



The Sizewell C Project

8.17/ Completed Deed of Obligation -
10.4 Scanned Copy - Part 5 of 6

Book 8 Revision: 9.0
Book 10 Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

October 2021

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

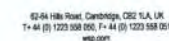


ANNEX T
WICKHAM MARKET SCHEME

- [illegible]

100	11/06/2021	20	1000 1000 1000 1000	100
101	11/06/2021	20	1000 1000 1000 1000	100
102	11/06/2021	20	1000 1000 1000 1000	100
103	11/06/2021	20	1000 1000 1000 1000	100
104	11/06/2021	20	1000 1000 1000 1000	100
105	11/06/2021	20	1000 1000 1000 1000	100

DRAWING TEXT: S2 - FOR INFORMATION



CLIENT: EDF ENERGY

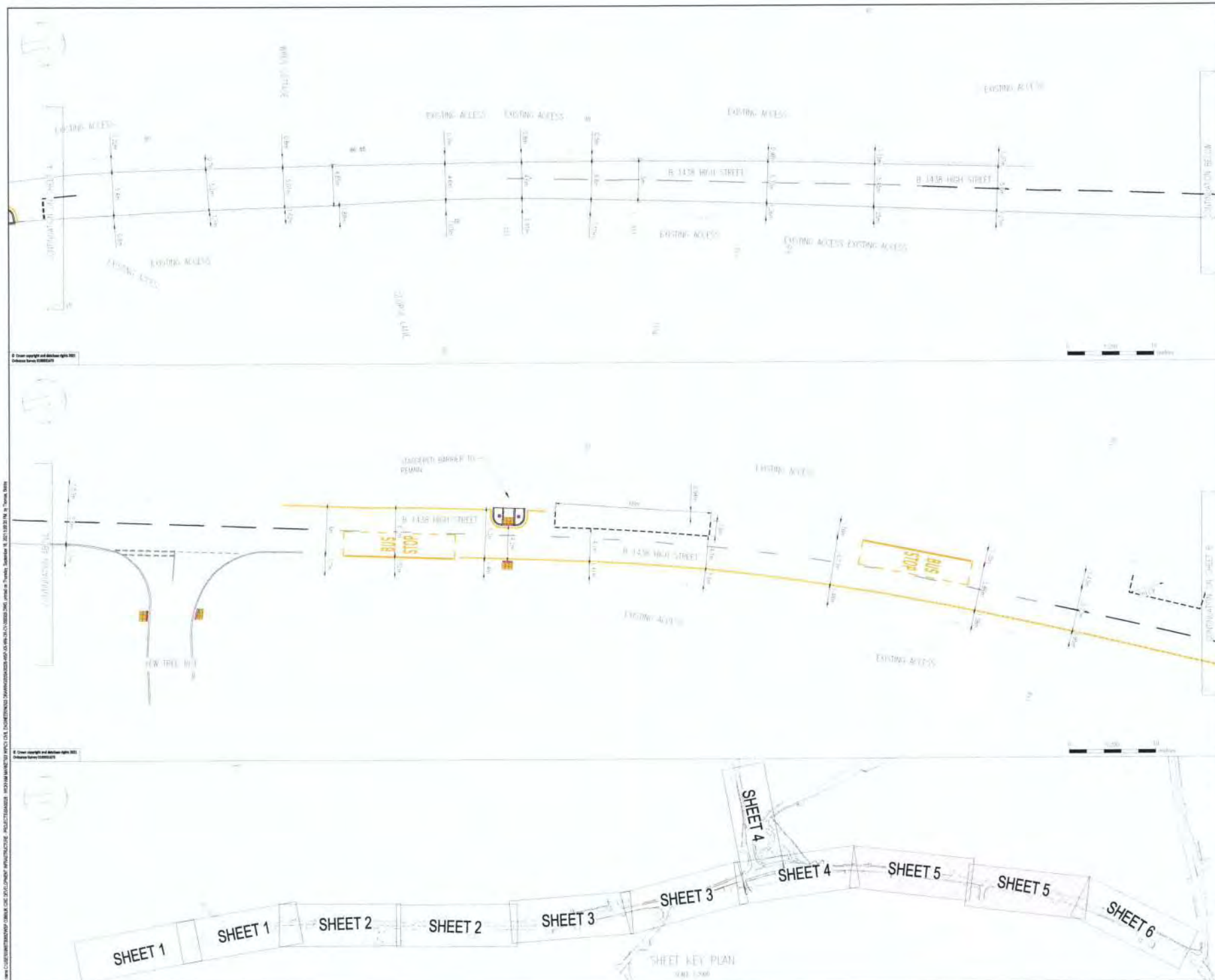
ARCHITECT	
INTERIOR	
WICKHAM MARKET IMPROVEMENT SCHEME	

PROPOSED LAYOUT
(SOUTH OF BORDER COT LANE JUNCTION)
SHEET 5 OF 6

SCALE: 1/2" = 1'-0"	DESIGNED: NM		APPROVED: J
PROJECT NO: 100-100000000	DESIGNED: NM	DRAWN: NM	DATE: 10/1/2014

DRAWING No.	REV.
50400326-WSP-XX-WM-DR-CV-000013	P05

(c) WSP UK Ltd



- [illegible]

[illegible]

101	10.10.2017	10	10.10.2017	10
102	10.10.2017	10	10.10.2017	10
103	10.10.2017	10	10.10.2017	10
104	10.10.2017	10	10.10.2017	10

DRAWING STATUS: S2 - FOR INFORMATION

wsp

62-64 Hills Road, Cambridge, CB2 1LA, UK.
T+44 (0) 1223 558 050, F+44 (0) 1223 558 051
www.cam.ac.uk

EDF ENERGY

ARCHITECT:

WICKHAM MARKET IMPROVEMENT SCHEME

PROPOSED LAYOUT
(WEST OF BORDER COT LANE JUNCTION)
SHEET 2 OF 4

SCALE: 1:200	DRAWN BY: NM	APPROVED: <u>1</u>
PROJECT NO.	DESIGNED BY	DATE

DRAWING No.		REV
50400326-WSP-XX-WM-DR-CV-000022		P03

© WSP UK Ltd



ANNEX U
MMP FOR MINSMERE – WALBERSWICK AND SANDLINGS (NORTH)

CONTENTS

1	INTRODUCTION.....	1
2	SCOPE: SENSITIVE SPECIES AND HABITATS	4
3	GOVERNANCE.....	6
3.1	Deed of Obligation	6
3.2	Ecology Working Group	7
3.3	Environment Review Group	8
4	MONITORING.....	10
4.1	Introduction	10
4.2	Survey Method	11
4.3	Use of Trigger Levels	17
4.4	Recording Signs of Human Disturbance	18
4.5	Survey Programme	18
5	MITIGATION MEASURES	21
5.1	Introduction	21
5.2	Mitigation Measures	23
5.3	Staff Resources.....	31
	REFERENCES.....	33

TABLES

Table 4.1: Visitor Survey Locations.....	12
Table 4.2: Proposed monitoring in relation to qualifying habitat features of European sites	14
Table 4.3: Proposed monitoring in relation to qualifying bird species of European sites	15
Table 5.1 Initial Mitigation Measures.....	24
Table 5.2 Additional Mitigation Measures.....	29

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

APPENDICES

APPENDIX A: ALDHURST FARM ACCESS PROVISION 35

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

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/>

comprising Tunstall Forest and Snape Warren), Alde-Ore Estuary SPA and Alde-Ore Estuary Ramsar site and which was submitted to examination at 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, 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 less 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 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 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.

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 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:
- reviewing the monitoring undertaken in accordance with this plan; and
 - 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.
- 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:
- 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;
 - 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;

- 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;
- report to the Environment Review Group on the approved expenditure from the European Sites Access Contingency Fund and the effectiveness of such expenditure; and
- 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:

- 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
- 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
- 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 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.

3.3.4 In addition, the Environment Review Group shall:

- 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;
- provide guidance to the Ecology Working Group on any issues that are referred to it; and
- 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

- **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.

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

Survey location	
3	Sandymount Covert
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.

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

Qualifying interest feature (habitat type)	Potential impact / pressure	Proposed monitoring
<p>European dry heath</p> <ul style="list-style-type: none"> – Annual vegetation of drift lines – Perennial vegetation of stony banks 	<ul style="list-style-type: none"> – Trampling – Nutrient enrichment 	<ul style="list-style-type: none"> – 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.
	<ul style="list-style-type: none"> – Burnt areas – Path widening – Formation of new routes – Littering 	<ul style="list-style-type: none"> – Visual monitoring of broad-scale habitat impact, potentially using transect-based approach. – Observations recorded by new wardens provided under this plan

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 and similar data will be used in future to monitor change on an annual basis.	

NOT PROTECTIVELY MARKED

Qualifying interest feature (species)	Proposed monitoring	Timing
Sandlings (North) European site Breeding nightjar and woodlark	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.	

NOT PROTECTIVELY MARKED

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;

- 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;

NOT PROTECTIVELY MARKED

- 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 [\[APP-148\]](#)).

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**.

- 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. 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) [\[AS-143\]](#)).

- 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		
New wardening resource (see Section 5.3) to educate visitors (e.g. walkers, dog walkers, picknickers, runners and mountain bikers) about	All areas ²	European Sites Access Contingency Fund

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

Initial Mitigation Measure	Location	How funded / secured
<p>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>		
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 Walks and North Warren	European Sites Access Contingency Fund

Initial Mitigation Measure	Location	How funded / secured
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	All areas	This plan

Initial Mitigation Measure	Location	How funded / secured
sensitive species 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	Westleton Heath, the outer areas of RSPB Minsmere, Aldringham Walks and	European Sites Access Contingency Fund

Initial Mitigation Measure	Location	How funded / secured
management of informal parking to focus parking in desired areas.	North Warren	
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)		
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	All areas	European Sites Access

Additional Mitigation Measure	Location	How funded / secured
specific routes, focussing access away from sensitive locations		Contingency Fund
Eastbridge to Minsmere sluice footpath re-routing and barriers to physical access (e.g. locked gates, mesh on gates to restrict dog access) to reduce access onto sensitive habitats. Maintain the route of the definitive PRow.	Eastbridge to Minsmere sluice footpath PRow E-363/020/0	European Sites Access 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,	European Sites Access Contingency Fund

Additional Mitigation Measure	Location	How funded / secured
	Aldringham Walks and North Warren	
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

- 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)) [\[REP3-024\]](#). Four new full time wardens 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 fund one full time Lead Warden and three field wardens, who will work closely with existing site managers, wardens and volunteers. 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;
 - 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]

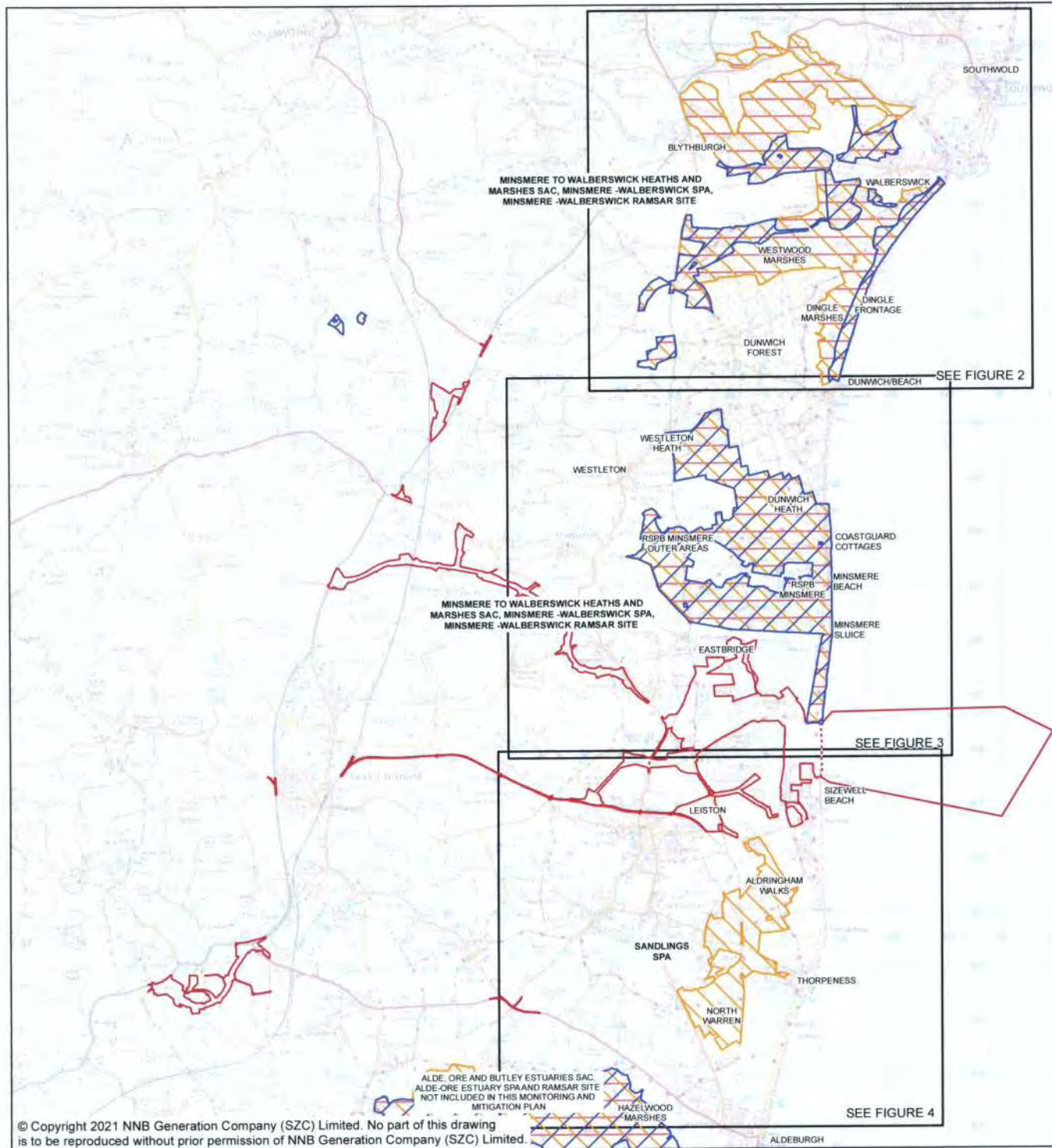
FIGURES

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

NOT PROTECTIVELY MARKED

COPYRIGHT

Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationary Office © Crown Copyright (2019). All Rights reserved. NB GeoCo 0100059408
© Natural England material is reproduced with the permission of Natural England 2019. National Cycle Route data supplied by Sustrans and contains Ordnance Survey data © Crown copyright and database right (2018). Choose Suffolk, Suffolk County Council and Suffolk Coastal District Council. PROW data sourced from Suffolk CC on 27/02/2019 under OGL v3.0 are an interpretation of the Definitive Map and Statement, not the Definitive Map itself, and should not be relied on for determining the position or alignment of any public right of way. The data contains Ordnance Survey data © Crown copyright and database right 2019. © National Trust

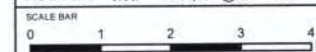


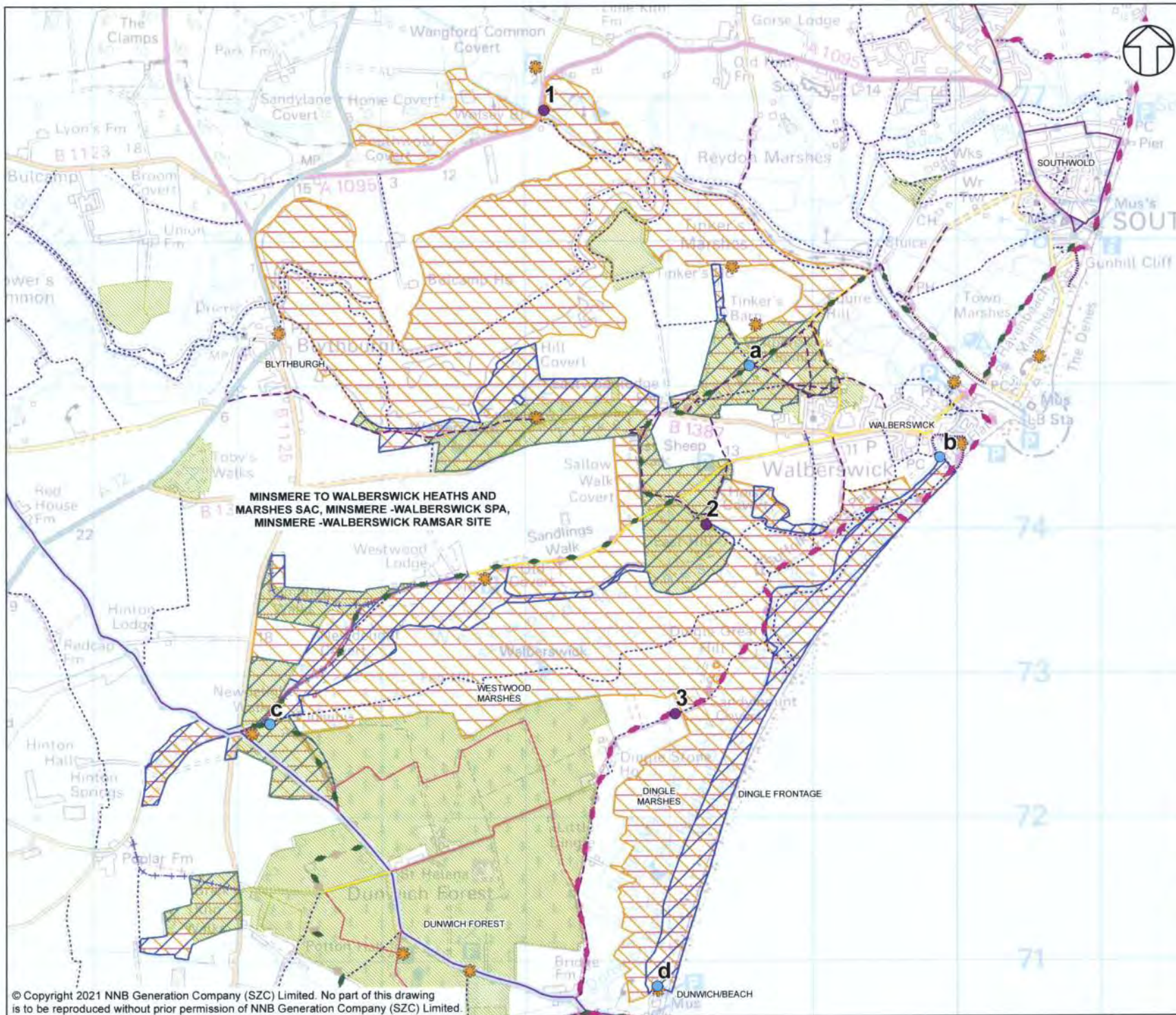
DOCUMENT:
SIZEWELL C
MONITORING AND MITIGATION PLAN FOR
MINSMERE – WALBERSWICK AND SANDLINGS
(NORTH)

DRAWING TITLE:
FIGURE 1:
LOCATION PLAN

DRAWING NO:
6839_SK_116

DATE: AUG 2021 DRAWN: V.W. SCALE: 1:75,000 @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

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

NOT PROTECTIVELY MARKED

COPYRIGHT
Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2019). All Rights reserved. NB GeoCo 010069408
© Natural England material is reproduced with the permission of Natural England 2019. National Cycle Route data supplied by Sustrans and contains Ordnance Survey data © Crown copyright and database right (2019). Choose Suffolk, Suffolk County Council and Suffolk Coastal District Council. PROW data sourced from Suffolk CC on 27/02/2019 under OGL v3.0 are an interpretation of the Definitive Map and Statement, not the Definitive Map itself, and should not be relied on for determining the position or alignment of any public right of way. The data contains Ordnance Survey data © Crown copyright and database right 2019. © National Trust

Doing the power of good for Britain

DOCUMENT
SIZEWELL C
MONITORING AND MITIGATION PLAN FOR
MINSMERE – WALBERSWICK AND SANDLINGS
(NORTH)

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

DRAWING NO.
6839_SK_108

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

SCALE BAR
0 0.2 0.4 0.6 0.8 1 KM



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

NOT PROTECTIVELY MARKED

COPYRIGHT

Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2019). All Rights reserved. NB GeoCo 010060408
© Natural England material is reproduced with the permission of Natural England 2019. National Cycle Route data supplied by Sustrans and contains Ordnance Survey data © Crown copyright and database right (2018). Choose Suffolk, Suffolk County Council and Suffolk Coastal District Council. PROW data sourced from Suffolk CC on 27/02/2019 under OGL v3.0 are an interpretation of the Definitive Map and Statement, not the Definitive Map itself, and should not be relied on for determining the position or alignment of any public right of way. The data contains Ordnance Survey data © Crown copyright and database right 2019. © National Trust.



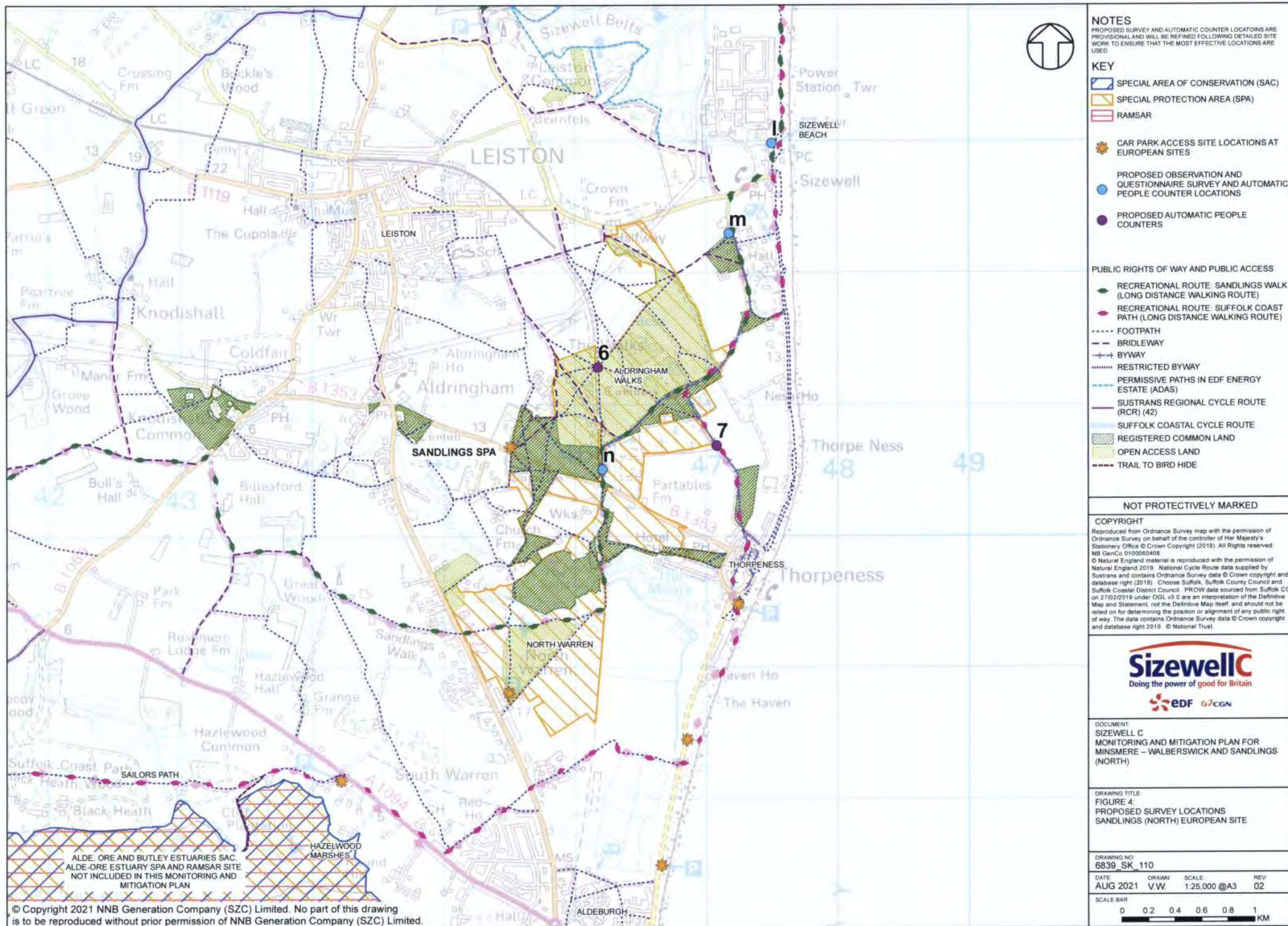
DOCUMENT
SIZEWELL C
MONITORING AND MITIGATION PLAN FOR
MINSTERE - WALBERSWICK AND SANDLINGS
(NORTH)

DRAWING TITLE
FIGURE 3:
PROPOSED SURVEY LOCATIONS
MINSTERE-WALBERSWICK EUROPEAN SITES
(SOUTH)

DRAWING NO.
6839 SK 109

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

SCALE BAR
0 0.2 0.4 0.6 0.8 1 KM



APPENDIX A: ALDHURST FARM ACCESS PROVISION



INTERNAL BUSINESS COLLABORATOR REFERENCE
NOT APPLICABLE FOR ALL FIGURES

Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office Crown Copyright (2014). All Rights reserved. NNB GenCo 0100050480

KEY

PROPOSED

- CAR PARKING SPACES
- PEDESTRIAN ACCESS POINT
- SURFACED PATH
- MOWN PATH
- FENCE

EXISTING

- LOWLAND HEATH MOSAIC
- INDICATIVE SCRUB, BROADLEAF AND CONIFEROUS WOODLAND PLANTING
- OPEN WATER
- HABITAT CREATION (WET REEDBED)
- HABITAT CREATION (DRY REEDBED)
- WATERCOURSE
- EXISTING TREES AND HEDGES
- PUBLIC RIGHT OF WAY
- FENCE

DOCUMENT:

ALDHURST FARM HABITAT CREATION SCHEME

DRAWING TITLE:

ACCESS AND RECREATION PROPOSAL - CONDITION 25

DRAWING NO: 6839_10005A

DATE: NOV 2020 **DRAWN:** MM **SCALE:** 1:3,500 **@A3**

SCALE BAR: 0 100M

DRAWING SECURITY CLASSIFICATION:

☐ PROTECTIVE MARKING REQUIRED

☒ NOT PROTECTIVELY MARKED

ANNEX V
MMP FOR SANDLINGS (CENTRAL) AND ALDE-ORE ESTUARY

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

DOCUMENT CONTROL

This document is stored and approved in the AECOM Online SharePoint system.

Author:	Name:	Date:
Reviewer(s):	Name:	Date:
Owner:	Name:	Date:

Revision history / Record of comments

Revision	Amendment	By	Date
Revision *		*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.
Revision *	*	*	Click or tap to enter a date.

CONTENTS

1	INTRODUCTION.....	1
2	SCOPE: SENSITIVE SPECIES AND HABITATS	5
3	GOVERNANCE.....	6
3.1	Deed of Obligation	6
3.2	Ecology Working Group	7
3.3	Environment Review Group	8
4	MONITORING.....	10
4.1	Introduction	10
4.2	Survey Method	11
4.3	Use of Trigger Levels	16
4.4	Recording Signs of Human Disturbance	17
4.5	Survey Programme	17
5	MITIGATION MEASURES	20
5.1	Introduction	20
5.2	Mitigation Measures	21
5.3	Monitoring Resources	26
5.4	Warden Resources (if required)	27
	REFERENCES.....	29

TABLES

Table 4.1: Visitor Survey Locations.....	12
Table 4.2: Proposed Monitoring In Relation To Vegetated Shingle Forming Part Of Ramsar Criterion 2 Of The Alde-Ore Estuary Ramsar Site.....	14
Table 5.1 Potential Mitigation Measures	23

FIGURES

Figure 1: Proposed Survey Locations

APPENDICES

APPENDIX A: ALDHURST FARM ACCESS PROVISION.....	31
---	----

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 (AEol) of the sites does not arise as a consequence of this effect pathway.
- 1.1.2 The three sites within the scope of this monitoring and mitigation plan (referred to collectively in this monitoring and mitigation plan as the “European sites”) are (see **Figure 1**):
- Alde–Ore Estuary Special Protection Area (SPA).
 - Alde–Ore Estuary Ramsar site.
 - Sandlings SPA (the area comprising Tunstall Forest and Snape Warren, referred to as Sandlings (Central) in this monitoring and mitigation plan).
- 1.1.3 This plan is named the **‘MMP for Sandlings (Central) and Alde-Ore Estuary’** (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

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.¹ See <https://cieem.net/brexit-changes-to-the-habitats-regulations/>

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 **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 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 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:

- reviewing the monitoring undertaken in accordance with this plan; and
- 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 4.3** 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:

- 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;
- 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;
- 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;

- report to the Environment Review Group on the approved expenditure from the European Sites Access Contingency Fund and the effectiveness of such expenditure; and
- 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:

- 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
- 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
- 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:

- 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;
- provide guidance to the Ecology Working Group on any issues that are referred to it; and
- 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.

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

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

4.2 Survey Method

a) Observation and Questionnaire Surveys

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

- 4.2.7 Methods for data collection will be standardised and designed to be readily repeatable to allow changes and trends to be identified and permit valid comparison from one survey period to the next. Survey methods will be reviewed by the Ecology Working Group and adjusted at the Group's direction if necessary from time to time to enhance their effectiveness.

b) Automatic Counters

- 4.2.8 'Automatic counters' will be used at paths and entry points at the locations shown on **Figure 1** and listed in **Table 4.1**. These will record use 24 hours a day and 365 days a year, and provide accurate information on levels of use.

- 4.2.9 The survey locations will be subject to minor location refinement on site to ensure most effective locations are used.

Table 4.1: Visitor Survey Locations

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

c) Ecological Surveys

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

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

- 4.2.11 The **Shadow HRA Report** concludes that the habitat that may be affected by an increase in recreational pressure on the Alde–Ore Estuary Ramsar site is vegetated shingle (Ramsar criterion 2). Baseline habitat monitoring, focussed on this particular habitat that forms part of Ramsar criterion 2, is proposed. This proposed monitoring is summarised in **Table 4.2**.
- 4.2.12 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..

NOT PROTECTIVELY MARKED

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.

NOT PROTECTIVELY MARKED

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.

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 **Table 5.1**.
- 4.3.4 The identification / agreement of further trigger levels needs to reflect a combination of factors, including:
- whether the net increase or changes in behaviour and pattern of use relates solely or primarily to the Sizewell C Project, or if the Sizewell C Project is making a significant contribution to the increase or change, in combination with one or more other factors. This will be based on recorded survey observations and discussions with visitors, in combination with the observation, questionnaire and habitat surveys.
 - whether the increase in net use or changes in behaviour and pattern of use is likely to be temporary or prolonged and is likely to be or is considered detrimental.
 - the time of year, whether in or outside the breeding and non-breeding season for birds.
 - the types of users, e.g. off road/night time cyclists, dogs quartering land where birds are nesting, roosting or feeding, unauthorised campers, walkers.

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

4.4 Recording Signs of Human Disturbance

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

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

4.5 Survey Programme

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

a) Visitor Surveys Programme

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

- Pre-construction initial monitoring of the current situation.
- 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.

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

5 MITIGATION MEASURES

5.1 Introduction

- 5.1.1 As explained in **Section 1**, no initial mitigation measures are deemed necessary in order to reach a conclusion of no AEoI for the European sites covered by this monitoring and mitigation plan. The need for mitigation measures will be monitored through the observation and questionnaire surveys and automatic people and vehicle counters. The survey results will be reviewed by the Ecology Working Group and the arrangements defined for identifying and delivering mitigation measures 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 **Table 5.1** 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 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.

5.1.6 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.

5.1.7 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 **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(l)).
- 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**).

5.2.2 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 **Table 5.1** 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.

- 5.2.3 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 5.4) 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 promote alternative locations to visitors. 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. 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.	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh.	European Sites Access Contingency Fund
Signage to educate visitors re importance of vegetated shingle and nesting birds and requesting avoidance	Tunstall Forest and Snape Warren.	European Sites Access Contingency Fund

Mitigation Measure	Location	How funded / secured
	Beach frontage south of Aldeburgh.	
Signage to educate visitors re fire risk and request no BBQs/fires, care with cigarettes etc.	Tunstall Forest and Snape Warren.	European Sites Access Contingency Fund
Signage to educate visitors and request that waste is taken home as appropriate to the protocol in place at the given site.	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh.	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.	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh.	European Sites Access Contingency Fund
Leaflets on sites and at public buildings	Upper Alde-Ore (e.g. Snape, Iken).	European Sites Access Contingency Fund

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

Mitigation Measure	Location	How funded / secured
	sites to be defined. Local vets, pet shops, dog groomers, dog training clubs.	
Measures to paths and access		
Adaption of access routes to guide appropriate uses (surfacing, barriers, signage)	Upper Alde-Ore (e.g. Snape, Iken). Tunstall Forest and Snape Warren. Beach frontage south of Aldeburgh.	European Sites Access Contingency Fund

- 5.2.4 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 **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:

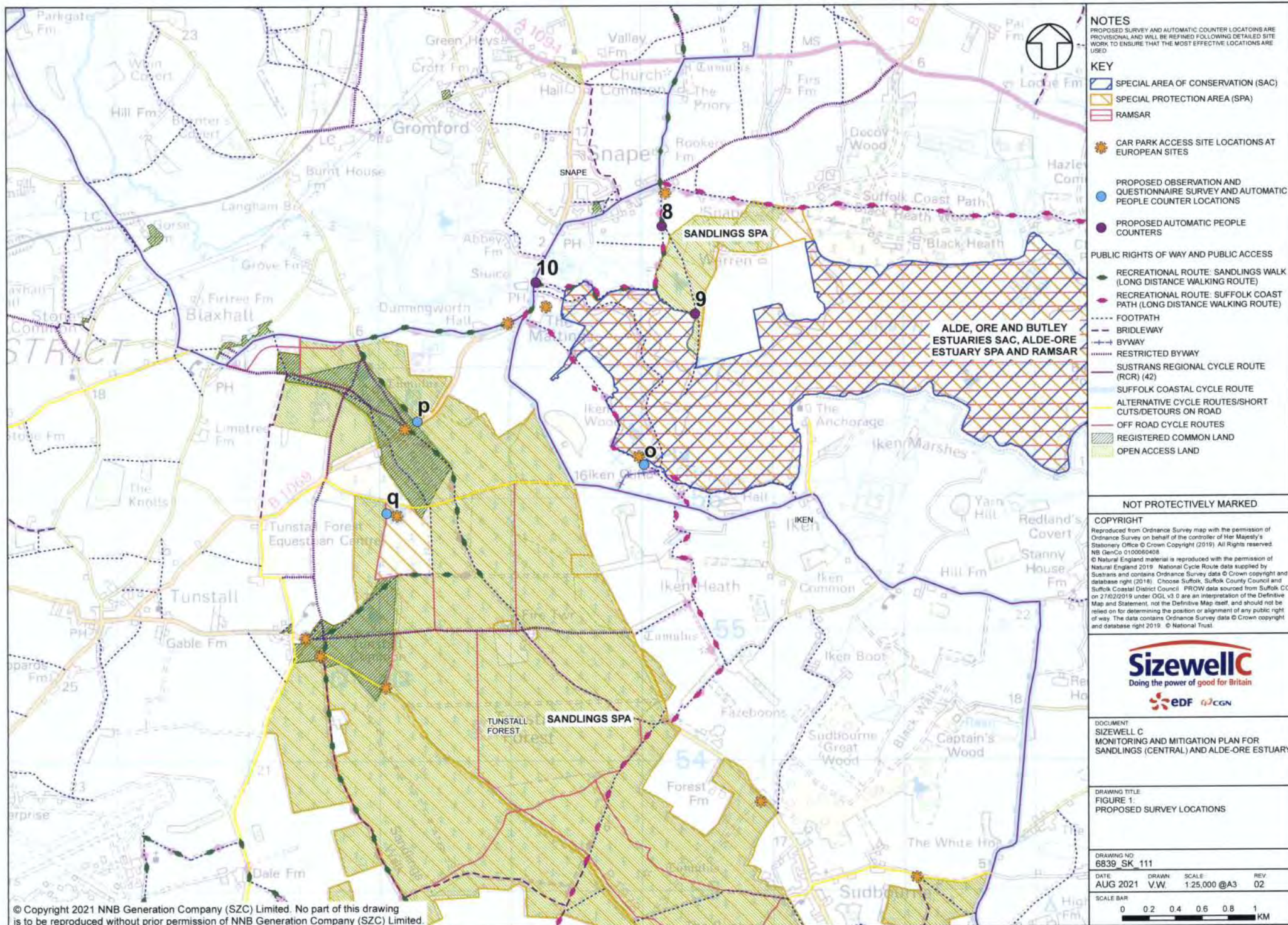
- Leading survey and monitoring work (visitor surveys and ecological monitoring).
- Observing and recording visitor levels and behaviour, and species and habitats, all year round, including between the main visitor and ecological survey and monitoring periods.
- Attendance at Environment Review Group 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]

FIGURES



APPENDIX A: ALDHURST FARM ACCESS PROVISION



INTERNAL BUSINESS COLLABORATOR REFERENCE
NOT APPLICABLE FOR ALL FIGURES

Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office Crown Copyright (2014). All Rights reserved. NNB GenCo 0100050480

KEY

PROPOSED

- CAR PARKING SPACES
- PEDESTRIAN ACCESS POINT
- SURFACED PATH
- MOWN PATH
- FENCE

EXISTING

- LOWLAND HEATH MOSAIC
- INDICATIVE SCRUB, BROADLEAF AND CONIFEROUS WOODLAND PLANTING
- OPEN WATER
- HABITAT CREATION (WET REEDBED)
- HABITAT CREATION (DRY REEDBED)
- WATERCOURSE
- EXISTING TREES AND HEDGES
- PUBLIC RIGHT OF WAY
- FENCE

DOCUMENT

ALDHURST FARM HABITAT CREATION SCHEME

DRAWING TITLE:

ACCESS AND RECREATION PROPOSAL - CONDITION 25

DRAWING NO: 6839_10005A

DATE: NOV 2020 **DRAWN:** MM **SCALE:** 1:3,500 **@A3**

SCALE BAR: 0 100M

DRAWING SECURITY CLASSIFICATION:

☐ PROTECTIVE MARKING REQUIRED

☒ NOT PROTECTIVELY MARKED

ANNEX W
NOISE MITIGATION SCHEME

CONTENTS

1.	NOISE MITIGATION SCHEME	1
1.1	Introduction	1
1.2	Refreshed Noise Assessments and Property Referencing	3
1.3	Process for Insulating Properties	4
1.4	Process for Temporary Rehousing	8
1.5	Review of eligible properties	12
1.6	Eligibility Criteria	13
1.7	Construction Noise Thresholds	17
1.8	Exceptional Circumstances	19
1.9	Glossary	22

TABLES

Table 1.1	Criteria for eligibility for insulation	13
Table 1.2	Criteria for eligibility for temporary rehousing	16
Table 1.3	Construction noise insulation trigger values for Associated Development sites...	17

PLATES

None provided.

FIGURES

None provided.

1. NOISE MITIGATION SCHEME

1.1 Introduction

- 1.1.1 This document sets out the **Noise Mitigation Scheme** that SZC Co. must implement and apply in respect of the construction and operation of the SZC Project. The **Noise Mitigation Scheme** applies to all aspects of the project, including the construction and operation of the main development site and all Associated Development sites, to existing roads and to the East Suffolk line between Westerfield Junction and the junction with the Saxmundham to Leiston branch line.
- 1.1.2 It has been informed by the outcome of the noise assessments undertaken as reported in the **Environmental Statement** [APP-159 to APP-582] and **Environmental Statement Addendums** (AS-179 to AS-292; REP5-062 to REP5-069; [REP6-017](#); REP7-030 to REP7-033 and Doc Ref. 6.19) for the main development site and the associated development sites and it includes mitigation for road, rail and construction noise, as well as operational noise. It also covers vibration effects.
- 1.1.3 The application documents identify a range of measures that will contribute to limiting and mitigating noise and vibration effects – particularly the controls over the construction process set out in the **Code of Construction Practice** (Doc Ref. 8.11(E)) (secured by Requirement 2 of the dDCO) and, for instance, the limits on HGV movements set out in the **Construction Traffic Management Plan** (Annex K of the DoO Doc Ref. 8.17(G)) (secured by Schedule 16 of the Deed of Obligation) or rail movements set out in the **Rail Noise Mitigation Plan** (Doc Ref. 6.14 9.3.E(A)) (secured by Requirement 25 of the dDCO). This document does not duplicate those controls, instead it is concerned with the criteria that are to be applied in determining whether properties affected by the residual noise and vibration effects of the project qualify for an offer of insulation or an offer of temporary rehousing.
- 1.1.4 This **Noise Mitigation Scheme** complements and is separate from the SZC Property Price Support Scheme (PPSS) which is a scheme originally launched by SZC Co. in November 2019 and then relaunched in October 2020. The PPSS offers to make up the difference in value for properties sold within defined areas close to the DCO application boundary, based on the difference between the with and without Sizewell C valuations.
- 1.1.5 SZC Co. must provide a telephone helpline service during the Construction Period (as defined in the **Deed of Obligation** (Doc Ref. 8.17(G))) to assist the public and owners who have been contacted by SZC Co. in accordance

with the **Noise Mitigation Scheme** with any queries they have in respect of the processes set out in Sections 1.2 to 1.8 of this document.

- 1.1.6 Wherever in this document, a plan or assessment is submitted to East Suffolk Council (ESC) for its approval in relation to all aspects of this **Noise Mitigation Scheme** except road traffic noise, or to Suffolk County Council (SCC) in respect of road traffic noise matters only, ESC and SCC shall act reasonably, promptly and in accordance with Schedule 12 of the **Deed of Obligation** (Doc Ref. 8.17(G)). Where ESC or SCC do not approve the submitted document, plan or assessment within the time period set out in Schedule 12 of the **Deed of Obligation** (Doc Ref. 8.17(G)), deemed approval shall not apply but the obligations on SZC Co. in respect of paragraph 1.3.21 of this **Noise Mitigation Scheme** shall not apply.
- 1.1.7 Level 1 control documents will either be certified under the **DCO** at grant or annexed to the **Deed of Obligation** (Doc Ref. 8.17(G)). 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 **Deed of Obligation** set out the status of each Level 1 document.
- 1.1.8 This **Noise Mitigation Scheme** is a Level 1 compliance document that is secured by Schedule 12 of the **Deed of Obligation**.
- 1.1.9 Where further documents or details require approval, this document states which body or governance group is responsible for the approval and/or must be consulted. Any approvals by ESC or SCC will be carried out in accordance with the procedure in Schedule 12 of the **Deed of Obligation**. The **Deed of Obligation** 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.
- 1.1.10 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 described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(B)).

- 1.1.11 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 **draft DCO** (Doc Ref. 3.1(l))), its appointed representatives and the appointed construction contractors.

1.2 Refreshed Noise Assessments and Property Referencing

- 1.2.1 This section of the **Noise Mitigation Scheme** sets out the process that SZC Co. must follow in carrying out the refreshed noise assessments needed to determine which properties will be eligible for insulation or temporary rehousing and in referencing such properties. In implementing this **Noise Mitigation Scheme**, SZC Co. must undertake the following steps unless otherwise stated in Schedule 12 of the Deed of Obligation:

Stage 1: Refreshed noise assessment(s)

- 1.2.2 Whilst the Environmental Statement and Environmental Statement Addendums assess the likely significant noise and vibration effects of the project, SZC Co. must base noise insulation and temporary housing offers on refreshed noise assessments carried out post-Examination. These refreshed noise assessments will benefit from and take account of the detailed construction working methods for the Project to be developed with relevant contractors, so far as these are available at the time of the assessment. This will enable SZC Co. to identify eligible properties with more accurately-modelled noise or vibration levels. SZC Co must carry out each of these refreshed noise assessments in advance of the start of the relevant noise generating activity.
- 1.2.3 SZC Co. must submit a phasing plan setting out details of the proposed phases for the completion of the refreshed noise assessments to ESC in respect to all matters except road traffic noise or to SCC in respect of road traffic noise only for their approval. It is anticipated that the refreshed noise assessments will be provided in phases broadly matching the order in which those elements of the SZC project are expected to give rise to eligibility for noise insulation or temporary rehousing under this **Noise Mitigation Scheme**.
- 1.2.4 SZC Co. must include any Listed Buildings which have been identified as likely to be eligible for noise insulation through the assessments in the Environmental Statement and Environmental Statement Addendums in the first phase of the refreshed noise assessments. This will maximise the amount of time available to obtain any necessary Listed Building Consent and/or Planning Permission.

1.2.5 SZC Co. must undertake the refreshed noise assessments in accordance with the approved phasing plan and in a manner consistent with the submitted noise assessments. Reports on each refreshed noise assessment must be submitted to ESC in respect of all aspects of this **Noise Mitigation Scheme** except for road traffic noise or to SCC in respect of road traffic noise only for their approval. These reports must identify which Properties meet the criteria for insulation or temporary rehousing (as set out in Sections 1.3 and 1.4 of this **Noise Mitigation Scheme**) and at what stage in the construction programme this is expected to arise.

1.2.6 No Property where Insulation has been provided by SZC Co. will be eligible for a further offer in respect of Insulation under this **Noise Mitigation Scheme**, except in exceptional circumstances where a review undertaken under Section 1.5 demonstrates that the installed mitigation is insufficient to meet the purposes of this **Noise Mitigation Scheme**.

Stage 2: Property referencing

1.2.7 Following the identification of eligible properties as part of each refreshed noise assessment, SZC Co. must carry out a referencing exercise to identify Property Owners and Occupiers and to ascertain the contact details for each, as they may differ.

1.3 Process for Insulating Properties

1.3.1 This section of the **Noise Mitigation Scheme** sets out the steps that SZC Co. must follow to determine which Properties will be eligible for Insulation.

Stage 3A: Property identification

1.3.2 SZC Co. must issue the Owners of eligible Properties with an application pack which must include a scheme booklet, application form and process flow diagram to allow them an opportunity to apply to the scheme.

1.3.3 Where SZC Co. receives an application in accordance with the application pack, SZC Co. must review this. Provided that this review confirms the potential eligibility of the Property for insulation, the Owner of the Property must be offered the opportunity to participate in the scheme via a formal letter (the 'Provisional Offer Letter'). The Provisional Offer Letter must confirm eligibility to participate in the scheme, with such eligibility and the scope and specification of any insulation works to be subject to survey. The Provisional Offer Letter must also highlight the Property Owner's responsibilities in relation to relevant consents, remedial building works etc. The Provisional Offer Letter must also state that the eligibility of any Listed Buildings will be subject to further assessment.

- 1.3.4 The Provisional Offer Letter will be conditional on the Owner of the Property confirming that they wish to proceed in principle and agreeing to allow survey access to their Property by the scheme's appointed building surveyors, so that a specification to achieve an appropriate level of Insulation can be assessed and agreed¹. The Owner of the Property will be required to sign and return a copy of the Provisional Offer Letter within a period of 28 days of the date of the Provisional Offer Letter.
- 1.3.5 If the Owner of the eligible Property declines the Provisional Offer Letter or does not provide its written acceptance to SZC Co. in accordance with any notification requirements contained in the Provisional Offer Letter, there will be no further obligation on SZC Co. in respect of that Property in connection with this **Noise Mitigation Scheme**, including in respect of paragraph 1.3.21. However, the Provisional Offer Letter will remain valid until the end of the Construction Period (as defined in the **Deed of Obligation** (Doc Ref. 8.17(G))), providing that there remains an occasion before the end of the Construction Period on which the noise that results in eligibility is anticipated to arise.
- 1.3.6 Where an eligible Property whose Owner has declined the Provisional Offer is sold or otherwise changes ownership, SZC Co. may remake the Provisional Offer to the new Owner but the obligations on SZC Co. in respect of paragraph 1.3.21 of this **Noise Mitigation Scheme** will not apply.

Stage 4A: Survey of the affected Property

- 1.3.7 Following receipt of written acceptance of the Provisional Offer Letter, SZC Co. must procure that the appointed building surveyors visit the Property and, subject to access being granted, carry out a survey to assess the suitability of the Property for Insulation and to understand the work involved. The Provisional Offer Letter must include details of the proposed timing of the survey and any consequential findings or specifications, as may be appropriate.
- 1.3.8 The surveyor must be instructed by SZC Co. to determine whether noise insulation can be practically installed and that the survey must also consider issues such as: whether the Property is a Listed Building, and therefore likely to require Listed Building Consent; what other works are likely to be required

¹ For the purposes of the Noise Mitigation Scheme, SZC Co. must appoint a bank of surveyors to carry out surveys, advise on relevant specifications of works etc.. Any surveyors appointed for these purposes must be qualified members of an appropriate professional organisation and must be drawn from a list of suitable firms agreed with East Suffolk Council and Suffolk County Council.

at the Property, for example remedial lintels or other structural supports; and any issues regarding access around the Property.

- 1.3.9 The surveyor must provide SZC Co. with the findings of the survey for review. Where it is considered that noise insulation can be practically installed at the Property, and where the Property does not already have glazing and/or ventilation that meets the Proposed Specification set out in paragraph 1.3.11, SZC Co. must formulate the Proposed Specification in respect of the Property.
- 1.3.10 Where the Property is a Listed Building, SZC Co. must instruct the surveyor to gather relevant additional information, where it is reasonably practicable to do so, to inform the draft scope of works (i.e. the Proposed Specification) in respect of the Property.
- 1.3.11 In all cases except where a Property is eligible for ventilation only (see section 1.6 for eligibility criteria) and unless otherwise agreed with the Property owner, this Proposed Specification must include, but not necessarily be limited to, a glazing system with a sound reduction performance of at least 35dB R_w and if appropriate in the opinion of the surveyor (acting reasonably), a ventilation system that complies with Approved Document F issued in respect of the Building Regulations 2010. For those Properties eligible for ventilation only as a result of a lower level of rail noise (see section 1.6 for eligibility criteria), the Proposed Specification must include a suitable ventilation system that complies with Approved Document F issued in respect of the Building Regulations 2010. In all cases, other measures may form part of the Proposed Specification, where the surveyor advises that such measures would be appropriate, practical and beneficial to noise levels at the Property.
- 1.3.12 Where the Property is a Listed Building, SZC Co. may inform the Owner that further information or supporting documents are required to develop the Proposed Specification.
- 1.3.13 The surveyor must act reasonably at all times and in accordance with the requirements of their professional body. All relevant records pertaining to the survey must be retained for audit purposes and made available for review if required by a written request from ESC or SCC to SZC Co.
- 1.3.14 SZC Co. must provide the Owner of the Property with: the Proposed Specification and a list of approved installers to carry out the Proposed Specification.
- 1.3.15 The Owner will be entitled, at their discretion, to accept or decline the Proposed Specification, in whole or in part, and SZC Co. will be under no

obligation in respect of those declined elements for that Property in connection with this **Noise Mitigation Scheme**, including in respect of paragraph 1.3.21.

- 1.3.16 The Owner of the Property will be required to seek at least two quotations from approved installers for the Proposed Specification and will be required to provide copies of these to SZC Co. within four weeks of receipt of the Proposed Specification from SZC Co. SZC Co. must select one of the quotations provided by the Owner of the Property, unless SZC Co. agrees otherwise with the Owner of the Property.
- 1.3.17 If the Owner of the eligible Property does not provide copies of these quotations within the four week period, the obligations on SZC Co. in paragraph 1.3.21 of this **Noise Mitigation Scheme** will not apply but the eligible Property will remain eligible and the quotations may be provided by the Owner at a later date providing that date is within the Construction Period (as defined in the **Deed of Obligation** (Doc Ref. 8.17(G))).

Stage 5A: Confirmation of offer and approved supplier

- 1.3.18 SZC Co. must review the quotations received from the Owner to confirm that these relate only to the Proposed Specification. Following this review, SZC Co. must confirm the sum that it will provide to deliver the Proposed Specification. SZC Co. will not provide funding towards any cosmetic or aesthetic enhancements or remedial works required in respect of existing structural defects at the Property or any other works requested by the Owner to be carried out in addition to the Proposed Specification.
- 1.3.19 SZC Co. must provide the Owner with a scheme agreement containing confirmation of the works to be undertaken (a "**Scheme Agreement**"). The Scheme Agreement must set out the Owner's responsibilities in respect of the works, including:
- obtaining any necessary consents such as: planning permission, Listed Building Consent, building regulations approval or obtaining a FENSA certificate etc; and
 - arranging for any remedial works in respect of existing structural defects that may be required.
- 1.3.20 SZC Co. will not make applications for Listed Building Consent or planning permission on behalf of Owners with but must offer Owners reasonable support and assistance upon request. The form of the assistance provided by SZC Co. may vary, but is likely to include identification of documentation to support applications for planning permission or listed building consents,

pro forma examples of completed applications, and liaison with the relevant authorities. SZC Co. must meet all reasonable costs in respect of making an application for listed building consent or planning permission, which must be agreed by SZC Co. in advance.

- 1.3.21 SZC Co. must not commence the phase of the construction works identified in the relevant refreshed noise assessment as giving rise to the eligibility for noise insulation until three months after the date of SZC Co. providing the Scheme Agreement to the Owner. There will be no obligation on SZC Co. in respect of the timing of the construction works, including the running of trains, where an offer is made for ventilation only to Properties eligible for ventilation only as a result of a lower level of rail noise (see section 1.6 for eligibility criteria) but the ventilation works will be undertaken expeditiously.

Stage 6A: Implementation, sign-off and payment

- 1.3.22 Within 14 days of receipt of the signed Scheme Agreement from the Owner, SZC Co. must confirm to the Owner that the Owner can instruct the installer to carry out the works. The date of the works will be a matter to be agreed between Owner and installer.
- 1.3.23 The financial responsibility for the funding for all works covered by the Scheme Agreement will remain with SZC Co. and the Owner will not be liable for any costs associated with the works covered by the Scheme Agreement.
- 1.3.24 Responsibility for obtaining and complying with any necessary consents in respect of the works will remain with the Owner, unless the owner has agreed with the installer that the installer will have responsibility. The Owner will also remain responsible for the rectification of building defects revealed, and for costs in relation to asbestos.

1.4 Process for Temporary Rehousing

- 1.4.1 Where the approved refreshed noise assessment identifies that Occupiers of a Property are considered likely to be eligible for temporary rehousing, the following steps shall apply.

Stage 3B: Issuance of Provisional Temporary Rehousing Offer Letter

- 1.4.2 SZC Co. must contact the Occupiers of any identified Property at least three months before the activity giving rise to the eligibility is due to take place.
- 1.4.3 SZC Co. must issue the Occupiers of Properties eligible for temporary rehousing with an application pack, which must include a scheme booklet,

application form and process flow diagram to allow them an opportunity to apply to the scheme.

1.4.4 The scheme booklet must confirm that an offer of temporary rehousing will include the following:

- Temporary alternative accommodation.
- Removals.
- Storage and insurance of personal effects.
- Insurance for the vacated house.
- Placing pets into kennels, catteries etc.
- Where agreed between Occupier and SZC Co., the disconnection and later reconnection of gas, water, electricity etc.

1.4.5 The scheme booklet must confirm that, alternatively, the Occupier can choose to make these arrangements themselves. In such circumstances, the Occupier must be supplied by SZC Co. with information and guidance on all the matters listed above, to enable them to make the arrangements themselves; the Occupier must be offered help so that incurred reasonable costs can be agreed between the Occupier and SZC Co. and then paid by SZC Co. as soon as practicable. The information and guidance provided by SZC Co. will be governed by what is available at the time and the Occupier's reasonable requirements.

1.4.6 The application form will be conditional on the Occupier of the Property confirming that they wish to proceed in principle.

1.4.7 Where the temporary rehousing offer is accepted in accordance with the terms of the application form, which will require the Occupier to confirm whether it wishes to proceed in principle within 28 days of the receipt of the scheme booklet and will require the Occupier to confirm whether it wishes to make the temporary rehousing arrangements itself, SZC Co. must issue a Temporary Rehousing Offer to the Occupier.

1.4.8 In the event that the Occupier does not submit the application within 28 days of the receipt of the scheme booklet, the offer for temporary rehousing will remain available for acceptance but there will be no obligation upon SZC Co. not to commence the works anticipated to give rise to the eligibility until temporary rehousing has been provided.

Stage 4B: Terms of the Temporary Rehousing Offer

- 1.4.9 The Temporary Rehousing Offer made by SZC Co. must include the terms of the offer of temporary rehousing for the Occupier of the Property.
- 1.4.10 The provision of or payment in respect of temporary rehousing by SZC Co. will be conditional upon the Occupier's written acceptance of the Temporary Rehousing Offer and provision of the same to SZC Co. The Temporary Rehousing Offer must set out the date by which the offer must be accepted.
- 1.4.11 Irrespective of whether SZC Co. or the Occupier is to make the temporary rehousing arrangements, SZC Co. must bear (or reimburse) the reasonable costs associated with the temporary rehousing. SZC Co. must also bear any increased costs of maintaining or insuring the affected Property resulting from the temporary relocation. These include any additional council tax liability which is due on the Property whilst it is unoccupied.
- 1.4.12 If there are pre-existing obligations to maintain the Property on a regular basis under the terms of any lease or as a result of statutory requirements, with due regard to any relevant health and safety considerations SZC Co. must ensure that suitable access is maintained to the affected Property so that such obligations can be maintained during the period of temporary rehousing.
- 1.4.13 However, the acceptance of any offer of temporary re-housing is discretionary. The Occupier does not have to move if they do not wish to, but if the Occupier does decide to stay, compensation for disruption due to the noise of the works cannot be claimed.
- 1.4.14 If the Occupier is a tenant and is offered temporary rehousing during the construction works, the Occupier will still be responsible for the rent, bills and other outgoings at the affected Property and will remain a tenant. The offer of temporary rehousing must include the additional cost of the relocation accommodation. The Occupier will be free to visit and use the affected Property as they wish during the relocation, subject to the terms of their existing tenancy. If the tenancy agreement expires during the relocation, the Occupier should renew it with their landlord in the normal way, if they wish to. If the Occupier chooses not to renew their tenancy, any grants to meet the cost of the alternative accommodation will cease when the tenancy expires.
- 1.4.15 For the landlord, the tenant will remain the tenant and remain liable to pay rent in accordance with the landlord's agreement with them.

- 1.4.16 The type of rehousing offered will depend on the duration of the relocation. For short durations hotel accommodation may be appropriate. For longer periods, alternative rented accommodation will be more suitable. In all cases account must be taken of the Occupier's existing accommodation as far as possible.
- 1.4.17 The accommodation offered will be governed by what is available at the time and the Occupier's reasonable requirements. Some Occupiers may be prepared to move to another area on a temporary basis if they would be nearer friends, family or work. Other Occupiers may need to stay in the same area. Each application and Provisional Temporary Rehousing Offer Letter must be based on the individual criteria of the applicant Occupier.
- 1.4.18 A Property may be eligible to receive both Insulation and temporary rehousing, but this will depend on the circumstances. The noise generated by the works will vary over the course of the project. In some areas, the noise may give rise to eligibility for temporary rehousing for one phase of construction, and Insulation only for a different phase. In these circumstances a temporary rehousing offer may be made during works in one phase and a Insulation offer for the other phase. In other areas, a Property may qualify for temporary rehousing for a given period, but outside that period the noise may not trigger a separate offer for Insulation. In such a case, a temporary rehousing offer only will be made and Insulation will not be offered.
- 1.4.19 Where a Property qualifies for temporary rehousing but not Insulation, the Occupier may at its discretion request Insulation to be provided instead. In such circumstances, SZC Co. must make clear the shortfall in sound insulation performance of the Insulation in relation to the thresholds presented in Table 1. and that the degree of disturbance could be high even with the Insulation in place.
- 1.4.20 Any Occupier that fails to complete the application form in time or declines an offer of temporary rehousing may request reconsideration in the event that the works progress and they change their mind as a result. While SZC Co. will not be obliged to make the offer again, SZC Co. must review the circumstances and at its discretion may reconfirm the offer. SZC Co. must take into account the performance of any Insulation provided in place of temporary rehousing in considering any later request.
- 1.4.21 Any declined offer of Insulation in respect of a Property will not affect eligibility for rehousing in respect of that Property.

-
- 1.5 Review of eligible properties
- 1.5.1 SZC Co. may at its discretion decide to review the list of eligible Properties at any time in response to changes to the construction methods or programme or to the receipt of monitoring information. This review may consider a group of Properties or a specific Property.
- 1.5.2 During the construction period, ESC or SCC may (acting reasonably) request SZC Co. to carry out a review considering a specific Property or group of Properties in response to changes to the construction methods or programme or on the receipt of monitoring information or as a result of a complaint. SZC Co. must comply with any such request.
- 1.5.3 Where a review identifies Properties as eligible for insulation or temporary rehousing in accordance with the criteria which were not previously identified in the relevant refreshed noise assessment, SZC Co. must carry out the process in Section 1.3 as quickly as practicable. However, SZC Co. may commence or continue any construction works identified as giving rise to the eligibility at any time and the development authorised by the DCO will not be delayed pending full implementation of the noise insulation works or temporary rehousing.
- 1.5.4 Should any review identify that a Property previously eligible for Insulation is no longer eligible, any installed insulation works will remain in-situ and any insulation works that are commenced must be completed as if the Property remained eligible. Any offer in respect of insulation works that have not yet been commenced will be automatically withdrawn.
- 1.5.5 Should any review identify that a Property previously eligible for temporary rehousing is no longer eligible, any temporary rehousing which has already commenced will be unaffected, subject to SZC Co.'s ability in such a case to terminate the temporary rehousing with one month's notice. Any offer in respect of temporary rehousing that has not yet commenced will be automatically withdrawn.
- 1.5.6 No Property where Insulation has been provided by SZC Co. will be eligible for a further offer in respect of Insulation under this **Noise Mitigation Scheme**.

1.6 Eligibility Criteria

1.6.1 The criteria for eligibility for Insulation are set out in **Table 1.1**.

Table 1.1 Criteria for eligibility for insulation

Category	Eligibility
Insulation for road traffic noise	<p>A Property within 300m of a new or altered highway will be eligible for an offer of insulation where the Property is predicted to experience all of the following, when measured 1m from the external façade of any Eligible Room:</p> <ul style="list-style-type: none"> (a) the Future (Road) Noise Levels exceed façade noise levels of 68dB $L_{A10,18hrs}$ during the hours of 06:00 to 24:00 or 58dB $L_{Aeq,8hrs}$ during the hours of 23:00 to 07:00; (b) the Future (Road) Noise Levels are at least 1dB higher than the Existing (Road) Noise Levels as a result of the use of the new or amended road associated with the Development; and (c) the contribution from the use of the new or amended road associated with the Development to the Future (Road) Noise Levels at the façade is at least 1dB. <p>A Property within 300m of an existing road or highway will be eligible for an offer of insulation where the Property is predicted to experience all of the following, when measured 1m from the external façade of any Eligible Room:</p> <ul style="list-style-type: none"> (a) the Future (Road) Noise Levels exceed façade noise levels of 68dB $L_{A10,18hrs}$ during the hours of 06:00 to 24:00 or 58dB $L_{Aeq,8hrs}$ during the hours of 23:00 to 07:00; (b) the Future (Road) Noise Levels are at least 3dB higher than the Existing (Road) Noise Levels as a result of the use of existing roads; and (c) the contribution from the use of existing roads to the Future (Road) Noise Levels at the façade is at least 3dB.

Category	Eligibility
Insulation for rail noise	<p>Eligibility will require one of the following two criteria (A or B) to be established, when measured 1m from the external façade of any Eligible Room:</p> <p>A. A Property will be eligible for an offer for noise insulation based on averaging rail noise over the day and night time periods, where:</p> <p>(a) the Future (Rail) Noise Levels exceed façade noise levels of 69dB $L_{Aeq,16hrs}$ during the hours of 07:00 to 23:00 or 58dB $L_{Aeq,8hrs}$ during the hours of 23:00 to 07:00; and</p> <p>(b) the Future (Rail) Noise Levels are at least 1dB higher than the Existing (Rail) Noise Levels as a result of the use of the new or amended railway line associated with the Development; and</p> <p>(c) the contribution from the use of new or amended railway line associated with the Development to the Future (Rail) Noise Levels at the façade is at least 1dB; or</p> <p>B. A Property will be eligible for an offer for noise insulation based on the maximum noise level created at night where the predicted maximum sound level as a result of the use of the new or amended railway line associated with the Development is L_{AFmax} 73dB or more between 23:00 and 07:00 hours.</p> <p>The same criteria must also apply to noise impacts from construction rail traffic on the existing East Suffolk line between Westerfield Junction and the junction between the East Suffolk line and the Saxmundham to Leiston branch line.</p>
Ventilation only for rail noise	<p>Eligibility will require the following criterion to be established, when measured 1m from the external façade of any Eligible Room:</p> <p>A. A Property will be eligible for an offer for ventilation only based on the maximum noise level created at night where the predicted maximum sound level as a</p>

Category	Eligibility
	<p>result of the use of the new or amended railway line associated with the Development exceeds L_{AFmax} 60dB and is below 73dB between 23:00 and 07:00 hours.</p> <p>The same criterion must also apply to noise impacts from construction rail traffic on the existing East Suffolk line between Westerfield Junction and the junction between the East Suffolk line and the Saxmundham to Leiston branch line.</p>
Insulation for construction noise	<p>A Property will be eligible for an offer of insulation where the Property is predicted to experience the following when measured 1m from the external façade of any Eligible Room:</p> <p>(1) a construction noise level which exceeds the higher of either (a) the noise insulation trigger levels set out in Table 1.3 for any Associated Development site or in Table 1.4 for the main development site for the corresponding times of the day; or (b) the existing Baseline Ambient Sound Level for the corresponding times of the day; and</p> <p>(2) an exceedance of (1) where: (a) the exceedance is predicted to occur on 10 or more days of working in any 15 consecutive days or on a total number of days exceeding 40 in any 6 consecutive months; or (b) where the exceedance occurs only on a Saturday or Sunday, it is predicted to occur on 2 weekends, or part thereof, in any 15 consecutive days or on 6 weekends, or part thereof, in any 6 consecutive months.</p>
Insulation for operational plant noise	<p>A Property will be eligible for an offer for insulation where the total noise from fixed plant or machinery associated with the use of the Development (including any Associated Development Site) exceeds any of the</p>

Category	Eligibility
	<p>following levels, when measured 1m from the external façade of any Eligible Room:</p> <p>(i) 63dB $L_{Aeq,16hrs}$ between 07:00 and 23:00 hours; or</p> <p>(ii) 58dB $L_{Aeq,8hrs}$ between 23:00 and 07:00 hours.</p>
Insulation for operational activity noise	<p>A Property will be eligible for an offer for insulation where the total noise from operational activities at an Associated Development Site excluding fixed plant or machinery exceeds any of the following levels, when measured 1m from the external façade of any Eligible Room:</p> <p>(1) (a) 63dB $L_{Aeq,16hrs}$ between 07:00 and 23:00 hours; or</p> <p>(b) 58dB $L_{Aeq,8hrs}$ between 23:00 and 07:00 hours; or</p> <p>(c) maximum sound level L_{AFmax} 70dB between 23:00 and 07:00 hours; and</p> <p>(2) any exceedance of the levels in (1):</p> <p>(a) is predicted to occur on 10 or more days of working in any 15 consecutive days or on a total number of days exceeding 40 in any 6 consecutive months; or</p> <p>(b) where the exceedance occurs only on a Saturday or Sunday, it is predicted to occur on 2 weekends, or part thereof, in any 15 consecutive days or on 6 weekends, or part thereof, in any 6 consecutive months.</p>

1.6.2 The criteria for eligibility for temporary rehousing are set out in **Table 1.2**.

Table 1.2 Criteria for eligibility for temporary rehousing

Category	Eligibility
Temporary rehousing for construction noise	<p>An occupier of a Property will be eligible for an offer of temporary rehousing where a Property is predicted to experience:</p> <p>(1) a construction noise level which exceeds the higher of either:</p> <p>(a) the temporary rehousing trigger levels set out in Table 1.5 for the corresponding times of the day; or</p>

Category	Eligibility
	<p>(b) the existing Baseline Ambient Sound Level by 10dB for the corresponding times of the day; and</p> <p>(2) an exceedance of (1):</p> <p>(a) that is predicted to occur on 10 or more days of working in any 15 consecutive days or on a total number of days exceeding 40 in any 6 consecutive months; or</p> <p>(b) where the exceedance occurs only on a Saturday or Sunday, it is predicted to occur on 2 weekends, or part thereof, in any 15 consecutive days or on 6 weekends, or part thereof, in any 6 consecutive months.</p>
Temporary rehousing for construction vibration	An occupier of a Property will be eligible for an offer of temporary rehousing where the Property is predicted to experience intermittent or continuous construction vibration of 10mm/s or more (peak particle velocity) on two or more consecutive days, or on any 40 days within a period of 6 consecutive months. Intermittent or continuous vibration have the meaning set out in Annex F of BS5228-2: 2009+A1: 2014.

1.7 Construction Noise Thresholds

- 1.7.1 SZC Co. must follow the guidance set out in British Standard 5228: Part 1: 2009+A1: 2014 (refer to **Table 1.3** for Associated Development sites and **Table 1.4** for the main development site) in carrying out its refreshed noise assessments of construction noise levels for insulating properties.

Table 1.3 Construction noise insulation trigger values for Associated Development sites

Day	Time	Averaging Period, T	Noise Insulation Trigger Value dB $L_{Aeq,T}$
Monday to Friday	07:00 to 08:00	1 hr	70
	08:00 to 18:00	10 hr	75

Day	Time	Averaging Period, T	Noise Insulation Trigger Value dB $L_{Aeq,T}$
	18:00 to 19:00	1 hr	70
	19:00 to 23:00	4 hr	65
	23:00 to 07:00	1 hr	55
Saturday	07:00 to 08:00	1 hr	70
	08:00 to 13:00	5 hr	75
	13:00 to 14:00	1 hr	70
	14:00 to 23:00	1 hr	65
	23:00 to 07:00	1 hr	55
Sunday and Public Holidays	07:00 to 23:00	1 hr	65
	23:00 to 07:00	1 hr	55

Table 1.4 Construction noise insulation trigger values for the main development site

Day / Time	Averaging Period, T	Noise Insulation Trigger Value dB $L_{Aeq,T}$
Day: Weekdays, 0700-1900, Saturday, 0700-1300	12 hr (weekdays) 6 hr (Saturdays)	65
Evenings and weekends: Weekdays 1900-2300, Saturdays 1300-2300, Sundays 0700 - 2300	4 hr (weekdays) 1 hr (Saturdays) 1 hr (Sundays)	55

Day / Time	Averaging Period, T	Noise Insulation Trigger Value dB L _{Aeq,T}
Every day 2300 - 0700	1 hr	45

- 1.7.2 SZC Co. must follow the guidance set out in British Standard 5228: Part 1: 2009+A1: 2014 (refer to **Table 1.5**) in carrying out its refreshed noise assessments of construction noise levels for temporary rehousing.

Table 1.5 Construction noise temporary rehousing trigger values – all sites

Day	Time	Averaging Period, T	Temporary Rehousing Trigger Value dB L _{Aeq,T}
Monday to Friday	07:00 to 08:00	1 hr	80
	08:00 to 18:00	10 hr	85
	18:00 to 19:00	1 hr	80
	19:00 to 23:00	4 hr	75
	23:00 to 07:00	1 hr	65
Saturday	07:00 to 08:00	1 hr	80
	08:00 to 13:00	5 hr	85
	13:00 to 14:00	1 hr	80
	14:00 to 23:00	1 hr	75
	23:00 to 07:00	1 hr	65
Sunday and Public Holidays	07:00 to 23:00	1 hr	75
	23:00 to 07:00	1 hr	65

1.8 Exceptional Circumstances

Houseboats

- 1.8.1 Where the external superstructure of houseboats in the Woodbridge or Melton area is demonstrated to have a sound reduction performance of less than 25dB R_w when all windows, portholes and other openings are closed, SZC Co. may at its discretion extend to the Owner or Occupier of any such

houseboat an offer of insulation works or temporary rehousing in line with the terms set out in Sections 1.3 and 1.4, but on the basis of alternative eligibility criteria to those in Section 1.6 and notwithstanding that the eligibility criteria in Section 1.6 are not met.

1.8.2 In such circumstances, SZC Co. may only exercise this discretion to reduce (and not to raise) the eligibility criteria.

1.8.3 Offers of insulation and ventilation for houseboats must include measures appropriate to the houseboat under consideration, and need not be limited to the insulation/ventilation specification set out in paragraph 1.3.11.

Medical, Clinical or Disability Need

1.8.4 Where there is a proven medical, clinical or disability need involving a particular sensitivity to noise, SZC Co. may at its discretion make an offer of insulation works or temporary rehousing in line with the terms set out in Sections 1.3 and 1.4, but on the basis of alternative eligibility criteria to those in Section 1.6 and notwithstanding that the eligibility criteria in Section 1.6 are not met. In such cases, the Owner or Occupier of the Property will be required to provide evidence to SZC Co. as to any relevant medical, clinical or disability need.

1.8.5 In such circumstances, SZC Co. may only exercise this discretion to reduce (and not to raise) the eligibility criteria.

Residential Park Homes

1.8.6 Where the external building fabric of residential park homes or other static homes is demonstrated to have a sound reduction performance of less than 25dB R'_w when all windows, doors and other openings are closed, SZC Co. may at its discretion make an offer of insulation works or temporary rehousing in line with the terms set out in Sections 1.3 and 1.4, but on the basis of alternative eligibility criteria to those in Section 1.6 and notwithstanding that the eligibility criteria in Section 1.6 are not met.

1.8.7 In such circumstances, SZC Co. may only exercise this discretion to reduce (and not to raise) the eligibility criteria.

Other Domestic Buildings

1.8.8 Where the external building fabric of other buildings in domestic use is demonstrated to have a sound reduction performance of less than 25dB R'_w when all windows, doors and other openings are closed, SZC Co. may at its discretion make an offer of insulation works or temporary rehousing in line

with the terms set out in Sections 1.3 and 1.4, but on the basis of alternative eligibility criteria to those in Section 1.6 and notwithstanding that the eligibility criteria in Section 1.6 are not met.

- 1.8.9 In such circumstances, SZC Co. may only exercise this discretion to reduce (and not to raise) the eligibility criteria.

1.9 Glossary

1.9.1 Where the following words and terms are used in this **Noise Mitigation Scheme**, they have the following meanings:

Table 1.6 Glossary

Ventilation	means the provision of a system to enable the provisions of Approved Document F to be achieved.
Approved Document F	means the document approved by the Secretary of State to provide practical guidance on ways of complying with the requirements in Part F of Schedule 1 to, and regulations 39, 42 and 44 (in so far as it relates to fixed systems for mechanical ventilation) of, the Building Regulations 2010 (SI 2010/2214) for England and Wales, and regulations 20(1) and 20(6) (in so far as it relates to fixed systems for mechanical ventilation) of the Building (Approved Inspectors etc) Regulations 2010 (SI 2010/2215) for England and Wales.
Development	means the development of the Sizewell C power station project pursuant to the Sizewell C (Nuclear Generating Station) Order.
Associated Development Sites	means: <ul style="list-style-type: none"> (i) the Sizewell link road (ii) the two village bypass (iii) the Yoxford roundabout and other highways improvements (iv) the northern park and ride site (v) the southern park and ride site (vi) the green rail route (vii) the freight management facility
Eligible Room	means a living room or a bedroom in a Property but does not mean a kitchen or bathroom.
Baseline Ambient Sound Level	means the equivalent continuous A-weighted sound pressure level of the totally encompassing sound in a given situation at a given time, usually from many sources near and far, at a location over a given time interval, T.

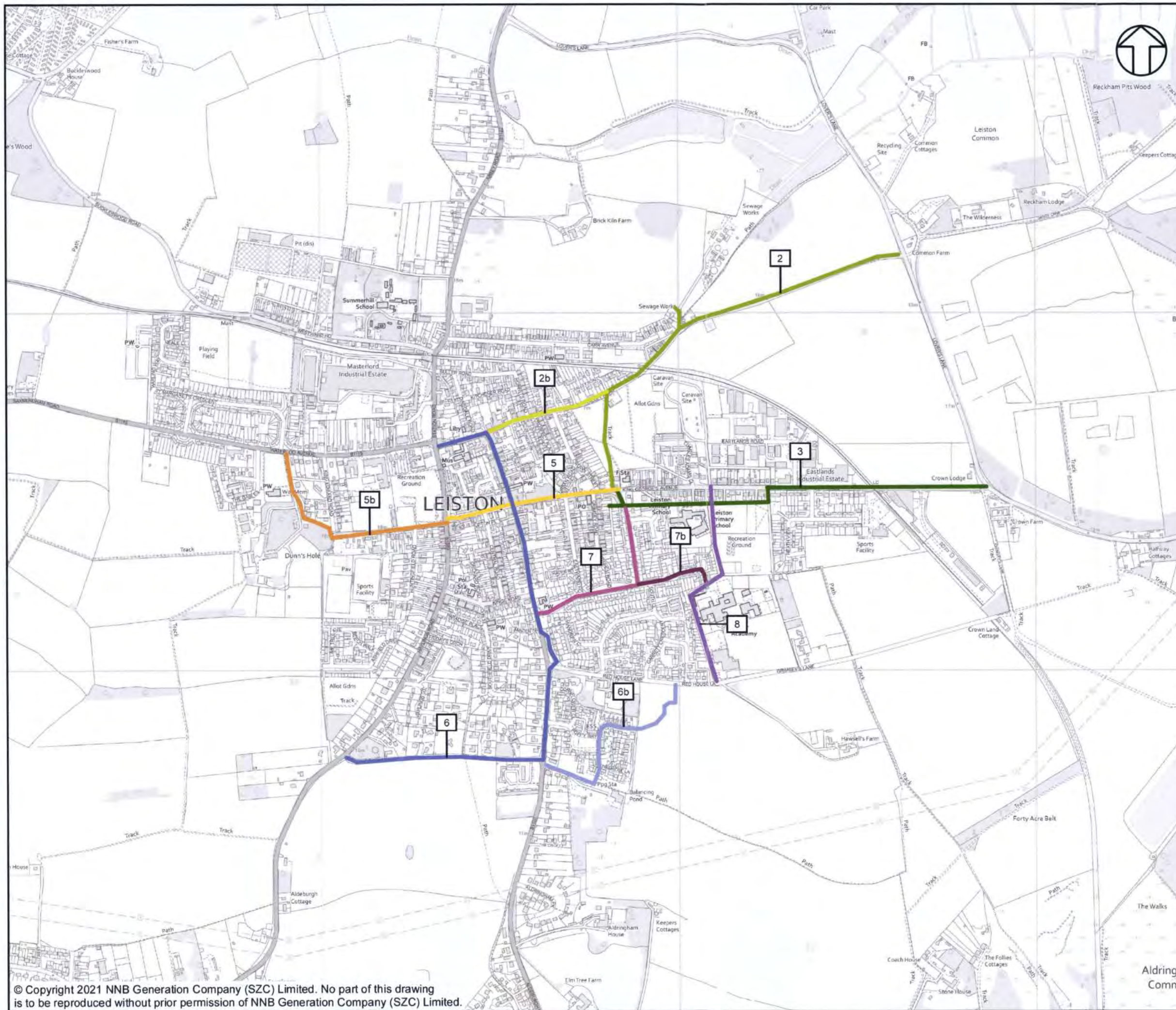
Future (Rail) Noise Levels	means the level of noise generated by SZC Co.'s freight services and other non-SZC Co. freight and passenger services using: (i) the East Suffolk line between Westerfield Junction and the junction with the Saxmundham to Leiston branch line; or (ii) the Saxmundham to Leiston branch line; or (iii) the amended rail line accessing Land East of Eastlands Industrial Estate; or (iv) the green rail route.
Existing (Rail) Noise Levels	means the level of noise generated by non-SZC Co. freight and passenger services using: (i) the East Suffolk line between Westerfield Junction and the junction with the Saxmundham to Leiston branch line; or (ii) the Saxmundham to Leiston branch line; or (iii) the amended rail line accessing Land East of Eastlands Industrial Estate; or (iv) the green rail route.
Future (Road) Noise Levels	means the level of noise generated by road traffic including vehicles associated with the Development or traffic using new or amended roads constructed for the Development.
Existing (Road) Noise Levels	means the level of noise generated by road traffic in the absence of the Development.
Occupier	means a person lawfully residing at the Property.
Owner	means a person with a freehold interest in the Property and/or a person with a leasehold interest in the Property (as relevant).
Property	means a building lawfully consented as a dwelling house (Use Class C3) or house in multiple occupation (Use Class C4) prior to the grant of the Development Consent Order.

**ANNEX X
YOXFORD SCHEME**

ANNEX Y

LEISTON CYCLING AND WALKING IMPROVEMENTS

Route No.	Details	Route Description	Benefits	Potential Highway Works
2	LOVERS LANE - VALLEY ROAD - ALLOTMENTS - EXITING AT SIZEWELL ROAD/KING GEORGES AVENUE.	Lovers Lane via EDF route. Close part of Valley Road to sewage works (known locally as Kemps Hill). Then on road via Valley Road to allotments. Then across allotments on footway and across private land to King George Avenue. Route 2b from allotments to High Street.	Closure of Valley Road will facilitate safe route from camp site for construction workers. Legacy route for residents and tourists accessing Aldhurst and route onto Suffolk Coast Path to Aldeburgh via new tourist cycle route along the old railway line.	Turning head on Valley Road at each end of closure and bollards. Access off Valley Road into allotments. Crossing on King George Avenue to link to route 3 (potential Tiger crossing.)
3	LOVERS LANE - SIZEWELL ROAD - KING GEORGES AVE - EXITING AT GRIMSEY ROAD	Sizewell Gap / Lovers Lane Junction via King Georges Avenue to Sizewell Road / Grimsey Road junction. Off road cycleway on south side of King George Avenue as far as eastern entrance to Sports Field/Recreation ground. Then private tracks / footways behind houses. Links back to King George Avenue with off road cycleway on Sylvester Road.	Joins existing cycle path to Sizewell. Joins new tourist route to Aldeburgh. Joins EDF route along Lovers Lane. Joins route through the Town centre. Safe route into Town and for workers accessing LEIEE. Final section of route provides access for many children and families to the Primary School and recreation ground.	Widen footway to shared cycleway along King George Avenue.
				Safe crossing points (uncontrolled) on Sylvester Road and Grimsey Road. Link back to King George Avenue and tiger crossing.
5	GRIMSEY ROAD (Sylvester Road?) - THROUGH TOWN CENTRE - CROSS STREET - VICTORY ROAD - WATERLOO AVENUE	King George Avenue / Sylvester Road junction via Sizewell Road, Cross Street and Victory Road (all on street) then via public footway to Waterloo Avenue (off road).	Main route through town linking east with west, avoiding busy/unsafe routes; Haylings Road, Park Hill and White Horse junction.	Town centre public realm improvements. Tiger crossing in Waterloo Avenue to link with Route 8. Crossing point on B1069 Haylings Road.
6	GOLDINGS LANE - ALDEBURGH ROAD - THROUGH TOWN CENTRE TO WHITE HORSE (WATERLOO AVENUE/ STATION ROAD JUNCTION)	B1069 Haylings Road via Goldings Lane (part on, part off road) to B1122 Aldeburgh Road the north on Aldeburgh Road, High Street and then west to Waterloo Avenue / Station Road junction. On road with short diversion onto service road.	Main route through the town from south to north. Route from Knodishall into Town or to Leisure Centre via 6b or Sizewell via route 4.	Gates and build-outs as enter town boundary (in Leiston Town Centre Improvements Scheme). Access / crossing from Haylings Road to Goldings Lane, crossing point on Aldeburgh Road at Goldings Lane, crossing of Red Wood Lane, crossing point to give access to King Street. For High Street see urban realm / highway improvements.
8	ALDEBURGH ROAD - SEAWARD AVENUE - SYLVESTER ROAD	Off-road cycleway from Aldeburgh Road along Seaward Avenue to Sylvester Road. Then on road (contra-flow) on Sylvester Road north to join route 3 south of Sizewell Road. Extension 7b on Seaward Avenue to Alde Valley Academy and route 8.	Safe route to travel to Alde Valley Academy (Secondary School) and Avocet Academy (Primary School) avoiding Town centre. Important link for route from south to north of town for workers and residents/tourists.	Eastward Ho and Grimsey Road – Parking bays to slow traffic. Build out at top of Sylvester Road. New cycleway on Seaward Avenue. Crossing points at Arnhem Road and Eastward Ho. Could be delivered as part of one-way system.



NOTES
KEY

NOT PROTECTIVELY MARKED

COPYRIGHT
Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2019). All Rights reserved. NNB GenCo 0100060408.
© Natural England material is reproduced with the permission of Natural England 2019. National Cycle Route data supplied by Sustrans and contains Ordnance Survey data © Crown copyright and database right (2018). Choose Suffolk, Suffolk County Council and Suffolk Coastal District Council, ADAS, Sizewell Estate Integrated Landscape Management Plan, December 2006.
PROW data sourced from Suffolk CC on 27/02/2019 under OGL v3.0 are an interpretation of the Definitive Map and Statement, not the Definitive Map itself, and should not be relied on for determining the position or alignment of any public right of way. The data contains Ordnance Survey data © Crown copyright and database right 2019.



DOCUMENT:
SIZEWELL C
DEED OF OBLIGATION ENHANCEMENTS

DRAWING TITLE:
LEISTON WALKING AND
CYCLING CONTRIBUTIONS

DRAWING NO:
FIGURE 3

DATE: SEP 2021 DRAWN: S.M. SCALE: 1:10,000 @A3 REV: 02

