



The Sizewell C Project

8.4 Planning Statement Appendix 8.4F Sizewell Link Road Planning Statement

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

May 2020

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





APPENDIX 8.4F: SIZEWELL LINK ROAD PLANNING STATEMENT

Contents

1	Introduction.....	1
1.1	The Planning Statement.....	1
1.2	Planning Statement structure	1
2	Site and surroundings.....	2
2.1	Site location	2
2.2	Planning and environmental designations	2
2.3	Planning history	3
3	Proposal	4
4	Planning policy context.....	8
4.1	National Policy Statements.....	8
4.2	Other national and regional planning policies	9
5	Principal planning issues	13
5.1	Introduction.....	13
5.2	The need for the Sizewell link road.....	13
5.3	Location.....	14
5.4	Traffic and transport.....	14
5.5	Heritage impacts.....	15
5.6	Surface water, groundwater and flood risk	16
5.7	Biodiversity and nature conservation	17
5.8	Soils and geology	17
5.9	Local amenity	Error! Bookmark not defined.
5.10	Landscape and visual impacts.....	20
5.11	Social-economic considerations	21
5.12	Planning balance	23
6	Conclusion.....	24
	References	25

Tables

None provided.



Figures

None provided.

Annexes

None provided.

1 Introduction

1.1 The Planning Statement

1.1.1 The nature of the Sizewell C Project, and the characteristics of the local area, require a number of associated developments to form part of the project in order to facilitate the construction of Sizewell C power station, and to mitigate potential environmental impacts associated with the project.

1.1.2 The purpose of this **Planning Statement** (Doc Ref. 8.4) is to set out the case for the Sizewell link road, which is one of the associated developments of the Sizewell C Project to which the application for development consent relates to. This statement considers the site-specific planning issues relevant to the Sizewell link road. Overarching planning merits/issues, such as the justification of the transport strategy as a whole, are considered within the **Planning Statement** for the main development site, the Site Selection Report which is appended to the **Planning Statement**, the **Transport Assessment** (Doc Ref. 8.5) and other documents accompanying the Sizewell C Development Consent Order (DCO) application.

1.2 Planning Statement structure

1.2.1 The remainder of this section of the **Planning Statement** is set out as follows:

- **section 2:** Site and surroundings – describes the site location, the planning, and environmental designations that apply to it, and its planning history;
- **section 3:** Proposal – provides a description of development, design specifics, layout and construction programme;
- **section 4:** Policy context – provides a summary of site specific planning policies;
- **section 5:** Principle planning issues – provides an assessment of the site against relevant policy; and
- **section 6:** Conclusion – summarises how the Sizewell link road complies with relevant policy and weighs its benefits against its harm in the context of the overall scheme.

2 Site and surroundings

2.1 Site location

- 2.1.1 The proposed 6.8 kilometres (km) long Sizewell link road starts at the A12 south of Yoxford and north of Curlew Green, in an east-west direction to bypass Middleton Moor and Theberton, before joining the B1122 south of Theberton (see the Existing Site Plan in **Book 2** which shows the site boundary).
- 2.1.2 The site predominantly comprises grade 2 and grade 3 agricultural land (very good to moderate), and a small amount of grade 4 land (poor).
- 2.1.3 The land use in the vicinity of the route is predominantly arable farmland, with well-defined hedgerow field boundaries, interspersed with scattered woodlands and copses.
- 2.1.4 Individual dwellings and farms are located along the route, with the closest residential properties being at Harling Way, Phoenix Cottage, Wood Farm Cottages, Fisher's Farm, Aldhurst Farm Cottage, properties on Westward Ho, properties of Abbey Lane, Old Abbey Farm, Vale Cottage, Oakfield house, Coronation Cottages, Annesons Cottage, Hawthorn Cottages, Trust Farm, and Fir Tree Farm. These locations are all within 700 metres (m) of the proposed development.

2.2 Planning and environmental designations

- 2.2.1 One designated heritage asset lies within the site boundary, the grade II listed Gate and Gate Piers at the junction of Leiston Road and Onner's Lane (LB 1287303), and forty-four listed buildings lie within 750m of the site.
- 2.2.2 The Sizewell link road is located predominately in Flood Zone 1. However, a small section of the site (northern end of Fordley Road), along the south west edge of the site, is at medium to high risk of flooding (within Flood Zones 2 and 3).
- 2.2.3 The Environment Agency 'flood risk from surface water' map (Ref 1.1) identifies the majority of the site to be at 'very low' surface water flood risk. Several localised areas, within proximity to the watercourses, are considered to have a 'low' to 'high' risk of surface water flooding.
- 2.2.4 Sewers may be located within the proposed site area, however with a rural location, and no recorded incidents of sewer flooding, the risk of sewer flooding is likely to be low.

- 2.2.5 The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 1.1km to the east of the eastern end of the proposed Sizewell link road.
- 2.2.6 There are three European sites comprising special protection areas (SPAs), special areas of conservation (SACs) and Ramsar sites within a 5km radius of the proposed Sizewell link road (some sites carry more than one designation). These are Minsmere to Walberswick Heaths and Marshes SAC, Minsmere-Walberswick SPA and Ramsar located approximately 1.5km north-east, Sandlings SPA located approximately 3.5km south-east, and Dews SAC located approximately 4.4km north.
- 2.2.7 There are five nationally designated sites (sites of special scientific interest (SSSI)) within 5km of the proposed link road: Minsmere-Walberswick Heaths and Marshes SSSI located approximately 0.9km east; Sizewell Marshes SSSI located approximately 2km south-east; Leiston-Aldeburgh SSSI located approximately 3.5km south; Potton Hall Fields, Westleton SSSI located approximately 4.4km north-east; and Dew's Ponds SSSI located approximately 4.4km north. There are also 11 non-statutory designated county wildlife sites within a 2km radius of the proposed link road.
- 2.2.8 The site sits on the boundary between National Character Area 83 South Norfolk and High Suffolk Claylands (Ref. 1.2) which form the higher ground to the west, and National Character Area 82F Suffolk Coast and Heaths to the east.
- 2.2.9 At a local level, the majority of the site is located within the ancient estate claylands, as identified in the Suffolk County Landscape Character Assessment. Small sections of the site in the east however, are characterised as the rolling estate claylands.
- 2.2.10 The site does not lie within a Neighbourhood Plan area.

2.3 Planning history

- 2.3.1 There is no relevant planning history for any of the land within the site boundary.

3 Proposal

3.1.1 The proposed Sizewell link road would run in an east-west direction to the south of Yoxford. It would commence at the A12 south of Yoxford, bypassing Middleton Moor and Theberton, before joining the B1122 to the west of the main development site.

3.1.2 The proposed Sizewell link road development would comprise:

- 6.8km single carriageway road, with a design speed of 60 miles per hour (mph), 7.3m wide with 1m wide hardstrips and 2.5m wide verges;
- a new three arm roundabout on the A12, located approximately 180m north of The Red House Farm, and realignment of A12 for approximately 200m;
- a single span railway bridge, approximately 50m in length, to enable the route of the proposed Sizewell link road to cross over the East Suffolk line;
- a ghost island junction and provision of the Middleton Moor link, from the proposed route of the Sizewell link road to the B1122;
- a new three arm roundabout and realignment of the B1122 over a length of approximately 300m to meet the new Middleton Moor link road, and a redesigned junction;
- realignment of Fordley Road on the south side of the proposed route of the Sizewell link road so northbound traffic could join the new road. On the north side, Fordley Road would be stopped up where it meets the proposed route of the Sizewell link road. A new footpath and private means of access would be created on the north side of the proposed route to provide access for Old Abbey Farm, with the new footpath connecting to the diverted Footpath E396/017/0;
- provision of a staggered crossroads, with ghost island junctions, as well as the realignment of Trust Farm access road, for approximately 400m from the property to the B1122;
- realignment of Hawthorn Road for approximately 150m to meet the proposed route of the Sizewell link road, and stopping up of Hawthorn Road on the north side of the proposed Sizewell link road;

- a new ghost island junction with an extension of the B1125 and extension and reconfiguration of the B1122;
 - a new overbridge, single span, up to 44m long would be provided which would carry non-motorised users only (pedestrians, cyclists, equestrians) over the Sizewell link road and connect to Pretty Road on either side;
 - a new junction to Moat Road and realignment of access road to Theberton Grange by approximately 300m;
 - a new road and junction would be provided connecting the Sizewell link road to the B1122 to provide access to Theberton. The existing B1122 would be realigned to the south-east of the new junction to tie in to the route of the Sizewell link road;
 - infiltration basins for drainage;
 - environmental mitigation, including screen planting and landscape bunds;
 - diversion and realignment of footpaths; and
 - associated signage, crossings, junctions, services, lighting, and fencing.
- 3.1.3 It is anticipated that construction of the proposed development would take place for approximately 24 months. It would be completed and opened to use before Sizewell C construction traffic reaches a peak in 2028.
- 3.1.4 The Sizewell link road would be used by SZC Co. during the construction phase of the Sizewell C main development site to transport construction workers arriving by car, buses from both northern (who would only use the Sizewell link road east of the Middleton Moor link) and southern park and ride sites, and goods vehicles (both light and heavy) delivering freight to the Sizewell C main development site. It would also be open to the public.
- 3.1.5 The proposed development would be permanent, and is expected to become part of the adopted highway network.
- 3.1.6 **Chapter 2 of Volume 6 of the Environmental Statement (ES)** (Doc Ref. 6.7) sets out a more detailed description of development.

a) Approach to plans

- 3.1.1 As with the other transport related associated developments, the parameters within which the Sizewell link road will be constructed, operated and maintained are shown on the relevant **Work Plans** (Works No. 12A, 12B, 12C and 12D).
- 3.1.2 Sizewell link road will be constructed, operated and maintained anywhere within the area as shown on the **Work Plans**, which include lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 3.1.3 These parameters have informed the assessment presented in the **ES Volume 6** and the flexibility being sought is consistent with the findings of the **ES**.
- 3.1.4 There are several plans within the Sizewell link road Plans set which provided additional detail and are submitted for approval. These plans will be secured by **Schedule 7** of the **draft DCO** and SZC Co. will be required to undertake works in accordance with these approved plans. These include:
- Proposed General Arrangement and Profiles
 - Sizewell Link Road Proposed Landscape Masterplan and Finished Levels
 - Sizewell Link Road Site Clearance Plans
 - Pretty Road Footbridge Proposed General Arrangement and Elevation Plan
 - East Suffolk Line Bridge Proposed General Arrangement and Elevation Plan
 - Detailed plans of the proposed Sizewell Link Road's junctions with the A12, B1122 / B1125, B1122 / Theberton, Moat Road, Hawthorn Road, Fordley Road and the Trust Farm Staggered Junction.
- 3.1.5 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the Sizewell link road must be carried out in accordance with the relevant **Work Plans**, the plans as set out in **Schedule 7** of the **Draft DCO** (Approved Plans) and the relevant **Associated Development Design Principles**, save to the extent that alternative plans or details are submitted by the undertaker and approved by Suffolk County Council.

- 3.1.6 Any revised plans shall be in general accordance with the relevant sections of the **Associated Development Design Principles** and within the limits of deviation specified in the **Draft DCO**.
- 3.1.7 Illustrative plans are also submitted as part of the **Sizewell Link Road Plans** which provided further illustrative details and demonstrate how the highway improvements could be delivered in line with the **Work Plans** and the plans for approval listed above. The illustrative plans include Existing Site Plans, Cross Sections, Drainage Plans, Proposed Street Lighting Plans and Existing Utilities Drawings. Requirements in the **Draft DCO** secure the submission and approval of the drainage and lighting proposals prior to commencement.

4 Policy context

4.1 National Policy Statements

4.1.1 The National Policy Statements for Energy (NPS EN-1) (Ref. 1.3) and Nuclear Power Generation (NPS EN-6) (Ref. 1.4) provide the primary policy context against which decisions on new nuclear power stations (and any associated development) should be made. The status of the NPS is referred to in **Chapter 3** of the **Planning Statement** (Doc Ref. 8.4).

4.1.2 As explained within the **Planning Statement** (Doc Ref. 8.4), the Sizewell link road is considered to be a ‘associated development’ as it has a direct relationship with the principal development (Sizewell C) and is proportionate to the nature of and scale of the principal development.

4.1.3 Paragraph 5.13.6 of NPS EN-1 (Ref 1.3) states that a new energy nationally significant infrastructure project (NSIP) may give rise to substantial impacts on the surrounding transport infrastructure and the decision maker should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the decision maker should consider requirements to mitigate adverse impacts on transport networks arising from the development.

4.1.4 Paragraph 5.13.7 of NPS EN-1 states:

“Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts identified in the NATA/WebTAG transport assessment, with attribution of costs calculated in accordance with the Department for Transport’s guidance, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.”

4.1.5 Paragraph 5.13.8 of NPS EN-1 requires that demand management measures must be considered before considering new inland transport infrastructure to deal with remaining transport impacts. Paragraph 5.13.9 goes on to say that the decision maker should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.

- 4.1.6 Paragraph 5.13.11 of NPS EN-1 (Ref 1.3) states that the decision maker may attach requirements to a consent where there is likely to be substantial heavy goods vehicles (HGVs) traffic to ‘*control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements*’.

4.2 Other national and local planning policies

- 4.2.1 NPS EN-1 and NPS EN-6 together form the primary basis for deciding DCO applications for nuclear NSIPs. Paragraph 4.1.5 of NPS EN-1 states that other matters which the decision maker may consider both “*important and relevant*” to its decision-making include development plan documents or other documents in the local development framework, such as the National Planning Policy Framework (NPPF) (2019) (Ref 1.8). Paragraph 4.1.5 of NPS EN-1 then explains that, in the event of a conflict between local policy and an NPS, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure.

- 4.2.2 Under Section 105 (2)(a) of the Planning Act 2008 (Ref. 1.5) the decision maker is also required to have regard to a local impact report produced by the relevant local authorities. Local authorities can determine the content of their own local impact reports, and this may include reference to development plan documents. This is likely to be particularly relevant to planning policy designations, which are not replicated in the NPSs.

- 4.2.3 The host local planning authority is East Suffolk Council. This authority was formed through the merger of Suffolk Coastal District Council and Waveney District Council on 1 April 2019. The development plan for East Suffolk comprises those development plan documents that were adopted by the two former authorities. The Sizewell C DCO application site lies entirely within the former Suffolk Coastal District.

- 4.2.4 The strategies of the Local Plan may be considered important and relevant, but where these relate to generic issues, such as the protection of the environment, the relevant policy tests are those set out in the NPS. The following sets out those policies that are considered relevant to the proposed development.

a) The National Planning Policy Framework (NPPF) (2019)

- 4.2.5 The NPPF sets out the Government’s planning policy at the national level, though it does not contain specific policies for NSIPs. The NPPF confirms this at paragraph 5:

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are

determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.” (Ref. 1.8).

- 4.2.6 The NPPF contains policies and guidance that may be considered relevant to the proposed park and ride development in particular. It also promotes low carbon energy and its associated infrastructure.
- 4.2.7 Section 14 of the NPPF concerns climate change, flooding and coastal change. It states in paragraph 148 that the transition to a low carbon future should be supported, including renewable and low carbon energy and associated infrastructure.
- 4.2.8 Paragraph 150 of the NPPF sets out that *“new development should be planned for in ways that... can help reduce greenhouse gas emissions...”* (Ref. 1.8).
- 4.2.9 In plan-making terms, paragraph 151 of the NPPF states that suitable areas for low carbon energy sources and supporting infrastructure should be identified to help secure their development. Such supporting infrastructure would include development associated with the transport and movement of the construction workforce.
- 4.2.10 Section 9 of the NPPF promotes the delivery of development that incorporates sustainable transport solutions. Relevant to the associated development transport-related proposals, the NPPF states in paragraph 102 that:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

NOT PROTECTIVELY MARKED

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”

The NPPF adds in paragraph 108 c) that it should be ensured that “any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.” (Ref. 1.8).

- 4.2.11 In addition, paragraph 98 of the NPPF encourages planning decisions to protect and enhance public rights of way and access.
- 4.2.12 This requirement is supported by paragraph 111 of the NPPF, which requires *“all development that will generate significant amounts of movements should... provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”* (Ref. 1.8).
- 4.2.13 In terms of site location, layout and operational use, paragraph 127 of the NPPF requires planning decisions to ensure that development proposals make effective use of landscaping to ensure that the visual impact of the proposed development is mitigated and the development is visually attractive. Clause (e) of this paragraph also requires the layout of the proposed development to optimise the potential of the site for its proposed purpose.
- 4.2.14 Section 15 of the NPPF deals with conserving and enhancing the natural environment. Paragraph 170 says that planning decisions should minimise impacts on and provide net gains for biodiversity.
- 4.2.15 Section 16 of the NPPF relates to the importance of conserving and enhancing the historic environment. Paragraph 189 of this section gives specific advice for applicants and requires them to describe *“the significance of any heritage assets affected, including any contribution made by their setting.”* (Ref. 1.8).

b) The Core Strategy and Development Management Polices (2013)

- 4.2.16 The Core Strategy and Development Management Policies (Ref. 1.6) set out the vision and strategy for development in the area covering the former Suffolk Coastal District to 2027.
- 4.2.17 Strategic Policy SP10 recognises the importance of the A12 as a valuable artery running north to south through the district, and subject to conformity with other elements of the strategy, the Council supports the provision of improvements to the A12.
- 4.2.18 Strategic Policy SP11 seeks to maximise opportunities for local journeys within the local and strategic road networks serving the district, to support the East Suffolk Council's strategic economic role both within the sub-region and nationally, to maintain quality of life and contribute to reducing the impact of carbon dioxide on climate change.
- 4.2.19 Strategic Policy SP18 supports the provision of new infrastructure in order to service, and deliver, new development at the required phase of the development.
- 4.2.20 Core Strategy Policy SP29 states that development within the countryside will be limited to that of which necessity requires it to be located there, and accords with other relevant policies within the Core Strategy, or would otherwise accord with special circumstances outlined in paragraph 55 of the National Planning Policy Framework (2012) (Ref 1.8).

c) Emerging Suffolk Coastal Local Plan (Final Draft Plan) (January 2019)

- 4.2.21 The emerging local plan (Ref. 1.7) contains a number of site specific policies, including for sites relevant to some of the Sizewell C project's associated development sites, such as at Darsham, the four villages or the vicinity of SZC Co.'s proposed freight management facility. As a matter of principle, however, the emerging plan recognises that the development of major infrastructure projects such as at the Port of Felixstowe or Sizewell C will generate a requirement for supporting land and that the local plan should seek to provide land to meet the needs of such main economic activities.
- 4.2.22 There are no additional policies that are considered relevant to the Sizewell link road.
- 4.2.23 Draft Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects states proposals (Ref 1.7), and the need to mitigate against them, will be considered against policy requirements, including:

- requirement for robust assessment of the potential impacts of the Suffolk Coast and Heaths AONB;
- appropriate road and highway measures are introduced (including diversion routes) for construction, operational, and commercial traffic to reduce the pressure on the local communities; and
- the development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment.

5 Principal planning issues

5.1 Introduction

- 5.1.1 Having regard to the ‘generic impacts’ and ‘flags for local consideration’ identified with the NPS EN-1 and NPS EN-6, the purpose of this subsection is to analyse the site-specific planning considerations that emerge from the planning policy background.

5.2 The need for the Sizewell link road

- 5.2.1 The rationale for proposing the Sizewell link road is to assist in accommodating the anticipated construction traffic associated with the main development site, and reduce traffic flows on the B1122, through Theberton, and Middleton Moor. It would also substantially reduce traffic flow through Yoxford, removing the need for traffic from the south to access the B1122 from the A12 at Yoxford.
- 5.2.2 It is anticipated that up to 2,300 vehicles are expected to use the link road between the A12, and the Middleton Moor link during the peak construction period at the main development site. These vehicle movements would include construction workers and goods vehicles and non SZC vehicles.
- 5.2.3 The link road would be open for the public to use as well and would continue to relieve the B1122 post construction when vehicle movements continue.
- 5.2.4 Accessibility has been a key consideration when planning the transportation of construction materials as part of the Sizewell C Project. The link road will enhance the main development site’s accessibility by road, and facilitate efficient deliveries of material to Sizewell C by road.
- 5.2.5 At Stage 1 and 2 consultations respondents raised concerns regarding the impact of construction traffic on the B1122. Respondents made specific

reference to proposals for a new road, known as D2, put forward to facilitate the construction of the Sizewell B power station in the 1980s, however, the route was never built. Route D2 is included in **Chapter 3 of Volume 6** of the **ES**.

- 5.2.6 All HGV construction traffic would use the A12 and B1122 between Yoxford and the new roundabout west of Middleton Moor only. The construction of the proposed development is expected to generate up to 100 HGV (each way) movements per day during the construction period (200 movements in total). Light goods vehicles and cars would use A12 and B1122 between Yoxford and Leiston, depending on origin/home location. The rationale for the proposing of the link road is to relieve the B1122 from the anticipated construction traffic associated with the main development site and reduce traffic passing through Theberton and Middleton Moor.

5.3 The location of the proposed Sizewell link road

- 5.3.1 NPS EN-1 sets out that where transport mitigation is needed, demand management measures must be considered, including the controlling and routing of HGV movements to and from the site. The temporary increase in journeys on the highway network justifies specific mitigation to relieve potential problems at specific locations, including at Theberton and Middleton Moor. Strategic Policy SP29 of the Core Strategy states that development in the countryside will be limited to that which of necessity must be located there. A robust assessment of the preferred route options has been undertaken, and the site's location is compliant with the principles set out in NPS EN-1 to mitigate against potential transport impacts.
- 5.3.2 The location is considered to be the most direct route, with the strongest relationship to the existing communities it serves. Environmental surveys were undertaken and relevant planning constraints were considered, which resulted in four possible routes options.
- 5.3.3 The route of the proposed Sizewell link road was selected as the preferred route as set out in the Site Selection Report in the **Planning Statement** (Doc Ref 8.4). The description of alternatives considered and the evolution of design can be found at **Chapter 3, Volume 6** of the **ES**.

5.4 Traffic and transport

- 5.4.1 Paragraph 5.13.3 of NPS EN-1 states that where a project is likely to have significant transport implications, the application's **ES** should include a transport assessment. Given the nature of the associated development and the anticipated impact of the Sizewell C Project on local roads, a **Transport Assessment** (Doc Ref. 8.5) has been undertaken in compliance with this

requirement. **Chapter 10 of Volume 10** of the **ES** also assesses the transport effects arising from the construction of the Sizewell C Project.

- 5.4.2 The Sizewell link road would comprise a 6.8km single carriageway road, beginning at the A12 south of Yoxford and bypassing Middleton Moor and Theberton before joining the B1122. The road would be used by SZC Co. during the construction phase of the Sizewell C Project to transport construction workers arriving by car, busses from the northern park and ride facility, and HGVs delivering freight to the main development site. The Sizewell link road would be open for public use as well as construction traffic. After completion of the power station it would be retained as a lasting legacy of the Sizewell C Project and is expected to become part of the adopted highway network.
- 5.4.3 The **Transport Assessment** fully details traffic impacts for the proposed development. Construction of the Sizewell link road would limit adverse traffic impacts during construction as traffic currently flows along the A12 and along other local roads, with the exception of when work at the junctions at either end of the link road is taking place. Short term traffic management may be needed in locations where the link road is proposed to join other existing roads. Mitigation is fully detailed in **Chapter 10 of Volume 2** of the **ES**.

5.5 Heritage impacts

- 5.5.1 **Chapter 9 of Volume 6** of the **ES** concludes that there will be minor adverse effects on potential prehistoric, Roman, medieval and post-medieval remains through material disturbance. There is considered to be a minor adverse effect on some designated grade II listed buildings at Theberton Hall close to the site, but there is considered to be no effect on all other designated heritage assets within the assessment area. There is also considered to be a minor adverse effect on the historic landscape character of the area. Overall, there are not considered to be any significant impacts on heritage assets or on archaeology.
- 5.5.2 NPS EN-1 identifies the historic environment as a generic impact, and sets out that any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development. Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on cultural heritage. Paragraph 5.8.1 of EN-1 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment. When considering the impacts of proposed development, the

particular nature of the significance of the heritage assets should be considered.

- 5.5.3 NPS EN-1 states that there should be a presumption in favour of the conservation of designated heritage assets, and the more significant the designated heritage asset, the greater the presumption in favour of its conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. **Chapter 9 of Volume 6 of the ES** sets out the significance of assets within 750m of the site, and confirms that no significant adverse effects are anticipated.

5.6 Surface water, groundwater and flood risk

- 5.6.1 NPS EN-1 identifies flood risk as a generic impact and states that infrastructure development can have adverse effects on the water environment, including groundwater, inland surface water, transitional waters and coastal waters. Section 5.7 of NPS EN-1 requires applicants to submit a Flood Risk Assessment for energy projects located in Flood Zones 2 and 3. Flood risk is also identified as a nuclear impact in EN-6.
- 5.6.2 Most of the site is located in Flood Zone 1, and therefore has a low risk of flooding from fluvial sources. Risks associated with groundwater, sewer and reservoir flooding at the site are also considered to be low. The Environment Agency's long-term flood risk mapping shows that the majority of the site is also at very low risk of flooding from surface water. However, a small section of the site along the south-west edge of the site is at medium to high risk of flooding (within Flood Zone 3). The area that falls within Flood Zone 3 will not be occupied for the lifetime of the development, only during the construction phase as the existing Fordley Road is diverted. The overall risk of flooding is therefore considered to be low. A Sizewell link road Flood Risk Assessment has been submitted as part of the application for development consent, which addresses flood mitigation if required, and is therefore compliant with NPS EN-1.
- 5.6.3 **Chapter 12 of Volume 6 of the ES** confirms that any surface water runoff would be contained within the site, with drainage to ground wherever feasible, with interception preventing the supply of sediment and other contamination to the surface drainage network during construction. During the operational phase, water will drain through a sustainable drainage system and bypass separators as necessary. No significant residual effects on groundwater or surface water are expected.

5.7 Biodiversity and nature conservation

- 5.7.1 NPS EN-1 recognises the need to protect the most important biodiversity and geological conservation interests, but also that the benefits of nationally significant low carbon energy infrastructure developments may include benefits for biodiversity interests and that these benefits may outweigh harm to these interests. Paragraph 5.3.4 in EN-1 states that the applicant should show how the proposals have taken advantage of opportunities to conserve and enhance biodiversity interests (and refers to the Government's biodiversity strategy 'Working with the grain of nature' at paragraph 5.3.5). NPS EN-6 identifies potential cumulative ecological effects in relation to nuclear development at sites in the east of England. The mitigation measures for each of the requirements is addressed in **Chapter 7 of Volume 6** of the **ES**, and the findings of any relevant studies are outlined in that chapter.
- 5.7.2 The proposed Sizewell link road has sought to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, and as a last resort compensates for losses that cannot be avoided or mitigated for. During the construction phase of the works, the main impact pathways would be associated with habitat loss, habitat fragmentation, incidental mortality of species, and disturbance effects.
- 5.7.3 Primary and tertiary mitigation that has been incorporated in the design in order to protect the existing habitats and species is included in the **ES**. Please refer to **Chapter 7 of Volume 6** of the **ES**. This chapter confirms that there are minor adverse impacts including habitat loss on some receptors including lowland mixed deciduous woodland, hedgerows and ponds, but that this will be mitigated against wherever possible. Mitigation for these impacts is to be sought through the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) and through site-specific measures, including additional and replacement habitat planting and additional landscaping. These measures will help contribute towards the aim of biodiversity net gain that is set out in NPS EN-1 and is therefore compliant with policy requirements. There would also be minor beneficial residual effects on hedgerows and ponds during operation.

5.8 Soils and geology

- 5.8.1 Sites of regional and local geological interest should be given due consideration by the decision maker, though given the need for new infrastructure, these designations should not be used in themselves to refuse development consent (EN-1 paragraph 5.3.13).
- 5.8.2 As part of the **Mitigation Strategy** as set out in **Chapter 10 of Volume 3** of the **ES**, the site layout has been optimised to reduce the overall land take.

This includes measures such as the proposed of new road junctions and overbridges to transport users, and the retention of access to fields from realigned roads and accommodation tracks.

- 5.8.3 However, construction of the Sizewell link road would still result in the permanent loss of 76.5ha of land from primary agricultural productivity and a further 16.3ha would be required temporarily.
- 5.8.4 The site is understood to comprise a mix of agricultural grades 2 and 3. Approximately 50% of the site comprises land which falls into a best and most versatile category of grades 2 and 3a. The remaining areas of the site comprise grade 3b land (27.70ha), non-agricultural land (8.19ha), and 14.45ha of land which has not been surveyed.
- 5.8.5 The loss of best and most versatile land is considered to be a significant adverse effect on BMV resources. Upon completion of construction 16.3ha of best and most versatile land would be returned to agricultural use. However, with this land returned, the effect would still remain major adverse on best and most versatile land.
- 5.8.6 During operation, no additional land would be required beyond that reported for the construction phase, and no further effects on best and most versatile land or agricultural land holdings are anticipated.
- 5.8.7 A **Soil Management Plan** appended to the **CoCP** will ensure the sustainable reuse of soil. This is in accordance with paragraph 5.10.8 of NPS EN-1 and Draft Policy SCLP10.3: Environmental Quality which states that applicants should identify any effects and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed.

5.9 Human health and well-being

- 5.9.1 NPS EN-1 sets out that infrastructure developments can have a negative impact on air quality and emissions and on noise and vibration. NPS EN-6 states that there may be associated local impacts from nuclear development in terms of significant noise, vibration or air quality, but that there may be local impacts of this nature from transport. With appropriate mitigation, the subsequent effect of these is unlikely to be significant.
- 5.9.2 Paragraph 5.10.24 of NPS EN-1 states that PRoWs, National Trails and other rights of access to land are important recreational facilities. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other PRoWs. Where this is not the case the decision maker should consider what appropriate mitigation requirements might be attached to any grant of

development consent. The mitigation measures with regard to local amenity are set out below.

- 5.9.3 The assessment of amenity as provided in **Chapter 6 of Volume 6** of the **ES**, considers the effects on the experiences of users of amenity and recreation resources caused by physical changes to resources, changes to the experience people have due to either perceptual or actual changes to views, noise, air quality of traffic movements and the changes to the experience people have when using recreational resources due to increases in the number of people using them.
- 5.9.4 The magnitude of the effects is entered into a matrix with the sensitivity of the receptor in order to classify the effects. The magnitude rating is determined in relation to scale, duration and extent of the impact. Some primary mitigation measures have been included in the description of the development and these are outlined below but can be referenced in full at **Chapter 8 of Volume 6** of the **ES**.
- 5.9.5 Noise and vibration mitigation has been incorporated into the design of the proposed development, as set out at **Chapter 4 of Volume 6** of the **ES**, as changes to the noise environment would be noticeable during the construction phase due to the nature of construction activity. Additional mitigation to protect residential amenity will be secured through the **CoCP** and includes measures such as the minimising of noisy activities between specified times. Other mitigation measures include acoustic screening and fencing.
- 5.9.6 Mitigation measures are to be put in place to reduce any air quality impacts. During construction, the site access points are located as far as practicable from receptors, potentially dusty loads to be covered in transit, and mobile crushing, and screening plant located as far as practicable from receptors. **Chapter 5 of Volume 6** of the **ES** confirms that the anticipated air quality effects during the construction and operational phases are negligible.
- 5.9.7 Existing woodland and hedgerows would be retained where possible, along with new planting to help to screen and filter views to the development from footpaths.
- 5.9.8 There are a number of PRoW which would be subject to permanent diversion during both construction and operational phase of the link road. Localised visual effects would also arise for users of these footpaths given the nature of construction works of the link road. The western edge of Middleton Moor common land and open access land is located within the ZVI identified within the Landscape and Visual Assessment as provided in **Chapter 6 of Volume 6** of the **ES**. There would be some visibility of the construction phase of the

proposed development, including the roundabout junction with the B1122. These effects would be small scale.

- 5.9.9 Once the proposed development is operational, the only significant impacts, once primary mitigation has been taken into account, would be for the public footpaths in the vicinity of the Pretty Road overbridge. Given the orientation of the structure, and the earthworks associated with it, it would not be possible to implement mitigation planting that would successfully screen the structure from view. In addition, public footpaths in this vicinity require relatively long permanent diversions to allow safe crossing of the proposed Sizewell link road. No further mitigation or monitoring measures for the other public rights of way are required to reduce or avoid a significant adverse effect for the majority of amenity and recreation receptors during the operational phase.

5.10 Landscape and visual impacts

- 5.10.1 NPS EN-1 acknowledges that the landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects inter alia on landscape and visual amenity. It should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs. However, paragraph 1.7.2 of EN-1 acknowledges that the impacts on landscape and visual amenity in particular will sometimes be hard to mitigate.
- 5.10.2 Large, medium and small-scale effects on the landscape character have been identified as a direct result of constructing the road. The large-scale effects include the change from a series of fields to a construction site. Medium and small-scale effects would arise in a number of locations around the site, at approximately 500m and 700m from the site boundary respectively. The small-scale effects are in locations where the visual relationship with the site is less pronounced than the medium scale effects.
- 5.10.3 Large scale effects on character are to be expected for a development of this nature. However, the effects would diminish rapidly beyond the site in many areas due to the limited vertical scale of the proposed development, the mitigation provided by the proposed and existing vegetation, and the terrain and vegetation in the wider landscape.
- 5.10.4 Where possible, mitigation measures have been proposed where a significant effect is predicted to occur from the construction and operational

phase. Mitigation measures include the retention of existing vegetation where possible as well as proposed planting to integrate and screen the link road and the sinking of the route to mitigate visual effects. Once operational and once proposed planting has been established, the only residual significant effect would be in the vicinity of the Petty Road overbridge and nearby public footpaths.

- 5.10.5 The mitigation approach set out above seeks to meet the policy tests set out in NPS EN-1, in that projects should aim to minimise harm to the landscape and that where possible, reasonable mitigation should be provided to reduce the impacts of the proposed development.

5.11 Social-economic considerations

- 5.11.1 Paragraph 5.12.6 of EN-1 states that the decision maker should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the decision maker considers to be both relevant and important to its decision. Paragraph 5.12.8 of EN-1 states that the decision maker should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.
- 5.11.2 The socio-economic impacts of the Sizewell C Project are identified in **Chapter 9 of Volume 2 of the ES**. Given the nature of the construction work, it is not possible to separate out the socio-economic impacts of the works associated with the Sizewell link road from the wider Sizewell C Project impacts.
- 5.11.3 Much of the core socio-economic mitigation sought for the proposed development includes measures to secure local recruitment set out in the **Employment, Skills and Education Strategy** which is provided in **Annex A to the Economic Statement** (Doc Ref. 8.9), and a **Supply Chain Strategy** as provided in **Annex B to the Economic Statement** (Doc Ref. 8.9). To address the potential impact on tourism and local accommodation, the **Accommodation Strategy** (Doc Ref. 8.10) includes a Housing Fund to mitigate against pressures on availability of accommodation. There will also be a Community Fund to mitigate against localised community impacts. There are also physical mitigation measures sought at the main development site, including the construction of an accommodation campus and temporary caravan accommodation. It is considered that the socio-economic impacts of the proposed development are therefore mitigated against where possible, and that the mitigation measures adhere to the requirements set out in NPS EN-1.

5.12 Noise and vibration

- 5.12.1 No significant noise and vibration effects are expected from the construction of the Sizewell link road. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11). Further acoustic screening and working methods will be considered by the contractor, such as limiting noisy construction activities on Saturday afternoons. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.
- 5.12.2 During the peak construction year for the main development site in 2028 when the Sizewell link road is used for Sizewell C construction traffic, significant noise effects have been identified at the following receptors in both of the 2028 assessment scenarios: Fir Tree Farm, Buskie Farm, Fordley Hall, Trust Farm, Dovehouse Farm, Theberton Hall, Church Farm, Doughty Wylie Crescent, Theberton Grange, Theberton House, Oakfield House, Hawthorn Cottages, Rookery Farm, Keepers Cottage, Town Farm, Hawthorn Farm, Moat House, south of Theberton Grange, and Rose Farm.
- 5.12.3 Where these outcomes are confirmed as part of a further assessment under the **Noise Mitigation Scheme (Appendix 11H of Volume 2, Chapter 11 of the ES)**, the provisions of that scheme will apply.
- 5.12.4 Noise levels at properties along the link road are expected to reduce following the completion of the Sizewell C power station, as the road will no longer be used for Sizewell C construction traffic. However, **significant** noise effects are anticipated to remain in the long term at: : Fordley Hall, Trust Farm, Dovehouse Farm, Doughty Wylie Crescent, Theberton Grange, Oakfield House, Hawthorn Cottages and Moat House.
- 5.12.5 Significant benefits are expected anticipated at the majority of receptors or receptor groups along the section of the B1122 from Middleton Moor to Theberton during all operational scenarios, i.e. the two scenarios in 2028 and the scenario in 2034, as a result of the reduction in traffic flows through the villages; the majority of vehicles are expected to use the new link road instead.
- 5.12.6 SZC Co. will continue to seek measures to avoid or reduce these significant adverse effects. The **Noise Mitigation Scheme** will be made available for all properties, where the specified noise criteria are exceeded (see **Volume 2, Appendix 11H** of the ES). In doing so SZC Co. will engage with stakeholders to further understand the affected receptors, their use and the benefit of the measures

5.13 Planning balance

5.13.1 The proposed development is required to support the construction of the Sizewell C Project. This **Planning Statement** sets out the need for the development and the consideration of the impacts of the proposed Sizewell link road. A combination of public consultation feedback, and options testing, has determined that the proposed route of the Sizewell link road is the most appropriate route. This is further detailed in the Site Selection Report which is appended to this **Planning Statement** (Doc Ref 8.4).

5.13.2 It is acknowledged that any new highway development could result in some form of residual impacts, even after site-specific mitigation measures are implemented. Where residual impacts remain however, they are considered acceptable taking into account the overall benefits of the development. The identified impacts are fully considered in **Chapters 4-12** of **Volume 6** of the **ES** but are summarised as follows:

- Major and moderate adverse residual noise impacts on nearby receptors.
- Negligible air quality impacts.
- Moderate adverse impacts on landscape character and major-moderate adverse impacts on visual receptors.
- Minor adverse and minor beneficial impacts on ecology.
- Moderate adverse impacts on footpaths within the site and minor impacts on footpaths close to the site.
- Minor adverse impacts on heritage assets, historic landscape character and archaeological remains.
- Major adverse impacts on agricultural land.
- Minor adverse impacts on geology through soil erosion.
- Minor adverse and minor beneficial impacts on groundwater.

6 Conclusion

- 6.1.1 NPS EN-1 and NPS EN-6 together form the primary basis for deciding DCO applications for nuclear NSIPs. It has been established that the Sizewell link road is a fundamental part of SZC Co.'s delivery of the Sizewell C Project and would minimise travel impacts and support the movement of construction traffic from the A12 to the main development site. The proposed Sizewell link road has been shown to be the most appropriate route through a process of local consultation and assessment of impacts.
- 6.1.2 Whilst the Sizewell C Project as a whole would, in common with any national infrastructure project, result in some adverse effects to the environment, the main **Planning Statement** states that these would not outweigh the important national significant benefits of the provision of new low carbon energy infrastructure alongside local benefits, such as job creation, investment in the local economy, and the provision of skills for the local workforce. The proposed Sizewell link road forms part of a project that has the potential to create a significant positive legacy for both Suffolk, and the UK.
- 6.1.3 The Sizewell link road itself offers a range of local benefits including the safe movement of construction traffic towards the main development site without placing additional pressure on existing local roads. The proposed development will also make significant contributions to road capacity for the construction of the Sizewell C Project, and will reduce the environmental impacts from noise and vibration that the settlements of Yoxford, Theberton and Middleton Moor would otherwise experience given the high levels of HGV movements per day during the peak construction period.

References

- 1.1 Environment Agency (n.d). Flood Map for Planning. (Online). Accessed at: <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=643642.77&northing=265966.51&placeOrPostcode=Theberton> (Accessed January 2020)
- 1.2 Suffolk County Council (n.d). Suffolk Landscape Character Assessment. (Online). Available at: <http://www.suffolklandscape.org.uk/> (Accessed January 2020)
- 1.3 Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1). (London: The Stationery Office, 2011)
- 1.4 Department of Energy and Climate Change, National Policy Statement for Nuclear Power Generation (EN-6). (London: The Stationery Office, 2011)
- 1.5 Parliament of the United Kingdom. Planning Act 2008. (London, 2008)
- 1.6 Suffolk Coastal District Council (2013). Suffolk Coastal District Local Plan Core Strategy and Development Management Policies. (Online). Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/SCDC-Local-Plan-July-2013.pdf> (Accessed January 2020)
- 1.7 Suffolk Coastal District Council (2019). Suffolk Coastal Local Plan: Final Draft. (Online). Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf> (Accessed January 2020)
- 1.8 Ministry of Housing, Communities and Local Government (2019). National Planning Policy Framework. (Online). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf (Accessed January 2020)