



The Sizewell C Project

8.4 Planning Statement Appendix 8.4G Yoxford Roundabout and Other Highway Improvements 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 8.4G: YOXFORD ROUNDABOUT AND OHI PLANNING STATEMENT

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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 facilitate the construction of the Sizewell C power station, and to mitigate potential environmental impacts associated with the Sizewell C Project.

1.1.2 This **Planning Statement** (Doc Ref. 8.4) considers the site-specific planning issues relevant to the proposed Yoxford roundabout and other highway improvements, which form part of the associated development proposals for the Sizewell C Project.

1.1.3 The 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 **Transport Assessment** (Doc Ref. 8.5) and other documents accompanying the Development Consent Order application.

1.2 Planning Statement Structure

1.2.1 This **Planning Statement** is set out as follows:

- **section 2:** Site and surroundings – describes the site locations, the planning and environmental designations that apply, and the planning history of the sites;
- **section 3:** Proposal – provides a description of the developments, including design specifics, layout and construction programme.
- **section 4:** Policy Context – provides a summary of site-specific planning policies;
- **section 5:** Principal planning issues – provides an assessment of the site against relevant policy; and
- **section 6:** Conclusion – summarises how the other highway improvements comply with relevant policy and weighs the benefits against the harm in the context of the overall scheme.

2. Site and surroundings

2.1 Site location

2.1.1 This associated development is spread across a number of sites covering road junctions and highways across the East Suffolk (formerly Suffolk Coastal) district, from Bramfield to the north to Wickham Market to the south. One of the sites, the A140/B1078 junction west of Coddendam, lies within the Mid-Suffolk district.

2.1.2 The sites are:

- the junction of the A12 and B1122 (Yoxford Roundabout);
- improvements at the A1094/B1069 junction south of Knodishall;
- improvements at the A12/A144 junction south of Bramfield; and
- improvements at the A12/B1119 junction at Saxmundham.

a) The A12/B1122 Yoxford Roundabout

2.1.3 The Yoxford roundabout site covers approximately 2.9 hectares (ha) and lies to the east of Yoxford on the junction of the B1122 (Middleton Road) and the A12, as shown on the Existing Site Plan in **Book 2**.

2.1.4 The site consists of existing road infrastructure and roadside vegetation, together with some Grade 3 agricultural land (good to moderate), which is currently used for horse grazing, and an element of private garden that relates to Satis House. The site is relatively flat, but with a gentle slope down in level from the south to the north.

2.1.5 The site boundary largely follows the existing road layout. To the south and west, existing hedgerows and tree belts define the boundary edge, whilst to the east the boundary runs through existing land used for grazing. Within the areas of grazing, field boundaries are generally post and wire fences.

2.1.6 The closest properties are located around the junction of the B1122 and the A12, namely Rookery Lodge, Rookery Cottages, Pinn's Piece, the Satis House Hotel, Woodland Cottages, Sans Souci, and White Lodge. A sewage works is located to the north-east of the site.

b) The A1094/B1069 junction south of Knodishall

2.1.7 The A1094/B1069 junction is a single carriageway priority T-junction located approximately 2.6km south-west of Knodishall, and 1.1km south-east of Friston, as shown on the Existing Site Plan in **Book 2**.

2.1.8 The site is approximately 1.6ha in area and consists of existing road infrastructure and roadside vegetation. The site boundary largely follows the existing road layout. The site is bounded by woodland and hedgerows to the north, south and west. There is a single residential dwelling to the east of the junction. The surrounding land is Grade 2 to 4 (very good to poor) agricultural land, and is predominantly used for large scale arable farming.

c) The A12/A144 junction south of Bramfield

2.1.9 The A12/A144 junction is a rural ghost island priority T-junction situated approximately 2.7km south-east of Bramfield, and 3.2km north-east of Yoxford, as shown on the Existing Site Plan in **Book 2**.

2.1.10 The site boundary is approximately 1.2ha in area, and largely follows the existing road layout, although there would be a permanent land take of some 0.5ha including agricultural land to the south of the junction. The surrounding land predominately comprises Grade 3 (good to moderate) agricultural land with some residential properties located to the north and south alongside the A12.

d) The A12/B1119 junction at Saxmundham

2.1.11 The A12/B1119 junction is a ghost island staggered crossroads on the A12 situated 1.1km west of Saxmundham and 1.2km south of Carlton, as shown on the Existing Site Plan in **Book 2**.

2.1.12 The site area is approximately 0.9ha, and consists of existing road infrastructure, a watercourse, and roadside vegetation. The site boundary largely follows the existing road layout. The surrounding land use to the north, south, and west predominately comprises Grade 2 to 3 (very good to moderate) agricultural land, and scattered residential dwellings and farm buildings. To the east, on the opposite side of the A12, lies the settlement of Saxmundham.

2.2 Planning and environmental designations

a) A12/B1122 Yoxford Roundabout

2.2.1 The majority of the site lies just outside the Physical Limits Boundary of Yoxford, as defined within the adopted Suffolk Coastal Local Plan (Ref. 1.1).

- 2.2.2 The site lies within, but on the edge of, the Yoxford Conservation Area. There are no listed buildings within the site, but there are two Grade II listed buildings to the west of the site, ‘Satis House’ and ‘White Lodge and the White House’.
- 2.2.3 The site falls within Flood Zone 1, and therefore there is a low probability of flooding. The Environment Agency ‘flood risk from surface water’ (Ref. 1.2) map identifies the majority of the site to be at ‘very low’ surface water flood risk, with several localised areas having a ‘low’ risk.
- 2.2.4 At a local level, the site is located in the ‘rolling estate claylands’ Landscape Character Type, with ‘Valley Meadows and Fens’ Landscape Character Type located immediately to the north as identified in the Suffolk County Landscape Character Assessment (Ref. 1.3). The ‘rolling estate claylands’ is a valley-side landscape of clay loams with parklands and fragmented woodland.
- b) [The A1094/B1069 junction south of Knodishall](#)
- 2.2.5 The site does not comprise any designated heritage assets and does not lie within a conservation area. There are no designated heritage assets within proximity to the site.
- 2.2.6 The site lies within Flood Zone 1, so has a low probability of fluvial flooding, however, the land to the south of the site lies within Flood Zones 2 and 3. The Environment Agency ‘flood risk from surface water’ map identifies the site to have a low risk from surface water flooding.
- 2.2.7 The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty is located along the south-western edge of the site, and the site is located within National Character Area 82: Suffolk Coast and Heaths (Ref. 1.4).
- c) [The A12/A144 junction south of Bramfield](#)
- 2.2.8 The site does not comprise any designated heritage assets and does not lie within a conservation area. However, the Grade II listed Stone Cottage borders the western boundary of the site.
- 2.2.9 The site lies within Flood Zone 1 so has a low probability of fluvial flooding. The Environment Agency ‘flood risk from surface water’ map also identifies the site to have a low risk form surface water flooding.
- d) [The A12/B1119 junction at Saxmundham](#)
- 2.2.10 The site does not comprise any designated heritage assets and does not lie within a conservation area. The nearest designated heritage asset is the

Grade II listed Grove Farmhouse which is approximately 700m to the north-west of the site.

2.2.11 The site lies within Flood Zone 1, so has a low probability of fluvial flooding. The Environment Agency ‘flood risk from surface water’ map identifies the majority of the site to have a low risk form surface water flooding, however, isolated areas of the existing road have a medium probability of surface water flooding.

2.2.12 The site lies within the Saxmundham approved Neighbourhood Plan area. The area was approved on 29 August 2017. The Neighbourhood Plan has not yet been adopted.

2.3 Planning history

a) A12/B1122 Yoxford Roundabout

2.3.1 An application (Local Planning Authority (LPA) ref: C/10/3247) was submitted on land within the western corner of the site and sought permission for the erection of three lodges within the walled garden of Satis House Hotel. The application was approved on 3 March 2011. A prior approval application (LPA ref: C/10/3248) was also submitted for the same development and it was deemed that prior approval was not required.

2.3.2 An application (LPA ref: C/89/2004) was also submitted for junction improvements, including the construction of a roundabout at the A12/B1122 junction, however this application was withdrawn on 29 November 1989. No further information is available as to why the application was withdrawn.

2.3.3 Immediately to the south of A12, and outside but adjacent to the south-west boundary of the site, an application (LPA ref: DC/19/1851/COU) was submitted for the change of use of an existing three-bedroom bed and breakfast, known as Sans Souci, to a five-bedroom bed and breakfast. The application was approved on 21 June 2019.

2.3.4 An application was also submitted on land outside but adjacent to the south-east boundary. The application (LPA ref: C/12/0494) sought permission for the construction of a lake. The application was approved on 28 May 2012.

b) The A1094/B1069 junction south of Knodishall

2.3.5 There are no historic planning applications that lie within the site boundary, however, an application (LPA ref: DC/14/3356/FUL) was submitted for the erection of a dwelling house on land to the south of the junction. This was approved on 10 March 2015.

2.3.6 The dwelling house that borders the south-east of the site has one historic planning application. The application sought permission for the erection of a single storey garage and was approved on 10 December 2003.

c) [The A12/A144 junction south of Bramfield](#)

2.3.7 There are no historic planning applications that lie within the site boundary, however, an application (LPA ref: C/12/1766) was submitted for the erection of a part single and part two-storey extension for the Grade II listed Stone Cottage immediately to the north-west of the site. The application was withdrawn on 20 November 2012. The reasons for the withdrawal are unknown.

d) [The A12/B1119 junction at Saxmundham](#)

2.3.8 An Environmental Impact Assessment (EIA) Screening Opinion (LPA ref: DC/18/2794/EIA) was submitted for the installation of approximately 7.7km of 250-millimetre diameter pipeline on land within the site boundary. The proposal indicates a pipeline to cross the middle of the A12/B1119 staggered crossroads. It was determined on 8 August 2018 that an EIA is not required.

3. Proposal

3.1.1 The proposals for Yoxford roundabout and the other highway improvements have been designed to achieve capacity and safety improvements where these are required to mitigate potential impacts of the Sizewell C Project. They are explained in more detail in **Chapter 2** of **Volume 7** of the **Environmental Statement (ES)** (Doc Ref. 6.8) but a summary of each proposal can be found below. All of the proposed highway improvements would be retained permanently following completion of the Sizewell C Project. .

a) A12/B1122 Yoxford Roundabout

3.1.2 The proposed Yoxford roundabout would be a three-arm roundabout sited approximately 90m to the north of the existing junction of the A12 and B1122 to the east of Yoxford. It would replace the existing ghost island, increasing the capacity of the junction to minimise disruption during the peak construction phase of the Sizewell C Project.

3.1.3 The proposed roundabout would have a diameter of 60m and would be built offline to further minimise disruption. Both the A12, and the B1122, would be realigned to tie-in with the roundabout once constructed.

3.1.4 There would also be a new road to the south of the roundabout to maintain access to the existing row of houses immediately south of the A12.

3.1.5 The Yoxford roundabout would incorporate sustainable urban drainage systems, including an infiltration pond between the proposed roundabout, and the access road to the south.

3.1.6 Existing trees and hedgerows adjoining the site boundary would be retained where possible. Additional landscaping would be provided through grassed areas, including on the proposed cutting and embankment slopes, and new tree and hedgerow planting along the eastern edge of the realigned roads, and around the proposed infiltration basin. Replacement planting would respect the new line of the A12.

3.1.7 There would be street lighting on the roundabout on columns up to 10m in height.

b) A1094 and B1069 junction south of Knodishall

3.1.8 The proposed improvements to the A1094 and B1069 junction involves vegetation maintenance to improve visibility for vehicles exiting the B1069, and the provision of signage and road markings.

3.1.9 SZC Co. is also engaging with SCC to reduce the speed limit at the junction to 40mph to improve the safety of the junction. This would match the required stopping distance to the visibility available when vegetation has been maintained, assisting vehicles turning right out of the B1069 to find suitable gaps in the A1094 traffic and safely complete the manoeuvre.

c) [A12 and A144 junction south of Bramfield](#)

3.1.10 The proposed improvements to the A12 and A144 junction comprise the provision of a physical central reservation island, and waiting area on the A12, allowing vehicles turning right from the A144 to legally undertake the manoeuvre in two stages. The A12 would be widened approximately 2m to facilitate the provision of the central reservation island and waiting area, and pedestrian walkways with dropped kerbs would also be included.

3.1.11 A verge approximately 350m in length would also be provided to the south-east of the A12.

d) [A12/B1119 junction at Saxmundham](#)

3.1.12 The proposed improvements include vegetation maintenance to improve the visibility from the B1119, alternation of the B1119 at the junction with the A12, and the provision of altered and additional road signage to increase driver awareness of the junction.

3.1.13 New road markings would also be provided to clarify the priority within the central reserve and allow right-turning vehicles from the B1119 to negotiate the junction in two manoeuvres.

e) [Approach to plans](#)

3.1.14 The parameters within which the highway improvements will be constructed, operated and maintained are shown on the relevant **Work Plans** (Doc Ref. 2.3):

- Work No. 14A
- Work No. 14B
- Work No. 15
- Work No. 16
- Work No. 17

- 3.1.15 The Draft DCO states that the highway improvements will be constructed, operated and maintained anywhere within the area as shown on the **Work Plans** (listed above), which include lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 3.1.16 These parameters have informed the assessment presented in the **ES Volume 7** and the flexibility being sought is consistent with the findings of the **ES**.
- 3.1.17 There are several plans within the **Yoxford Roundabout and Other Highway Improvement Plans** (Doc Ref. 2.9) set which provided additional detail and are submitted for approval as part of this application for development consent. 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 comprise:
- Yoxford Roundabout Site Clearance Plan
 - Yoxford Roundabout Proposed Landscape Masterplan and Finished Levels
 - Yoxford Roundabout Proposed General Arrangement
 - A1094 / B1069 Junction South of Knodishall Highway Proposed General Arrangement
 - A12 / A144 Junction Proposed General Arrangement
 - A12 / B1119 Junction Saxmundham Proposed General Arrangement
- 3.1.18 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the highway improvements 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** (Doc Ref. 8.3), save to the extent that alternative plans or details are submitted by the undertaker and approved by Suffolk County Council.
- 3.1.19 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**.
- 3.1.20 Illustrative plans are also submitted as part of the **Yoxford Roundabout and Other Highway Improvement 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 and Long 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. 1.5) and Nuclear Power Generation (NPS EN-6) (Ref. 1.6) provide the 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**.

4.1.2 As explained within the **Planning Statement**, the highways improvements are considered to be ‘associated development’ as they have a direct relationship with the principal development (Sizewell C) and are proportionate to the nature and scale of the principal development.

4.1.3 Paragraph 5.13.6 of NPS EN-1 states that a new energy 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. Paragraph 5.13.6 also states that applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts.

4.1.4 Paragraph 5.13.7 of NPS EN-1 states that:

“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 states that the decision maker may attach requirements to a consent where there is likely to be substantial HGV 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 regional 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. 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. 1.7) 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 ESC. This authority was formed through the merger of SCDC and Waveney District Council (WDC) 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 Core Strategy and Development Management Polices (2013)

4.2.5 The Core Strategy and Development Management Policies set out the vision and strategy for development in the area covering the former Suffolk Coastal District to 2027.

4.2.6 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.

- 4.2.7 Strategic Policy SP11 seeks to maximise opportunities for local journeys within the local and strategic road networks serving the district, to support ESC’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.
- 4.2.8 Strategic Policy SP18 supports the provision of new infrastructure in order to service and deliver new development at the required phase of the development.
- b) [Emerging Suffolk Coastal Local Plan \(Final Draft Plan\) \(January 2019\)](#)
- 4.2.9 The emerging Local Plan (Ref. 1.8) 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.
- 4.2.10 There are no additional policies that are considered relevant to the proposed development.
- 4.2.11 Draft Policy Suffolk Coastal Local Plan 3.4: Major Proposals for Major Energy Infrastructure Projects states that proposals and the need to mitigate against them will be considered against policy requirements, including:
- 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.
- 4.2.12 Table 3.6 makes reference to the identified issues relevant to the consideration of energy infrastructure proposals, including the impact on the transport network. The table identifies that the local roads are not well suited to carrying the number, or type of vehicle movements that will be necessary to enable construction and operation of major energy infrastructure projects.

c) [Mid Suffolk Core Strategy \(2008\)](#)

4.2.13 The proposed development at the A140/B1078 junction lies within the joint Mid Suffolk/Babergh District. It identifies (paragraph 1.25) the A14 corridor as a key transport corridor in the region.

4.2.14 Policy CS6 identifies transport infrastructure as a local priority towards which infrastructure contributions may be sought towards.

d) [Babergh and Mid Suffolk Joint Local Plan – Preferred Options \(July 2019\)](#)

4.2.15 Policy LP30 of the emerging Babergh and Mid Suffolk Joint Local Plan (Ref. 1.9) states that development proposals that are expected to, or likely to have major impact on the highway infrastructure will be required to provide a travel plan in accordance with national guidance and should also be supported by a transport statement or assessment.

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 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 proposed highways improvements

5.2.1 The rationale for proposing the proposed development is to assist in accommodating the anticipated construction traffic associated with the main development site. NPS EN-1 states at paragraph 5.13.1 that the transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. As set out in the **Site Selection Report** that accompanies this **Planning Statement**, the **Transport Assessment** (Doc Ref. 8.5) aims to minimise the impact of traffic associated with the construction of Sizewell C on the road network. Nevertheless, the temporary increase in journeys on the network in some cases justifies specific mitigation to relieve potential problems at particular junctions. The works proposed at points on the highway network are where they are considered necessary for the highway safety, and/or highway capacity reasons.

5.3 The location of the proposed highways improvements

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. Following an examination of the geometry of roads, visibility and the constraints to their use by HGVs required for the construction and operation of the Sizewell C Project, six locations that were in need of improvements were identified.

5.3.2 Considerations of the types of impacts that these proposed works are considered to create are set out in turn below. The full discussion of alternatives and the evolution of design can be found at **Chapter 3, Volume 7** of the **ES**.

5.4 Landscape and visual impacts

5.4.1 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.

5.4.2 During the construction of the highways works, a slight localised negative impact has been identified to occur on the local Landscape Character of the highway improvements sites, and their immediate context, arising primarily due to vegetation loss. There would also be some visual impacts to road users and local properties through the construction stage. These however are not expected to be significant effects.

5.4.3 During the operation of the highways post-completion, there are unlikely to be any significant effects on Landscape Character from any of the highways improvement sites given the presence of existing road infrastructure. The proposed improvements may be visible from a limited number of properties close to the location of the works sites.

5.4.4 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.

5.5 Ecology and biodiversity

5.5.1 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 development 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' (Ref. 1.10) 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.

5.5.2 Habitats within the proposed highways improvements areas are unlikely to be of particular importance to invertebrates and reptiles, but some breeding birds may be present in hedgerows, which themselves may also be of value to foraging species such as bats. However, there is a very limited area of potentially suitable habitat identified to lie within the footprint of the highways works so any potential negative impacts would be extremely localised. In the construction phase, hedgerows would be retained wherever possible, and mitigation for the loss of any valuable habitats would be incorporated into the design wherever possible. Temporary construction lighting would be designed to minimise light overspill. There are not considered to be any negative impacts on biodiversity and geodiversity in the operational phase.

5.5.3 **Chapter 7 Volume 7** of the **ES** details the approach to mitigation. The proposed highways works would not require land take from any statutory or non-statutory designated sites. The proposals seek the maintenance of existing roadside vegetation and the provision of new planting where possible. The lighting design would also seek to minimise light spill into adjacent habitats. These measures, sought through the **Code of Construction Practice** (Doc Ref. 8.11) as well as on-site, 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.

5.6 Traffic and transport

5.6.1 Paragraph 5.13.3 of 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.

5.6.2 The package of works listed in **Chapter 3** of this **Planning Statement** offer the opportunity for improvements to existing junctions, and road networks in the area in order to mitigate some of the highways impacts expected from the development of the Sizewell C Project. The **Transport Assessment** also fully details traffic impacts for the proposed development. The improvements to the Yoxford roundabout in particular will deliver capacity improvements to the A12 at the B1122 junction, which are required to accommodate increasing volumes of traffic using this junction, and the location of the new roundabout has been deliberately offset from the A12 so that existing users can still use the road whilst the works are being carried out. Other minor safety improvements are to be implemented at the A12/A144 junction south of Bramfield (additional central reservation island and vehicle waiting area) and at the A12/B1119 junction at Saxmundham (maintenance of vegetation, revised road markings and additional signage).

5.7 Flooding, surface water and groundwater

- 5.7.1 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 (FRA) for energy projects located in Flood Zones 2 and 3. Flood risk is also identified as a Nuclear Impact in EN-6.
- 5.7.2 The Yoxford roundabout lies within Flood Zone 1, and the use of bunds on-site would ensure the run-off of any surface water. The other junctions receiving improvements are not located in river catchments, and so the proposed improvements would not have an impact on surface water. There is no known land contamination within the sites, and construction drainage would likely be contained within the sites or where appropriate, existing drainage could also be used.
- 5.7.3 The **Yoxford Roundabout and Other Highway Improvements Flood Risk Assessment** (Doc Ref. 5.7) outlines that, due to the nature of the works being proposed at five of the six highway improvement sites, a detailed flood risk assessment was not required. Only the Yoxford roundabout site was assessed in detail.
- 5.7.4 Flood risk from tidal, fluvial, groundwater, sewers and reservoirs is low. The large majority of the site is at 'very low' risk of surface water flooding, an area of risk of flooding potentially associated with the existing highways use was identified and is mitigated by the drainage strategy.
- 5.7.5 As a result of locating the development primarily in Flood Zone 1, with no material change at the northern edge in Flood Zone 2, it is considered that there will be no loss in functional floodplain storage or displacement of sea or river flood water as a result of the proposed development. The proposed development is classed as being 'Essential Infrastructure' under the NPPF and is located primarily in Flood Zone 1, with a small part in Flood Zone 2. As per the Flood Risk Vulnerability and Flood Zone Compatibility table, the development is considered appropriate in flood Zones 1 or 2 in terms of flood risk vulnerability. It therefore passes the sequential test.
- 5.7.6 The increase in impermeable area associated with the proposed development has been addressed in the drainage strategy through sustainable surface water management for any additional surface water run-off. A combination of infiltration and controlled discharge methods are proposed for the discharge of surface water run-off. Based on the information presented, the proposed mitigation measures and in accordance with NPPF

guidance, the development site is considered to be appropriate in terms of flood risk.

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 Policy Suffolk Coastal Local Plan 10.3: Environmental Quality states that development proposals will be considered in relation to impacts on soils and the loss of agricultural land. Several of the works proposed involved additional land take in order to facilitate safety and capacity improvements. The Yoxford roundabout installation requires the acquisition of land adjacent to the A12, and the A12/A144 works south of Bramfield require the acquisition of a strip of agricultural land adjacent to the highway.

5.8.3 There are 2.8ha of land considered to be Agricultural Land Classification Grade 3 within the Yoxford roundabout site. Whilst some agricultural land is to be lost as part of the proposed works, the soil is intended to be sustainably re-used as set out in **Chapter 17** of **Volume 7** of the **ES**. No significant adverse residual effects are expected on soils and geology.

5.9 Local amenity

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 Public Rights of Way (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 There are no PRoW within the site boundary at the Yoxford roundabout. Footpath E-584/020/0 runs from the site boundary at the B1122 Middleton Road, away from the site in a south-westerly direction. Several PRoWs pass through the landscape near to the areas of highways works, but there are not

considered to be any significant impacts on these, although there will be some minor visual changes to views as vegetation is managed. This is in accordance with Policy Suffolk Coastal Local Plan 8.2: Open Space, which has a presumption against any development that results in the loss of open space.

5.9.4 With regards to noise and vibration, during the construction phase the standard of good practice outlined in ‘British Standard BS5228-1 Noise: 2009 + A1 2014 – Code of Practice for noise and vibration control at open construction sites’ (Ref. 1.11 and 1.12), would be followed. Embedded mitigation in the form of a selection of quiet plant, switching off equipment when not in use, and control of construction hours of work alongside other means will limit the impacts of noise and vibration on local communities. Finished road surfaces would be in good condition and would thus reduce noise and vibration which may occur where existing road surfaces are uneven. Moderate adverse effects during the construction of Yoxford roundabout are expected but this is not expected to be significant due to the short duration of works. No significant adverse residual noise effects are anticipated during construction or operation.

5.9.5 Table 3.6 of the Final Draft Local Plan sets out themes relevant to the consideration of energy infrastructure proposals and identifies that the construction and transportation noise on local communities is a key health consideration, and so endeavours will be made to minimise any noise impacts of the construction of the highways improvements. 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.

5.9.6 **Chapter 5 of Volume 7** of the **ES** confirms that there are negligible effects on air quality expected during both construction and operation.

5.10 Archaeological and heritage impacts

5.10.1 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.

- 5.10.2 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.
- 5.10.3 The site boundary of the Yoxford roundabout overlaps with the Yoxford Conservation Area. Aside from the upgrades to the Yoxford roundabout, the majority of the works proposed are contained within the current highway extent, where a certain degree of previous disturbance can be expected. It is not considered that any adverse effects would arise from the proposals on to the historic environment.
- 5.10.4 Changes to the setting of designated heritage assets would be very minimal as a result of the limited scope and duration of the work, and these effects would reduce further upon completion of the work, which would overall preserve the character of a Conservation Area as required in Policy Suffolk Coastal Local Plan 11.5: Conservation Areas.
- 5.10.5 No lasting change to the setting of any designated heritage asset is anticipated, and where works take place within a conservation area or adjacent to a designated heritage asset, mitigation can be achieved through detailed design.
- 5.11 **Socio-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, Volume 2** of the **ES** (Doc Ref. 6.3). Given the nature of the construction work, it is not possible to separate out the socio-economic impacts of the works associated with the Yoxford roundabout and other proposed highways improvements 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 (Annex A to the Economic Statement) (Doc Ref. 8.9), and a **Supply Chain Strategy (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 Impact Mitigation Fund available for possible 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 Yoxford roundabout and the proposed A12/A144 junction improvement works south of Bramfield. 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). In addition, 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 Once the Yoxford roundabout works are complete, the modelling of road traffic noise for the two 2028 scenarios (during a typical day and a busiest day of main development site construction) and the 2034 scenario (operation of Sizewell C power station) demonstrated that in all scenarios no significant noise and vibration effects are expected to occur.

5.12.3 No significant effects are expected from the operational use of the proposed A12/A144 junction improvement works south of Bramfield and this was screened-out from the assessment.

5.13 Planning balance

5.13.1 The proposed development is required to support the construction of the Sizewell C Project. This **Planning Statement** relates to the following improvements:

- A12/B1122 Yoxford Roundabout;

- A1094/B1069 Junction south of Knodishall;
- A12/A144 Junction south of Bramfield; and
- A12/B1119 Junction at Saxmundham.

5.13.2 Road safety analysis has also identified potential highway safety issues at two sites (the B1078 and B1079 junction east of Easton and Otley College and the A140 and B1078 junction west of Coddendam). Highway safety measures at these sites will be secured by obligations in a Section 106 Agreement (see draft **Section 106 Heads of Terms (Appendix J)**).

5.13.3 This package of highway works forms a core part of the construction management and implementation of the Sizewell C Project, as they form part of a key mitigation offering to reduce the impact of construction and operational traffic on the local road network.

5.13.4 The works have had their site-specific issues considered, but their limited scope of these works, largely in the footprint of the existing highways network, means that they will have minimal impacts on the local communities. As set out, the construction of the Yoxford roundabout will have a larger development footprint but is to be constructed in a location offset from the A12 so that highways impacts during construction on the A12 are limited.

5.13.5 No significant impacts on ecology, archaeology, heritage, etc. are therefore identified given the limited scope of the works. Further details are available in **Chapters 4-12 of Volume 7 of the ES**, including a full description of the proposed mitigation measures for each topic.

5.13.6 A selection of highways improvements have been tested, and these improvements put forward are considered to offer the best strategy for the mitigation of construction and operational traffic on the highway network. A combination of public consultation feedback and highway modelling has determined the locations for each of the proposed highway improvement works. This is further detailed in the **Site Selection Report** which is appended to this **Planning Statement**.

5.13.7 The identified impacts are fully considered in **Chapters 4-12 of Volume 7 of the ES**, but are summarised as follows:

- Moderate adverse residual noise impacts on nearby receptors;
- moderate to minimal adverse Landscape Character impacts;

- minor impacts on footpaths and PRowS close to the site;
- minor impacts on the setting of nearby heritage assets;
- moderate adverse impacts on agricultural land and soils, given the largely developed nature of the site and low amount of agricultural land loss; and
- minor adverse and minor beneficial impacts on groundwater conditions.

5.13.8 Whilst offering improvements in the management of construction and operational traffic for Sizewell C in the short and medium term, the proposed highway improvement works also offer permanent improvements of highway conditions for the local community. In the case of the Yoxford roundabout, the capacity improvements meet an identified need that would otherwise not be in operation as early without the construction of the Sizewell C Project.

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 package of highways improvement works is a core part of SZC Co.'s delivery of the Sizewell C Project, and would offer the opportunity to bring about highway capacity improvements on the existing highway network that would not be operational in the same timeframe without the delivery of Sizewell C. These improvements then ensure that the impacts of construction and operational traffic are mitigated, alongside local communities seeing a longer-term benefit from these permanent improvements.

6.1.2 Whilst the Sizewell C Project as a whole will, in common with any national infrastructure project, result in some adverse effects to the environment and local community, the main **Planning Statement** states that these (considered individually or collectively) will not outweigh the important nationally significant benefits of the provision of new safe and secure 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 highways improvement works therefore 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 Yoxford roundabout and proposed highways improvements offers a range of local benefits including the maintenance, improvement in junction capacity of multiple road junctions, and 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



contribution towards the road capacity required for Sizewell C, and offers permanent highways improvements as a legacy benefit for local residents.

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