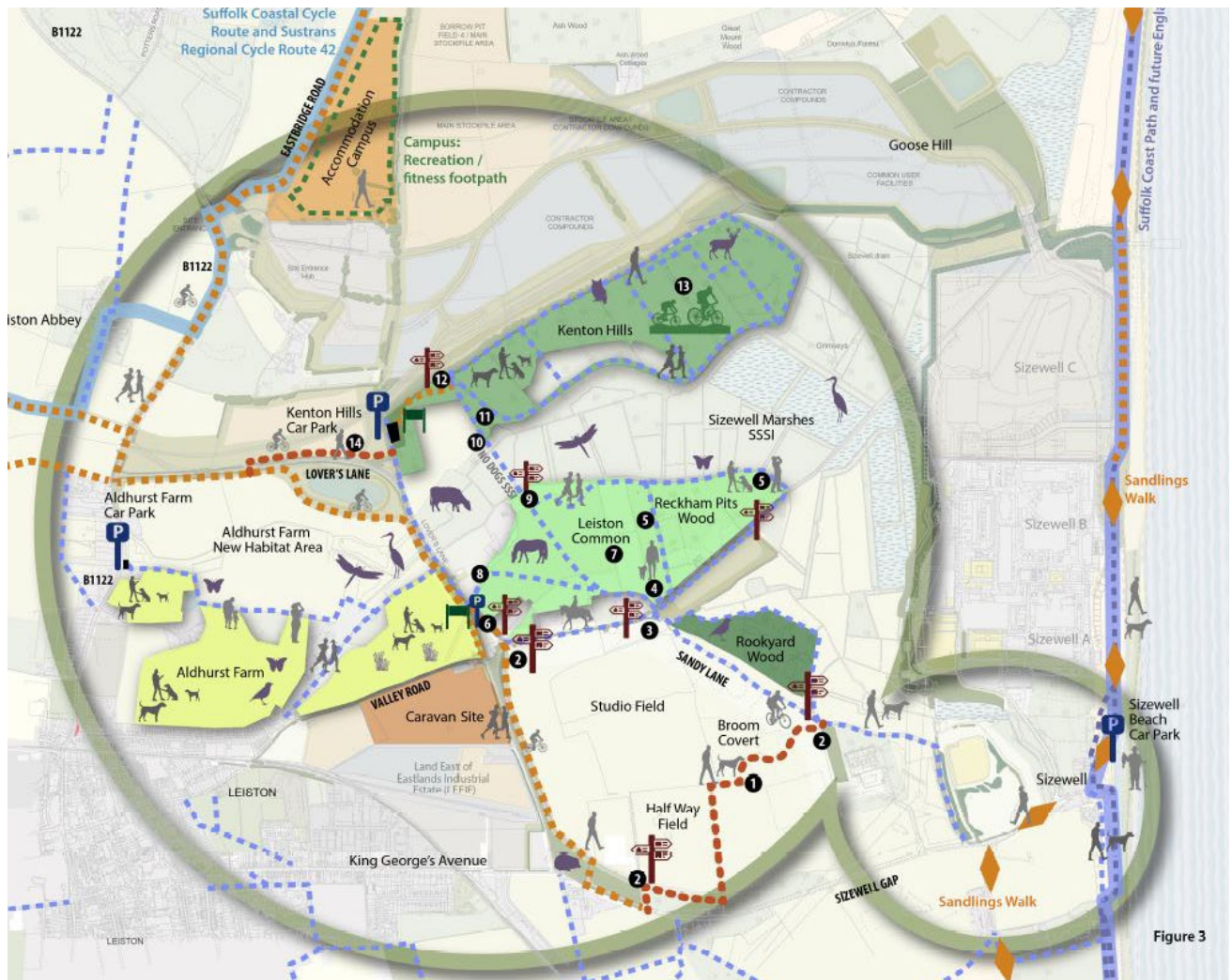
“... the National Trust believes that recreational displacement and additional visits to the countryside by construction workers arising from the development should not all be directed to designated sites and as such would wish to see adequate Suitable Alternative Natural Green Space (SANG) provision included as mitigation.”

- 2.2.7 It is therefore clear that Natural England, the RSPB and SWT’s request for further alternative greenspace relates to construction workers, principally those residing at the accommodation campus and caravan site (up to 3,000 at peak) who will not be allowed dogs in their accommodation. The network of recreational landscapes including proposals for further improvements seek to address this concern.
- 2.2.8 These proposals would be delivered in addition to those which SZC Co. has already committed to, and which are summarised in Appendix C.

3 VISION

- 3.1.1 This section presents the overall vision for a network of recreational routes and spaces located between the accommodation campus, the caravan site and Leiston. It describes a network of existing access areas and routes, and committed and proposed improvements. These would provide an enriching and well-connected recreation experience for construction workers, local people and visitors, on the Sizewell Estate and beyond.
- 3.1.2 The overall vision including the proposals for the additional accessible green space and recreational route improvements are shown on Figure 3 in Appendix A, with an extract shown in Plate 3.1 below. This figure encapsulates a comprehensive network of existing, committed, and proposed further improvements and shows just how well they connect and provide for the accommodation campus, caravan site and town of Leiston, and other people who may otherwise visit European sites for recreation.

Plate 3.1: Extract from Figure 3 (included in full at Appendix A)



3.1.3 The existing and committed routes (see Figure 1, Appendix A) provide a good degree of accessibility to a wide variety of existing landscape and recreational areas, including (to name a sample): the public footpath and permissive footpaths at the expansive Leiston Common, permissive footpaths within the woodland at Kenton Hills, along existing Bridleway 19, the proposed off-road bridleway from Eastbridge Road to Sizewell Gap, and the newly created and accessible landscape at Aldhurst Farm.

3.1.4 The additional proposals (see Figures 2 and 3, Appendix A), numbered, with new routes coloured a burnt umber on Figure 3 and Plate 3.1, have been carefully considered by walking and reviewing the existing provisions to determine what connections or qualities may be missing and how these might be improved to enhance the diverse network of paths, cycle routes and areas for walking, dog walking, running, cycling and engaging with

nature. The numbered proposals are explained in more detail at Section 4, including how they would be delivered as part of the Sizewell C Project.

3.1.5 The network of additional proposals would provide the following:

- A new permissive pedestrian and cycle route of approximately 1km in length that would, combined with existing and committed routes within the area shown, facilitate off-road circular walks in excess of 9km.
- Circular walking and running routes easily accessible and signposted from car parks, the accommodation campus and caravan site, through a variety of habitat types, landscapes and terrains.
- A concentration of enhancements signposted south of the campus in order to attract and divert workers from the more limited connections which lead north towards Minsmere.
- Improvements to existing gateways and access points.
- A new off-road mountain bike skills trial, well signposted from the accommodation campus and caravan site, placed sensitively within Kenton Hills.
- Changes to the permissive footpath between the new off-road bridleway and Kenton Hills into a permissive footpath and cycleway to ensure access for mountain biking access is provided to the skills trail.
- Access improvements such as reducing path gradients or providing improved widths.
- Management of vegetation to ensure paths remain open and easily accessible, whilst maintaining their rural character.
- Space to exercise dogs safely off lead within clearly defined areas.
- Improved signage across the area, to make users feel welcome, give them directions, manage behaviours and highlight the presence of new and existing recreational opportunities within the wider area.
- Advertising and promotion of routes to the Sizewell construction workers, who would benefit from their close proximity.

3.1.6 Taken together, and combined with the existing and committed routes and areas, these proposals would deliver a high quality recreation offer, optimising the potential of this varied landscape, providing attractive facilities to construction workers and the public, thereby ensuring

recreational pressures are diverted away from vulnerable areas. Whilst workers at the accommodation campus would already have access to on-site facilities, including a gym and fitness trail at the campus, and all construction workers would have access to the active sports facilities proposed at the Alde Valley Academy in Leiston, the improvements would further enhance the excellent recreational network on their doorstep. This would serve to attract construction workers, and also local people and visitors who may otherwise access European sites.

3.1.7 Workers residing at the accommodation campus (up to 2,400 no.) would have direct access to this network, commencing at the new off road bridleway which would extend along the edge of existing fields with a retained hedgerow between the bridleway and the B1122, itself providing an enhanced part of the recreational network. Workers would be approximately 1.1km from Aldhurst Farm habitat area (at the north-west corner of Aldhurst Farm) via a new off-road bridleway, and 1.3km from the new car park at Aldhurst Farm, c. 2km away from the trails and mountain biking at Kenton Hills and c. 2.5km from Leiston Common. These would all be accessible via foot and bicycle on the new off-road bridleway which will be delivered early in the construction phase, and are all connected via various existing and proposed route options. Workers at the accommodation campus would also have access to the Suffolk Coastal Cycle Route and Regional Cycle Route 42 which passes the entrance to the accommodation campus. Workers at the caravan site would have direct access to Aldhurst Farm across Valley Road and, from there, to the rest of the connected network.

3.1.8 These recreational opportunities are all connected and would form part of one larger, diverse recreational landscape, meeting and exceeding Natural England's 'Site Quality Checklist for a SANG' as demonstrated in Table 3.1. The new and improved connections would allow users to undertake extensive walks or runs. For example, users could travel from the accommodation campus along the new off road bridleway to Aldhurst Farm, along the permissive path and cycle route to Kenton Hills, or across the new controlled crossing point to Bridleway 19 and into Leiston Common. From Leiston Common they could continue along the enhanced permissive footpath network around Reckham Pits Wood, or walk across Sizewell Marshes to Kenton Hills, or travel further afield to the coast. These improved links allow users greater and more well-connected access to diverse and undulating landscapes, including the created habitats at Aldhurst Farm with views across the new wetlands, through coniferous and deciduous woodland at Kenton Hills, across the grazing pasture at Sizewell Marshes, through the heathland of Leiston Common, the mixed deciduous woodland at Reckham Pits Wood, the wet woodland at Rookyard Wood, or to the expansive coastline and beach at Sizewell.

- 3.1.9 The off-road bridleway from the accommodation campus and caravan site also provide connections to the extensive inland network of footpaths and bridleways, and the extensive coastal walks to the north and south.
- 3.1.10 This enhanced network within close proximity to the main development site will be complimented by the further extensive improvements to public rights of way and cycle routes and facilities within the wider area that will be funded in the PRow Fund and the Cycling Fund through Deed of Obligation.
- 3.1.11 SZC Co. would promote and explain these opportunities to construction workers and provide information for both workers and the public on the environment, the species, habitats and landscapes, their origin and history, as well as the sensitivities and activities that could potentially cause damage at European sites. This wide range of interconnected opportunities and resources would provide a significant attraction, especially for the adjacent construction workers, but also for the local community and visitors. They would help reduce the potential for disturbance at European sites from existing and new visitors to the area.

Table 3.1: Comparison of the existing, committed and proposals for enhancement of the green space network to Natural England’s SANG Site Quality Checklist

Natural England’s Criteria		Provision
Must haves		
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)	Car parks at Aldhurst Farm (to be enlarged from 5 existing to 20 spaces) and Kenton Hills (to be enlarged by about 15 spaces from the existing capacity of approximately 19 spaces). SZC Co. will also subsidise parking at Sizewell beach car park during the construction phase so that it is free or reduced cost, to increase its attractiveness as a recreational location away from European sites, as stated in the Monitoring and Mitigation Plan (MMP) for Minsmere – Walberswick and Sandlings (North). This will be funded through the European Sites Access Contingency Funds in the Deed of Obligation Schedule 11 paragraph 6.

Natural England's Criteria		Provision
2	Circular walk of 2.3-2.5km	<p>Circular walks in excess of 9km available within the area within the Sizewell Estate shown on Figures 2 and Figure 3, via a number of alternative routes.</p> <p>The paths connect an extensive network of Public Rights of Way, permissive footpaths and accessible landscapes including at Aldhurst Farm, Kenton Hills, Leiston Common, Sandy Lane, Reckham Pits Wood, Rookyard Wood, and the grasslands at Broom Covert, Half Way Field and Studio Field. New crossings will be provided over the B1122 and Lover's Lane to provide safe connections across roads. These all connect to the wider network, including to the coast at Sizewell, and lie outside European sites and close to the main centres of construction worker's accommodation.</p>
3	Car parks easily and safely accessible by car and clearly sign posted	<p>Car parks at Aldhurst Farm and Kenton Hills will be clearly signposted from Abbey Road and Lover's Lane.</p> <p>There is existing informal parking west of Leiston Common where a new access gate will be provided.</p> <p>It is anticipated that construction workers at the accommodation campus and caravan site would be most likely to walk or cycle to access these areas, and not drive to the car parks.</p> <p>SZC Co. will provide interpretation signage at Sizewell beach car park in addition to subsidising the cost for parking, as stated in the MMP for Minsmere – Walberswick and Sandlings (North). This will be funded through the European Sites Access Contingency Funds in the Deed of Obligation Schedule 11 paragraph 6.</p>
4	Access points appropriate for	Access points will be enhanced to ensure that they are accessible by construction

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Natural England's Criteria		Provision
	particular visitor use the SANG is intended to cater for	workers, but also by the general public including people with particular protected characteristics identified by SCC.
5	Safe access route on foot from nearest car park and/or footpath/s	The network will be safe by providing additional off-road routes where PRow currently run along Lover's Lane carriageway, safe off-road bridleways from the accommodation campus and caravan site, new safe road crossings, and safe access directly from Aldhurst Farm and Kenton Hills car parks.
6	Circular walk which starts and finishes at the car park	The first approximately 190m from the Aldhurst Farm car park is along a new surfaced footpath, which walkers will need to return along when walking back to their cars at the end of their walks. There is a short permissive footpath leading to circular walks around Kenton Hills and beyond, from the Kenton Hills car park.
7	Perceived as safe – no tree and scrub cover along part of walking routes	Many of the recreational routes pass through open landscapes including grassland / heathland habitats (e.g. Aldhurst Farm, Leiston Common, Sizewell Marshes, Broom Covert, Half Way Filed and Studio Field). Some routes also pass through mixed and coniferous woodland (Kenton Hills, Reckham Pits Wood and Rookyard Wood). However, woodland is positive, as noted on page 3 of Natural England's guidelines for SANG (see Appendix B) which says ' <i>Surveys [carried out at heathland sites within the Thames Basin Heaths area or within the Dorset heathlands] clearly show that woodland or a semi-wooded landscape is a key feature that people appreciate in the sites they visit, particularly those who use the SPA. This is more attractive than open landscapes or parkland with scattered trees.</i> ' The recreational network provides opportunities to

Natural England's Criteria		Provision
		<p>experience a range of open and more enclosed / wooded landscapes.</p> <p>In addition, Kenton Hills car park is to be improved and enlarged through the Sizewell C Project, with one measure to remove selective vegetation to make the car park more open, welcoming and attractive.</p>
8	Paths easily used and well maintained but mostly unsurfaced	<p>Many paths in this area are unsurfaced, or follow tracks used for maintenance. Some are or will be surfaced where agreed with SCC – e.g the new PRow and the existing PRow within Aldhurst Farm, and the proposed off-road bridleway between the accommodation campus and Sizewell Gap.</p> <p>All paths will be well maintained, including management of vegetation to ensure that they remain accessible.</p>
9	Perceived as semi-natural with little intrusion of artificial structures	<p>All of these landscapes appear semi-natural. E.g.:</p> <p><u>Aldhurst Farm</u> is an area of former arable land that has been subject to a habitat creation scheme (implemented in 2015-2016) and public access scheme (implemented in 2021) to compensate for the loss of wetland and reedbed on the proposed Sizewell C power station site, and provide access to mitigate potential displacement to European sites. These schemes include 7 ha of reedbed and wetlands in a series of four lagoons as well as new areas of open access provision within grasslands. The long term vision for Aldhurst Farm is to create a habitat mosaic which reflects the distinctive land-use, topography and vegetation typologies that are characteristic of the Suffolk Coasts and Heaths AONB.</p> <p>Houses and a sewage works lie adjacent to the site and are currently visible from it, but</p>

Natural England's Criteria	Provision
	<p>new and future planting will provide screening.</p> <p><u>Kenton Hills</u> is the largest single block of managed woodland on the estate, a mainly Scots and Corsican pine plantation extending to 95 ha. It is managed to provide screening of the Sizewell power stations, to provide timber and for biodiversity and recreation. Opportunities are taken at each timber thinning to increase the number of oak and sweet chestnut trees planted which then improves the biodiversity and aesthetic value of the woodland.</p> <p>The <u>Sizewell Marshes</u> SSSI is a complex system of grazing marsh, fen and reedbed interspersed with dykes and ditches holding both static and flowing water. A permissive footpath crosses the marshes linking Kenton Hills and Leiston Common.</p> <p><u>Leiston Common</u> is a large area of heathland, having been cleared of invasive birch and bracken scrub. Part of it is a County Wildlife Site managed by grazing and bracken control.</p> <p><u>Reckham Pits Wood</u> is lowland mixed deciduous woodland. It comprises oak and birch with some sycamore, and Scots and Corsican pines.</p> <p><u>Rookyard Wood</u> is a wet woodland based on alder and willow and surrounded by dykes. The woodland is primarily managed for landscape and wildlife objectives. Permissive footpaths pass through the grazing pasture encircling the woodland.</p> <p><u>Halfway Field</u> forms part of the <u>Studio Field</u> complex and is managed as a reptile receptor site comprising heathland / acid grassland. Management measures to improve the habitat value for reptiles has included allowing growth of planted scrub,</p>

Natural England's Criteria		Provision
		<p>scrub planting, and construction of features such as basking banks and hibernacula.</p> <p><u>Broom Covert</u> is an area of grazed heathland traditionally used to over-winter cattle taken off Sizewell Marshes. Broom Covert is now maintained by light summer grazing and some cutting of the grassland with control of encroaching bracken.</p> <p>Views of artificial structures (e.g. Sizewell A and B stations, pylons, nearby housing and roads, the sewage works at Aldhurst Farm) are possible from some areas. Construction works will also be visible from some locations, and construction works will be audible. However, the over-riding experience is of a 'natural' landscape.</p>
10	If larger than 12 ha then a range of habitats should be present	A range of habitats is present as described in item 9 above.
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead	It will be possible to exercise dogs off-lead and under effective control at many areas or routes including Aldhurst Farm, Kenton Hills, Sandy Lane, the new bridleway and permissive footpath / cycleway at Broom Covert, Half Way Field and Studio Field, and on permissive footpaths around Reckham Pits Wood. Signage will be provided so that it is clear how dogs should be managed to ensure no conflict with, for example, wildlife and livestock.
12	No unpleasant intrusions (e.g. sewage treatment smells etc)	SZC Co. is not aware of any odours from the existing Leiston sewage works but if they did occur the odours will dissipate with distance and are expected to be very localised. Existing vegetation, and further planting to be implemented in winter 2021/22, will help to screen the sewage works.

Natural England's Criteria		Provision
Should have		
13	Clearly sign posted or advertised in some way	The network will be clearly signposted, and construction workers will be regularly briefed on the opportunities it provides.
14	Leaflets or website advertising their location to potential users	Aldhurst Farm is being, and will continue to be, publicised for the recreational opportunities it provides, in particular off-lead dog walking. Construction workers will be regularly briefed on the opportunities that the network provides.
Desirable		
15	Can dog owners take dogs from the car park to the SANG safely off the lead	Dogs can be taken off-lead directly from the car parks at Aldhurst Farm and Kenton Hills, and also from Sizewell beach car park.
16	Gently undulating topography	The topography of the area is gently undulating, with low-lying wetland landscapes within Sizewell Marshes and Aldhurst Farm, and land rising to the north and south.
17	Access points with signage outlining the layout of the SANG and routes available to visitors	Signage is already provided at Aldhurst Farm, and the proposed improvements will ensure that signage outlining the layout of the accessible network is provided at access points and key locations.
18	Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable	This is provided, as described under item 9 above.
19	Focal point such as a viewpoint or monument within the SANG	Views across the landscapes are / will be possible from a number of vantage points, such as at the proposed bird hide in Aldhurst Farm, and from elevated land in

Natural England's Criteria		Provision
		Leiston Common looking across Sizewell Marshes to Kenton Hills.

- 3.1.12 Natural England's previous SANG guidelines required SANG to be area based, and did not include linear SANG or linked SANG. The new SANG guidance published by Natural England in August 2021 (included in Appendix B) states that linear SANG and routes can be part of the SANG provision. Page 4 of the new SANG guidelines states:

" The evidence shows that the use of SANG networks, linear orientated sites and small sites of no smaller than two hectares have potential to provide effective mitigation where traditional SANG is unavailable. These SANG areas will be linked and/or in proximity to an already established SANG. If effectiveness can be demonstrated of small or linear SANGs working alone, then we will assess this on a case by case basis, taking in to account the site's context amongst the wider greenspace network."

- 3.1.13 The existing, committed and proposed further improvements to the linear and area recreational network presented in this report will provide excellent alternative recreational green space and routes for construction workers and the general public, to help mitigate the potential for recreational disturbance at European sites.

4 SECURING FURTHER IMPROVEMENTS

4.1.1 The proposals for further improvements, which are in addition to those already committed and summarised in Appendix C, are described in two tables below, which also identify how they would be secured and funded as part of the Sizewell C Project:

- Table 4.1: Overarching proposals
- Table 4.2: Detailed proposals

4.1.2 The areas and locations discussed in the tables, and numbered in Table 4.2, are illustrated on Figures 2 and 3 in Appendix A.

4.1.3 The committed delivery of improvements to Aldhurst Farm and Kenton Hills, and other access improvements, are already covered by existing documentation.

4.1.4 The most effective means of securing these additional provisions is proposed to be via a new provision within the SZC Deed of Obligation which requires the principles and details of this plan to be developed and maintained in accordance with a timetable and approval process submitted to and approved by Suffolk County Council in consultation with East Suffolk Council, other members of the Environment Review Group and the SCHAONB Partnership.

Table 4.1: Overarching proposals

Measure	How funded / secured
Signage	
Welcoming signage at visitor access points. Initial messaging and engagement will communicate a feeling of welcome and answer as a priority “where can I go and what can I do”, ensuring that other important management outcomes are not compromised (e.g. wildlife conservation).	Obligation in Deed of Obligation
Space for temporary information at access points so that SZC Co. can convey information about management taking place, or events or further	Obligation in Deed of Obligation and a commitment to

Measure	How funded / secured
improvements to engage visitors, or communicate other information important to SZC Co.	active updating and Management
Finger posts and waymark arrows to make people feel welcome, as well as showing where they can go and what they can do, especially where new or improved amenity is being provided.	Obligation in Deed of Obligation
<p>Where it is necessary to communicate where dog walking access is allowed and when, and where dogs are required to be on lead or off lead, there will be clear signage.</p> <p>The approach on the Sizewell Estate is that dogs are permitted on PRowS and permissive routes across the estate, with the expectation that they are kept under effective control in accordance with the Countryside Code¹, and with specific restrictions on access for dogs where this would cause issues (e.g. the SSSI crossing).</p> <p>New access areas for off-lead dog walking provided at Aldhurst Farm.</p>	Obligation in Deed of Obligation
Vegetation management	
Vegetation along footpaths and where space is to be provided for exercising dogs (e.g. for ball throwing) will be managed to allow use of areas for the intended recreation, while achieving other management objectives (e.g. wildlife conservation). Paths through grassland or other vegetation will be regularly cut to ensure access is clear and unrestricted.	Obligation in Deed of Obligation



¹ 'Keep your dog under effective control to make sure it stays away from wildlife, livestock, horses and other people unless invited. You should:

- always keep your dog on a lead or in sight
- be confident your dog will return on command
- make sure your dog does not stray from the path or area where you have right of access





Always check local signs as there are situations when you must keep your dog on a lead for all or part of the year. Local areas may also ban dogs completely, except for assistance dogs. Signs will tell you about these local restrictions.' (<https://www.gov.uk/government/publications/the-countryside-code/the-countryside-code-advice-for-countryside-visitors>) (accessed 17/9/21)

Measure	How funded / secured
Fencing, gates, stiles and footbridges	
Secure perimeter fencing will be provided where it is necessary to keep people and dogs separated from roads, or sensitive habitats or features.	Obligation in Deed of Obligation
Gates will only be provided where necessary, with gaps preferred to provide least-restrictive access. Stiles will be avoided, as they are more restrictive for access than gates or gaps.	Obligation in Deed of Obligation



Table 4.2: Detailed proposals (see Figure 2 for locations)





Proposal i/d	Image	Notes	Measure	How funded / secured
1 Half Way Field / Broom covert		Opportunity to create an additional circular walk / run / off-road cycle route connecting Bridleway 19 to Sandy Lane, and the new off-road bridleway between the campus and Sizewell Gap, and further afield.	New unsurfaced permissive footpath and cycle route within 7m wide corridor, which may be fenced where there are ecological / land management issues with adjoining land. Potential hedge planting along some boundaries to strengthen rural character and enhance habitat. Dogs allowed off-lead and under effective control within route.	Obligation in Deed of Obligation
2 Rookyard Wood		Opportunity to make it clearer to walkers that there is an existing permissive	Provide finger post sign for Bridleway 19 and Permissive Footpath around Rookyard Wood, and to the new permissive foot / cycle route to south (i/d 1).	Obligation in Deed of Obligation

NOT PROTECTIVELY MARKED


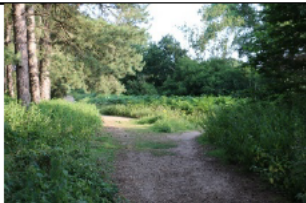

Proposal i/d	Image	Notes	Measure	How funded / secured
		footpath to the north.		
2a Bridleway / permissive route junctions			Finger post signs	Obligation in Deed of Obligation
3 Sandy Lane, Reckham Pits Wood and Rookyard Wood		Permissive footpath to Rookyard Wood and Reckham Pits Wood, and Bridleway 19 route options currently unclear.	Provide sign showing the permissive footpath and PRoW routes around Reckham Pits Wood and Rookyard Wood.	Obligation in Deed of Obligation
4 Sandy Lane and PRoW E-363/030/0		Existing finger post signs at the triangle junction are obscured and need rationalising. Signage could be improved.	Improve signage and include a finger post towards the permissive footpaths at Reckham Pits Wood and Rookyard Wood. Finger post to Sizewell and the coast. Clear signage that dogs to be kept on-lead on Leiston Common, and to be kept under effective control on the permissive footpath around Reckham Pits Wood.	Obligation in Deed of Obligation
		PRoW E-363/030/0 to Leiston Common is narrow.	Widen footpath through vegetation management.	Obligation in Deed of Obligation
5 Reckham Pits Wood		Existing permissive footpath around Reckham Pits Wood is within the	Signs to advise that dogs to be kept under effective control.	Obligation in Deed of Obligation

NOT PROTECTIVELY MARKED

Proposal i/d	Image	Notes	Measure	How funded / secured
		woodland – opportunity to allow off-lead dog walking.		
6 The Common		Existing on road car parking for 5+ vehicles. Currently no direct access to Leiston Common at this location.	Create new pedestrian access gate next to existing field gate on the right side of this photo. Provide combined dog waste and general waste bin (or bins to suit existing collection arrangements) within Sizewell Estate land.	Obligation in Deed of Obligation
			Provide welcoming interpretation sign within Sizewell Estate land, and sign to the access network including Leiston Common, Reckham Pits Wood, Aldhurst Farm, Kenton Hills and to the coast. Sign to make clear that dogs must be kept on-lead on the Common.	Obligation in Deed of Obligation
7 Leiston Common Open Access Land		Opportunity to create a network of pedestrian routes through the dense bracken within the Open Access Land at Leiston Common	Regularly mow informal routes through bracken.	Obligation in Deed of Obligation

Proposal i/d	Image	Notes	Measure	How funded / secured
8 PRoW E-363/030/0 access to Leiston Common		Gate into Leiston Common overgrown and not at the level.	Create level entry onto Leiston Common and a replacement 'all accessible' gate along with destination signage (e.g. to Kenton Hills, Leiston Common and Aldhurst Farm) and clarification re lead use by walkers with dogs.	Obligation in Deed of Obligation
9 Permissive footpath between Leiston Common and Sizewell marshes		Steep slope from Leiston Common (top of slope) down to Sizewell Marshes. (winter photo).	Create additional shallower longer route to the east, for those who find the direct route too steep. Provide signage to identify both routes.	Obligation in Deed of Obligation
		Photo from same location taken in July 2021 – overgrown with bracken	Manage vegetation to keep permissive footpath clear.	Obligation in Deed of Obligation
			Provide signage to Kenton Hills, Leiston Common, Aldhurst Farm, Reckham Pits Woods, and sign saying dogs on lead on Leiston Common, and dogs not allowed across the SSSI.	
10 Kenton Hills permissive footpath from Sizewell Marshes		Path linking Sizewell Marshes and Kenton Hills is narrow and encroached by bracken.	Widen permissive path through vegetation management. Sign saying no dogs across the SSSI, and dogs to be kept under effective control at Kenton Hills.	Obligation in Deed of Obligation

NOT PROTECTIVELY MARKED

Proposal i/d	Image	Notes	Measure	How funded / secured
11 Permissive footpath junction with footpath to Sizewell Marshes		No sign to Leiston Common from paths in Kenton Hills.	Provide finger post showing direction to Leiston Common and Kenton Hills car park. Sign saying no dogs across the SSSI, and dogs to be kept under effective control at Kenton Hills.	Obligation in Deed of Obligation
12 Permissive footpath junction with footpath to car park		No sign to Kenton Hills car park, or to Aldhurst Farm once new link across Lover's Lane is provided.	Provide finger post sign showing direction to Leiston Common, Kenton Hills car park and Aldhurst Farm. Sign saying no dogs across the SSSI, and dogs to be kept under effective control at Kenton Hills.	Obligation in Deed of Obligation
13 Coniferous woodland within Kenton Hills		Opportunity to provide off-road bike trails through the coniferous woodland, for construction workers but also open to the public. Mountain bikers from campus is concern raised by consultees including Natural England.	<p>Create an off-road mountain bike skills trail, well signposted from the accommodation campus and caravan site, the new off-road cycle route within Aldhurst Farm, and from Kenton Hills car park. Parkwood Springs Sheffield, Aberfoyle MTB skills area Scotland and Comrie Croft skills area Scotland are examples, but the degree of difficulty would be designed specifically for this location to make it attractive to construction workers.</p> <p>This trail would be aligned, where practical, with the ecology commitment to create 3km of new glades and rides in Kenton Hills for bat foraging (see the Estate Wide Management Plan for the EDF Energy Estate submitted at Deadline 8).</p> <p>The skills trail will be designed sensitively to avoid impacts on the reptile receptor sites that</p>	Obligation in Deed of Obligation

NOT PROTECTIVELY MARKED

Proposal i/d	Image	Notes	Measure	How funded / secured
			<p>have been created in Kenton Hills, as well as reptiles, especially adder, present outside of the enclosures, associated in particular with the clearings and rides within the woodland. SZC Co. commits to securing the advice of a specialist adder ecologist to mitigate impacts on reptiles, especially adder.</p> <p>The trail would not be a formalised right of way. Access to be carefully designed and controlled and a suitable management regime to be agreed.</p>	
14 Link between Aldhurst Farm and Kenton Hills		Permissive footpath connection between new off-road bridleway in Aldhurst Farm and Kenton Hills is committed from approx. after 2nd year of construction phase, which will be dedicated as Bridleway during operation.	Change the permissive footpath (construction phase) between the new off-road bridleway and Kenton Hills to a permissive footpath and cycleway (if item 13 is delivered).	Obligation in Deed of Obligation

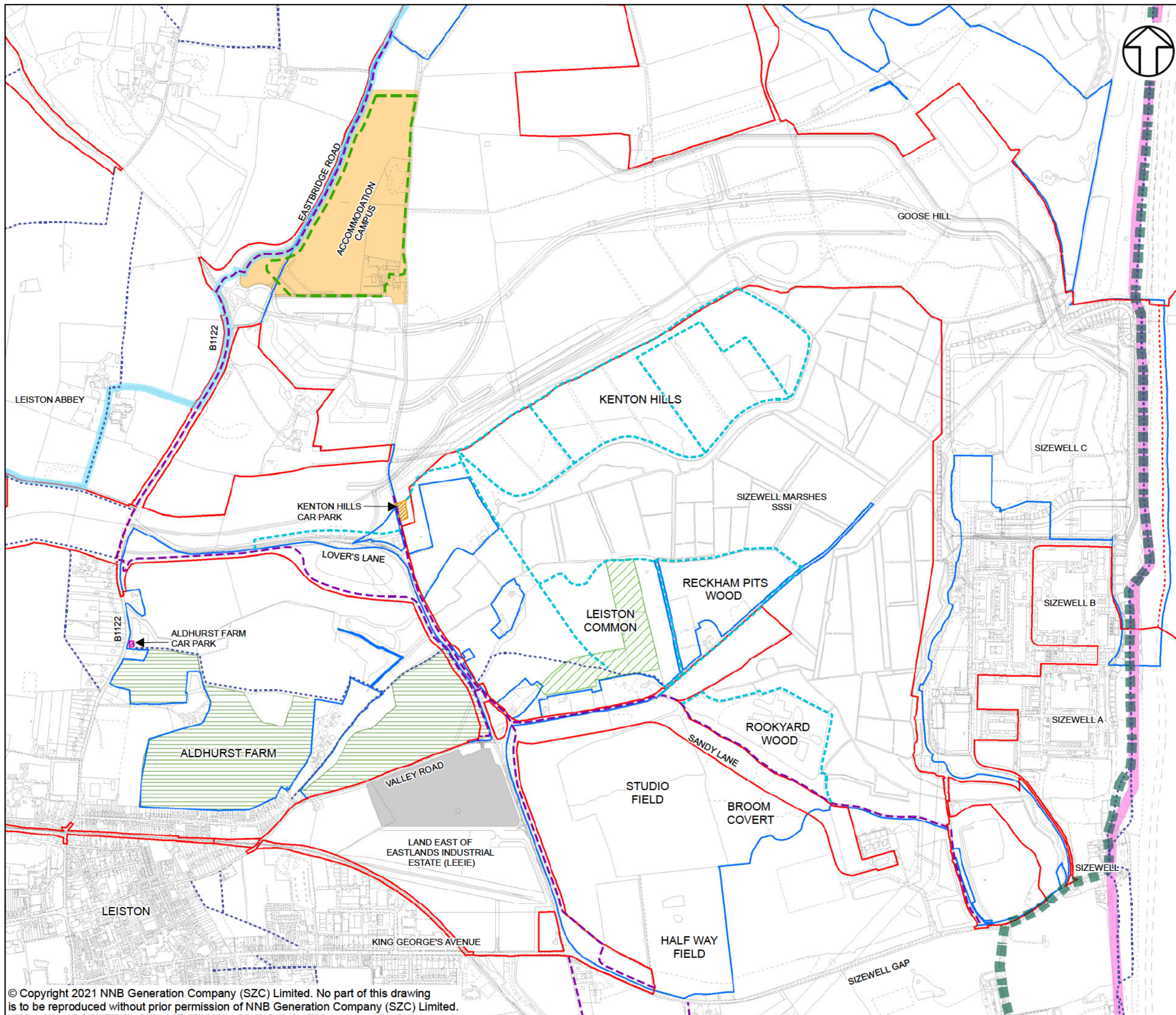
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APPENDIX A: FIGURES

Figure 1: Existing and Committed Recreational Access – Construction Phase

Figure 2: Proposed Additional Recreational Greenspace Enhancements –
Construction Phase

Figure 3: Sizewell C – Informal Recreation and Green Space Proposals



NOTES

KEY

- SIZEWELL C AND ASSOCIATED DEVELOPMENT SITE BOUNDARIES
- - - DEMARCATION LINE
- SIZEWELL ESTATE BOUNDARY
- EXISTING AND PROPOSED (ALREADY COMMITTED) - CONSTRUCTION PHASE
- EXISTING REGISTERED COMMON LAND
- EXISTING OPEN ACCESS LAND
- ACCOMMODATION CAMPUS
- CARAVAN SITE
- RECREATION FITNESS FOOTPATH
- KENTON HILLS CAR PARK IMPROVEMENTS
- ALDHURST FARM OPEN ACCESS LAND
- - - PERMISSIVE FOOTPATHS (EXISTING AND PROPOSED)
- SANDLINGS WALK WITH RE-ALIGNMENT ON COAST
- SUFFOLK COAST PATH AND FUTURE ENGLAND COAST PATH WITH RE-ALIGNMENT ON COAST
- SUSTRANS REGIONAL CYCLE ROUTE (RCR) (42) AND SUFFOLK COASTAL CYCLE ROUTE
- - - PUBLIC RIGHTS OF WAY (EXISTING (SUFFOLK COUNTY COUNCIL), DIVERTED AND PROPOSED)
- - - FOOTPATH
- - - BRIDLEWAY

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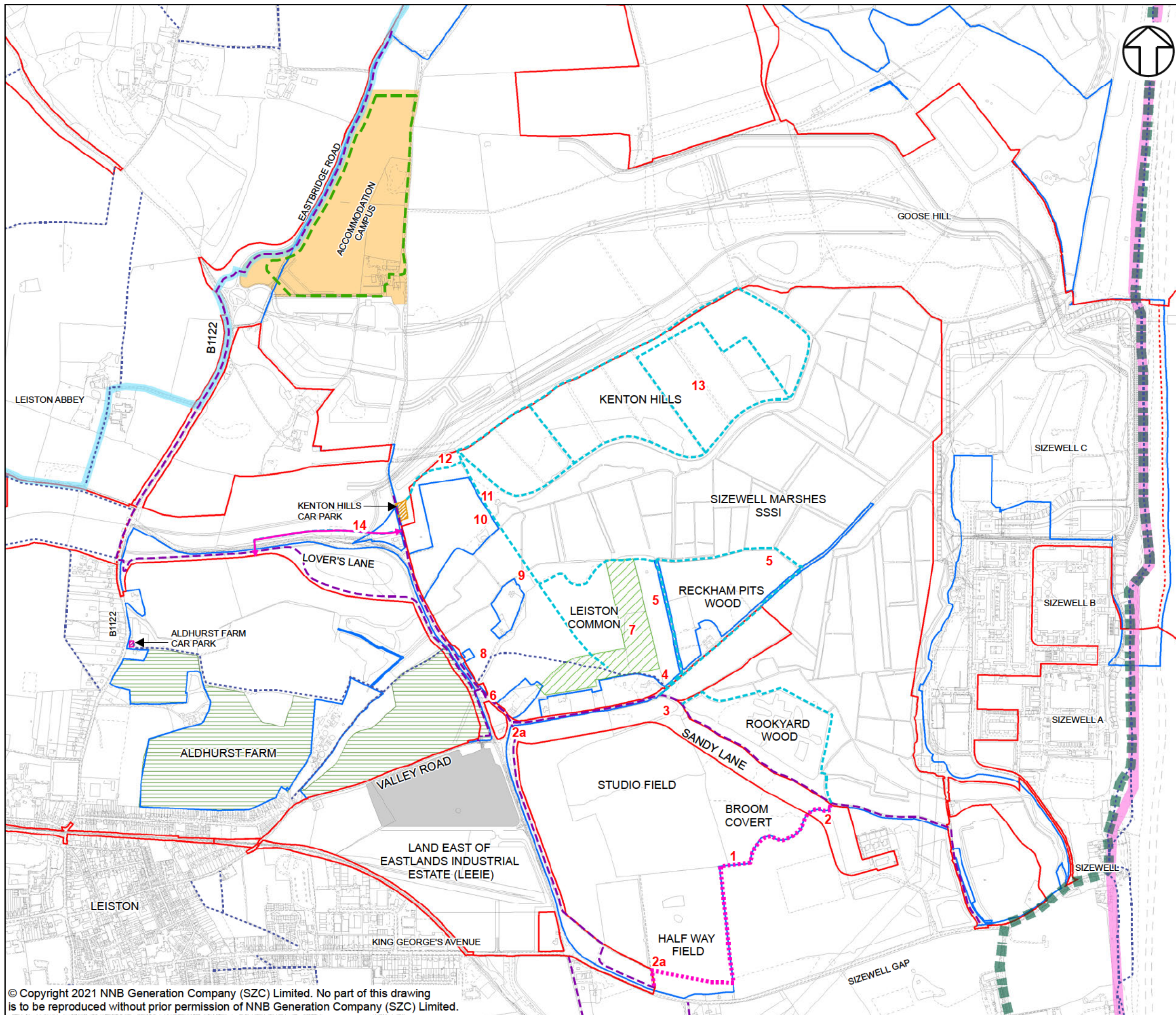


DOCUMENT:
 SIZEWELL C

DRAWING TITLE:
 FIGURE 1: EXISTING AND COMMITTED RECREATIONAL ACCESS - CONSTRUCTION PHASE

DRAWING NO:
 6839 SK 121
 DATE: OCT 2021 DRAWN: A.G. SCALE: 1:11,000 @A3 REV: 03





NOTES

KEY

- SIZEWELL C AND ASSOCIATED DEVELOPMENT SITE BOUNDARIES
- - - DEMARCATION L NE
- SIZEWELL ESTATE BOUNDARY
- EXIST NG AND PROPOSED (ALREADY COMMITTED) - CONSTRUCTION PHASE
- EXISTING REGISTERED COMMON LAND
- EXISTING OPEN ACCESS LAND
- ACCOMMODATION CAMPUS
- CARAVAN SITE
- RECREATION FITNESS FOOTPATH
- KENTON HILLS CAR PARK IMPROVEMENTS
- ALDHURST FARM OPEN ACCESS LAND
- - - PERMISSIVE FOOTPATHS (EXISTING AND PROPOSED)
- - - SANDLINGS WALK WITH RE-ALIGNMENT ON COAST
- - - SUFFOLK COAST PATH AND FUTURE ENGLAND COAST PATH WITH RE-ALIGNMENT ON COAST
- - - SUSTRANS REGIONAL CYCLE ROUTE (RCR) (42) AND SUFFOLK COASTAL CYCLE ROUTE
- PUBLIC RIGHTS OF WAY (EXIST NG (SUFFOLK COUNTY COUNCIL), DIVERTED AND PROPOSED)
- - - FOOTPATH
- - - BRIDLEWAY
- PROPOSED FOR FURTHER ACCESS IMPROVEMENTS
- PERMISSIVE FOOTPATH CHANGED TO PERMISSIVE FOOTPATH AND CYCLEPATH
- - - NEW PERMISSIVE FOOTPATH AND CYCLEWAY
- 1** ENHANCED WORK REFERRED TO N REPORT

NOT PROTECTIVELY MARKED

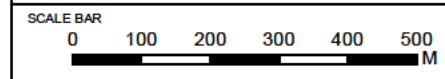
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DOCUMENT:
SIZEWELL C

DRAWING TITLE:
FIGURE 2: PROPOSED ADDITIONAL RECREATIONAL ACCESS ENHANCEMENTS - CONSTRUCTION PHASE

DRAWING NO:
6839 SK 122
 DATE: OCT 2021 DRAWN: A.G. SCALE: 1:11,000 @A3 REV: 02



Sizewell C - Informal Recreation and Green Space Proposals

Proposals for an enriching and well-connected recreation experience for construction workers, local people and visitors on the Sizewell Estate and beyond.

These proposals will provide a network of recreational opportunities further enhancing the existing accessible landscapes, footpaths and bridleways, and those already committed to as part of the Sizewell C Project. They will, together, provide an excellent outdoor informal recreational landscape for walking, dog walking, running and cycling close and well-connected to the construction worker's accommodation at the

accommodation campus and caravan site, and to Leiston where many construction workers are likely to stay. This diverse range of enhanced access routes and spaces, together with education for construction workers on the opportunities provided and the sensitivities of European sites, will help to reduce the potential for recreational disturbance at European sites.



Figure 3

- 1 New footpath and cycle route within 7m wide accessible corridor. This would create a new circular walking / running / dog walking / cycling route connecting to Bridleway 19 on Sandy Lane and the proposed off-road bridleway between the campus and Sizewell Gap, and further afield.
- 2 New finger post signs providing clear waymarking at junctions.
- 3 New signage on Bridleway 19 showing the permissive footpath routes around Reckham Pits Wood and Rookyard Wood.
- 4 Improvements to signage to the permissive footpaths at Reckham Pits Wood. Finger posts to highlight Bridleway 19 to Sizewell and the coast. Signage stating that dogs should be kept on-lead at Leiston Common and to be kept under effective control on the permissive footpaths around Reckham Pits Wood. Footpath into Leiston Common widened and enhanced through vegetation management.
- 5 Signage to advise that dogs to be kept under effective control on the permissive paths around Reckham Pits Wood.
- 6 Location of existing on-road car parking for 5+ vehicles. Creation of a new pedestrian access gate to Leiston Common. Provision of combined dog and general waste bin. Signage to explain the access network that includes Leiston Common, Reckham Pits Wood, Aldhurst Farm, Kenton Hills and to the coast. Sign to make clear that dogs must be kept on-lead on the Common.
- 7 Regular mowing of routes through the bracken at Leiston Common.
- 8 Improve existing permissive footpath access to Leiston Common - level ground surface, replace gate and provide signage.
- 9 Creation of a new shallower permissive footpath down the steep slope between Leiston Common and Sizewell Marshes. Manage vegetation to keep permissive footpath clear of bracken. Signage directing to Kenton Hills, Leiston Common, Aldhurst Farm and Reckham Pits Wood, and to advise that dogs must be kept on-lead at Leiston Common and dogs not allowed across the Sizewell Marshes SSSI.
- 10 Widening of the permissive path within Kenton Hills, linking Sizewell Marshes to Kenton Hills through vegetation management. New signage explaining that no dogs are allowed across the SSSI and that dogs are to be kept under effective control in Kenton Hills.
- 11 New signage to direct users between Leiston Common, permissive footpaths within Kenton Hills woodland, and Kenton Hills car park.
- 12 New signage to direct users between Leiston Common, Kenton Hills woodland and car park, and to Aldhurst Farm following the creation of a new link across Lover's Lane.
- 13 Creation of a new off-road mountain bike skills trail through the coniferous woodland at Kenton Hills that is signposted from the construction workers accommodation campus and caravan site, the new off-road cycle route within Aldhurst Farm, and from Kenton Hills car park. Access to be carefully controlled and a suitable management regime to be agreed.
- 14 Permissive footpath upgraded to include cyclists.

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APPENDIX B: GUIDELINES FOR RECREATION OF SUITABLE ALTERNATIVE NATURAL GREENSPACE (SANG) – AUGUST 2021 (NATURAL ENGLAND)

- B.1.1. Guidelines published by Natural England and received from Natural England on 8 September 2021.

Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) – August 2021

Introduction

‘Suitable Alternative Natural Greenspace’ (SANG) is the name given to green space that is of a quality and type suitable to be used as avoidance within the Thames Basin Heaths Planning Zone.

Its role is to provide alternative green space to divert visitors from visiting the Thames Basin Heaths Special Protection Area (SPA). SANG are intended to provide avoidance measures for the potential impact of residential development on the SPA by preventing an increase in visitor pressure on the SPA. The effectiveness of SANG as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.

This document describes the features which have been found to draw visitors to the SPA, which should be replicated in SANG. It provides guidelines on

- the type of site which should be identified as SANG
- measures which can be taken to enhance sites so that they may be used as SANG

It also covers the outputs of the recent Thames Basin Heaths Project 2021.

These guidelines relate specifically to the means to provide mitigation for significant impact arising from new housing within the Thames Basin Heaths Zone of influence. They do not address nor preclude the other functions of green space. Other functions may be provided within SANG, as long as this does not conflict with the specific function of mitigating visitor impacts on the SPA.

SANG may be created from:

- existing open space of SANG quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public
- existing open space, which is already accessible, but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SPA
- land in other uses which could be converted into SANG

The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan. These sites may require an ecological discount of their proposed SANG area.

SANG continue to need to be delivered in advance of any associated housing stock being occupied. They should also be funded for in perpetuity as is the current process.

The Character of the SPA and its Visitors

The Thames Basin Heaths SPA is made up of 13 Sites of Special Scientific Interest, and consists of a mixture of heathland, mire, and woodland habitats. They are essentially ‘heathy’ in character. The topography is varied, and most sites have a large component of trees and some contain streams, ponds and small lakes. Some are freely accessible to the public and most have a degree of public access, though in some areas this is restricted by army, forestry or other operations.

Survey effort in 2005 showed that more than 83% of visitors to the SPA arrive by car, though access points adjacent to housing estates showed a greater proportion arriving on foot (up to 100% in one case). 70% of those who visited by car had come from within 5km of the access point onto the SPA. A very large proportion of the SPA visitors are dog walkers, many of whom visit the particular site on a regular (more or less daily) basis and spend less than an hour there, walking on average about 2.5km. Almost 50% are retired or part-time workers and the majority are women. Further detailed information on visitors can be found in the reports referenced at the end of this document. These figures have been supported in further SPA wide surveys, the most recent being in 2018.

Guidelines for the Quality of SANG

The quality guidelines have been sub-divided into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from visitor surveys carried out at heathland sites within the Thames Basin Heaths area or within the Dorset heathlands. These are listed as references at the end of this document.

The principle criteria contained in the Guidelines have also been put into a checklist format which are contained in Appendix 1.

Accessibility

Most visitors come by car and want the site to be fairly close to home. Unless SANG are provided for the sole use of a local population living within a 400-metre catchment around the site, then **the availability of adequate car parking at sites larger than 4 ha is essential.** The amount and nature of parking provision should reflect the anticipated use of the site by visitors and the catchment size of the SANG. It should provide an attractive alternative to parking by the part of SPA for which it is mitigation. **Car parks should be clearly signposted and easily accessed.**

New parking provision for SANG should be advertised as necessary to ensure that it is known of by potential visitors.

Target groups of Visitors

This should be viewed from two perspectives, the local use of a site where it is accessed on foot from the visitor's place of residence, and a wider catchment use where it is accessed by car. **Most of the visitors to the SPA come by car and therefore should be considered as a pool of users from beyond the immediate vicinity of the site.** All but the smallest SANG should therefore target this type of visitor.

It is apparent from access surveys that a significant proportion of those people who visit the sites on foot, also visit alternative sites on foot and so this smaller but significant group look for local sites. **Where large populations are close to the SPA, the provision of SANG should be attractive to visitors on foot.**

Networks of sites

The provision of longer routes within larger SANG is important in determining the effectiveness of the authorities' network of SANG as mitigation. The design of routes within sites will be critical to providing routes of sufficient length and attractiveness for mitigation purposes.

Though networks of SANG may accommodate long visitor routes and this is desirable, they should not be solely relied upon to provide long routes.

Paths, Roads and Tracks

The findings suggest **that SANG should aim to supply a choice of routes of around 2.3 - 2.5km in length** with both shorter and longer routes of at least 5km as part of the choice, where space permits.

Paths have to be of a width acceptable to visitors.

Paths should be routed so that they are perceived as safe by the users, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well spaced mature trees, or wide rides with vegetation back from the path), especially those routes which are 1-3 km long.

The routing of tracks along hill tops and ridges where there are views is valued by the majority of visitors.

Artificial Infrastructure

Little or no artificial infrastructure is found within the SPA at present apart from the provision of some surfaced tracks and car parks. Generally, an urban influence is not what people are looking for when they visit the SPA and some people undoubtedly visit the SPA because it has a naturalness about it that would be marred by such features.

However, **SANG would be expected to have adequate car parking with good information about the site and the routes** available. Some subtle waymarking would also be expected for those visitors not acquainted with the layout of the site.

Other infrastructure would not be expected and should generally be restricted to the vicinity of car parking areas where good information and signs of welcome should be the norm, though discretely placed benches or information boards along some routes would be acceptable.

Landscape and Vegetation

SANG do not have to contain heathland or heathy vegetation to provide an effective alternative to the SPA.

Surveys clearly show that **woodland or a semi-wooded landscape is a key feature** that people appreciate in the sites they visit, particularly those who use the SPA. This is more attractive than open landscapes or parkland with scattered trees.

A **semi-natural looking landscape with plenty of variation** was regarded as most desirable by visitors and some paths through quite enclosed woodland scored highly. There is clearly a balance to be struck between what is regarded as an exciting landscape and a safe one and so some element of choice between the two would be highly desirable. The semi-wooded and undulating nature of most of the SPA sites gives them an air of relative wildness, even when there are significant numbers of visitors on site. SANG should aim to reproduce this quality.

Hills do not put people off visiting a site, particularly where these are associated with good views, but steep hills are not appreciated. **An undulating landscape is preferred to a flat one.**

Water features, particularly ponds and lakes, act as a focus for visitors for their visit, but are not essential.

Restrictions on usage

The bulk of visitors to the SPA came to exercise their dogs and so it is imperative that **SANG allow for pet owners to let dogs run freely over a significant part of the walk. Access on SANG should be largely unrestricted, with both people and their pets being able to freely roam**

along the majority of routes. This means that sites where freely roaming dogs will cause a nuisance or where they might be in danger (from traffic or such like) should not be considered for SANG.

Assessment of site enhancement as mitigation

SANG may be provided by the enhancement of existing sites, including those already accessible to the public that have a low level of use and could be enhanced to attract more visitors. The extent of enhancement and the number of extra visitors to be attracted would vary from site to site. Those sites which are enhanced only slightly would be expected to provide less of a mitigation effect than those enhanced greatly, in terms of the number of people they would divert away from the SPA. In order to assess the contribution of enhancement sites in relation to the hectare standards of the Delivery Plan, it is necessary to distinguish between slight and great enhancement.

Methods of enhancement for the purposes of this guidance could include enhanced access through guaranteed long-term availability of the land, creation of a car park or a network of paths.

SANG which have not previously been open to the public count in full to the standard of providing 8ha of SANG per 1000 people in new development. SANG which have an appreciable but clearly low level of public use and can be substantially enhanced to greatly increase the number of visitors also count in full. The identification of these sites should arise from evidence of low current use. This could be in a variety of forms, for example:

- Experience of managing the site, which gives a clear qualitative picture that few visitors are present
- Quantitative surveys of visitor numbers
- Identified constraints on access, such as lack of gateways at convenient points and lack of parking
- Lack of easily usable routes through the site
- Evidence that the available routes through the site are little used (paths may show little wear, be narrow and encroached on by vegetation)

Practicality of enhancement works

The selection of sites for enhancement to be SANG should take into account the variety of stakeholder interests in each site. Consideration should be given to whether any existing use of the site which may continue is compatible with the function of SANG in attracting recreational use that would otherwise take place on the SPA. The enhancement should not result in moving current users off the SANG and onto the SPA. The specific enhancement works proposed should also be considered in relation not only to their effects on the SANG mitigation function but also in relation to their effects on other user groups.

TBH SPA Mitigation Project – January 2021

The Hart, Rushmoor and Surrey Heath Councils worked together with Natural England to complete a project reviewing the approach to mitigation within the Thames Basin Heaths. The work analysed eleven potential alternative options when it comes to delivering SPA mitigation. The report concluded that the role and design of SANG could be clarified further.

To be made very clear from the outset. There remains a hierarchy of SANG provision. Great weight will be given to those SANGS meeting all the existing quality criteria (shown in Appendix 1) which should be delivered in the first instance. Only if this is **not possible, for clearly established reasons**, should the delivery of the options outlined in the section below be considered. If any proposed SANGS do not meet all of the Appendix 1 quality criteria, then these SANGS will continue to be assessed on a case by case basis and should be **agreed** with both the competent authority and Natural England. The proposal will need to demonstrate equivalent effectiveness of mitigation being provided to ensure a robust, consistent approach continues. Any shortfall in SANG criteria should be offset by other complementary means, such as an elevated provision rate, size or high-quality features.

The evidence shows that the use of SANG networks, linear orientated sites and small sites of no smaller than two hectares have potential to provide effective mitigation where traditional SANG is unavailable. These SANG areas will be linked and/or in proximity to an already established SANG. If effectiveness can be demonstrated of small or linear SANGs working alone, then we will assess this on a case by case basis, taking in to account the site's context amongst the wider greenspace network.

Historically Natural England have apportioned significant weight to the requirement for a 2.3 – 2.5km circular walk, which is less likely to be achievable in a small or linear SANG. These guidelines do not remove weight from the requirement but do accept that in specific circumstances the walk doesn't have to be included within every single SANG unit. It is however desirable to provide the full Appendix 1 criteria across a local SANG network or on another SANG.

Natural England would urge all Local Planning Authorities to take note, that this approach **could** enable sites previously deemed unacceptable to Natural England, to now qualify as valid avoidance measure. Please come and speak to us if you feel that is the case.

Appendix 1: Site Quality Checklist – for a SANG

This guidance is designed as an Appendix to the full guidance on Suitable Alternative Natural Greenspaces (SANG) to be used as mitigation (or avoidance) land to reduce recreational use of the Thames Basin Heaths SPA.

Must haves

- For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANG and the SPA.
- Possible to complete a circular walk of 2.3-2.5km around the SANG.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the visitor use the SANG is intended to cater for.
- The SANG must have a safe route of access on foot from the nearest car park and/or footpath/s
- All SANG with car parks must have a circular walk which starts and finishes at the car park.
- SANG must be designed so that they are perceived to be safe by users; they must not have tree and scrub cover along parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming to urban in feel.
- SANG must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANG larger than 12 ha must aim to provide a variety of habitats for users to experience.
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANG must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).

Should haves

- SANG should be clearly sign-posted or advertised in some way.
- SANG should have leaflets and/or websites advertising their location to potential users. It would be desirable for social media to be used as well, with the goal of reducing paper use. Although a leaflet for a new home is desirable. It could advertise the TBH Partnership website at <https://www.tbhpartnership.org.uk/greenspace/>

Desirable

- It would be desirable for an owner to be able to take dogs from the car park to the SANG safely off the lead.

- Where possible it is desirable to choose sites with a gently undulating topography for SANG
- It is desirable for access points to have signage outlining the layout of the SANG and the routes available to visitors.
- It is desirable that SANG provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water is encouraged and desirable on sites. However large areas of open water cannot count towards capacity.
- Where possible it is desirable to have a focal point such as a viewpoint, monument etc within the SANG.

Appendix 2: Further clarification on the TBH Project 2021

Reliance on the length of circular walk could be given less weight in specific circumstances on individual SANG sites. A circular route is still required. This will be agreed on a case by case basis by Natural England and the relevant Local Planning (Competent) Authority and only where equivalence can be effectively demonstrated. Sites will also only be accepted where most of the other criteria from Appendix 1 are met, either individually or as part of a group of sites.

Small SANG – This will be no smaller than 2 hectares in size. Where possible all other Appendix 1 criteria should be met, and the site will be adjacent to, linked in an accessible manner to, or close to a SANG or network which can deliver the required circular walk. Small SANG should be available to residents on their doorsteps.

Linear SANG – This approach allows for the width of a SANG to be reduced, where the walk incorporates an attractive linear feature or links to other open sites. For example, alongside waterways or disused railway lines. Linear SANG should include sites with wider areas, creating irregular shapes and opportunities for dogs to exercise freely off lead. In exceptional cases a there and back walk could qualify. It would require strong evidence and visitor surveys to show that it will provide an avoidance experience like that of a traditional SANG. It would also be preferable for linear SANG to link with wider routes and/or other SANGs to provide opportunities for a variety of walks.

SANG Network – Where several SANGs are in proximity or adjacent, they can be used and visited as one single entity. This approach allows for the use of links between SANG units to deliver a circular walk and meet all the Guidelines in combination. The default position is that the SANG links would not count as having capacity or catchments but would need to be secured in perpetuity. If they happen to be a substantial unit of green space themselves then they could be included within the SANG calculation. The size of an individual SANG catchment can be increased depending on the area afforded by an overall SANG network (excluding links), in line with the quanta figures in the TBH Delivery Framework.

Equivalence – This will be required on all SANG sites not meeting the guidelines in Appendix 1. There will have to be an over provision of something else to offset the lack of the full circular walk. This would be likely to incorporate an increased provision rate, for example providing 12 hectares of SANG per thousand head of population. A significant high quality SANG in terms of amenities and habitats could also demonstrate this requirement. We are happy to discuss this matter further on a case by case basis, either through our DAS Service for developers or our Local Plan Service for Local Planning Authorities.

Appendix 3: Suitable Alternative Natural Greenspace: A best practice guide

Natural England would urge that these recommendations are followed unless there is valid justification for a deviation.

A SANG can be greatly improved for visitors and wildlife by implementing some of the suggestions in this guide. They are based on Natural England's Strategic Access Management and Monitoring teams' findings from visiting SANG and undertaking visitor number and questionnaire surveys.

This guide has been produced to provide more advice to Local Planning Authorities and developers up front. These are features found throughout the current SANG suite that we feel have tangible positive impacts on the draw to a SANG. We understand that it may not be possible to adopt them all, especially in a smaller SANG. There are a lot of quick fixes in this list which will generate a substantial uplift in SANG attractiveness. Natural England are likely to raise fewer concerns through the formal planning process on a SANG which provides the majority of the following.

It is essential that Natural England visits and agrees a SANG, before any housing development can be attributed towards it. This is in line with Policy NRM6 of the South East Plan. For SANG development advice please contact Natural England's Discretionary Advice Service:

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

It is advisable to contact your local planning authority at the first instance of SANG development.

Naming of SANG:

1. Use a name which highlights any attractive features within the site. E.g. meadow, copse, lake etc.
2. Avoid the use of the word 'SANG' in the name of the site.
3. Keep the name relevant to the location but dissimilar to nearby SANG's.
4. The name is different to any associated development.

Location of SANG:

1. Where possible, provision of connectivity to wider greenspace/other SANG is recommended but should ensure a SANG does not result in new and additional access and visits to sensitive sites.
2. Seek to protect and enhance any existing local wildlife site designations (e.g. SSSI/SINC/SNCI) within or adjacent to the SANG boundary.

Biodiversity:

1. Ensure habitat of SANG complements adjacent habitats. e.g by extending similar landscape or something complementary such as grassland for foraging woodland birds.
2. Ensure appropriate connectivity of landscape scale habitat features. e.g. hedgerows, tree belts etc.
3. Include features such as; dead wood, sand banks, wildflower meadows etc.
4. Where open water is included, separate dog ponds and wildlife ponds. (Case study 4)
5. Avoid frequent mowing as a tool to manage grasslands, it is an expensive technique which produces little biodiversity benefit.
6. Grazing is a good management tool. It is not suitable for all SANG, but if it possible on your SANG, a route must be provided which avoids the grazing area for the benefit of those nervous of cattle.
7. Good practice monitoring of SANG use should be built into in perpetuity management of the site, and work consistently with the SAMM Project.

Biodiversity Net Gain (BNG) is an approach to land management and/or development that aims to leave biodiversity in a measurably better state than before. BNG does not change existing protections to protected sites, irreplaceable habitats or protected species.

Through appropriate design and implementation BNG can complement the purpose of SANGS. These are designed to provide more natural and diverse green space for communities to benefit from and, consequently, delivering more effective mitigation to alleviate pressure on SPAs. [SANG is not an automatic delivery mechanism for BNG but the two can exist on the same site.](#) [BNG on SANG is only attributable](#) to such habitat creation or enhancement that proves measurable additionality over and above the minimum requirements of the SANG, demonstrated through use of the Biodiversity Metric stipulated by the consenting body.

For BNG to be delivered on SANG, the SANG should achieve nature conservation outcomes that demonstrably exceed existing obligations under the SANG guidance, as quantified through the metric. It is encouraged that, where applicable, additional or enhanced features at SANGs are informed by local nature or wildlife strategies and priorities, such as Local Nature Recovery Strategies (LNRS). It is recommended that the BNG calculations for the SANG are done separately from the rest of the project calculations, in order to ensure a clear audit trail and allow for simple demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements. Any additional features provided for BNG purposes should not conflict with the principle purpose of the SANG. Consideration should be given for other ecosystem services provided by the SANG and design should ensure BNG does not compete with these but delivers alongside them. For example, a wildflower rich grassland area created for biodiversity benefits would provide additional ecosystem services but could potentially also conflict with recreational services provided by the SANG. Careful consideration should be given to the design of any additional biodiversity features introduced into the SANG to ensure they did not conflict with the SANGs principle purpose.

For the purposes of the BNG calculation, the baseline value of the SANG is the site with the Habitat Regulation key required habitat features incorporated. Enhancements should be additional to count towards BNG, in that the enhancements would not have taken place in the absence of the BNG funding (or commitment of funding) and the biodiversity benefit (as measured through the metric) should not also be claimed to compensate for another project's biodiversity impact. Further information on BNG is set out in the following guidance and standards

1. The CIEEM, CIRIA, IEMA Good practice principles for development should be followed: <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>
2. [The British Standard for Biodiversity Net Gain \(BS 8683\) is a process standard that describes the implementation of BNG by a project \(to be released in 2021\).](#)

Equality Act 2010 Compliance:

1. This does not fall under the remit of Natural England and we will not be giving bespoke advice about it during our pre application discussions. However, we urge developers and Local Planning Authorities alike to consider the requirements of it, when designing their SANG solutions.

Paths:

1. We are concerned about sections of the circular route that seasonally are wet, muddy or flooded, and could put visitors off from visiting. In these cases, we recommend boardwalk or paths are built up, for them to remain as compliant SANG. Relating to this, if applying grip to surfaces, avoid wire netting as it can trap dog claws.
2. Path surfacing needs to remain semi natural. The highest specification surface we would accept is resin bound hoggin.

3. Avoid convoluted paths and pinch points in SANG design. By maintaining a minimum width between paths of 100 m in open ground and 50 m in dense woodland.
If necessary, look to extend the area of the SANG, or look at a local SANG Network.
4. Avoid paths running through areas adjacent to major infrastructure with prolonged loud noise. For example, adjacent dual carriageways or motorways. Natural England look at a maximum decibel limit of 60, before requiring discounting of SANG area.

Way-marking and signage:

1. Provide a map at the entrances with an easy to follow circular walk.
2. Gates, fencing and planting following natural land features can help distinguish routes.
3. Highlight points of interest and site history.
4. Car parks well sign posted using highways specification. Where possible through use of the brown sign initiative.
5. Provide contact details for site manager at main entrance.

Bins and dog fouling:

1. Dog bins should be in convenient sections of site and near the entrances.

Car park standard:

1. Provide a minimum of 1 parking space per ha.

Safety and security:

1. Where required for health and safety purposes, the SANG should have suitable access for emergency vehicles.
2. Car parks should be designed to reduce risk of anti-social behaviour, break in or feelings of vulnerability for site users.
3. Perimeter fencing secure to prevent dogs getting out.

Amenities:

These are **not a requirement** but have proved an attractive feature in those SANG with the space available.

1. A play area is a feature that attracts those with children to visit the site, as these are not present on the SPA. If a play area is included, it should be made from sustainable natural sources and not be full of bright plastics.
2. A café or food/drink provisions often attracts more visitors to the site. (Case study 4)

To conclude

We sometimes lose track of the basic requirement for a SANG, which is to attract people away from the SPA. When designing all SANG, the visitor experience needs to be put first. Costings and even habitat creation should all fall from a strong Visitor Strategy, which should form part of the SANG Management Strategy. Sites and their information should be created in a positive manner to interest visitors and have them coming back time and time again. Though biodiversity and landscape planning are obviously important, we urge you to start by considering the local populous and what they want and how they want to interact with your site, when creating a new SANG.

Case Studies

1. Edenbrook Country Park – Hart District Council - Well surfaced paths, and provisions for wildlife.

Edenbrook is a 24-hectare country park, delivered by Berkeley in partnership with Natural England and Hart District Council.

The paths are sufficiently wide for a combination of site users (Figure 1). There is also a good network of surfaced paths which are not convoluted and avoids pinch points. This was historically agricultural fields, but through innovative design, they have delivered a site that delivers both for visitors but also for biodiversity. Hart District Council have recognised the SANG network approach here and are bolting on extra area to the SANG and linking to other SANG in the vicinity.



Figure 1: The surfaced paths at Edenbrook are located sufficiently far from one another, and from wildlife rich-areas. They are wide enough for the whole combination of site visitors to use.

2. Farnham Park – Waverley Borough Council - Provisions for dogs and wildlife.

Several of the ponds in Farnham Park are designated as wildlife ponds. These are rich in wildlife, hosting many amphibian and invertebrate species. Dead hedges were built around three of the ponds, using materials cut from Farnham Park. To provide water and an opportunity to swim, 'Friends Pond' has been kept fully accessible to dogs. It is located nearest the main entrance and is easily accessible to all visitors. The wildlife ponds are further away from the main entrance, where visitor density is expected to be lower.



Figure 2: 'Friends Pond' a dog pond on Farnham Park which allows dogs to swim and drink from, whilst other ponds are fenced to protect wildlife.

3. Bucklers Forest – Bracknell Forest Council Comprehensive and engaging interpretation.

At the entrance to the site, Buckler's Forest includes a map that shows 3 options for circular routes (measuring 3.6 km, 2.4 km and 1.3 km). It also includes information on the wildlife that visitors can expect to see on site. As well as this, it highlights the site history. The inclusion of such comprehensive signage encourages users to care more about the site.

Buckler's Forest has showcased its site history by incorporating green electrical boxes, retained from the transport laboratory, into the site design. These have been transformed into benches, bug hotels, and even mini 'museum' exhibitions. The integration of the site's history is beloved by many site visitors and it creates a distinctly 'country park' feel.



Figure 3: A mini 'museum' exhibition including some archaeological samples found on site. Located within a green electrical box present when the site was a transport laboratory.



Figure 4: A bug hotel also within a repurposed green electrical box.

4. Heather Farm – Delivered by Horsell Common Preservation Society in partnership with Woking Borough Council - Provision of amenities.

Heather Farm has proved to be a very popular SANG, particularly for of its amenities, including a café and a large car park. Whilst it is not possible, or advisable, to include a café on every SANG, at Heather Farm, it has attracted a lot of visitors, many of whom would otherwise visit the SPA. After identifying a need for additional parking provisions, Horsell Common Preservation Society added 57 new spaces to the car park. There are currently 109 car parking spaces for visitors. Heather Farm provides 4 spaces per hectare, significantly more than the suggested minimum of 1 space per hectare.



Figure 5: A view of some of the habitat creation at Heather Farm

5. Wellesley Woodlands – Rushmoor Borough Council - Waymarking and signposting.

Wellesley Woodlands has incorporated non-intrusive way-markers to clearly signpost users around the 8 trails included in the SANG. These are easy to follow for site users whilst remaining unobtrusive. Where multiple trails intersect, signposting is clear to ensure that trails can be followed with ease. Both the map and associated markers clearly identify those trails that are suitable ground for wheelchairs and those with restricted mobility.



Figure 6: A signpost clearly defining two all-ability trails, the Birch Trail and the Holly Trail.



Figure 7: A way-marker to signpost users along the Wellesley Willow Trail.

6. Biodiversity Net Gain

Examples of Biodiversity Net Gain delivered within a SANG:

- A. If an extra hedgerow was put into a SANG, not for screening purposes, this could count. If it is put in for screening reasons, this is a key SANG feature and therefore cannot count towards BNG unless the hedgerow was of higher distinctives than that needed for screening purposes or maintained in better ecological condition, in which case it could count.
- B. Planting wildflower bulbs on appropriately sited amenity grassland within a SANG and in turn converting it to species rich meadow could be counted towards BNG.
- C. If the SANG has structures such as a toilet block or café, then BNG could be delivered through the introduction of green/vegetated roofs and/or walls on such structures.

Potential Opportunities for Biodiversity Net Gain



By vegetating the roof of this structure at Famham Park SANG, measurable additionality over and above the minimum requirements of the SANG has been demonstrated and it can therefore count towards the delivery of biodiversity net gain.

Appendix 4: SANG Information Form

This form is designed to help you gather information about any potential SANG. For more guidance on the creation of SANG, please also refer to the relevant Borough Council's Thames Basin Heaths SPA Interim Avoidance Plan.

Natural England, Local Planning Authorities, and other organisations will then be able to consider the potential suitability of the proposed SANG based on this initial information.

Background information

Name and location of proposed SANG	Name: Address: Grid reference: (Please attach a map of the site with the boundaries clearly marked)
Size of the proposed SANG (hectares), excluding water features	hectares
Any current designations on land - e.g. LNR / SSSI	
Current owners name and address. (If there is more than one owner then please attach a map)	
Who manages the land?	
Legal arrangements for the land – e.g. how long is the lease?	
Is there a management plan for the site? (if so, please attach)	

Current visitor arrangements

Is the site currently accessible to the public?	
Does the site have open access?	
Has there been a visitor survey of the site? (If so, please attach)	
If there has been no visitor survey, please give an indication of the current visitor levels on site	
Does the site have existing car parking?	How many car parks? How many car parking spaces? (Please mark car parks and numbers of car parking spaces on the site map)
Are there any existing routes or paths on the site?	(Please mark these on the map)
Are there signs to direct people to the site? (Please indicate where and what type of sign)	

Site quality checklist

Must/should have – these criteria are essential for all SANG			
	Criteria	Current	Future
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)		
2	Circular walk of 2.3-2.5km		
3	Car parks easily and safely accessible by car and clearly sign posted		
4	Access points appropriate for particular visitor use the SANG is intended to cater for		
5	Safe access route on foot from nearest car park and/or footpath		
6	Circular walk which starts and finishes at the car park		
7	Perceived as safe – no tree and scrub cover along part of walking routes		
8	Paths easily used and well maintained but mostly unsurfaced		

9	Perceived as semi-natural with little intrusion of artificial structures		
10	If larger than 12 ha then a range of habitats should be present		
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead		
12	No unpleasant intrusions (e.g. sewage treatment smells etc)		
13	Clearly sign posted or advertised in some way		
14	Leaflets or website advertising their location to potential users		
15	Can dog owners take dogs from the car park to the SANG safely off the lead		
16	Gently undulating topography		
17	Access points with signage outlining the layout of the SANG and routes available to visitors		
18	Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable		
19	Focal point such as a viewpoint or monument within the SANG		

APPENDIX C: SUMMARY OF SZC CO.'S CURRENT COMMITMENTS

- C.1.1. SZC Co. has committed to delivering the following measures to reduce and mitigate the potential impacts of recreational displacement:
- a) **Monitoring and Mitigation Plans at European sites**
- C.1.2. Two Monitoring and Mitigation Plans (MMP) for European sites in order to monitor existing visitor numbers and behaviours pre-construction, and any changes during construction and operation, and the implementation of mitigation measures to ensure that adverse effect on the integrity (AEoI) of the sites does not arise as a consequence of recreational disturbance caused by the Sizewell C Project. The measures in the MMPs are secured through the Deed of Obligation.
- C.1.3. 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 [APP-145, APP-146, APP-147, APP-148 and APP-149] and Shadow HRA Second Addendum [REP2-032]. The Shadow HRA and Second Addendum has identified that certain initial mitigation measures will be appropriate at the Minsmere – Walberswick and Sandlings (North) European sites, which will be delivered by the commencement of construction, whereas mitigation measures may only be necessary at the Sandlings (Central) and Alde-Ore Estuary if monitoring of potential recreational disturbance identifies that it is necessary.
- i. **The MMP for Minsmere – Walberswick and Sandlings (North)**
- C.1.4. The MMP for Minsmere – Walberswick and Sandlings (North) [[REP5-105](#)] covers 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.
- C.1.5. The MMP for Minsmere – Walberswick and Sandlings (North) includes a suite of Initial Mitigation Measures deployed at the commencement of construction on the basis that impacts may occur unless mitigation is implemented. Mitigation measures include two new full time wardens, improvements to signage and other measures.
- C.1.6. The MMP for Minsmere – Walberswick and Sandlings (North) also includes a suite of Additional Mitigation Measures which would be

deployed as necessary and would be dependent on any triggers that might be reached or evidence of changes in visitor numbers and behaviour which may increase the risk of disturbance to qualifying habitats and/or species, as determined by monitoring. These measures could be extensions to the Initial Mitigation Measures or entirely new measures to react to particular circumstances.

ii. The MMP for Sandlings (Central) and Alde-Ore Estuary

C.1.7. The MMP for Sandlings (Central) and Alde-Ore Estuary [[REP5-122](#)] covers the Sandlings SPA (the area comprising Tunstall Forest and Snape Warren), Alde-Ore Estuary SPA and Alde–Ore Estuary Ramsar site. This MMP includes monitoring of visitor use and ecological surveys to identify if changes are caused by the Sizewell C Project, and implementation of a suite of potential Mitigation Measures which would be deployed as necessary. Implementation of Mitigation Measures would be dependent on any triggers that might be reached or evidence of changes in visitor numbers and behaviour which may increase the risk of disturbance to qualifying habitats and/or species, as determined by monitoring.

b) Other committed mitigation measures

C.1.8. 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, which were committed to at Deadline 5 [[REP5-126](#)] include (secured in the Deed of Obligation Schedule 11 paragraphs 7 and 10):

- expanding the existing car park;
- 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.

- C.1.9. Improvements and enlargement to Kenton Hills car park (see Work No.1A(cc) of the draft DCO) [[AS-143](#)] and Schedule 11, paragraph 7 of the Deed of Obligation [[REP5-082](#)]).
- C.1.10. 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).
- C.1.11. A suite of improvements to the wider PRow network has been agreed with Suffolk County Council and East Suffolk Council which will be funded through a Deed of Obligation financial contribution within the PRow Fund (Schedule 10 paragraph 16 of the Deed of Obligation). 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 path and prevent people diverting from the path where they may affect habitats or species.
- C.1.12. SZC Co. will subsidise parking at Sizewell beach car park during the construction phase so that it is free or reduced cost, and provide interpretation signage, to increase its attractiveness as a recreational location away from European sites as stated in the MMP for Minsmere – Walberswick and Sandlings (North) submitted at Deadline 8. This will be funded through the European Sites Access Contingency Funds in the Deed of Obligation Schedule 11 paragraph 6.
- C.1.13. SZC Co. will provide a sum of £150,000 (the Recreational Disturbance Avoidance Mitigation Contribution) to be used by East Suffolk Council towards mitigating the recreational disturbance impacts of the Sizewell C Project, to reduce the impact of potential increased levels of recreational use on European sites (see Schedule 11, paragraph 7 of the Deed of Obligation).
- C.1.14. SZC Co. will also provide a 3G pitch and two multi-use games areas at the Lediston Leisure Centre for use by construction workers in accordance with Schedule 10, paragraph 2 of the DoO, which will be attractive to many construction workers for recreation in preference to outdoor informal recreation at European sites.