



The Sizewell C Project

5.10 Shadow Habitat Regulations Assessment Second Addendum

Revision: 1.0
Applicable Regulation: Regulation 5(2)(g)
PINS Reference Number: EN010012

June 2021

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



CONTENTS

1	BACKGROUND	1
2	UPDATE TO FIGURES SUPPORTING THE RECREATIONAL DISTURBANCE ASSESSMENT IN THE SHADOW HRA REPORT ...	1
2.1	Introduction	1
2.2	Alde-Ore Estuary SPA and Ramsar site.....	3
2.3	Minsmere to Walberswick Heaths and Marshes SAC and Minsmere- Walberswick Ramsar site	5
2.4	Sandlings SPA	6

1 BACKGROUND

- 1.1.1 This paper has been prepared to report an update to the calculations of potential change in recreational use of European sites by displaced visitors and construction workers and to assess the implications of this change on the assessment of recreational displacement in the **Shadow Habitats Regulation Assessment (HRA) Report** [\[APP-145\]](#).

2 UPDATE TO FIGURES SUPPORTING THE RECREATIONAL DISTURBANCE ASSESSMENT IN THE SHADOW HRA REPORT

2.1 Introduction

- 2.1.1 The prediction of change in recreational disturbance pressure at European sites (as reported in the **Recreational Disturbance Evidence Base** to the **Shadow HRA Report** [\[APP-148\]](#)) is highly precautionary in a number of respects. Consequently, the assessment of potential effect on the qualifying features of European sites, which is underpinned by these predictions of change, also accounts for this high degree of precaution.

- 2.1.2 In light of the above, care needs to be taken before assuming that the predictions do more than provide a high level indication of a particularly precautionary approach. In particular:

- The numbers of additional people estimated to visit European sites due to the construction of Sizewell C within the Shadow HRA assumes that all those visiting locations near but not within European sites (e.g. coastal locations such as Aldeburgh, Dunwich, Sizewell Beach, Thorpeness and Aldeburgh) would recreate within the nearest European sites. In reality a large proportion of these additional visitors (displaced people and construction workers) would visit the location but not the nearest European site.
- Surveys asking before an event how someone may react to a relatively unknown effect in the future have been found to overstate impacts.
- The approach adopted looks only at the worst case gross impact of those who might be displaced to a location – it does not account of those who might be displaced from a location.
- In responding to question 4b) i) of the 2014 Sizewell C Visitor Surveys asking “*If you would prefer to avoid the paths around the construction site which other areas are you likely to visit instead*”, respondents

were referred to two maps of the local area as far north as the National Trust car park at Dunwich Heath Coastguard Cottages, as far south as Thorpeness, and 5-6km inland, which might have drawn respondents to name local locations rather than locations closer to home or alternative holiday locations. This is particularly relevant to the 49% of respondents to the surveys who live outside the 8km local area, including 25% who were holiday makers.

- The estimation of numbers of construction workers recreating at European sites was based on the largest potential numbers of workers at peak of construction (i.e. when construction workers, and consequently numbers potentially visiting European sites, are likely to be at their highest) across the full 12 year construction phase. In reality, numbers of construction workers who could potentially visit European sites would be lower than factored into the Shadow HRA for the majority of the construction phase.
- The results take no account of the mitigation planned to manage the impacts of the construction work or to enhance alternative rights of way, etc.

2.1.3 The outcome therefore needs to be viewed on a common sense basis. It is not susceptible to a very high level of precision and is highly precautionary.

2.1.4 Notwithstanding the above, the National Trust has questioned how the additional number of recreational visits to the Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC), as reported in paragraph 7.7.34 of the **Shadow HRA Report** [APP-145], have been calculated. On investigating this question, it was apparent that the numbers reported in the **Recreational Disturbance Evidence Base** to the **Shadow HRA Report** [APP-148] had not been correctly transcribed into the assessment for the habitat qualifying features of the following European sites:

- Alde-Ore Estuary Ramsar site.
- Minsmere to Walberswick Heaths and Marshes SAC.
- Minsmere-Walberswick Ramsar site.

2.1.5 As a separate, but related, point, the National Trust has suggested that the figures for the estimated additional visits to Dunwich Heath in the study area, quoted in the **Recreational Disturbance Evidence Base** to the **Shadow HRA Report** [APP-148], are not precautionary. The National Trust believes this is because the figures do not take account of those

people who said they would be displaced, but did not name a location where they would be displaced to. The same issue could be applied to the calculations for other displacement locations, including Minsmere. The alternative numbers (i.e. to account for those people who said they would be displaced, but did not name a location where they would be displaced to) are provided in response to ExA Q1 AR 1.12 (and its accompanying Appendix 6A – Response to ExQ1 AR.1.12).

2.1.6 To emphasise the points made above, there is already a high degree of precaution in the approach taken to the prediction of the change in recreational disturbance pressure. As evidenced in the response to ExA Q1 AR 1.12, however, those numbers would be increased if the calculations are reworked to include proportions of those who did not identify an alternative location to which they might be displaced and assuming that the alternative locations for those people were the same as those which had been specified by others.

2.1.7 The response to ExA Q1 AR 1.12 notes that the alternative numbers have been reviewed and potential implications on European sites analysed and it is concluded that they do not affect the ornithology or habitat assessments in relation to increased visitor pressure due to Sizewell C, assessed in the **Shadow HRA Report** ([APP-145](#)).

2.1.8 The implications of the alternative numbers for the following European sites are set out in this Addendum:

- Alde-Ore Estuary Special Protection Area (SPA) and Ramsar site.
- Minsmere to Walberswick Heath and Marshes SAC.
- Minsmere-Walberswick Ramsar site.
- Sandlings SPA.

2.1.9 The implications of the alternative numbers for the Minsmere-Walberswick SPA were described in the **Shadow HRA Addendum** ([AS-173](#)) submitted in January 2021.

2.2 Alde-Ore Estuary SPA and Ramsar site

2.2.1 Disturbance due to an increase in recreational pressure was screened into the assessment for the breeding and non-breeding bird populations of the Alde-Ore Estuary SPA and Ramsar site and Ramsar criterion 2 of the Alde-Ore Estuary Ramsar site. As noted in the **Shadow HRA Report** ([APP-145](#)), the habitat that may be affected by an increase in recreational pressure on the Ramsar site is vegetated shingle.

- 2.2.2 As reported in the Annex to ExQ1 AR.1.12 (Table 2.1), the calculations estimate that there could be a potential additional 51,298 visits to locations that potentially enable access to areas within the Alde-Ore Estuary SPA and Ramsar site. This equates to a potential estimated increase of less than 9% of the existing estimated number of recreational visits which, as noted in the **Shadow HRA Report** [APP-145], is a small proportional potential increase over existing visits. In addition, the estimated total increase in pressure would be diffuse and spread across a large number of potential car park and other access points and, to reiterate the points made in section 2.1 of this Addendum, there is a high degree of precaution in the approach taken to the prediction of the change in recreational disturbance pressure.
- 2.2.3 Although any increase in numbers of visits does, in theory, represent an increased risk of disturbance to birds and to vegetated shingle habitat (e.g. trampling), there is not an automatic correlation between an increase in the number of recreational visits and a detrimental effect on birds or habitats. Visitor behaviour and existing management measures play a significant role in the risk of changes in recreational pressure resulting in a detrimental effect on qualifying birds and habitat.
- 2.2.4 With regard to the bird qualifying features of the Alde-Ore Estuary SPA and Ramsar site, the breeding Sandwich tern, little tern, lesser black-backed gull, avocet and marsh harrier populations are not considered sensitive species given the inaccessibility of their breeding areas.
- 2.2.5 The main area of importance for non-breeding waterbirds (avocet, redshank and ruff) 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. However, the existing network of footpaths and access management controls mean that the habitats favoured by these species are not easily accessible and increased recreational pressure is considered unlikely to increase anthropogenic disturbance levels for the species.
- 2.2.6 Of relevance to the Ramsar criterion 2 habitat of the Alde-Ore Estuary Ramsar site, the car park to the south of Aldeburgh gives direct access to the shingle beach and to a dirt surfaced path giving access to a short section of the Alde-Ore Estuary. There is some existing visitor management in place, including signage, fencing and a vehicle barrier to prevent unauthorised vehicular public access towards Orfordness from Aldeburgh along the shingle spit and deter public access on foot.
- 2.2.7 Given the above, the rationale behind the conclusions drawn in the **Shadow HRA Report** [APP-145] for the bird and habitat qualifying features / criteria

of the Alde-Ore Estuary SPA Ramsar site are, therefore, unaffected (i.e. adverse effect can be excluded).

- 2.2.8 Notwithstanding that conclusion, SZC Co. is currently developing a monitoring and mitigation plan which will include the Alde-Ore Estuary SPA and Ramsar site and will consult with relevant stakeholders on this plan prior to its submission to the Examination at an appropriate deadline.

2.3 Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick Ramsar site

- 2.3.1 Disturbance due to an increase in recreational pressure was screened into the assessment for the European dry heaths, annual vegetation of drift lines and perennial vegetation of stony banks qualifying interest features of the Minsmere to Walberswick Heaths and Marshes SAC. This effect pathway was also screened into the assessment for Ramsar criterion 1 (a mosaic of marine, freshwater, marshland and associated habitats) and Ramsar criterion 2 (nationally scarce plants and red data book invertebrates) of the Minsmere-Walberswick Ramsar site.
- 2.3.2 As reported in the Annex to ExQ1 AR.1.12 (Table 2.1), it is estimated that there could be a potential additional 139,086 visits to locations that potentially enable access to areas within the Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick Ramsar site. This equates to a potential estimated increase of approximately 12.5% of the existing estimated number of recreational visits.
- 2.3.3 As noted in the **Shadow HRA Report** [APP-145], and stated in section 2.2 of this Addendum, there is no automatic correlation between an increase in the number of recreational visits and the potential for the qualifying features of European sites to be detrimentally affected. The nature of any existing management measures and the behaviour of any additional visitors influences the potential effect on habitats within the sites.
- 2.3.4 In reaching a conclusion on potential effect on these European sites, the **Shadow HRA Report** [APP-145] takes into account the likely duration of effect, the location of access points relative to sensitive habitats, the small potential change in visitor numbers relative to the baseline situation, the diffuse nature of this pressure and existing management measures in place in certain locations. Alongside these considerations, the **Shadow HRA Report** [APP-145] includes a mitigation commitment to a monitoring programme for recreational displacement and additional construction workers to identify the need for further local mitigation measures. Taking the above into account, the **Shadow HRA Report** [APP-145] concludes that an adverse effect on integrity would not occur.

- 2.3.5 This mitigation commitment has been further developed in a **Monitoring and Mitigation Plan** including the Minsmere to Walberswick Heaths and Marshes SAC and Minsmere-Walberswick Ramsar site (Doc Ref. 9.15).
- 2.3.6 Given the approach taken to the assessment and proposed mitigation of this potential effect, and recognising the high degree of precaution adopted in the prediction of change in recreational disturbance pressure, the alternative numbers do not change the conclusions of the **Shadow HRA Report** [[APP-145](#)].
- 2.4 **Sandlings SPA**
- 2.4.1 Disturbance due to an increase in recreational pressure was screened into the assessment for the breeding nightjar and breeding woodlark qualifying interest features of the Sandlings SPA. The Sandlings SPA encompasses a total area of approximately 34 km² and comprises several discrete blocks of land, some of which are separated by distances of several kilometres. Although the SPA is within 0.7km of the main development site at its closest point, the largest blocks of land which comprise the SPA are considerably further from the main development site, at over 9km. The part of the SPA which is closest to the main development site overlaps substantially with the RSPB's North Warren and Aldringham Walks Reserve.
- 2.4.2 As reported in the Annex to ExQ1 AR.1.12 (Table 2.1), it is estimated that there could be a potential additional 66,006 visits to locations that potentially enable access to areas within the Sandlings SPA. This equates to a potential estimated increase of approximately 10.5% of the existing estimated number of recreational visits.
- 2.4.3 The **Shadow HRA Report** [[APP-145](#)] recognises that there is the potential for increased recreational disturbance to adversely affect breeding nightjar and woodlark. Given the limitations of existing on-site visitor management measures, on a precautionary basis, the **Shadow HRA Report** [[APP-145](#)] concluded that there is the potential for increased recreational use to reduce the breeding density of nightjar and woodlark at Aldringham Walks and North Warren (i.e. within the northern section of the Sandlings SPA). Consequently, it is proposed that existing arrangements to manage recreational access at Aldringham Walks and North Warren are enhanced. This mitigation commitment has been further developed in a **Monitoring and Mitigation Plan** including the northern section of the Sandlings SPA (Doc Ref. 9.15).
- 2.4.4 Subject to the implementation of enhanced management measures for recreational access at Aldringham Walks and North Warren, an increase in recreational pressure is not predicted to result in an adverse effect on the integrity of the Sandlings SPA.

- 2.4.5 No mitigation was deemed necessary for other areas of the Sandlings SPA. Notwithstanding that conclusion, SZC Co. is currently developing a monitoring and mitigation plan which will include the central areas of the Sandlings SPA (the areas comprising Tunstall Forest and Snape Warren) and will consult with relevant stakeholders on this plan prior to its submission to the Examination at an appropriate deadline.