



The Sizewell C Project

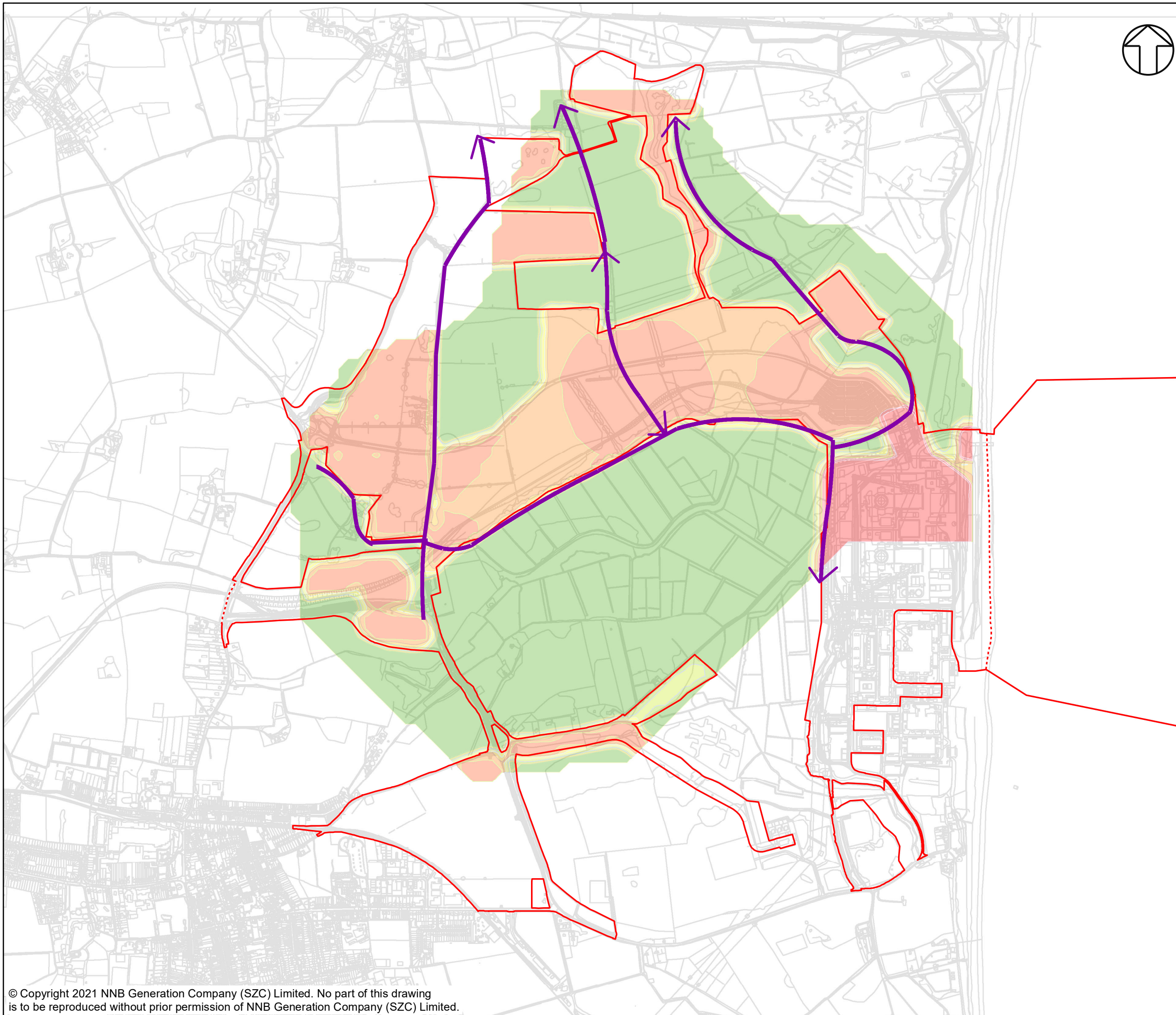
SZC Co.'s Response to the Secretary of State's Request for Further Information dated 31 March 2022: Appendix 4 - Code of Construction Practice (clean version), submitted in response to Question 8.16 and in response to our submission dated 8 April 2022 - Appendices Part 3 of 3

Document Reference: 8.11 / 10.2

Revision: 8.0 / 2.0

April 2022





NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- - - DEMARCATION LINE
- AREAS IDENTIFIED AS BEING KEY COMMUTING ROUTES (INDICATIVE)

NOISE LEVEL LMAX (DB)

- <= 30
- 30 - 35
- 35 - 40
- 40 - 45
- 45 - 50
- 50 - 55
- 55 - 60
- 60 - 65
- 65 - 70

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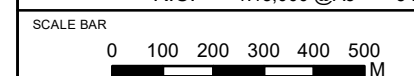


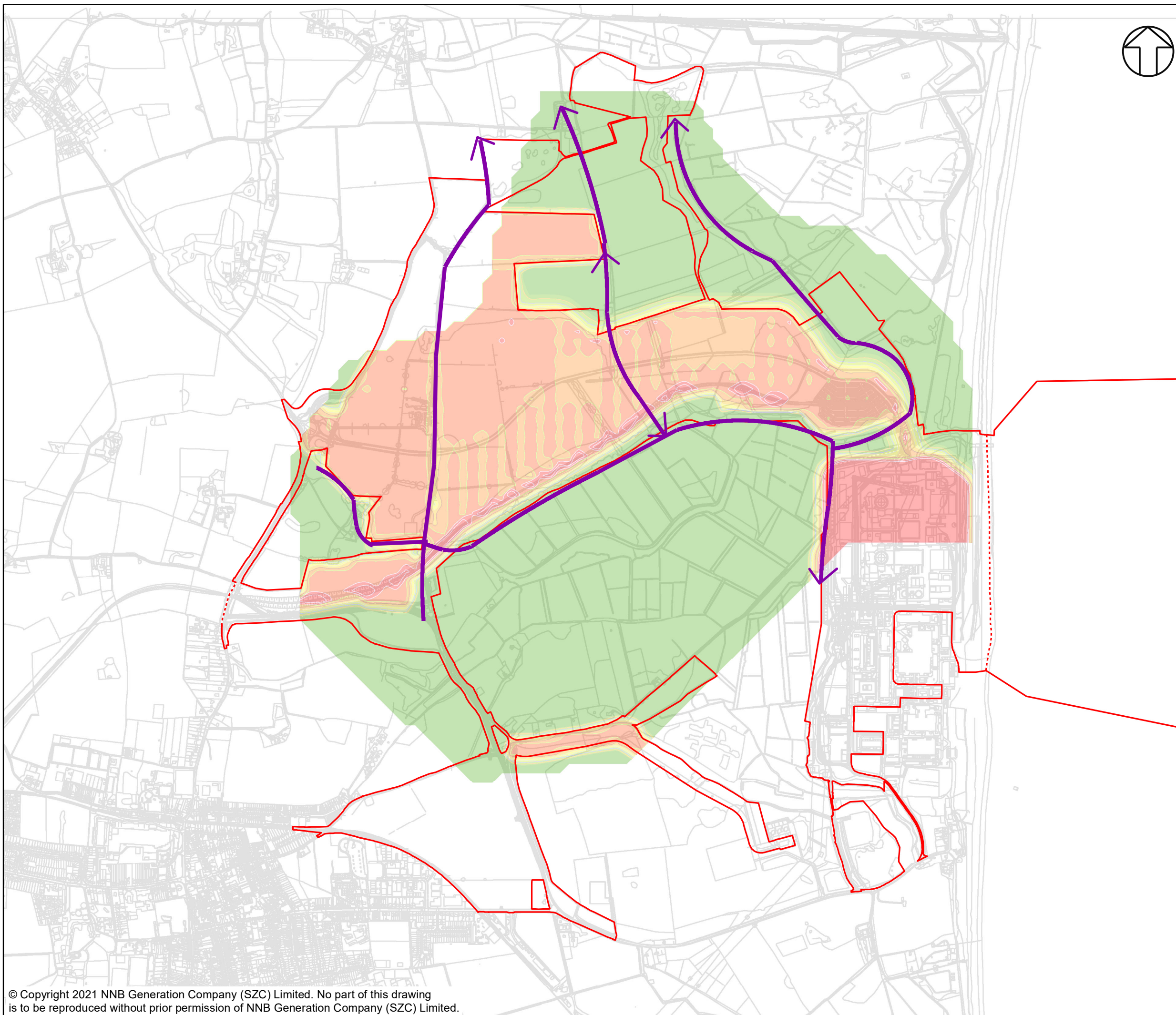
DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT:
 MAIN DEVELOPMENT SITE

DRAWING TITLE:
 IMPORTANT FORAGING/ COMMUTING AREAS
 WITH NOISE (22K) CONTOURS OVERLAID
 CONSTRUCTION PHASE 1

DRAWING NO:
 FIGURE 14C1B.10a

DATE:	DRAWN:	SCALE:	REV:
SEPT 2021	R.C.	1:15,000 @A3	01





NOTES

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- - - DEMARCATION LINE
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NOISE LEVEL LMAX (DB)

- 30
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- 40
- 45
- 50
- 55
- 60
- 65
- 70

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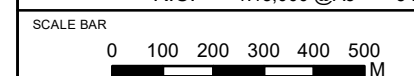


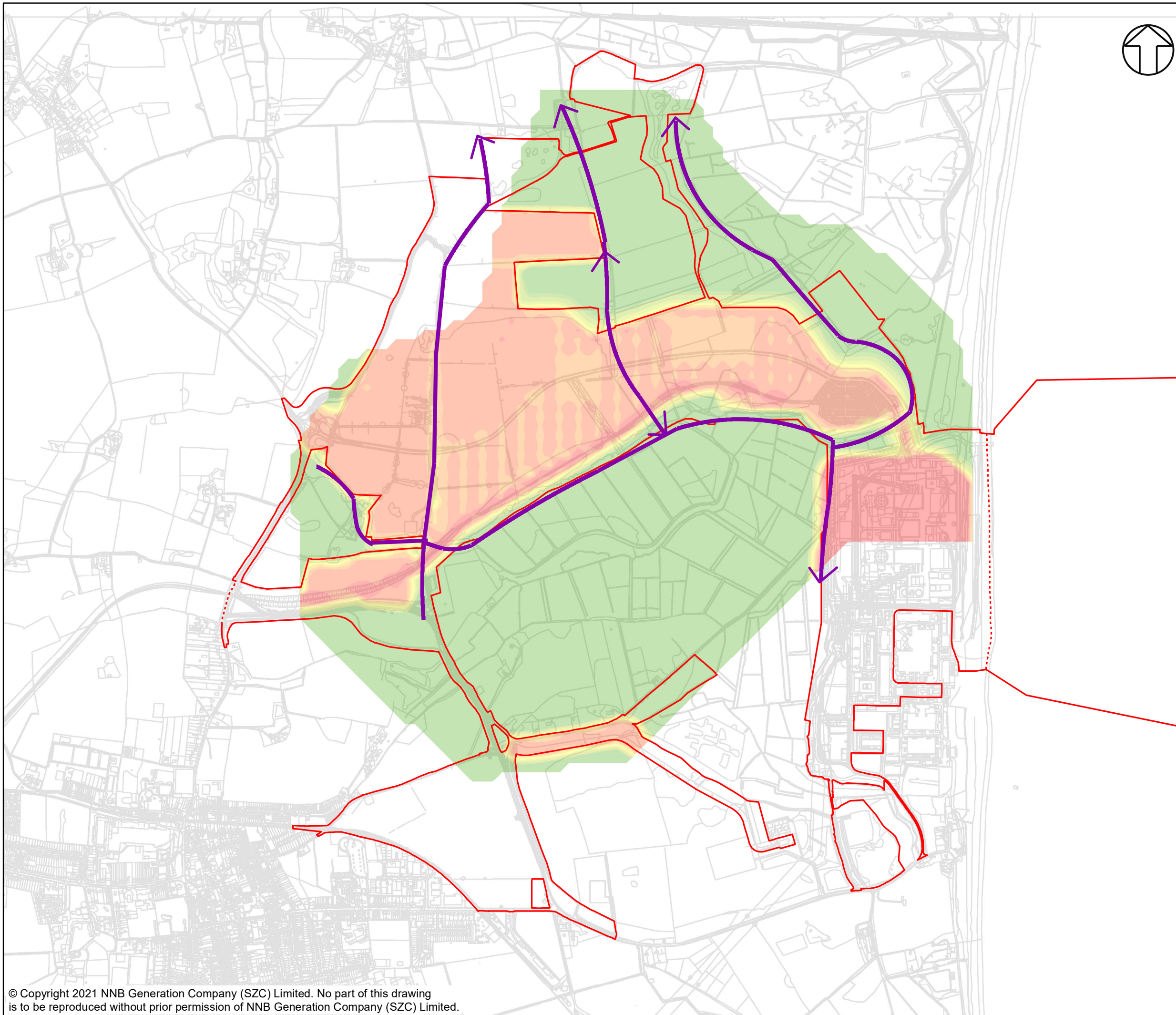
DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT:
 MAIN DEVELOPMENT SITE

DRAWING TITLE:
 IMPORTANT FORAGING/ COMMUTING AREAS
 WITH NOISE (22K) CONTOURS OVERLAID
 CONSTRUCTION PHASE 2

DRAWING NO:
 FIGURE 14C1B.10b

DATE:	DRAWN:	SCALE:	REV:
SEPT 2021	R.C.	1:15,000 @A3	01





NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- - - DEMARCATION LINE
- AREAS IDENTIFIED AS BEING KEY COMMUTING ROUTES (INDICATIVE)

NOISE LEVEL LMAX (DB)

- 30
- 35
- 40
- 45
- 50
- 55
- 60
- 65
- 70

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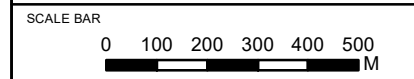


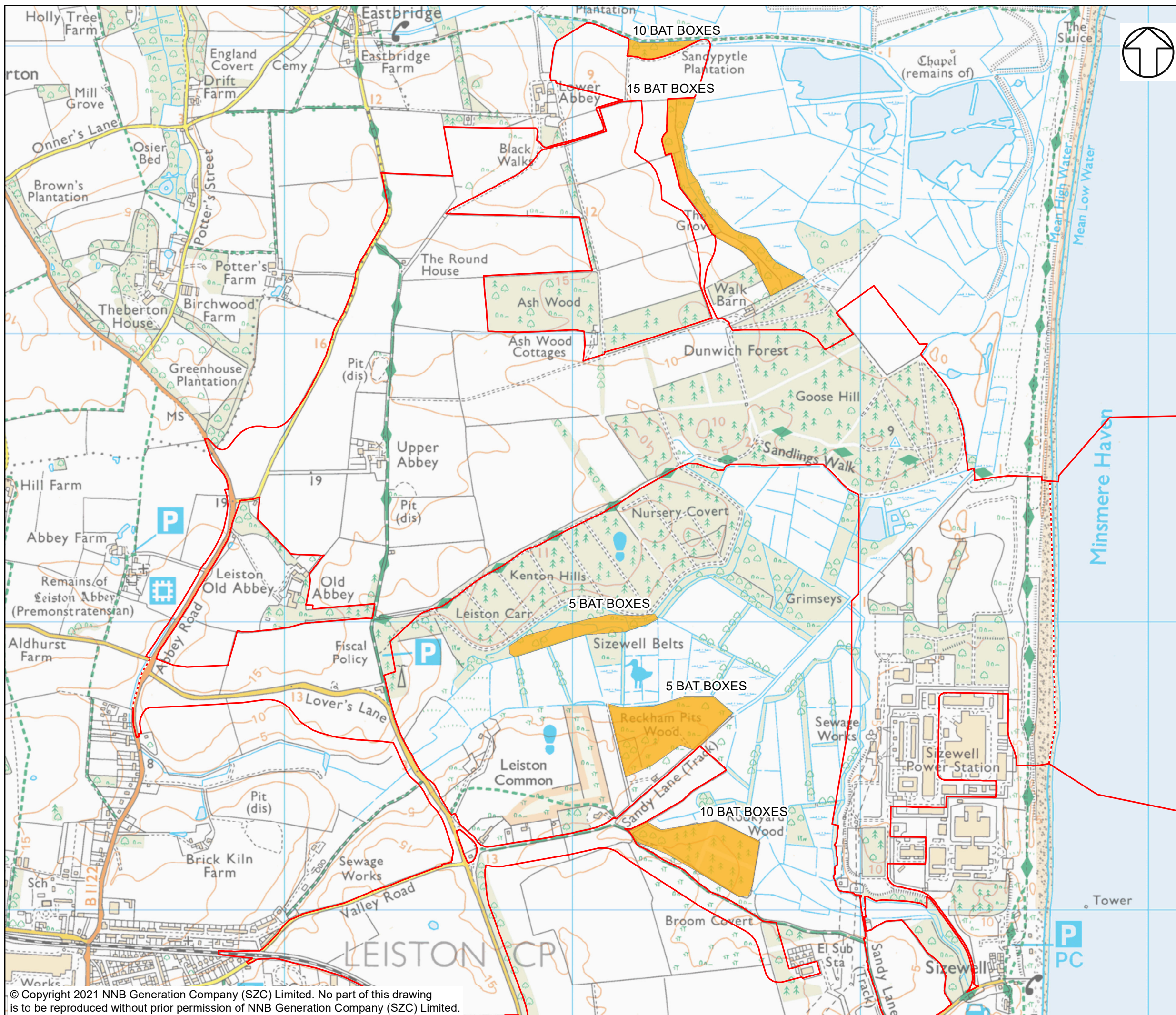
DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT: MAIN DEVELOPMENT SITE

DRAWING TITLE:
 IMPORTANT FORAGING/ COMMUTING AREAS WITH NOISE (22K) CONTOURS OVERLAID CONSTRUCTION PHASE 3&4

DRAWING NO:
 FIGURE 14C1B.10c

DATE: SEPT 2021	DRAWN: R.C.	SCALE: 1:15,000 @A3	REV: 01
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NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- DEMARCATION LINE
- LOCATION OF BAT BOXES

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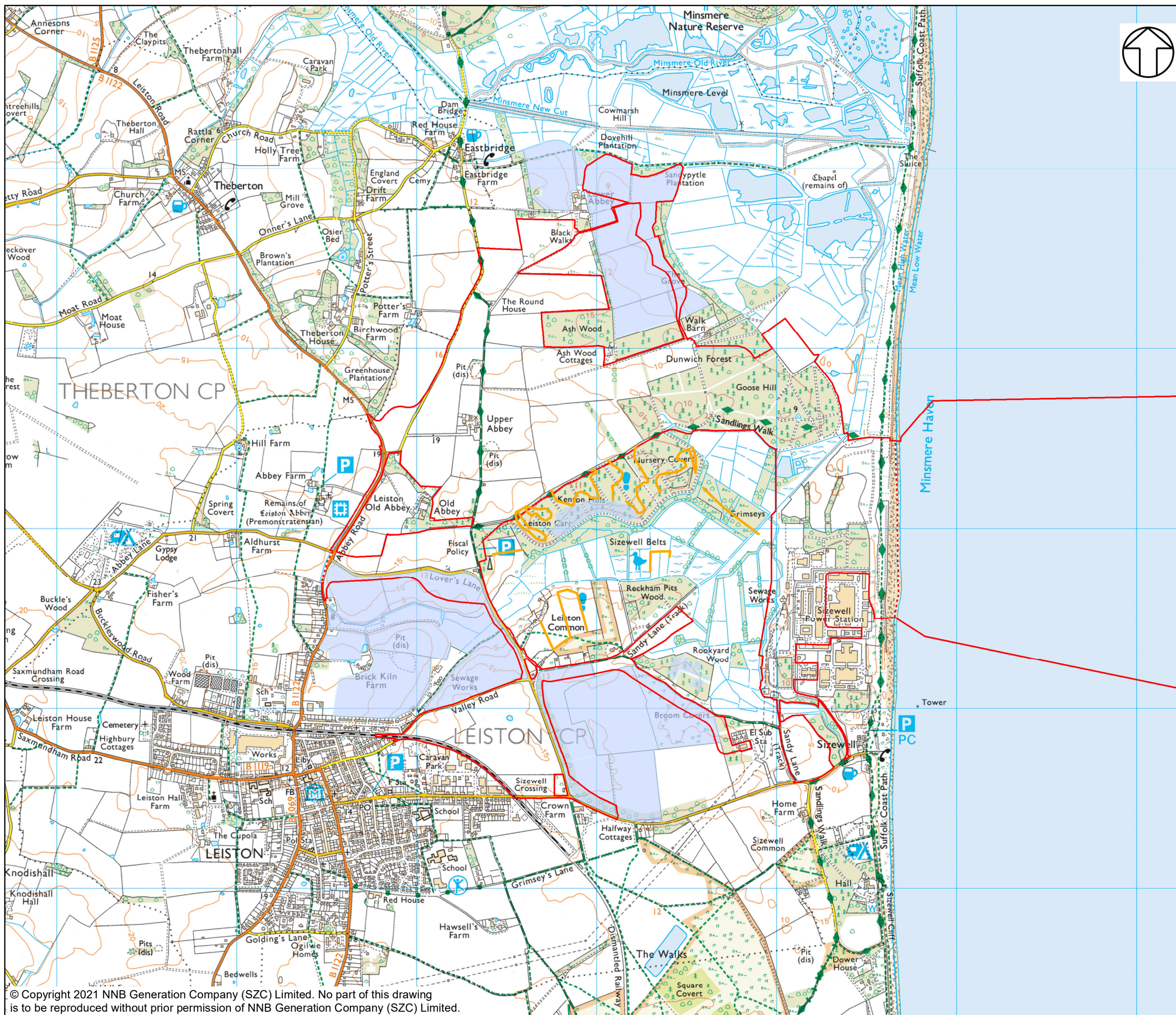
DOCUMENT:
 CHANGES TO THE DCO APPLICATION - JAN 2021
 ENVIRONMENTAL STATEMENT
 VOLUME 2
 APPENDIX 14C1B
 BAT METHOD STATEMENT

DRAWING TITLE:
 LOCATION OF 45 BAT BOXES ERECTED
 AROUND THE SIZEWELL SITE

DRAWING NO:
 FIGURE 14C1A.11

DATE: SEPT 2021 **DRAWN:** R.C. **SCALE:** 1:12,500 @A3 **REV:** 01





- NOTES**
- KEY**
- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
 - - - DEMARCATION LINE
 - MITIGATION AREAS WHERE HABITATS HAVE BEEN ENHANCED AND WILL BENEFIT BATS
 - NEW PLANTING AND RIDE CREATION

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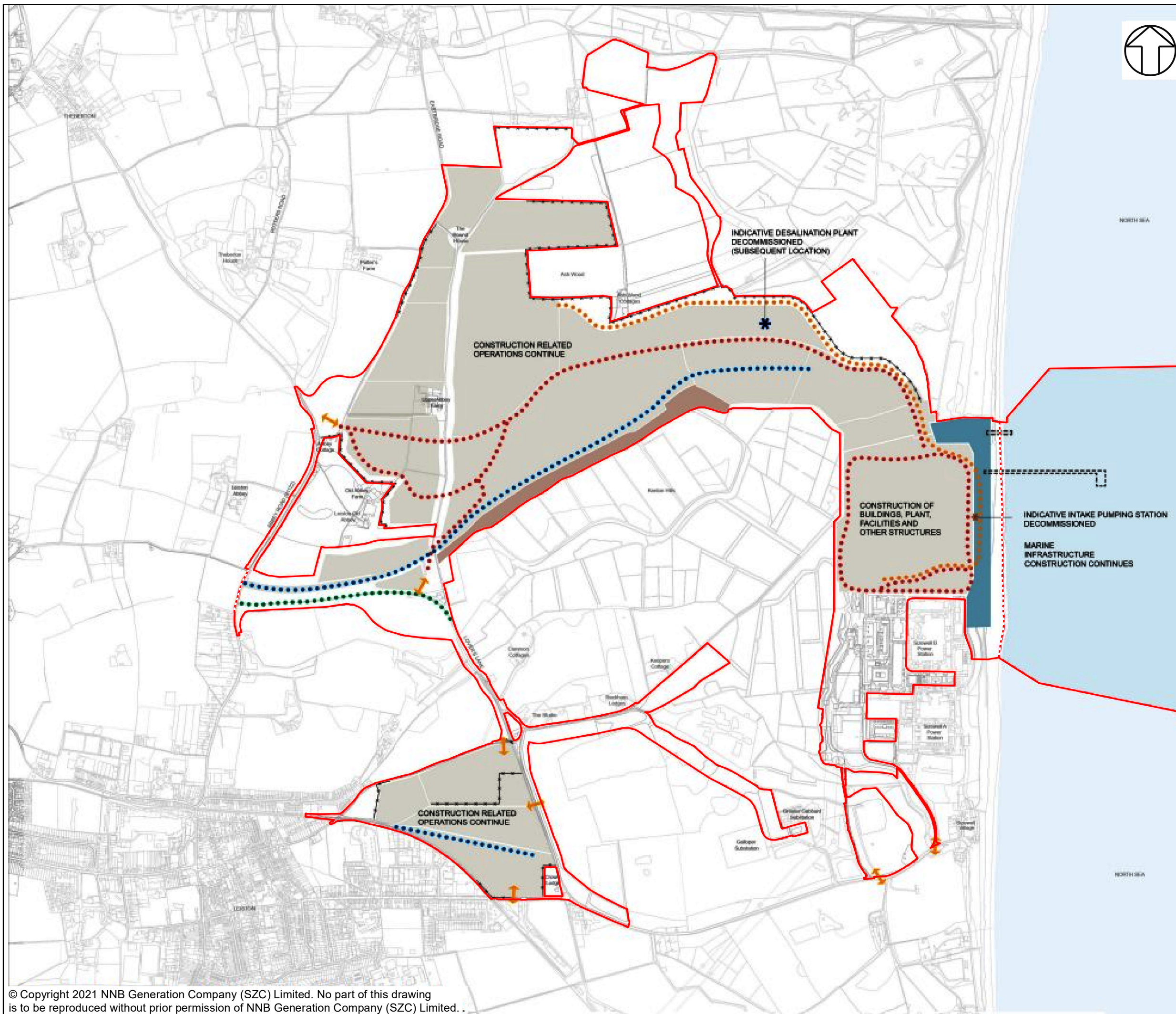
DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT: MAIN DEVELOPMENT SITE

DRAWING TITLE:
 ENHANCED MITIGATION AREAS (WHERE HABITAT HAS BEEN IMPROVED FOR FORAGING BATS)

DRAWING NO:
 FIGURE 14C1B.12

DATE: SEPT 2021 DRAWN: R.C. SCALE: 1:20,000 @A3 REV: 01

SCALE BAR
 0 140 280 420 560 700 M



NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- DEMARCATION LINE
- AREA OF MAIN CONSTRUCTION ACTIVITY
- APPROXIMATE LOCATION OF SITE ACCESS ROADS
- APPROXIMATE LOCATION OF SITE HAUL ROADS
- APPROXIMATE LOCATION OF RAIL ROUTE
- LOVERS LANE REALIGNMENT
- APPROXIMATE LOCATION OF ACOUSTIC FENCE / BUND
- SITE ACCESS
- HARD COASTAL DEFENCE FEATURE
- APPROXIMATE LOCATION OF SOUTHERN BUND
- APPROXIMATE LOCATION OF BLF

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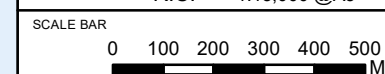


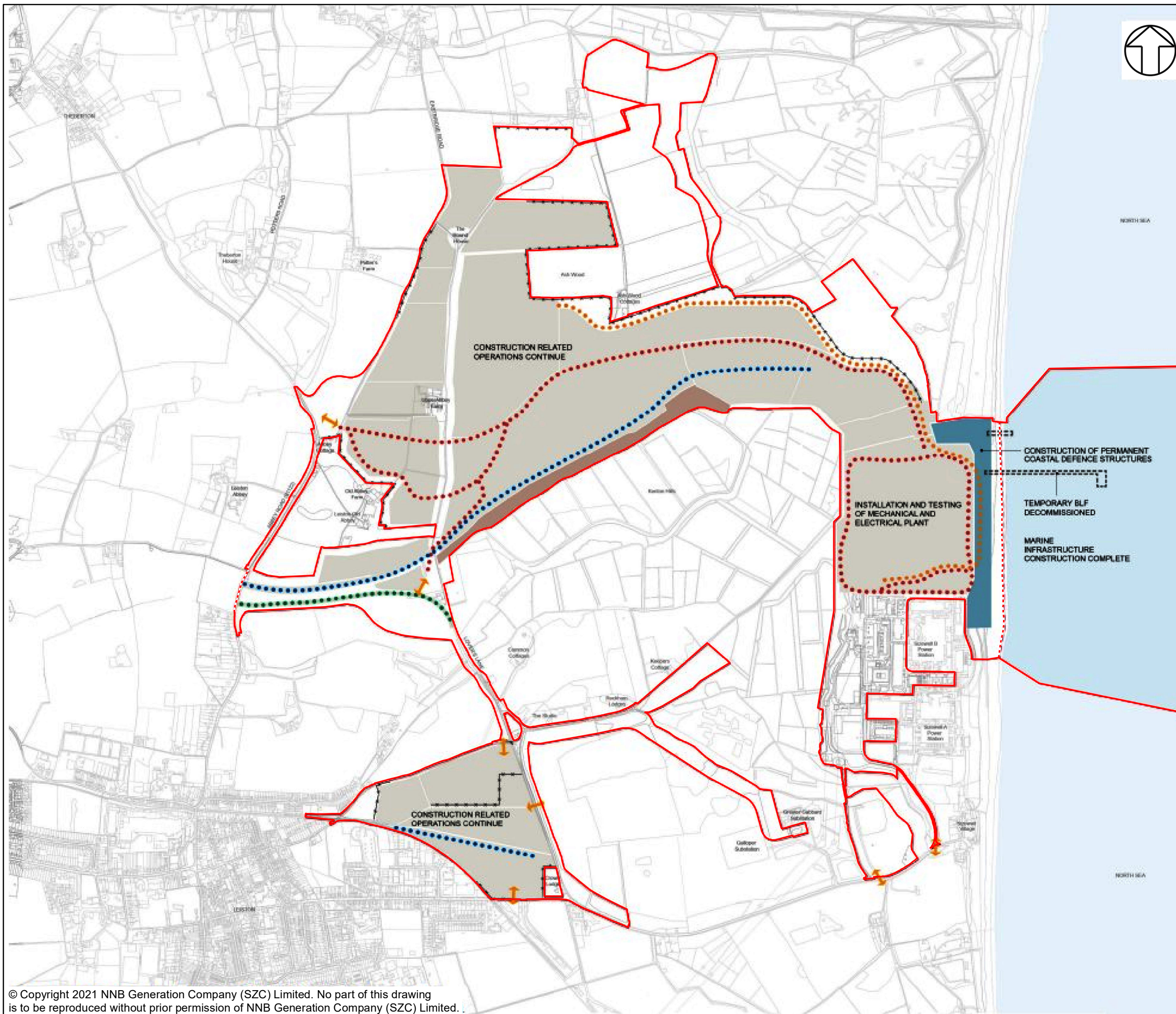
DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT:
 MAIN DEVELOPMENT SITE

DRAWING TITLE:
 CONSTRUCTION AT MAXIMUM IMPACT DURING
 PHASE 3 OF THE DEVELOPMENT

DRAWING NO:
 FIGURE 14C1B.13

DATE: SEPT 2021 **DRAWN:** R.C. **SCALE:** 1:15,000 @A3 **REV:** 01





NOTES

KEY

- SIZEWELL C MAIN DEVELOPMENT SITE BOUNDARY
- DEMARCATION LINE
- AREA OF MAIN CONSTRUCTION ACTIVITY
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- APPROXIMATE LOCATION OF SITE HAUL ROADS
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- APPROXIMATE LOCATION OF ACOUSTIC FENCE / BUND
- SITE ACCESS
- HARD COASTAL DEFENCE FEATURE
- APPROXIMATE LOCATION OF SOUTHERN BUND
- APPROXIMATE LOCATION OF BLF

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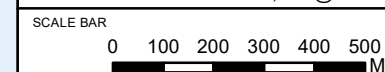


DOCUMENT:
 BAT NON-LICENSABLE METHOD STATEMENT:
 MAIN DEVELOPMENT SITE

DRAWING TITLE:
 CONSTRUCTION AT MAXIMUM IMPACT DURING
 PHASE 4 OF THE DEVELOPMENT

DRAWING NO:
 FIGURE 14C1B.14

DATE: SEPT 2021 **DRAWN:** R.C. **SCALE:** 1:15,000 @A3 **REV:** 01



APPENDIX E MAIN DEVELOPMENT SITE – REPTILE NON- LICENSABLE METHOD STATEMENT (ENVIRONMENTAL STATEMENT VOLUME 2 CHAPTER 14 APPENDIX 14C2B)



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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None provided.

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1. Reptile Non-Licensable Method Statement: Main Development Site

1.1 Introduction

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

1.1.2 This bat non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and Scheme Overview

1.1.6 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as 'Sizewell C') located to the north of the existing Sizewell B Power Station.



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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- 1.1.7 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.
- 1.1.8 This Reptile Method Statement compiled by Arcadis Consulting (UK) Limited (hereafter referred to as 'Arcadis') outlines the key approaches to mitigating potential impacts to the reptile populations present within or adjacent to the construction site for Sizewell C Main Development Site. It must be used by SZC Co. in relation to the proposal to build the Sizewell C.
- 1.1.9 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.
- 1.1.10 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area. These are:
- Two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the 'northern park and ride'), and one to the south-west at Wickham Market (the 'southern park and ride') to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
 - A permanent road to bypass Stratford St Andrew and Farnham (referred to as the 'two village bypass') to alleviate traffic on the A12 through the villages;
 - A permanent road linking the A12 to the Sizewell C main development site (referred to as 'Sizewell link road') to alleviate traffic from the B1122 through Theberton and Middleton Moor;

- Permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- A temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site;
- A temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network; and
- Green rail route extension and rail improvements to the Saxmundham to Leiston branch line.

1.1.11 The components of the Project listed above are referred to collectively as the ‘Sizewell C Project’.

b) **Site Location and Setting**

1.1.12 The main development site is located on the Suffolk coast, to the north of the existing Sizewell A and B power station complex. The total size of the proposed development is approximately 365ha, which encompasses five land parcel components, which are described below:

- Main platform: the area that would become the power station itself;
- Sizewell B relocated facilities and National Grid land: the area that certain Sizewell B facilities would be moved to in order to release Sizewell B land for the proposed development and the area required for the National Grid transmission network;
- Offshore works area: the area where offshore cooling water infrastructure and other marine works would be located;
- temporary construction a: the area located primarily to the north and west of the proposed Sizewell Marshes Site of Special Scientific Interest (SSSI) crossing, which would be used to support construction activity on the main platform; and
- Land east of Eastlands Industrial Estate (LEEIE): the area including and directly to the north of Sizewell Halt, which would be used to support construction on the main platform and TCA.



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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1.1.13 The existing EDF Sizewell power station complex comprises a series of buildings associated with the power station, parking areas, access infrastructure and ancillary structures. The proposed development footprint is dominated by arable fields with field boundaries comprising native, species poor hedgerows or tree lines. Areas of woodland encompasses the EDF power station complex on the northern, western and southern boundaries, whilst several woodland blocks, comprising plantation, mixed plantation and broadleaved semi-natural woodland, are scattered across the site. The larger area present to the north east includes Hilltop Covert, Dunwich Forest, Goose Hill and the northern boundary of Kenton Hills. Numerous farm buildings and structures are also scattered to the north and west of the site. Portions of the site falls within the following designated sites:

- Sizewell Marshes SSSI – a small wetland area, including fen meadow habitat;
- Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB);
- Sizewell Levels and Associated Areas County Wildlife Site (CWS) – largely plantation woodland and acid grassland; and
- Suffolk Shingle Beaches CWS – dune grassland and vegetation shingle.

1.1.14 The area covered by this method statement is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



1.1.15 The purpose of the works is to install a new nuclear power station at the Sizewell site. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) **Key Ecological Constraints**

1.1.16 The key potential ecological constraints associated with the facilitation works within the site include:

- **Badger;**

- Bats;
- Deptford Pink;
- Great Crested Newt;
- Natterjack Toad;
- Reptiles
- Water Vole; and
- Otter.

This reasonable avoidance measures method statement only covers guidance relating to reptiles, however reasonable avoidance measures method statements and / or draft protected species licences for badger, bats, Deptford pink, natterjack toad, water vole and otter have also been prepared.

1.1.17 In order to enable the proposed development of the main development site, as detailed above, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the presence of reptiles within the site, the proposed works have the potential to cause injury/ mortality of reptiles that may be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

1.1.18 The content of this reasonable avoidance measures method statement has been devised based on consultation with Natural England and other stakeholders. Mitigation measures for reptiles are set out in detail in the **Reptile Mitigation Strategy** (Appendix C of Part B of the CoCP (Doc Ref. 10.2)).

1.2 Site reasonable avoidance measures method statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

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1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from the individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox Talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (Appendix 1) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (Appendix 2) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Reptiles**

a) **Site Status**

1.3.1 Given that the site supports large areas of long sward open grassland, arable hedgerow margin, conifer plantation, ride, scrub, a portion of Sizewell Marshes Sites of Special Scientific Interest (SSSI) and the landscape plantations on the main platform, reptiles are relatively widespread within the

site. Moreover, desk-study data received from the Suffolk Biodiversity Information Service (SBIS) returned a large number of records of reptiles within the immediate 2km surrounds of the site.

1.3.2 Surveys carried out between 2007 and 2020 by Wood Group and Arcadis Consulting (UK) recorded regular observations of all four reptile species including adults, sub-adults and juveniles. Following the completion of the reptile survey work, mean population density estimates were calculated for each of the species encounter, as set out below:

- Common lizard, 6.0 per ha;
- Slow-worm, 12.1 per ha;
- Adder, 9.3 per ha; and
- Grass snake, 6.1 per ha.

1.3.3 Froglife present criteria for assessment of a Key Reptile Site. To qualify, the site in question must meet at least one of the following criteria:

- supports three or more reptile species;
- supports two snake species;
- supports an exceptional population of one species;
- supports an assemblage of species scoring at least 4; and
- does not satisfy the previous criteria but which is of particular regional importance due to local rarity.

1.3.4 As a result, given that the site satisfies the first four of these criteria, it is considered to constitute a Key Reptile Site. As such, measures have been set out below to ensure that this species group is safeguarded during the proposed facilitating works.

b) Legislation

1.3.5 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (WCA) (as amended) (HMSO, 1981 as amended) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (HMSO 2000)).

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1.3.6 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (HMSO, 2006). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

c) **Toolbox Talk**

1.3.7 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.

1.3.8 Site-specific toolbox talks, as defined by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features ,must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) **Precautionary Working Methods**

1.3.9 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.

1.3.10 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).

1.3.11 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance

exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.

1.3.12 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co. must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

- Vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature). The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
- The ECoW and the contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
- The ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- Initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- Subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- The grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- Vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- Any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this should be overseen by the ecologist. If a reptile is found

¹ Advanced works approach would integrate vegetation clearance in relation to breeding birds, reptiles, water voles and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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the ecologist must decide whether or not it is appropriate to relocate the animal;

- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- If reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be within the one designated reptile receptor areas (Kenton Hills, St. James Covert and Broom Covert) near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.13 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating work requirements

a) Vegetation Clearance Methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area,

supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Such methods are likely to require a hand search and a staged vegetation clearance approach under direct supervision.




1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) Vegetation Clearance Equipment

1.4.7 SZC Co. must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example:

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- Brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) Ground-breaking Works Methods

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the absence of suitable habitat within the areas proposed for ground-breaking works.

1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), the ground-breaking works must be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

d) Ground-breaking Works Equipment

1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- Spade;
- Spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

	
<p><i>JCB 16C-I New Generation 1 Tonne Mini Digger</i></p>	<p><i>Chapter 8 barrier/ Heras fencing</i></p>



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

NOT PROTECTIVELY MARKED

References

- 1.1 HMSO (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

NOT PROTECTIVELY MARKED



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

NOT PROTECTIVELY MARKED

Appendix 14C2B.1: Toolbox Talk Example

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SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Reptiles

Reptiles in the UK



IF BITTEN SEEK MEDICAL HELP IMMEDIATELY.

Legal Protection

All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brash piles, mammal burrows and tree / hedgerow roots.

NOT PROTECTIVELY MARKED



SIZEWELL C PROJECT
MAIN DEVELOPMENT SITE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Appendix 14C2B.1: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

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**APPENDIX F MAIN DEVELOPMENT SITE – GREAT
CRESTED NEWT NON-LICENSABLE METHOD
STATEMENT (FIRST ENVIRONMENTAL STATEMENT
ADDENDUM VOLUME 3 CHAPTER 2 APPENDIX 2.9.C2)**

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TABLES

None Provided.

PLATES

None Provided.

FIGURES

None Provided.

1 INTRODUCTION

1.1 Summary

- 1.1.1 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station. The project is being submitted as a Nationally Significant Infrastructure Project (NSIP).
- 1.1.2 This updated non-licensable method statement outlines the key approaches to mitigating potential impacts to the great crested newt (*Triturus cristatus*) populations present within or adjacent to the construction site for the Sizewell C main development site. It must be used by SZC Co in relation to the proposal to build Sizewell C.
- 1.1.3 Level 1 control documents will either be certified under the Development Consent Order (DCO) at grant or annexed to the Deed of Obligation (DoO). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and DoO set out the status of each Level 1 document.
- 1.1.4 This great crested newt non-licensable method statement (hereafter referred to as the ‘reasonable avoidance measures method statements’) is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.
- 1.1.5 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.
- 1.1.6 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).
- 1.1.7 For the purposes of this document the term ‘SZC Co.’ refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by

the dDCO), its appointed representatives and the appointed construction contractors.

1.1.8 Surveys undertaken in 2020 confirmed that great crested newts were present in two ponds to the west of the site (Ponds 4 and 30). Four ponds within 500m of the site boundary (Ponds 6, 9, 17 and 18) were not surveyed in 2020 due to access restrictions. Great crested newt presence has been assumed within these ponds and therefore they were subject to a Rapid Risk Assessment (RRA). The full results are detailed within the **Great Crested Newt Survey Report 2020** [[AS-021](#)].

1.1.9 Any suitable great crested newt habitats within the construction zone, up to 500m from the six ponds listed above, will require Precautionary Working Methods (PWM) to reduce the risk of causing injury/mortality of great crested newt and avoid contravention of the relevant legislation.

1.2 Great Crested Newt Legislation

1.2.1 Great crested newt is listed on Schedule 5 of the Wildlife and Countryside Act (WCA) 1981 (as amended) (Ref. 1) in respect of Section 9, which makes it an offence, inter alia, to:

- Intentionally or recklessly kill, injure or take (handle) a great crested newt;
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a great crested newt uses for shelter or protection; or
- Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place that it uses for shelter or protection.

1.2.2 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref. 2).

1.2.3 Great crested newt receives further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017. They are listed on Schedule 2 of the Regulations, which makes it an offence, inter alia, to:

- Deliberately capture, injure or kill a great crested newt;
- Deliberately disturb a great crested newt, in particular any disturbance which is likely:

1.2.4 Impair their ability to:

- Survive, to breed or reproduce, or to rear or nurture their young, or
- Hibernate or migrate
- Significantly affect the local distribution or abundance of great crested newt; or

- Damage or destroy a breeding site or resting place of a great crested newt.

1.2.5 Great crested newt is also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref. 3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

2 GREAT CRESTED NEWT BASELINE INFORMATION

2.1 Desk Study

2.1.1 Desk-study data received from the Suffolk Biodiversity Information Service (SBIS) returned no records of great crested newt within the boundaries of the site, given the presence of suitable aquatic and terrestrial habitat within the site, specific presence/ absence surveys were undertaken with respect to great crested newt within the site. The full desk study information is detailed within the **Volume 2, Chapter 14: Appendix 14A5, Annex 14A5.2** of the ES [[APP-233](#)].

2.2 Field Surveys

a) 2007-2016 Surveys

2.2.1 Full details of previous great crested newt surveys are located within the **Volume 2, Chapter 14, Appendix 14A5** of the ES [[APP-233](#)], however an overview is detailed below.

2.2.2 Great crested newt surveys were carried out between 2007 and 2010 by Wood Group and in 2014 and 2016 by Arcadis Consulting (UK). These surveys all recorded an absence of great crested newts within the site boundary.

2.2.3 The eDNA surveys carried out in 2014 by Arcadis confirmed that great crested newts were present within four offsite ponds within 500m of the boundary, located to the west of the site (Ponds 2, 4, 5 and 30). Great crested newt presence was also recorded in Ponds 55 and 57, however these are located more than 500m from the site boundary.

b) Updated Surveys 2020

2.2.4 Updated eDNA surveys were undertaken by Arcadis in 2020 on 24 waterbodies by licensed surveyor Duncan Sweeting (great crested newt survey licence holder: 2015-16722-CLS-CLS) and accompanied by field assistant Kevin Burgess). All waterbodies surveyed within the MDS boundary resulted in negative eDNA results, confirming that great crested newts were absent from these waterbodies. The full results of the 2020 surveys are detailed in the Great Crested Newt Survey Report 2020 (Doc Ref. 6.13) [[AS-021](#)].

2.2.5 Two ponds to the west of the MDS boundary returned positive eDNA results, confirming great crested newt presence in Pond 4 (340m west) and Pond 30 (475m west). Ponds 2 and 5 returned negative results in 2020 (refer to **Figure 1** in **Annex A** for pond locations).

2.2.6 Access was not granted for four waterbodies within 500m of the site boundary in 2020 (Ponds 6, 9, 17 and 18) and these ponds were not surveyed. Ponds 6 and 9 have never been surveyed as part of the SZC project due to access restrictions. Ponds 17 and 18 were surveyed in 2016, where the eDNA results were negative. All of these waterbodies are located towards the west and southwest of the site, the distance and direction of each pond in relation to the site boundary are as follows:

- Pond 6 is located approximately 20m east alongside Abbey Road.
- Pond 9 is located approximately 230m west.
- Pond 17 is located approximately 335m south.
- Pond 18 is located approximately 370m south.

2.2.7 For the purposes on informing mitigation, great crested newts are assumed present within these four ponds as absence cannot be confirmed at this stage. Great crested newts tend to be present within terrestrial habitats at an increasingly low density the further these habitats are from a breeding pond(s), generally occurring within approximately 500m of the relevant pond.

2.3 Rapid Risk Assessment (RRA)

2.3.1 The rapid risk assessment was applied to Ponds 6, 9, 17 and 18 and the calculation assumes that all of the waterbodies support breeding great crested newt, to ensure a ‘worst case’ assessment. The rapid risk assessment resulted in ‘*Amber: offence likely*’ regarding the risk of harming great crested newt during the proposed works and the same result was obtained when assessing Ponds 6 and 9 separately; ‘*Green: offence highly unlikely*’ was obtained for Ponds 17 and 18, when assessed separately.

2.3.2 As detailed in the **Great Crested Newt Survey Report 2020** [[AS-021](#)], Ponds 6, 9, 17 and 18 are located to the west and southwest of the site boundary. It is assumed that great crested newts are present within the four ponds but there appears to be no reason to expect them to move towards the proposed construction area. Movements are likely to be restricted to the suitable terrestrial habitats in closer proximity to these ponds (such as mature woodland blocks) and across the landscape between these ponds.

2.3.3 Following the RRA, it is considered that any impacts from the proposed works are likely to be negligible on great crested newts. PWM are proposed with regards to the construction works within 500m of Ponds 4, 6, 9, 17, 18 and 30 where great crested newts are confirmed or assumed to be present (see **Figure 1 in Annex A**).

3 PRECAUTIONARY WORKING METHODS

3.1 Overview

3.1.1 Precautionary working methods (PWM) must be followed to reduce the risk of causing injury/mortality of great crested newts and avoid contravention of the relevant legislation. the Ecological Clerk of Works (ECoW) must oversee and quality-control the implementation of the tasks undertaken by site contractors to facilitate the works.

3.1.2 It should be noted that where PWM are deemed necessary, such measures can only take place during February – November (inclusive) and with weather conditions suitable for the species to be active, and not torpid. Where hibernating or torpid animals are found unexpectedly, best practice methodology must be followed. In the event that a great crested newt is discovered during implementation of PWM, the ECoW must determine whether works can continue in that area.

3.1.3 The biosecurity guidelines in Amphibian Disease Precautions: A Guide for UK Fieldworkers, ARG-UK Note 4 will be followed by all ECoWs and assistants carrying out PWM (Ref. 4).

3.1.4 PMW are intended to render habitats unsuitable for great crested newts (and other non-target species) and remove potential resting places. They are proposed for all habitats within 500m of a great crested newt pond (confirmed and assumed presence), which includes Ponds 4, 6, 9, 17, 18 and 30. However, some habitats (e.g. arable fields) are already maintained in an unsuitable condition for great crested newt and therefore vegetation removal and hand/destructive searches in these areas may not be necessary (providing current management regimes remain until construction begins).

3.2 Toolbox Talk

3.2.1 Before any works commence, SZC Co. must ensure that all those persons involved with the PWM activity are briefed by way of a 'toolbox talk', given by the ECoW (or a nominated person).

3.2.2 The toolbox talk must include guidance upon: great crested newt identification; what to do should a great crested newt be found; good working practices; mitigation methods and the legal protection granted to great crested newts (refer to **Annex B**). A declaration of understanding must be signed by the site contractors (refer to **Annex C**). Evidence of such training must be available for inspection.

3.3 Vegetation Removal

- 3.3.1 Any vegetation that is required to be removed to facilitate construction works, must be removed in two phases:
- 3.3.2 Vegetation within suitable habitats up to 500m from the ponds must be cut to 150mm above ground level and removed from the works footprint. The area will then be left undisturbed for at least 24 hours. Any clearance within 250m of the ponds must be undertaken by hand tools or flail mounted attachments that do not require heavy machinery to be tracked over vegetation, and in conjunction with a hand search (see below for details). Low-pressure vehicles may be used dependent on the ground conditions and at the discretion of a supervising (ECoW).
- 3.3.3 Where vegetation within 500m of the ponds remains dense, this must be cleared to ground level, with arisings removed. The area must again be left undisturbed for at least 24 hours.
- 3.3.4 Following at least 24 hours from the second phase of vegetation removal, soil stripping of the area will commence with arisings removed from the works footprint. Where necessary, this must be undertaken in conjunction with a secondary hand search and destructive search (see below for details).
- 3.3.5 The working area must be maintained free of vegetation for the duration of the works.

3.4 Hand and Destructive Searches

- 3.4.1 Such activities must only be carried out by an ECoW and in suitable habitats within the works footprint that are situated within 250m from the great crested newt ponds. This activity only applies to a small area within 250m of Pond 6 (refer to **Figure 1** in **Annex A**). Hand searches comprise the dismantling and removal of potential refuges by hand. This must be undertaken during the first phase of vegetation removal and again prior to soil stripping to ensure any potential refugia obscured by vegetation is identified and removed.
- 3.4.2 Destructive searches comprise the careful stripping of potential refuge areas or habitat piles that could not be easily dismantled by hand (i.e. larger/heavier/partially buried/labour intensive refugia). Where possible, stripping of these areas must first be undertaken with use of non-mechanical hand tools, followed by machinery for any remaining areas.

3.5 Other Considerations

- 3.5.1 The measures listed above must be undertaken with consideration to nesting birds (March to August, inclusive). Pre-works check for bird nests



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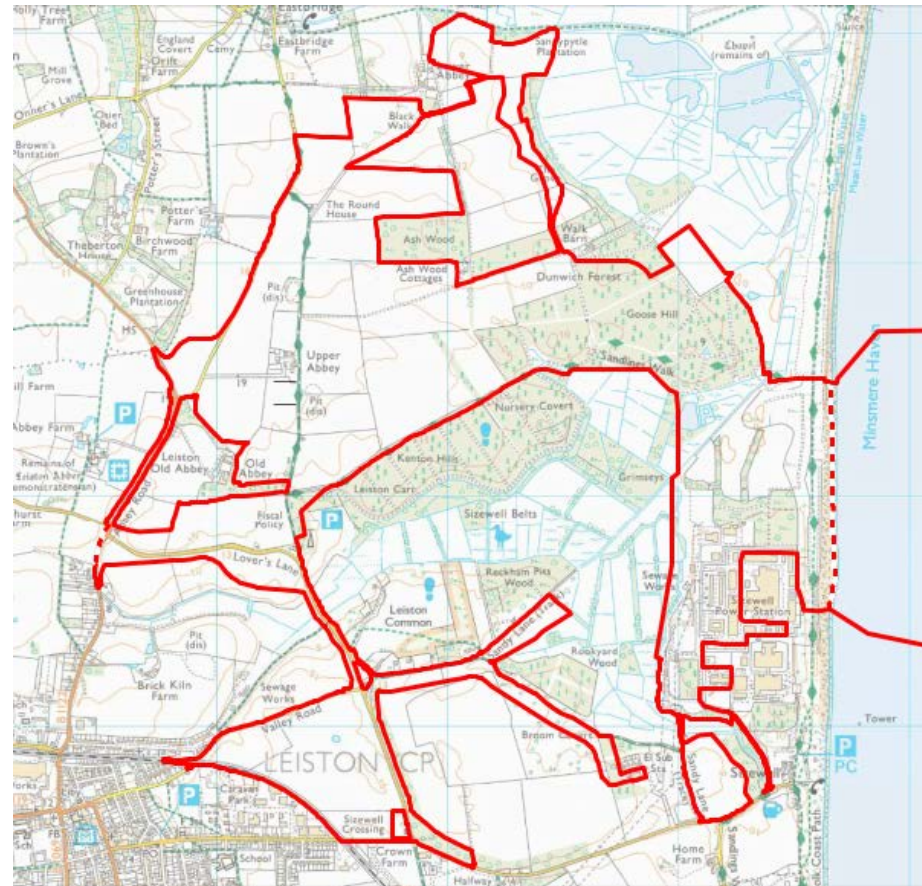
must be undertaken and if an active nest is found, a minimum 4m works exclusion zone must be marked out by the ECoW and vegetation must be retained around the nest until the young have fledged. The period that nests are active for varies between species and can be several months. An estimated time until completion must be determined by the ECoW and re-inspection(s) must be planned until the young have fledged.

REFERENCES

1. Wildlife and Countryside Act, as amended. 1981. (Online) Available from: <http://www.legislation.gov.uk/ukpga/1981/69/contents> (Accessed 01 September 2020).
2. The Countryside Rights of Way (CRoW) Act. 2000. (Online) Available from: <https://www.legislation.gov.uk/ukpga/2000/37/contents> (Accessed 01 September 2020).
3. Natural Environment and Rural Communities (NERC) Act. 2006. Section 41: Species of Principal Importance in England. (Online) Available from: <http://www.legislation.gov.uk/ukpga/2006/16/section/41> (Accessed 01 September 2020).
4. ARG UK. 2017. Amphibian Disease Precautions: A Guide for UK Fieldworkers, ARG-UK Advice Note 4. (Online) Available from: <https://www.arguk.org/info-advice/advice-notes/324-advice-note-4-amphibian-disease-precautions-a-guide-for-uk-fieldworkers-pdf-2/file> (Accessed 01 September 2020).

ANNEX A: FIGURE 1: PRECAUTIONARY WORKING METHOD AREAS

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ANNEX B: TOOLBOX TALK

Great Crested Newt



Legal Protection
Great crested newts, their breeding habitat and their eggs are protected under the Habitats Directive 2017 (as amended).



PART C: OFF-SITE ASSOCIATED DEVELOPMENTS

APPENDIX A NORTHERN PARK AND RIDE – DRAFT NOISE MONITORING AND MANAGEMENT PLAN

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1 INTRODUCTION

- 1.1.1 SZC Co. is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.
- 1.1.2 Consent to construct the development is sought through a Development Consent Order (DCO) as a Nationally Significant Infrastructure Project under the Planning Act 2008.
- 1.1.3 The **Code of Construction Practice** (CoCP) (Doc Ref. 10.2) (secured by Requirement 2 of the **dDCO** (Doc Ref. 3.1(J)) is the mechanism through which SZC Co. will ensure that the construction works are undertaken in accordance with all relevant legislative controls, construction health, safety and environmental standards and other relevant best practice methods.
- 1.1.4 The aim of the **CoCP** (Doc Ref.10.2) is to provide a clear and consistent approach to the control of Sizewell C construction activities on the main development site and associated development sites so as to maintain satisfactory levels of environmental protection, and take all reasonable steps to mitigate and minimise disturbance from construction activities. The **CoCP** (Doc Ref. 10.2) also seeks to control construction works to minimise potential significant environmental effects
- 1.1.5 This Draft **Northern Park and Ride Noise Monitoring and Management Plan** (NPR NMMP) has been submitted to the Examination to set out how the details anticipated by paragraph 3.1.3 of the **CoCP** Part C (Associated Development sites) (Doc Ref. 10.2) will be discharged for the northern park and ride site (NPR). As set out in the CoCP Part C, the final NMMP for the northern park and ride site must be submitted to ESC for approval. Vegetation clearance within the northern park and ride site must not be carried out until a Northern Park and Ride Site NMMP in general accordance with this draft NPR NMMP has been approved by ESC and the construction works must then be undertaken in accordance with the approved NPR NMMP.
- 1.1.6 Site-specific NMMPs must be submitted to and approved by ESC for each of the Associated Development sites. The site-specific NMMPs must be in general accordance with the principles set out in this Draft NPR NMMP and must be implemented as approved.
- 1.1.7 Level 1 control documents will either be certified under the DCO at grant or annexed to the DoO. All are secured and legally enforceable. Some Level 1

documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and **Deed of Obligation (DoO)** (Doc Ref. 10.4) set out the status of each Level 1 document.

1.1.8 This Draft NMMP is a Level 1 document. As explained above, the final NMMP for the northern park and ride site must be submitted to ESC for approval prior to any vegetation clearance being carried out on the northern park and ride site.

1.1.9 Where further documents or details require approval, this document states which body or governance group is responsible for the approval and/or must be consulted. The approval of the final NPR NMMP by East Suffolk Council will be carried out in accordance with the procedure in Schedule 23 of the DCO. However the final NPR NMMP will require Bespoke Mitigation Plans to be submitted to and approved by East Suffolk Council. Approval of these Bespoke Mitigation Plans will follow the procedure set out in the final NPR NMMP (section 4.4 of this draft NPR NMMP). The DoO establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made. Any updates to these further documents or details must be approved by the same body or governance group and through the same consultation and procedure as the original document or details.

1.1.10 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

1.2 Purpose of the NMMP

1.2.1 The final NMMP will provide a framework for monitoring and managing noise at the northern park and ride site in accordance with this Draft Noise Monitoring and Management Plan.

1.2.2 The NMMP will be subject to periodic review and update so that it remains current and relevant to the works being undertaken and treated as a live

document. The NMMP and any updates will be subject to agreement with East Suffolk Council pursuant to Requirement 2.

1.2.3 The NMMP will relate to the monitoring and management of construction works within the northern park and ride site, i.e. the monitoring and management of those activities between source and receptor, which is the noise or vibration pathway from the sources to affected properties. The NMMP will not relate to any control at the receptor.

1.3 Principles of the NMMP

1.3.1 The NMMP will act as a framework to guide the control, monitoring and management of noise and vibration from the construction works.

1.3.2 An updated noise assessment of the construction works will be undertaken as part of the implementation of the **Noise Mitigation Scheme** (Annex W of the DoO (Doc Ref. 10.4)) which is secured by Schedule 12 of the **Deed of Obligation** (Doc Ref. 10.4). This work will include a review of the NMMP and will confirm if updates to the NMMP are required. Any amendments to the NMMP will be submitted to ESC for approval pursuant to Requirement 2.

1.3.3 The monitoring and update of the NMMP to reflect the above will:

- ensure mitigation is targeted appropriately throughout the construction period;
- facilitate identification of ‘noisy’ works, which will in turn facilitate notification of local residents and other steps required by the **CoCP** (Doc Ref. 10.2);
- provide a feedback mechanism for ongoing validation of construction noise and vibration predictions.

1.4 Compliance

1.4.1 SZC Co. will comply with the provisions in the NMMP throughout all the construction activities on the northern park and ride site.

1.4.2 The NMMP will incorporate a range of noise mitigation measures that reflect best practice techniques, to be employed during the undertaking of construction activities, to seek to design out the risk of emissions of noise, and will take all reasonable steps to mitigate and minimise noise and vibration where elimination of risk is not feasible.

- 1.4.3 Once contractors are appointed, the NMMP will be reviewed in consultation with them to identify further opportunities for noise control.

2 ROLES AND RESPONSIBILITIES

- 2.1.1 It is recognised that all those participating in the delivery of construction activities at all of the Sizewell C sites have a role to play in the minimisation and mitigation of potential noise and vibration impacts.

- 2.1.2 It is also recognised that certain key roles within construction teams will play a more active role in delivering the requirements of the NMMP.

- 2.1.3 The requirements identified within this draft NMMP are the responsibility of SZC Co. This section provides a description of the defined roles and responsibilities that will be adopted so that SZC Co. can ensure that these requirements are fulfilled and so that noise and vibration impacts from construction activities are minimised.

- 2.1.4 The roles will not necessarily be retained solely for the purposes of the northern park and ride site, but may cover one or more Associated Development sites.

2.2 SZC Co. Site Environmental Lead

- 2.2.1 This is expected to be under the direct employment of SZC Co. The role will include responsibility for:

- the implementation of the SZC Co. Environmental Management System, including the provision of environmental training;
- co-ordination between the client, contractors and external stakeholders as appropriate;
- approving contractor-submitted Construction Environmental Management Plans;
- approving the environmental parts of contractor-submitted works method statements and liaison with relevant authorities in relation to those aspects of the submissions;
- undertaking investigations in relation to noise level exceedances and to investigate any complaints received by the project in relation to noise and vibration issues, including assessment of contractors' compliance with approved Bespoke Mitigation Plans, and taking

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appropriate enforcement action against contractors found to be operating in breach of any requirement of a Bespoke Mitigation Plan;

- environmental monitoring and reporting, including collation and analysis of data to demonstrate compliance with the construction noise thresholds;
- carrying out the measures outlined within the NMMP in relation to construction noise threshold exceedances, including liaison with the contractor; and
- conducting site inspections producing reports and communications with relevant parties within SZC Co., the contractor's project management team and internal / external stakeholders as required.

2.3 SZC Co. Noise Specialist

2.3.1 This role will include a noise specialist to:

- advise on how to meet legal and contractual noise requirements;
- review and develop the NMMP as part of the **CoCP** (Doc Ref. 10.2) for the works, as required;
- undertake the noise assessments required under the **Noise Mitigation Scheme** (Annex W of the DoO (Doc Ref. 10.4)), which will feed into the NMMP process;
- train nominated staff to undertake basic monitoring tasks correctly, e.g. downloading data and undertaking initial checks of results for compliance with requirements;
- provide analysis and interpretation of noise monitoring results for compliance with the requirements and advise the construction teams on action required and follow up;
- provide specialist noise management advice to the construction teams as required;
- liaise with East Suffolk Council as necessary and provide it with monitoring results in agreed timescales;
- be responsible for noise assessments of temporary works and equipment to determine their design and location and any necessary mitigation works required to maintain noise levels below the threshold levels; and

- assist and support the Site Environmental Lead in the preparation of reports, and assist to resolve any problems arising from noise issues.

2.3.2 SZC Co. will require the Noise Specialist to have the following experience and qualifications:

- appropriate experience of dealing with noise on construction projects;
- good knowledge and practical experience of legal requirements and how to comply with them;
- experience of liaison with stakeholders including statutory bodies such as local authorities; and
- be an Associate or Full Member of the Institute of Acoustics (or equivalent competent body).

2.4 Contractor's Site Manager

2.4.1 This will be a role in the employment of the appointed lead contractor. In so far as it relates to noise, the role will include responsibility for:

- all works on site, within the scope of their contract;
- preparing and submission of SZC Co. method statements and risk assessments, and liaison with Noise Specialist on noise assessments;
- implementing the NMMP and for liaison and communication with sub-contractors; and
- reviewing Construction Environmental Management Plans (CEMP) as far as they relate to compliance with the NMMP and noise measures set out within the **CoCP** (Doc Ref. 10.2).

2.5 Contractor's Site Environmental Engineer

2.5.1 This will be a role in the employment of the appointed lead contractor. The role will include responsibility for:

- planning works on site;
- instructing the foreman and briefing site workers;
- daily site inspections in relation to the implementation of noise mitigation measures and for recording inspections within the site logs;

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- technical environmental input into the Method Statements submitted to SZC Co. for approval, where required; and
- providing specific training in relation to noise management to all levels of contractor's staff including inductions, subject-specific training and tool box training where appropriate.

2.6 Contractor's Foreman

2.6.1 This will be a full-time role in the employment of the appointed lead contractor. The role will include responsibility for:

- directing activities on site;
- implementing the measures outlined in the NMMP and defined in the works method statement and for undertaking daily inspections to demonstrate compliance; and
- undertaking inspections of work sites and the implementation of remedial measures in the event of a noise level exceedance being attributed to their works.

3 LIAISON

3.1.1 Regular meetings will be held between representatives of SZC Co. and ESC. Unless agreed otherwise between the parties, the meetings will be held monthly for the first year of the project post-consent, and every two months thereafter.

3.1.2 The meetings will cover the following topics:

- upcoming works;
- updates to the noise assessments;
- additional mitigation proposals;
- need for community liaison and plan for same;
- any complaints in the prior period and resolutions.

3.1.3 The scope of the meetings can be adapted according to need, with agreement of all parties.

4 NOISE AND VIBRATION THRESHOLDS

4.1 Introduction

4.1.1 This section sets out the noise and vibration thresholds that will apply to the northern park and ride site, and describes the process for agreeing alternative thresholds with ESC, should they be required.

4.2 Noise Thresholds

4.2.1 In accordance with section 3.2 of Part C of the **CoCP** (Doc Ref. 10.2), the noise thresholds for receptors close to the northern park and ride site are set using the ‘ABC’ method contained in Annex E3.2 in BS5228-1: 2009+A1: 2014. For clarity, the ‘ABC’ method thresholds are set out in **Table 4.1**.

Table 4.1: ‘ABC’ method construction noise thresholds

Period	Assessment Category		
	A	B	C
Day: Weekdays, 0700-1900 Saturday 0700-1300	65 dB L _{Aeq,T}	70 dB L _{Aeq,T}	75 dB L _{Aeq,T}
Evenings and weekends: Weekdays 1900-2300 Saturdays 1300-2300 Sundays 0700 – 2300 ⁽¹⁾ Bank holidays ⁽¹⁾	55 dB L _{Aeq,T}	60 dB L _{Aeq,T}	65 dB L _{Aeq,T}
Every day 2300 - 0700	45 dB L _{Aeq,T}	50 dB L _{Aeq,T}	55 dB L _{Aeq,T}
Note: ⁽¹⁾ – Working on Sundays or bank holidays is not expected and will not be undertaken without prior notification to East Suffolk Council. Where it is undertaken, the stated thresholds will apply			

4.2.2 The process for determining which category will apply at each receptor, is as follows:

- the ambient noise level, excluding any noise from SZC construction works is determined and rounded to the nearest 5dB.
- the rounded value is compared to the Category A criteria in **Table 4.1** for the appropriate period.
- If the rounded value is below the Category A value, then Category A applies; if the rounded value is equal to the Category B value, then

Category B applies; and where the rounded value exceeds the Category A value, then Category C applies.

- 4.2.3 The applicable categories for each receptor are set out in **Table 4.2**, based on the baseline data contained in Appendix C of this document. These categories will be updated where further baseline requires different categories to be applied.

Table 4.2: Applicable threshold categories for each receptor

Receptor ⁽¹⁾	Daytime Baseline Noise Level, $L_{Aeq,T}$	Rounded Baseline Noise Level	Applicable Category
A	54	55	A
B	62	60	A
C	65	65	B
D	49	50	A
E	54	55	A
F	43	45	A
G	52	50	A

Note: ⁽¹⁾ see plan at Figure B.1 for receptor locations. Alternative or additional locations may be included if agreed between SZC Co. and ESC but a plan must be included for clarity.

- 4.2.4 SZC Co. will use best practicable means (as defined by Section 72 of the Control of Pollution Act 1974) to comply with these noise thresholds at all times.
- 4.2.5 Other representative receptors may be used to calculate noise levels at relevant residential receptors, where this has been agreed with ESC, including the relevant equivalent thresholds that will be used. This will allow for instances where monitoring at the relevant residential receptor is not practicable and that alternative locations, such as within SZC Co. land, can provide a suitable proxy to measure noise thresholds.
- 4.2.6 The noise thresholds apply to noise from SZC Co.’s construction activities only; the thresholds do not apply to existing or extraneous sources.

4.3 Vibration Thresholds

- 4.3.1 **Table 4.3** sets out the construction vibration thresholds for the site.

Table 4.3: Vibration thresholds for construction works

Period	Threshold	Parameter
Any time	1.0	PPV mm/s

Notes: Thresholds are external and apply at residential receptors

4.3.2 SZC Co. will use best practicable means (as defined by Section 72 of the Control of Pollution Act 1974) to comply with these vibration thresholds at all times.

4.4 Bespoke Mitigation Plans

4.4.1 Where, despite the use of best practicable means (as defined by Section 72 of the Control of Pollution Act 1974), it is anticipated that the construction works will exceed either the noise levels set out in **Table 4.4** for each category as assigned to each receptor in **Table 4.2**, or the vibration thresholds set out in **Table 4.3**, a Bespoke Mitigation Plan will be submitted to ESC for approval in accordance with the process set out below.

Table 4.4: Thresholds to trigger Bespoke Mitigation Plan

Period	Applicable Assessment Category (see Table 4.2)		
	A	B	C
Day: Weekdays 0700-1900 Saturday 0700-1300	60 dB LAeq,T	65 dB LAeq,T	70 dB LAeq,T
Evenings and weekends: Weekdays 1900-2300 Saturdays 1300-2300 Sundays 0700 – 2300 ⁽¹⁾ Bank holidays ⁽¹⁾	50 dB LAeq,T	55 dB LAeq,T	60 dB LAeq,T
Every day 2300 - 0700	40 dB LAeq,T	45 dB LAeq,T	50 dB LAeq,T

Note: ⁽¹⁾ – Working on Sundays or bank holidays is not expected and will not be undertaken without prior notification to East Suffolk Council. Where it is undertaken, the stated thresholds will apply

4.4.2 Details of works likely to require a Bespoke Mitigation Plan and a draft of the plan will be provided to ESC at least 28 days prior to the start of the works, to include proposed method statements, likely noise or vibration levels at the closest sensitive receptors, proposed mitigation, and a scheme for notifying local residents. The purpose will be to agree measures to reduce noise as far as reasonably practical for particularly noisy activities. If appropriate, the Bespoke Mitigation Plan can include revised noise thresholds.

- 4.4.3 As the Bespoke Mitigation Plans will be agreed, monitored and enforced and their purpose will be to determine the best practicable means of delivering the construction activity, it will not normally be appropriate to include finite noise limits in the plans. Nevertheless, the parties recognise that ESC must have the ability to monitor the effect of the work and require adjustments to working practices in the event that adverse effects exceed those anticipated. For this purpose, indicative limits may be appropriate and it is intended that close working between the parties will enable corrections to be made to working practices to ensure that the objectives of the Bespoke Mitigation Plan are achieved.
- 4.4.4 Each Bespoke Mitigation Plan will be approved pursuant to the procedure set out below. Any breach or non-compliance with measures set out in the Bespoke Mitigation Plan will therefore be enforceable under the DCO. The parties also recognise that the **dDCO** (Doc Ref. 3.1(J)) does not remove ESC's powers under section 60 of the Control of Pollution Act 1974. Section 60 authorises ESC to serve a notice imposing requirements as to the way in which works are to be carried out to control noise on construction sites, and is subject to a right of appeal by the recipient. A person who contravenes any requirement of a section 60 notice without reasonable excuse will be guilty of an offence. Where the requirements of a section 60 notice reflect the measures set out in a Bespoke Mitigation Plan, those requirements will be enforceable under section 60 of the Control of Pollution Act 1974 as well as under the DCO.
- 4.4.5 The details of the works and proposed controls must be submitted to and approved by ESC before the specified activity can commence. The measures must be implemented as approved for the duration of those activities. Where ESC does not approve the submitted Bespoke Mitigation Plan in whole or in part within a period of 28 days, SZC Co. can elect to instigate the dispute resolution process set out in **Section 4.5** in respect of the unapproved parts. Works covered by a Bespoke Mitigation Plan that are subject to the dispute resolution process set out in **Section 4.5**, must not be commenced until the dispute resolution process has been completed, or agreement otherwise reached. It is permissible for approved elements of a Bespoke Mitigation Plan to commence upon approval while unapproved elements are subject to the dispute resolution process set out in **Section 4.5**.
- 4.4.6 The number and duration of occasions on which activities subject to Bespoke Mitigation Plans are carried out will be limited to those approved by ESC.

4.5 Dispute Resolution Process

4.5.1 In the event that SZC Co. and ESC cannot agree the terms of a Bespoke Mitigation Plan, it will be open to SZC Co. to either:

- a) refer the disagreement to a Governance Group set up under the Deed of Obligation to seek guidance; or
- b) activate the formal dispute resolution process set out in this Section 4.5.

4.5.2 ESC will be under no obligation to agree the terms of a submitted Bespoke Mitigation Plan (so long as it is acting reasonably) and none of the Governance Groups established in the **Deed of Obligation** (Doc Ref. 10.4) are authorised to determine a dispute concerning a Bespoke Mitigation Plan. Nevertheless, SZC Co. will be entitled to seek advice and assistance from one of these Governance Groups to seek advice and assistance in reaching agreement with ESC. Depending on the nature of the disagreement and the availability of a relevant Governance Group, for instance, SZC Co. could seek advice from the Planning Group, the Environment Review Group or the Delivery Steering Group.

4.5.3 In the event that SZC Co. considers that formal dispute resolution is necessary, it may send ESC a notice stating that it intends to refer the dispute to an expert for determination in accordance with the process set out below:

- SZC Co will request that the President of the Institute of Acoustics nominate a suitably qualified expert (the Expert) to act as an expert and not as an arbitrator. If that Expert is or becomes unable or unwilling to act, then SZC Co will request that the President of the Institute of Acoustics nominate a suitable replacement Expert;
- SZC Co will meet all reasonable and proper costs involved in the appointment of the Expert and the determination of the dispute by the Expert following the receipt by SZC Co of invoices from the Expert and ESC;
- Following the appointment of the Expert, SZC Co. will submit to the Expert in writing details of the proposed Bespoke Mitigation Plan and SZC Co.'s written justification for the terms of that Plan ('the dispute'). SZC Co. will provide a copy of the dispute to ESC;
- No later than providing the dispute to the Expert in accordance with c), SZC Co. will ensure that the Expert has access to the Sizewell C

Environmental Statement (in its final form), the **CoCP** (Doc Ref. 10.2), the **NMS** (Annex W of the DoO (Doc Ref. 10.4)), the relevant **NMMP** and all relevant noise monitoring data that may be relevant to the dispute;

- As soon as practical and in any event within 28 days of receipt of the dispute, the Expert will invite ESC to submit its response to the dispute. Any response from ESC must be submitted within 28 days of receipt of that invitation from the Council, be in writing, and copied to SZC Co;
- Exceptionally, the Expert will be entitled to send either party a written request for further information if necessary to assist his or her determination (with a copy of the request sent to the other party) and to set a reasonable period (of no longer than 28 days) for both parties to respond but, subject to that exception, the Expert will be required to determine the dispute within 28 days of ESC's response;
- The determination by the Expert will be in writing, and take the form of a final form of the Bespoke Mitigation Plan and will be final and binding on both parties (in the absence of manifest error). The Expert will give reasons for its determination.
- In reaching his or her determination, the Expert will:
 - be guided by best professional practice, by the terms of documents submitted under item d) above, and by the policy requirements of NPS EN-1 or any successor document; and
 - have regard to any representations and evidence before them.

5 SITE-SPECIFIC CONTROLS

5.1 Working Hours

5.1.1 The works at the northern park and ride site will be:

- Monday to Saturday between the hours of 07:00 and 19:00 hours for all offsite associated developments.
- Where possible, noisy works will be avoided on Saturday afternoons between 13:00 and 19:00 hours.
- Working on Sundays or bank holidays is not expected and will not be undertaken without prior notification to East Suffolk Council (ESC).

- Some activities may require 24 hour working and where this is the case, ESC will be notified in advance, including details of any noise control measures that may be necessary.

5.2 Noisy Work Controls

5.2.1 Any periods where the thresholds set out in **Tables 4.1 and 4.2 or Table 4.3** are likely to be exceeded will be considered to constitute ‘noisy’ works and the following actions from the **CoCP** (Doc Ref. 10.2) (secured by Requirement 2) will be implemented as appropriate, and documented in any agreed Bespoke Mitigation Plan:

- staggering or restricting certain activities to less-sensitive periods (CoCP Part C Table 3.1);
- installing temporary screens as required to provide additional screening attenuation and to protect sensitive receptors (CoCP Part C paragraph 3.3.1);
- notifying local communities of potentially noisy or disruptive works (CoCP Part C paragraph 3.3.4 and paragraph 3.3.20).

5.3 Physical Controls

5.3.1 Barriers or screens that are identified as appropriate under the provisions of the **CoCP** (Doc Ref.10.2), but not including those required under any Bespoke Mitigation Plan, will be listed in this section with plans showing their location contained in Appendix A.

5.3.2 Barriers required by a Bespoke Mitigation Plan will be documented in that Bespoke Mitigation Plan.

5.4 General Controls

5.4.1 The general controls to be implemented are set out in **Table 3.1** in **Part C** of the **CoCP** (Doc Ref. 10.2) (secured by Requirement 2).

5.4.2 SZC Co. is responsible for the compliance with the obligations set out in the final NMMP and compliance with approved Bespoke Mitigation Plans. As a description of how SZC Co. plans to ensure this: SZC Co. will require its contractors to prepare Construction Environment Management Plans (CEMPs) for its approval. These plans will demonstrate to SZC Co. how the specific works will be carried out in accordance with the Level 1 and Level 2 control documents (including the Bespoke Mitigation Plans) and all other relevant legislation and guidance.

6 NOISE AND VIBRATION MONITORING

6.1.1 Noise and vibration monitoring will be carried out throughout the Sizewell C construction works, to determine compliance with the target noise levels set out in the **NMMP**.

6.1.2 This section of the **NMMP** sets out the proposed approach to that monitoring.

6.1.3 The thresholds identified in **Tables 4.1, 4.2 and 4.3** apply to noise or vibration from SZC Co.'s construction works only. Where required, steps will be taken to exclude non-construction sources from any measurements.

6.1.4 Any 1 hour measurements that exceed the numerical noise thresholds in **Tables 4.1 and 4.2** for the appropriate period of the day or night will be taken as an indication that the overall thresholds may be exceeded unless corrective action is taken.

6.2 Measurement Locations

6.2.1 The measurement locations have been selected to be representative of noise-sensitive receptors close to the construction works.

6.2.2 Monitoring locations are shown in Figure B.1 in Appendix B and are as follows, including the receptor reference numbers from **Volume 3, Chapter 4** of the **ES** [[APP-354](#)]:

- **Position A:** Receptors west of the East Suffolk line.
- **Position B:** Properties east of the A12 at the southern end of the site.
- **Position C:** Properties east of the A12 at the centre of the site.
- **Position D:** Properties to the west of the A12, to the east of the site.
- **Position E:** Properties to the west of the A12, to the north end of the east of the site.
- **Position F:** Properties north-west of the site.
- **Position G:** Properties north of the site.

6.2.3 It will be acceptable to monitor at a representative sample of the identified positions, and assign the measured noise levels to nearby or adjacent positions. Justification for any variations will be submitted to and approved by ESC.

6.2.4 Other locations may be acceptable, subject to agreement with ESC.

6.3 Measurement Equipment

6.3.1 All noise monitoring systems will meet the following requirements:

- Type 1/Class 1 sound level meter, complying with BS EN 61672-1 and BS EN 61672-2 [Ref 1];
- Type 1/Class 1 field calibrator, complying with BS EN IEC 60942:2018 [Ref 2].

6.3.2 An effective windshield will be used throughout to minimise turbulence at the microphone.

6.3.3 All vibration monitoring systems will meet the requirements set out in BS 5228-2: 2009+A1: 2014 [Ref 3].

6.4 Meteorological Monitoring Equipment

6.4.1 Meteorological data will be gathered during any noise measurements. As a minimum, the following information will be gathered:

- wind speed and direction;
- precipitation;
- fog;
- wet ground;
- frozen ground or snow cover;
- temperature;
- cloud cover; and
- presence of conditions likely to lead to temperature inversion (e.g. calm nights with little cloud cover).

6.4.2 Hand-held anemometers are acceptable to periodically gather wind speed data for attended measurements. Where unattended measurements are undertaken, either a remote meteorological station will be used, or a suitable third party source of local meteorological data identified.

6.5 Calibration Requirements

- 6.5.1 All sound level meters will have been laboratory-calibrated to a traceable standard within a two year period prior to the end of the measurements. All field calibrators will have been similarly calibrated within a one year period prior to the completion of the measurements, or within a two year period prior to the completion of the measurements but be subject to a cross-check every other year. Any such cross-checks will be documented.
- 6.5.2 Calibration certificates for all noise monitoring equipment will be retained on file and made available to East Suffolk Council upon request.
- 6.5.3 The on-site field calibration of the sound level meters will be checked immediately prior to the start of any measurements and after any measurements, using acoustic calibrators. Where appropriate, intermediate checks will be carried out of the meter's calibration. For long-term or permanent monitoring locations, the periodic calibration will be at least every six months. All calibration checks will be reported to East Suffolk Council, and any drifts stated.
- 6.5.4 Should the calibration of a meter drift by more than 1dB for an unattended measurement over several days, or by more than 0.5dB for an attended measurement, the data gathered will be reported to East Suffolk Council but not used in any subsequent assessment.

6.6 Measurement Periods

- 6.6.1 Measurements will be undertaken during both weekdays and weekends, and will cover the daytime (07:00 to 23:00 hours) and night-time (23:00 to 07:00 hours) periods as necessary.
- 6.6.2 Measurements will include a combination of long-term, semi-permanent monitoring at some positions, and short duration, attended monitoring at others. The proposed combination of monitoring duration and location will be agreed with ESC.

6.7 Baseline Measurements

- 6.7.1 Baseline measurements were undertaken as part of the Environmental Impact Assessment. These are contained in **Appendix C** of this document.
- 6.7.2 Further baseline measurements will be undertaken in advance of the start of any works and reported to ESC. Any baseline measurements undertaken after the works have started will, as far as is possible, be free from the

influence of SZC Co. construction works and will capture the existing level of ambient noise at each location.

6.7.3 The purpose of further baseline monitoring is to quantify non-construction noise levels at any given location to facilitate the calculation of construction noise levels where monitoring includes a combination of both construction noise and non-construction noise.

6.7.4 Any update to the **NMMP** will include any relevant or necessary updates to the baseline noise survey data, which will take account of changes in the noise climate occur, where these changes do not result from construction activities at Sizewell C.

6.7.5 The duration of further baseline measurements may vary according to a number of factors, including but not limited to, the security of a given location, access constraints, weather, and the presence of local extraneous noise sources, such as local atypical activities, e.g. lawn mowers.

6.7.6 Where possible, baseline measurements will be conducted over a minimum 24 to 48 hour period, at a secure location, using remote, automated equipment. For locations where it is not possible to secure a meter for an extended period, for example where there are access or security constraints, measurements will be undertaken over shortened periods, as appropriate.

6.7.7 Further baseline measurements will be gathered across daytime (07:00 to 23:00 hours) and night-time (23:00 to 07:00 hours) periods on a weekday and weekend (Saturday and Sunday).

6.7.8 Where baseline data gathered at one location is considered representative of another location, this will be made clear.

6.8 Reporting Requirements

6.8.1 The following information will be reported to ESC for all measurements:

- the appropriate measured values, e.g. $L_{Aeq,T}$, L_{Amax} , PPV, together with details of the appropriate time periods;
- details of the instrumentation and measurement methods used, including details of any sampling techniques, position of microphone(s) in relation to the site and system calibration data;
- any factors that might have adversely affected the reliability or accuracy of the measurements;

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- plans of the site and neighbourhood showing the position of plant, associated buildings and notes of site activities during monitoring period(s);
- notes on weather conditions, including where relevant, wind speed/direction, temperature, presence of precipitation, etc.;
- time, date and name of person carrying out the measurement.
- statement of compliance with the identified maximum appropriate sound level for that location.

6.8.2 Survey reports will be submitted to ESC within 28 days of completion of that particular element of monitoring, unless agreed otherwise.

7 COMPLAINTS HANDLING PROCESS

7.1.1 Section 3 of the **CoCP** Part A (Doc Ref. 10.2) (secured pursuant to Requirement 2) sets out the proposed communication, community and stakeholder engagement arrangements, including a complaints handling procedure, that will be applied throughout the construction period.

REFERENCES

1. BS EN 61672-1:2013 Electroacoustics. Sound level meters – Specifications and BS EN 61672-2: 2013+A1: 2017 Electroacoustics. Sound level meters - Pattern evaluation tests
2. BS EN IEC 60942:2018 Electroacoustics. Sound calibrators
3. British Standard BS5228-2: 2009+A1: 2014 Code of Practice for noise and vibration control at open construction sites – Vibration

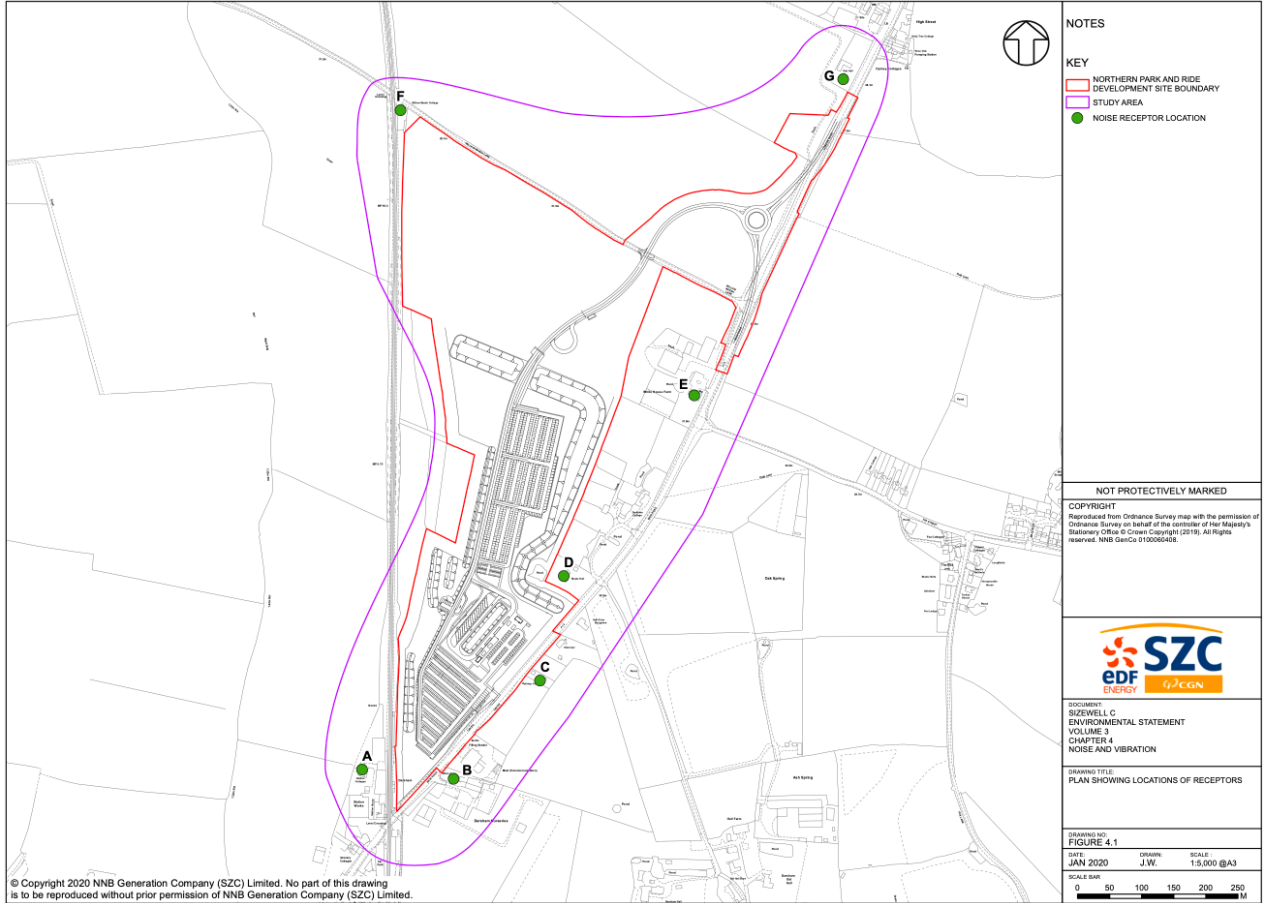
APPENDIX A: BARRIER LOCATIONS

Figure A.1: Barrier location plan

Placeholder for future barrier proposals

APPENDIX B: MONITORING LOCATIONS

Figure B.1: Indicative monitoring location plan



APPENDIX C: BASELINE NOISE LEVELS

Table C.1: Summary of ES baseline noise levels

Receptor	Existing level, L_{Aeq} , dB.	
	Day	Night
A – Properties west of the East Suffolk Line, south site, (medium sensitivity).	54	48
B – Properties east of the A12 at the southern end of the site (medium sensitivity).	62	56
C – Properties east of the A12 at the centre of the site (medium sensitivity).	65	59
D – Properties to the west of the A12, to the east of the site (medium sensitivity).	49	44
E – Properties to the west of the A12, to the north end of the east of the site (medium sensitivity).	54	48
F – Properties north-west of the site (medium sensitivity).	43	36
G – Properties north of the site, west of the A12 (medium sensitivity).	62	55

**APPENDIX B NORTHERN PARK AND RIDE – BAT NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 3 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6A)**



SIZEWELL C PROJECT
NORTHERN PARK AND RIDE – BAT
NON-LICENCE METHOD STATEMENT

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1. Bat Non-licensable Method Statement: Northern Park and Ride

1.1 Introduction

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

1.1.2 This bat non-licensable method statement (hereafter referred to as the ‘reasonable avoidance measures method statements’) is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The DoO establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and Scheme Overview

1.1.6 SZC Co. is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast,



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approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.7 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.8 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the 'northern park and ride'), and one to the south-west at Wickham Market (the 'southern park and ride') to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the 'two village bypass') to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as 'Sizewell link road') to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the 'Yoxford roundabout') and other road junctions to accommodate Sizewell C construction traffic;

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- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site ('the green rail route') and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.9 The components listed above are referred to collectively as the 'Sizewell C Project'.

1.1.10 In order to enable the proposed development of Darsham (the 'northern park and ride'), as detailed above, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to bats by the habitats present within the site, the proposed facilitating works have the potential to cause injury / mortality and indirect disturbance of bats that may be present. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by the SZC Co., to ensure the safeguarding of bats during the facilitation works to be undertaken within the site.

b) Site Location and Setting

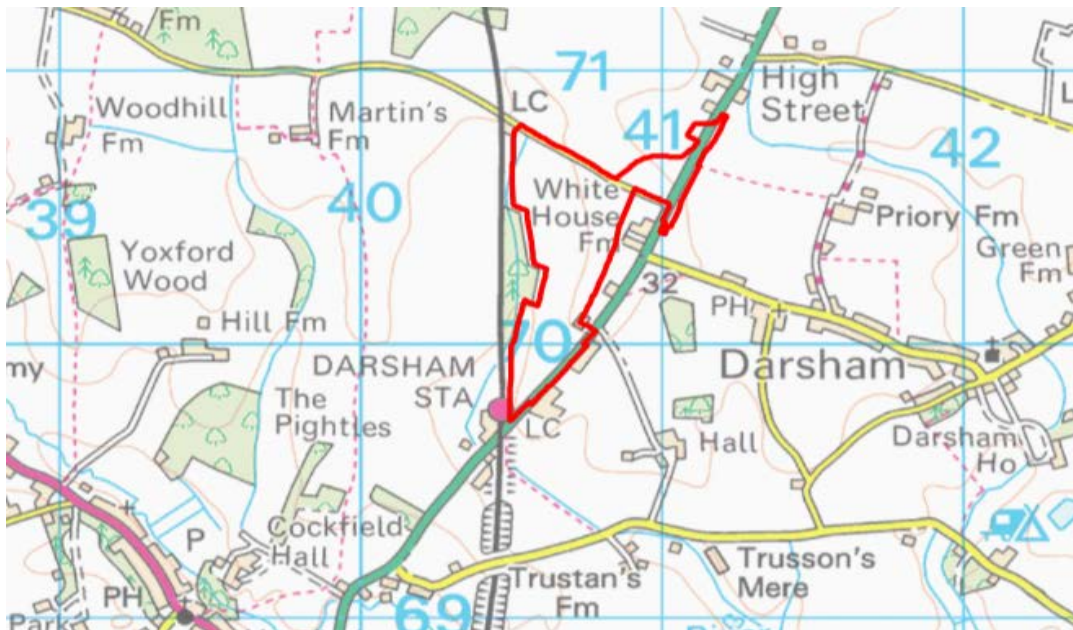
1.1.11 The Site is located in Sizewell, East Suffolk (site centre grid reference OS Grid Reference TM 40687 70312). The northern park and ride at Darsham would be situated to the west of the A12, to the east of the East Suffolk line and to the north of Darsham rail station. Access to the site would be via a new three arm roundabout, with realignments of Willow Marsh Lane and the A12.

1.1.12 The area within the red line boundary predominately consisted of arable farmland bordered by a semi-improved species-poor 2m wide grassland margin. The area is bordered by species-poor hedgerows, interspersed with stands of mature Oak (*Quercus robur*) and Ash (*Fraxinus excelsior*) on three sides, and by a block of broadleaved woodland (Little Nursery Wood) on the western boundary. A small number of ponds were identified within gardens adjacent to the eastern boundary, with a further small pond located within Little Nursery Wood. Little Nursery Wood consisted of primarily mature Ash with a dry ditch running along the eastern boundary and a running stream through the centre.

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1.1.13 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



c) **Proposed Works**

1.1.14 The specific works covered by this method statement include vegetation clearance measures, and the lighting arrangements for the site.

1.1.15 Perimeter and parking area lighting Lanterns will utilise LED based light fittings with zero-degree tilt, and lighting columns along the perimeter would be fitted with a demountable shield to reduce backward spill of light.

d) **Key Ecological Constraints**

1.1.16 The key potential ecological constraints associated with the facilitation works within the site include:

- bats;
- reptiles; and
- great crested newts.

1.1.17 The reasonable avoidance measures method statements detailed herein only cover bats, there are associated reasonable avoidance measures

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method statements for reptiles which are detailed separately. and a draft protected species licence for great crested newt.

1.2 Site reasonable avoidance measures method statements for bats

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for bats during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality and disturbance of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in this reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) Toolbox talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or

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adverse effects on protected species that could occur within or in the vicinity of the working area.

- 1.2.6 There is a declaration (**Appendix 7A.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Bats

a) Site status and potential impacts

- 1.3.1 Surveys identified a 'big bat' species (potentially serotine or noctule), common pipistrelle, and soprano pipistrelle emerging from and entering Little Nursery Wood, indicating the wood is likely to be used for both roosting and foraging. A confirmed brown long-eared bat roost was identified within Little Nursery Wood. Low numbers of barbastelle passes were also recorded in the vicinity of Little Nursery Wood although the number of passes did not suggest this feature was a regular/frequently used commuting route and no barbastelle were observed emerging from Little Nursery Wood.

- 1.3.2 Assessment of trees with bat roost potential identified three trees within the proposed development site with potential to support roosting bats, but these three trees would be retained. Little Nursery Wood adjacent to the development site provided a greater roost resource and 41 trees were identified with the potential to support roosting bats, including the brown long-eared roost. All of these trees within the adjacent wood land are retained.

- 1.3.3 Bats are impacted by both increased noise levels and increased lighting but only a relatively small number of bats have been recorded within the proposed development site on any one occasion. Evidence suggests that bats using the site are not dependent on the habitats present and will also be using a range of additional habitats in the wider area. A 10m buffer from the development would be maintained along the north-east, south-east and south-west borders and a 20m total buffer is maintained from Little Nursery Wood. No significant effects on bat populations are expected as a result of construction noise or lighting.

b) Legislation

- 1.3.4 All bat species in England are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to:

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- intentionally or recklessly kill, injure or take a bat;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection; or
- intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.

1.3.5 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2).

1.3.6 All bat species in England receive further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref 1.4). They are listed on Schedule 2 of the Regulations, which makes it an offence, *inter alia*, to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat, in particular any disturbance which is likely:
 - impair their ability
 - i. to survive, to breed or reproduce, or to rear or nurture their young, or
 - ii. to hibernate or migrate
 - affect significantly the local distribution or abundance of that bat species; or
- damage or destroy a breeding site or resting place of a bat.

1.3.7 Noctule (*Nyctalus noctule*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auratus*) are also included on Section 41 of the NERC Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

c) [Toolbox talk for bats](#)

1.3.8 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to bats (**Appendix**

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7A.1). Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by bats and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area.

d) **Precautionary working methods**

1.3.9 Little Nursery Wood would be retained in its entirety with a buffer distance of 20m between the woodland and the proposed development.

1.3.10 Close-boarded fencing must be provided where the proposed development site abuts Little Nursery woodland.

1.3.11 The three trees within the development site with the potential to support roosting bats must be retained. No trees will be felled as part of this works at the northern park and ride.

1.3.12 Construction lighting must be designed to prevent spill and exposure on to Little Nursery Wood. The lighting design for the proposed development must comply with the lighting strategy and use light fittings chosen to limit stray light. Guidance within the latest Institution of Lighting Professionals (ILP) Guidance Note (Ref 1.5) must be followed as far as possible. These measures will minimise impacts on nocturnal species such as bats that may use the nearby tree lines or habitats for roosting or foraging.

1.3.13 In addition, although some activities may require 24 hour working, the majority of construction would take place Monday to Saturday 07:00 to 19:00 hours. This means night-time works will be avoided, which is when bats are most active. Incidental mortality associated with traffic movements will therefore not have a significant effect on the bat assemblage.

1.3.14 A 10m buffer from the development must be maintained along the north-east, south-east and south-west borders.

1.4 **Facilitating work requirements**

a) **Vegetation clearance methods**

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. Whilst this document has been produced in relation to bats, further information has been provided to ensure legal compliance in relation to other protected species.

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- 1.4.2 Vegetation clearance works must, where possible, take place outside of the active bird breeding season (early March and late August inclusive) and it is considered that no nesting bird checks would be required prior to the commencement of works. Nevertheless, if any vegetation clearance works was required within the core bird breeding season, a qualified ECoW must carry out a nesting bird check at least 48 hours before the commencement of works effecting the vegetation within the site. Once nesting birds have been confirmed absent, a habitat manipulation exercise must be undertaken in the form of a two stage vegetation cut, with the initial cut reducing the vegetation to a height of 150mm before a second cut subsequently reduces it to ground level, with a minimum of two hours between cuts to allow reptiles or amphibians to move out of the cutting area.
- 1.4.3 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles. Any vegetation clearance likely to impact vegetation below 150mm or the removal of places of shelter/hibernation features must, where possible, be undertaken outside of the reptile and amphibian hibernating period (October to February inclusive), during periods of warm, dry weather. If this is not possible, vegetation must be cut to the ground (to remove potential bird nesting habitat), but the roots would remain intact until hibernation is complete. The root system of vegetation must then be removed once the hibernation season is over. Clearing of vegetation must be undertaken under the supervision of the suitably experienced Ecological Clerk of Works (ECoW).
- 1.4.4 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).
- 1.4.5 The habitats present within the site are largely sub-optimal for bats, being intensively managed for arable farming purposes. The sub-optimal arable land supports few invertebrates on which bats can forage.
- 1.4.6 Works must be undertaken outside of all tree and hedgerow root protection zones that are not proposed to be removed as part of the proposed development. Tree protective fencing as described in section 6.2 of British Standard 5837:2012 (Ref 1.6) must be installed (distance of fencing from tree trunk = 12x trunk diameter, distance from hedgerows = 1m from the spread of hedgerow canopy), where required, prior to plant and machinery arriving on site and construction works commencing. The fencing must remain intact throughout the duration of the works and only be removed upon completion. Weather-proof notices must be attached to any protective fencing located



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adjacent to retained trees displaying the words 'Construction Exclusion Zone'. All personnel must be made aware of these restrictions. If works need to be undertaken within the root protection zones an Arboricultural survey must be undertaken and any advice provided adhered to, to secure the long-term survival of the tree/hedgerow.



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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London
- 1.4 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London.
- 1.5 Institution of Lighting Professionals/Bat Conservation Trust (2018). Institution of Lighting Professionals. 2018. Bats and artificial lighting in the UK. Guidance Note 08/2018.
- 1.6 British Standards Institute (2012). British Standard for Trees in relation to design, demolition and construction (BS 5837:2012). British Standards Institute. 2012

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Appendix 7A.1: Ecological Tool Box Talk

1.1. Legislation

1.1.1. Ecology surveys have been completed within the site and have identified the potential for the presence of a legally protected species. The Ecological Method Statement details the mitigation and working methods that should be adopted to avoid contravention of the legislation. If this is not followed, there is a risk that you could break the law by doing actions such as:

- Deliberately capture, injure or kill;
- Damage or destroy a resting place or breeding site;
- Deliberately or recklessly disturb an individual while it's in a structure or place of shelter or protection;
- Block access to structures or places of shelter or protection; or
- Possess, sell, control or transport live or dead individuals.

1.1.2. Any of the following could happen if you're found guilty of any offence:

- You could get an unlimited fine;
- You could be sent to prison for up to 6 months.

1.2. Species identification







Nesting Birds

The bird nesting season extends from March to August inclusive, although in mild climate nesting may start in February.

Nesting occurs in a variety of habitats including agricultural fields (ground nesting birds), dense bramble scrub, buildings and other man-made structures and trees.

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 	<p><u>Reptiles (slow-worm, common lizard, grass snake and adder)</u></p> <p>They may be found sheltering in vegetation, under debris such as logs, ricks or piles of rubble or waste items. They may also bask in the open on sunny days.</p> <p>DO NOT leave materials in area where it might be colonised by reptiles. Any debris or materials should be moved with care or moved under direct supervision of a suitably qualified ecologist.</p>
	<p><u>Bats</u></p> <p>On site habitats where bats may roost include trees.</p> <p>If works involve trees with cavities then check with the on-site ecologist that these have been inspected.</p>
	<p><u>Badgers</u></p> <p>It is unlikely that the animals would be seen but signs of their presence include:</p> <ul style="list-style-type: none"> • Setts (d shaped burrow with a large spoil heap); • Latrines or dung pits; and • Snuffle holes and runs.

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	<p><u>Great Crested Newts</u></p> <p>It is possible that great crested newt may be present on site.</p> <p>Newts are associated with water bodies but during the winter they live / hibernate in terrestrial habitat.</p> <p>They can be harmed when clearing vegetation, moving debris such as log piles and ground works.</p>
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1.3. Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, **OR IF IN ANY DOUBT**, stop the works immediately and contact the Project ecologist;
- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and
- Do not attempt to move any species found unless instructed to do so by an ecologist.



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Appendix 7A.2: Declaration

By signing the register below you confirm that you have received the ECOLOGY TOOLBOX TALK (Appendix 7A.1) AND METHOD STATEMENT briefing provided by the project ecologist for the Wickham Sizewell C Scheme.

Date	Name	Role on Site	Signature

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APPENDIX C NORTHERN PARK AND RIDE – REPTILE NON-LICENSABLE METHOD STATEMENT (ENVIRONMENTAL STATEMENT VOLUME 3 CHAPTER 7 APPENDIX 7A ANNEX 7A-6B)

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NORTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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None provided.

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1. Reptile Non-licensable Method Statement: Northern Park and Ride

1.1 Introduction

1.1.1 In order to enable the proposed development of the northern park and ride at Darsham site, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to reptiles by the habitats present within the site, the proposed facilitating works have the potential to cause injury/ mortality of reptiles that may be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statements which must be used by SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).



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

a) **Background and Scheme Overview**

1.1.7 SZC Co is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.

1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.

1.1.9 This Reptile Method Statement outlines the key approaches to mitigating potential impacts to the reptile populations at Darsham. It must be used by the SZC Co’, in relation to the proposal to build the northern park and ride.

1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

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- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.12 The components listed above are referred to collectively as the ‘Sizewell C Project’.

b) **Site Location and Setting**

1.1.13 The northern park and ride at Darsham site measures approximately 27.9ha in area and is located west of the village of Darsham. The site lies to the west of the A12, to the east of the East Suffolk line, and to the north of Darsham railway station. The northern park and ride at Darsham is one of two proposed park and ride developments associated with the main development site, with the Darsham park and ride being created for the use of construction workers approaching Sizewell from the north on the A12. The northern park and ride facilities would also intercept traffic movements from locations west of the A12.

1.1.14 The proposed development would provide spaces for up to 1,250 cars, and would allow the transfer of a substantial proportion of the construction

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workforce by bus to and from the main development site, therefore reducing the construction workforce traffic on the roads between the A12 and the main development site. The proposed development is temporary and would be in situ until the construction of the Sizewell C power station is complete (between 9–12 years).

1.1.15 The site is dominated by arable farmland with a block of broadleaved woodland (Little Nursery Wood), measuring approximately 2.8ha located adjacent to the site on its western boundary. Small arable field margins comprising semi-improved, species-poor grassland is present within the site alongside the east side of Little Nursery Wood, as well as an area of tall ruderal vegetation to the south. Species-poor hedgerows are also present along the western, eastern and northern site boundaries, whilst a single pond is present within the site.

1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



1.1.17 The purpose of the proposed development would be to reduce the amount of additional traffic generated by the construction workforce on local roads and through local villages as a result of the Sizewell C Project. The northern park and ride at Darsham would be used by construction workers approaching Sizewell from the north on the A12, with workers then being transported to and from the Sizewell C main development site by bus. The park and ride facilities would also intercept traffic movements from locations

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west of the A12. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) **Key Ecological Constraints**

1.1.18 The key potential ecological constraints associated with the facilitation works within the site include:

- bats;
- great crested newt; and
- reptiles.

The reasonable avoidance measures method statements detailed herein only cover guidance relating to reptiles. There are also reasonable avoidance measures method statements for bats which are detailed separately and a draft protected species licence prepared for great crested newt.

1.2 **Site Reasonable Avoidance Measures method statements for reptiles**

a) **Introduction**

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these reasonable avoidance measures method statements may contravene legislation and therefore risk

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prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (Appendix 1) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (Appendix 2) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Reptiles**

a) **Site status**

1.3.1 Within the site boundary, there is some potential for the grass margin of the arable field to provide sheltering and foraging habitat for common reptile species but the arable field itself is considered sub-optimal habitat. There is also some potential for hibernation sites within Little Nursery Wood, and in brick and rubble identified adjacent to White House Farm, as well as some breeding and foraging opportunities for grass snake within the habitat surrounding the dry pond within Little Nursery Wood. However, the available habitat to support reptile species is limited, of little value, and poorly connected to other suitable habitat, with the surrounding area primarily comprising arable farmland. The desk-study data received from the Suffolk Biodiversity Information Service (SBIS) returned only a single historic record of grass snake (*Natrix natrix*) within 2km of the site.

1.3.2 Accordingly, given that the extent of this habitat is quite limited such that it is unlikely that the site is of elevated potential to this species group. As a result, targeted presence/ absence surveys were not undertaken. Nevertheless,

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given the presence of suitable habitat within and adjacent to the site, there is the potential for this species group to make at least occasional use of the site.

b) Legislation

1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (WCA) (as amended) (Ref. 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref. 1.2).

1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref. 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

c) Toolbox talk for reptiles

1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles (**Appendix 1**).

1.3.6 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) Precautionary working methods

1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in

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addition to reptiles, particularly nesting birds, dependent upon the timings of the works.

1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).

1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the Ecological Clerk of Works (ECoW), in order to reduce the suitability of the habitats within the site.

1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co. must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependent)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature). The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
- the ECoW and the contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;

¹ Advanced works approach would integrate vegetation clearance in relation to reptiles, great crested newts and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this should be overseen by the ECoW. If a reptile is found the ECoW is responsible for determining whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- if reptiles are found, the ECoW is responsible for moving the animals out of the way to a place of safety. The exact location must be decided on a case-by-case basis by the ECoW, with any reptiles encountered moved to a safe location within a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

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1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach is to minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.




1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) Vegetation clearance equipment

1.4.7 SZC Co. must ensure that equipment specific to each clearance method as per the reasonable avoidance measures is used. For example:

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) Ground-breaking works methods

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the absence of suitable habitat within the areas proposed for ground-breaking works.

1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and initially must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

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d) Ground-breaking works equipment

1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

	
<p><i>JCB 16C-I New Generation 1 Tonne Mini Digger</i></p>	<p><i>Chapter 8 barrier/ Heras fencing</i></p>



SIZEWELL C PROJECT
NORTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A6B.1: Toolbox Talk

Reptiles

Reptiles in the UK



IF BITTEN SEEK MEDICAL HELP IMMEDIATELY.

Legal Protection

All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brush piles, mammal burrows and tree / hedgerow roots.



SIZEWELL C PROJECT
NORTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A6B.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

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**APPENDIX D SOUTHERN PARK AND RIDE – BAT NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 4 CHAPTER 7 APPENDIX 7A
ANNEX 7A-5A)**



SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – BAT
NON-LICENSABLE METHOD STATEMENT

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None provided.

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None provided.

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SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – BAT
NON-LICENSABLE METHOD STATEMENT

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1 Bats Non-licensable Method Statement: Southern Park and Ride

1.1 Introduction

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

1.1.2 This bat non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and scheme overview

1.1.6 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east

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SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – BAT
NON-LICENSABLE METHOD STATEMENT

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of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.7 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.8 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;

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- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site ('the green rail route') and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.9 The components listed above are referred to collectively as the 'Sizewell C Project'.

1.1.10 In order to enable the proposed development of Wickham Market, as detailed above, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to bats by the habitats present within the site, the proposed facilitating works have the potential to cause injury / mortality and indirect disturbance of bats that may be present. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of bats during the facilitation works to be undertaken within the site.

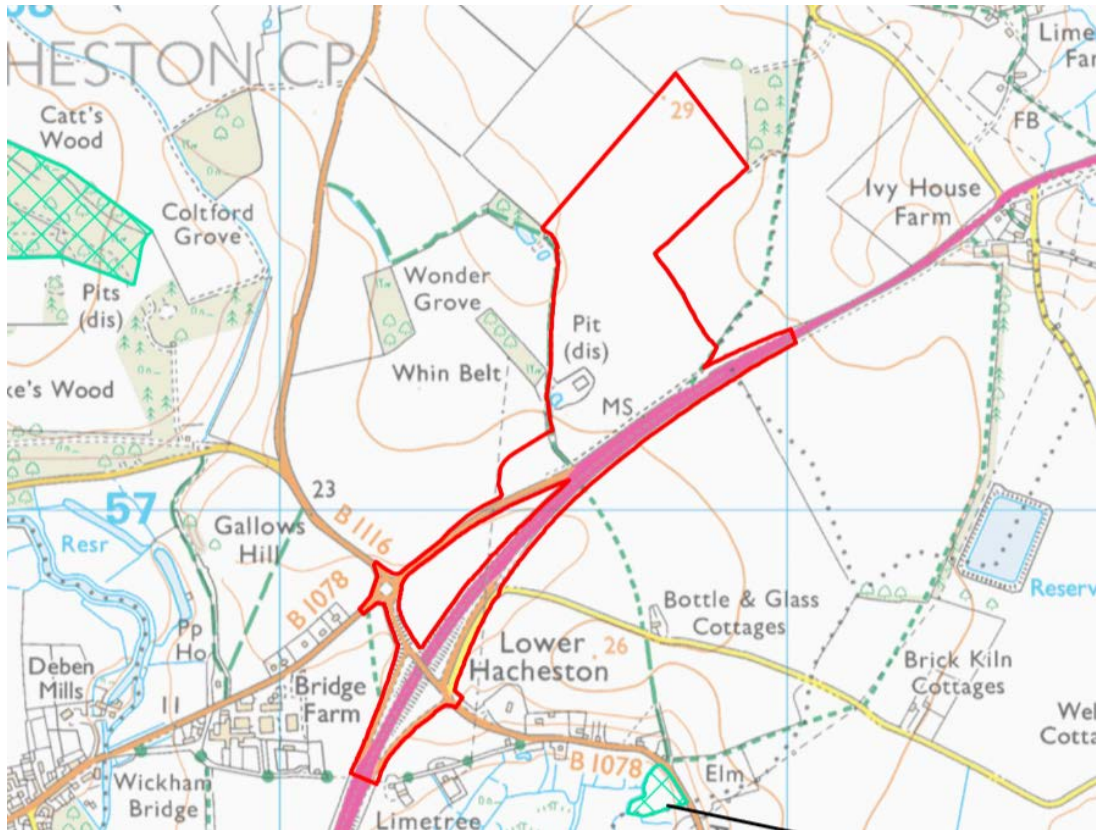
b) Site location and setting

1.1.11 The Site is located in Sizewell, East Suffolk (site centre grid reference OS Grid Reference TM 31649 57492). It is located to the north-east of Wickham Market. Access to the site would be off the slip road from the B1078 which leads to the northbound A12.

1.1.12 The site comprises large arable fields separated by a track. The crops are intensively managed and "clean" (i.e. the soil surface is essentially free of residue) and had, at the time of survey, been treated with herbicide, such that no scarce arable weeds or other notable plant species were identified. In the majority of instances, the crops had been planted up to the edges of the fields and no weedy margins were noted. The fields are bounded by fences and hedgerows. A number of blocks of woodland are present outside of the site boundary.

1.1.13 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



c) Proposed works

- 1.1.14 The specific works covered by this method statement include vegetation clearance measures specifically in relation to the felling of trees, and the lighting arrangements for the site.
- 1.1.15 Perimeter and parking area lighting Lanterns will utilise LED based light fittings with zero-degree tilt, and lighting columns along the perimeter would be fitted with a demountable shield to reduce backward spill of light.

d) Key ecological constraints

- 1.1.16 The key potential ecological constraints associated with the facilitation works within the site include:
 - bats; and
 - reptiles.

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- 1.1.1 The reasonable avoidance measures method statement detailed herein only cover bats. There are also reasonable avoidance measures method statements for reptiles which are detailed separately. A draft protected species licence for bats has also been prepared.
- 1.2 **Site Reasonable Avoidance Measures Method Statements for bats**
- a) **Introduction**
- 1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for bats during the facilitation works.
- 1.2.2 The aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality and disturbance of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in this reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.
- 1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.
- b) **Toolbox talk**
- 1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.5A.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.
- 1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental

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measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

- 1.2.6 There is a declaration (**Appendix 7A.5A.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Bats

a) Site status and potential impacts

- 1.3.1 Habitats within the site primarily consists of open arable land, which is of limited value for bats. However, the boundaries of the site, primarily hedgerows, as well as woodland blocks, are considered to provide suitable foraging, commuting and roosting habitat.
- 1.3.2 Assessments of trees within the survey area identified 13 trees with potential roost features for bats (eight high potential, one medium potential, two low potential, and two undetermined) as well as several adjacent woodland blocks which have the potential to support roosting bats.
- 1.3.3 Except for common and soprano pipistrelle activity, low levels of bat flight and foraging activity were recorded.
- 1.3.4 The construction of the proposed development would result in the loss of arable land, a short section of hedgerow (approximately 40m), and three trees with the potential to support roosting bats (two high potential and one low potential). The loss of habitat would cause a reduction in foraging habitat available to bats and the loss of features suitable for bats to roost in. The loss of the hedgerow section would remove part of a linear feature suitable for use by commuting bats.
- 1.3.5 The arable habitat to be temporarily lost would be approximately 18 hectares (ha) in area. This habitat, while sub-optimal, is used to a limited extent by foraging bats.
- 1.3.6 Bats are potentially impacted by both increased noise levels and increased lighting but only a relatively small number of bats have been recorded within the proposed development site on any one occasion. Evidence suggests that bats using the site are not dependent on the habitats present and will also be using a range of additional habitats in the wider area. No significant effects on bat populations are expected as a result of construction noise or lighting.

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b) Legislation

1.3.7 All bat species in England are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, *inter alia*, to:

- intentionally or recklessly kill, injure or take a bat;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection; or
- intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.

1.3.8 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2)).

1.3.9 All bat species in England receive further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref. 1.4). They are listed on Schedule 2 of the Regulations, which makes it an offence, *inter alia*, to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat, in particular any disturbance which is likely:
 - impair their ability
 - to survive, to breed or reproduce, or to rear or nurture their young, or
 - to hibernate or migrate
 - affect significantly the local distribution or abundance of that bat species; or
- damage or destroy a breeding site or resting place of a bat.

1.3.10 Noctule (*Nyctalus noctule*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auratus*) are also included on Section 41 of the NERC Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

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c) **Toolbox talk for bats**

- 1.3.11 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to bats. Specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by bats and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on bats that could occur within or in the vicinity of the working area.

d) **Precautionary working methods**

- 1.3.12 Construction lighting must be designed so that light spill beyond the site boundary would be minimal and there would be no substantive light spillage into adjacent habitats and woodland blocks including Whin Belt. The lighting design for the proposed development must use light fittings chosen to limit stray light. Guidance within the latest Institution of Lighting Professionals Guidance Note (Ref 1.5) must be followed as far as possible. These measures will minimise impacts on nocturnal species such as bats that may use the nearby tree lines or habitats for roosts or foraging.
- 1.3.13 In addition, although some activities may require 24 hour working, the majority of construction would take place Monday to Saturday 07:00 to 19:00 hours. This means night-time works will be avoided, which is when bats are most active. Incidental mortality associated with traffic movements would therefore not have a significant effect on the bat assemblage.
- 1.3.14 Close-boarded fencing must be provided where the proposed development site abuts areas of woodland to provide additional protection from vehicle headlights and noise.
- 1.3.15 All trees to be removed must be reassessed for bat roosting potential ahead of felling.
- 1.3.16 Any trees identified as having low bat roosting potential must be removed using a soft felling methodology outlined below with a suitability experienced, appropriately licensed, bat worker or bat worker assistant present. Where possible, Trees must be removed in October, thereby avoiding the sensitive maternity (April-September) and hibernation (November-February) periods for bats.

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- 1.3.17 For any trees with moderate or high roosting potential, a thorough pre works check for roosting bats must be undertaken. The methodology and required survey effort for these pre works checks is dependent upon the status of the roosting features within the trees, but may include:
- a climbed or ground based tree inspection using an endoscope and / or torch; and
 - emergence / re-entry surveys.
- 1.3.18 Should any of the trees to be removed be found to support bat roosts, an EPS licence is likely to be required. The documents associated with this licence will outline the required mitigation, and the required measures are not discussed further within this report.
- 1.3.19 Should additional emergence re-entry surveys be required these must be undertaken between April and September inclusive. If no roosts are found, the approach outlined below must be undertaken.
- 1.3.20 All trees with potential roost features for bats must be soft felled using the following precautionary measures:
- trees classed as having low potential to support roosting bats, must be felled under the watching brief of the ECoW;
 - where potential roost features for bats cannot be exhaustively checked they should be section felled, with each section carefully lowered to the ground. Cuts must be made at least 50 cm beyond the extent of the potential roost feature;
 - if limbs or large branches require felling, consideration must be given to cracks which may close (crushing any bats inside) once the weight of the limb has been removed. If the crack cannot be thoroughly inspected to ensure bats are not present, the crack should be wedged open prior to removal of the limb/branch;
 - the stems of dense ivy must be cut at ground level at least 48 hours before the tree is felled; and
 - once the trees have been felled the potential roost features must be re-checked on the ground by a suitably experienced bat ecologist. If any potential roost feature can still not be exhaustively checked that section must be allowed a rest period of at least 24 hours to ensure that any

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individual bats that may have been missed are given the opportunity to relocate.

1.3.21 If any bats are encountered during the felling operations all works and activity must cease immediately, until the ECoW has advised on the most appropriate manner to deal with the situation.

1.3.22 To mitigate for the loss of the tree and potential roost resources, bat boxes must be installed on retained trees in suitable locations within the site boundary, prior to felling. A variety of bat boxes are to be used to support different species. The following re-provision to loss ratios have been specified by Natural England:

- 1:1 potential roosting features;
- 2:1 low status roost of common species;
- 4:1 maternity roosts of common species; and
- 4:1 low status roost of Annex 2 species.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. Whilst this document has been produced in relation to bats, further information has been provided to ensure legal compliance in relation to other protected species.

1.4.2 Vegetation clearance works must, where possible, take place outside of the active bird breeding season (early March and late August inclusive) and it is considered that no nesting bird checks would be required prior to the commencement of works. Nevertheless, if any vegetation clearance works was required within the core bird breeding season, a qualified ECoW must carry out a nesting bird check at least 48 hours before the commencement of works effecting the vegetation within the site. Once nesting birds have been confirmed absent, a habitat manipulation exercise must be undertaken in the form of a two stage vegetation cut, with the initial cut reducing the vegetation to a height of 150mm before a second cut subsequently reduces it to ground level, with a minimum of two hours between cuts to allow reptiles or amphibians to move out of the cutting area.

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- 1.4.3 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles. Any vegetation clearance likely to impact vegetation below 150mm or the removal of places of shelter/hibernation features must, where possible, be undertaken outside of the reptile hibernating period (October to February inclusive), during periods of warm, dry weather. If this is not possible, vegetation must be cut to the ground (to remove potential bird nesting habitat), but the roots would remain intact until hibernation is complete. The root system of vegetation must then be removed once the reptile and amphibian hibernation season is over. Clearing of vegetation must be undertaken under the supervision of the suitably experienced Ecological Clerk of Works (ECoW).
- 1.4.4 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).
- 1.4.5 Works must be undertaken outside of all tree and hedgerow root protection zones that are not proposed to be removed as part of the proposed development. Tree protective fencing as described in section 6.2 of British Standard 5837:2012 (Ref 1.6) must be installed (distance of fencing from tree trunk = 12x trunk diameter, distance from hedgerows = 1m from the spread of hedgerow canopy), where required, prior to plant and machinery arriving on site and construction works commencing. The fencing must remain intact throughout the duration of the works and only be removed upon completion. Weather-proof notices must be attached to any protective fencing located adjacent to retained trees displaying the words 'Construction Exclusion Zone'. All personnel must be made aware of these restrictions. If works need to be undertaken within the root protection zones an Arboricultural survey must be undertaken and any advice provided adhered to, to secure the long-term survival of the tree/hedgerow.



SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – BAT
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London
- 1.4 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London.
- 1.5 Institute of Lighting Professional /Bat Conservation Trust (2018). Institution of Lighting Professionals. 2018. Bats and artificial lighting in the UK. Guidance Note 08/2018.
- 1.6 British Standards Institute. (2012). British Standard for Trees in relation to design, demolition and construction (BS 5837:2012). British Standards Institute. 2012

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Appendix 7A5A.1: Ecological Tool Box Talk

1.1 Legislation

1.1.1 Ecology surveys have been completed within the site and have identified the potential for the presence of a legally protected species. The Ecological Method Statement details the mitigation and working methods that should be adopted to avoid contravention of the legislation. If this is not followed, there is a risk that you could break the law by doing actions such as:

- Deliberately capture, injure or kill;
- Damage or destroy a resting place or breeding site;
- Deliberately or recklessly disturb an individual while it's in a structure or place of shelter or protection;
- Block access too structures or places of shelter or protection; or
- Possess, sell, control or transport live or dead individuals.

1.1.2 Any of the following could happen if you're found guilty of any offence:

- You could get an unlimited fine;
- You could be sent to prison for up to 6 months.

1.2 Species Identification






Nesting Birds

The bird nesting season extends from March to August inclusive, although in mild climate nesting may start in February.

Nesting occurs in a variety of habitats including agricultural fields (ground nesting birds), dense bramble scrub, buildings and other man-made structures and trees.

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	<p><u>Reptiles (slow-worm, common lizard, grass snake and adder)</u></p> <p>They may be found sheltering in vegetation, under debris such as logs, ricks or piles of rubble or waste items. They may also bask in the open on sunny days.</p> <p>DO NOT leave materials in area where it might be colonised by reptiles. Any debris or materials should be moved with care or moved under direct supervision of a suitably qualified ecologist.</p>
	<p><u>Bats</u></p> <p>On site habitats where bats may roost include trees.</p> <p>If works involve trees with cavities then check with the on-site ecologist that these have been inspected.</p>
	<p><u>Badgers</u></p> <p>It is unlikely that the animals would be seen but signs of their presence include:</p> <ul style="list-style-type: none"> • Setts (d shaped burrow with a large spoil heap); • Latrines or dung pits; and • Snuffle holes and runs.

1.3 Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, OR IF IN ANY DOUBT, stop the works immediately and contact the Project ecologist;
- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and



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- Do not attempt to move any species found unless instructed to do so by an ecologist.



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Appendix 7A5A.2: Declaration

By signing the register below you confirm that you have received the ECOLOGY TOOLBOX TALK (Appendix 1) AND METHOD STATEMENT briefing provided by the project ecologist for the Wickham Sizewell C Scheme.

Date	Name	Role on Site	Signature

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**APPENDIX E SOUTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 4 CHAPTER 7
APPENDIX 7A ANNEX 7A-5B)**



SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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None Provided.

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SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – REPTILE
NON-LICENSABLE METHOD STATEMENT

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1 Reptile Non-Licensable Method Statement: Southern Park and Ride

1.1 Introduction

1.1.1 In order to enable the proposed development of the southern park and ride at the Wickham site, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to reptiles by the habitats present within the site, the proposed facilitating works have the potential to cause injury/ mortality to reptiles should they be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

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



SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – REPTILE
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described in this document they are set out in the Schedule of Other Consents, Licences and Agreements (Doc Ref. 5.11(C)).

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

a) **Background and Scheme Overview**

1.1.7 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.

1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.

1.1.9 This Reptile Method Statement compiled by Arcadis Consulting (UK) Limited (hereafter referred to as ‘Arcadis’) outlines the key approaches to mitigating potential impacts to the reptile populations present at Wickham Market. It must be used by the SZC Co. in relation to the proposal to build the Southern Park and Ride.

1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

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- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.12 The components listed above are referred to collectively as the ‘Sizewell C Project’.

b) **Site Location and Setting**

1.1.1 The southern park and ride at the Wickham Market site measures approximately 26.4ha in area and is located north-east of Wickham Market. The part of the site which would contain the parking and buildings, postal consolidation building and Traffic Incident Management Area (TIMA) is approximately 18ha in size and located to the east of the B1078/B1116 and to the north of the A12. The remainder of the site encompasses a section of the A12, and an associated slip road where highway improvements are proposed to form the site access and include the provision of signage and road markings.

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- 1.1.2 The proposed development would provide spaces for up to 1,250 cars and would allow the transfer to and from the main development site, therefore reducing the construction workforce traffic on the roads between the A12 and the main development site. A postal consolidation facility would also be part of the proposed development. The proposed development is temporary and would be in situ until the construction of the Sizewell C power station is complete (between 9-12 years).
- 1.1.3 The site is dominated by arable farmland, which was noted to be “clean” at the time of the 2018 survey, having been treated with an intensive herbicide such that no arable weeds or other plant species were recorded within the area of arable land. The site also supports six woodland blocks, comprising broad-leaved plantation, broad-leaved semi-nature woodland and lowland mixed deciduous woodland, along with an area of improved grassland, an area of tall ruderal vegetation and a number of hedgerows, which bound the arable land within the site. In addition, the site also supports a single pond.
- 1.1.4 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



- 1.1.5 The purpose of the proposed development would be to reduce the amount of additional traffic generated by the construction workforce on local roads and through local villages as a result of the Sizewell C Project. The southern park and ride at Wickham would be used by construction workers approaching Sizewell C from the south on the A12, with workers then being

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transported to and from the Sizewell C main development site by bus. The park and ride facilities would also intercept traffic movements from locations west of the A12. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) **Key Ecological Constraints**

1.1.13 The key potential ecological constraints associated with the facilitation works within the site include:

- bats; and
- reptiles.

1.1.14 The reasonable avoidance measures method statements detailed herein only cover guidance relating to reptiles. There are also reasonable avoidance measures method statements and a draft protected species licence for bats which are detailed separately.

1.2 **Site Reasonable Avoidance Measures Method Statements for reptiles**

a) **Introduction**

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support

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protected species. Any variations from these reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox Talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.5B.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.5B.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Reptiles**

a) **Site Status**

1.3.1 The majority of this site comprises intensively managed arable fields which are unsuitable for reptiles. However, an area of tall ruderal herbs at the west corner of Whin Belt, the track to and margins of the small patch of woodland to the north of Whin Belt, and the disused pit area to the south of Whin Belt provide habitat that is suitable foraging habitat for small numbers of reptiles. The woodland areas also have the potential to provide hibernation sites. The desk-study data received from the Suffolk Biodiversity Information Service returned a number of records within 2km of the site, although none were returned from within the site.

1.3.2 Accordingly, given that the extent of this habitat is quite limited such that it is unlikely that the site is of elevated potential to reptiles. Nevertheless, given

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the presence of suitable habitat within and adjacent to the site, there is the potential for this species group to make at least occasional use of the site.

b) Legislation

1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref 1.2)).

1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref. 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

c) Toolbox Talk for reptiles

1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles (**Appendix 7A.1**).

1.3.6 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) Precautionary Working Methods

1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in

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addition to reptiles, particularly nesting birds, dependent upon the timings of the works.

1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).

1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.

1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co. must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature). The works must not be conducted early in the morning before reptiles have had a chance to 'warm up';
- the ECoW and the contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;

¹ Advanced works approach would integrate vegetation clearance in relation to reptiles and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this should be overseen by the ECoW. If a reptile is found the ECoW is responsible for determining whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- if reptiles are found, the ECoW is responsible for moving the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be , near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

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1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating Work Requirements

a) Vegetation Clearance Methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW is and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features should be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must not be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW is responsible for providing bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.

1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).




b) Vegetation Clearance Equipment

1.4.7 SZC Co. must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example:

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- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearing equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) Ground-breaking Works Methods

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the absence of suitable habitat within the areas proposed for ground-breaking works.

1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to

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February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

d) **Ground-breaking Works Equipment**

1.4.10 SZC CO. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

	
<p><i>JCB 16C-I New Generation 1 Tonne Mini Digger</i></p>	<p><i>Chapter 8 barrier/ Heras fencing</i></p>



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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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SIZEWELL C PROJECT
SOUTHERN PARK AND RIDE – REPTILE
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Appendix 7A.5B.1: Toolbox Talk

Reptiles

Reptiles in the UK



IF BITTEN SEEK MEDICAL HELP IMMEDIATELY.

Legal Protection
All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brash piles, mammal burrows and tree / hedgerow roots.

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**APPENDIX F TWO VILLAGE BYPASS – BAT NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 5 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6A)**



SIZEWELL C PROJECT
TWO VILLAGE BYPASS – BAT
NON-LICENSABLE METHOD STATEMENT

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None provided.

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None provided.

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SIZEWELL C PROJECT
TWO VILLAGE BYPASS – BAT
NON-LICENSABLE METHOD STATEMENT

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1 Bat Non-licensable Method Statement: Two Village Bypass

1.1 Introduction

1.1.1 Level 1 control documents will either be certified under the **Development Consent Order (DCO)** (Doc. Ref. 3.1(J)) at grant or annexed to the **Deed of Obligation (DoO)** (Doc. Ref. 10.4). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and DoO set out the status of each Level 1 document.

1.1.2 This bat non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and scheme overview

1.1.6 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast,



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approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.7 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.8 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- Two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- A permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- A permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- Permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;

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- A temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- A temporary extension of the existing Saxmundham to Leiston branch line into the main development site ('the green rail route') and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.9 The components listed above are referred to collectively as the 'Sizewell C Project'.

1.1.10 In order to enable the proposed development of the Two Village Bypass, as detailed above, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to bats by the habitats present within the site, the proposed facilitating works have the potential to cause injury / mortality and indirect disturbance of bats that may be present. Accordingly, the purpose of this document is to provide a reasonable avoidance measures (RAMs) method statement that must be used by SZC Co. to ensure the safeguarding of bats during the facilitation works to be undertaken within the site.

b) Site location and setting

1.1.11 The Two Village Bypass (TVB) site measures approximately 54.8 hectares (ha) and is located to the south and south-east of Stratford St. Andrew, and to the south-west to south-east of Farnham. The proposed development comprises a new permanent two-lane single carriageway road that would depart the A12, creating a new route around the south of Farnham and Stratford St. Andrew, before re-joining the A12 east of Farnham.

1.1.12 Once operational, the TVB would be open to construction traffic associated with the construction of the Sizewell C project as well as to the general public. The proposed development would reduce the volume of construction traffic traveling through Farnham and Stratford St. Andrew. As the proposed development is permanent, once construction of Sizewell C is completed, it will remain open for general use by the public and would provide legacy benefit to the residents of Farnham and Stratford St. Andrew.

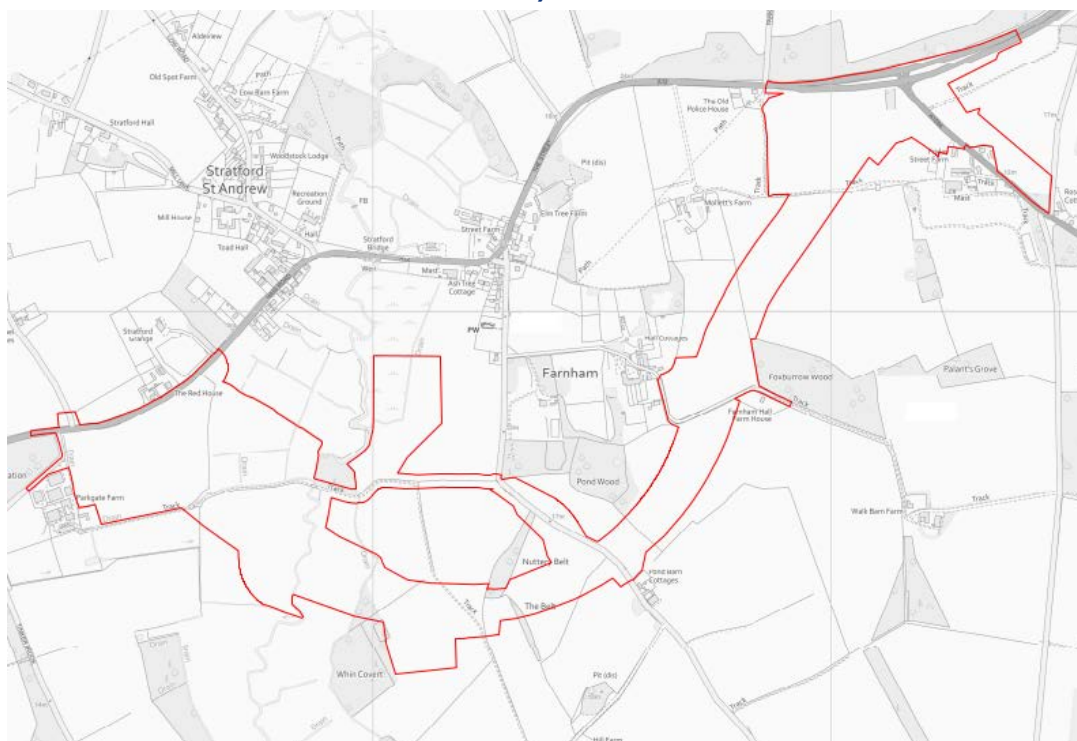
1.1.13 The two village bypass site is dominated by arable land with field boundaries comprising native, species poor hedgerows and tree lines. The site also supports significant areas of semi-natural woodland. Scattered trees and a number of watercourses are present within the site, whilst the site also

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contains a number of buildings and associated areas of hardstanding. Whilst no ponds are present within the site itself, a number of waterbodies are present within the immediate 500m surrounding the site.

- 1.1.14 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1** below.

Plate 1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



c) Proposed works

- 1.1.15 The purpose of the works is to create a permanent road to bypass Stratford St. Andrew and Farnham in order to alleviate the increased traffic on the A12 through the villages generated by the Sizewell C scheme.
- 1.1.16 The specific works covered by this method statement include vegetation clearance measures, and the lighting arrangements for the site.
- 1.1.17 A number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

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d) Key ecological constraints

1.1.18 Within this site, the following are the predicted key potential ecological constraints associated with the facilitation works:

- badger;
- bats;
- great crested newt;
- reptiles;
- water vole; and
- otter.

1.1.19 The reasonable avoidance measures method statements detailed herein only covers bats. There are associated reasonable avoidance measures method statements (detailed separately) and draft protected species licences for bats, badger and water vole have also been prepared.

1.2 Site Reasonable Avoidance Measures method statements for Bats

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for bats during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statement is to reduce the risk of causing injury / mortality and disturbance of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in these reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from this reasonable avoidance measures

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method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6A.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6A.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Bats**

a) **Site status and potential impacts**

1.3.1 Habitats within the site boundary predominantly consist of open arable land, which is of limited value for bats. However, the site also includes habitat features such as hedgerows and blocks of woodland which provide suitable foraging, commuting and roosting habitat.

1.3.2 An assessment of trees within the woodland blocks identified 107 trees with bat roost potential (38 high potential, 42 moderate potential, 27 low potential).

1.3.3 Activity and static detector surveys recorded at least 13 bat species/species groups within the site (Natterer's, common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle (*Pipistrellus nathusii*), serotine, barbastelle, noctule, brown long-eared, pipistrelle species, Myotis species, Nyctalus species, "big bat" and long-eared species (*Plecotus* spp). The activity surveys demonstrated that activity within the site and within adjacent habitats was

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dominated by common and soprano pipistrelle with low levels of other species recorded.

1.3.4 Bats using the site are almost certainly not dependent on the sub-optimal habitats present and would also be using a range of additional habitats in the Zol. This includes the more valuable woodland blocks, external and adjacent to the site boundary.

1.3.5 The construction of the proposed development would result in the loss of primarily arable land as well as hedgerows, broadleaved woodland and mature trees with bat potential. There would also be the loss of 51 trees with the potential to support roosting bats (18 with high potential, 18 with moderate potential, 15 with low potential). The loss of habitat would cause a reduction in foraging habitat available to bats and the loss of features suitable for bats to roost in.

1.3.6 The proposed development would result in the permanent loss of approximately 24.6ha of sub-optimal arable foraging habitat, 2.91ha floodplain grassland (better foraging habitat), 0.38ha broadleaved woodland and 1371m of hedgerow. During the construction phase there would be a temporary loss of habitat suitable to support foraging bats, this would be reinstated and new habitat planted upon the completion of the construction phase.

1.3.7 Bats are impacted by both increased noise levels and increased lighting at this site. Provided the proposed mitigation measures are implemented, no significant effects on bat populations are expected as a result of the proposed development and those habitats most suitable for bats are retained.

b) **Legislation**

1.3.8 All bat species in England are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to:

- intentionally or recklessly kill, injure or take a bat;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection; or
- intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.

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1.3.9 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2).

1.3.10 All bat species in England receive further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref 1.4). They are listed on Schedule 2 of the Regulations, which makes it an offence, *inter alia*, to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat, in particular any disturbance which is likely:
 - Impair their ability
 - to survive, to breed or reproduce, or to rear or nurture their young, or
 - to hibernate or migrate
 - affect significantly the local distribution or abundance of that bat species; or
- damage or destroy a breeding site or resting place of a bat.

1.3.11 Noctule (*Nyctalus noctule*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auratus*) are also included on Section 41 of the NERC Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

c) [Toolbox talk for Bats](#)

1.3.12 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to bats. Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by bats and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area.

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d) Precautionary working methods

- 1.3.13 In order to control impacts, 15m buffer areas between the edge of the proposed development and Foxburrow Wood CWS and watercourse must be maintained.
- 1.3.14 Provision of close-board fencing where the proposed development abuts woodland (such as along Whin Covert, Nuttery Belt, The Belt, Pond Wood and Foxburrow Wood CWS).
- 1.3.15 Construction lighting must be designed to minimise light spill and the potential for light disturbance on adjacent land. The lighting design for the proposed development must comply with the lighting strategy and use light fittings chosen to limit stray light. Guidance within the latest Institution of Lighting Professionals Guidance Note (Ref 1.5) must be followed as far as possible. These measures will minimise impacts on nocturnal species such as bats that may use the nearby tree lines or habitats for roosting or foraging.
- 1.3.16 In addition, although some activities may require 24 hour working, the majority of construction would take place Monday to Saturday 07:00 to 19:00 hours. This means night-time works will be avoided, which is when bats are most active. Incidental mortality associated with traffic movements would therefore not have a significant effect on the bat assemblage.
- 1.3.17 All trees to be removed must be reassessed for bat roosting potential ahead of felling.
- 1.3.18 Any trees identified as having low bat roosting potential must be removed using a soft felling methodology with a suitability experienced, appropriately licensed, bat worker or bat worker assistant present. This is outlined below. Where possible, Trees must be removed in October, thereby avoiding the sensitive maternity (April-September) and hibernation (November-February) periods for bats.
- 1.3.19 For any trees with moderate or high roosting potential, a pre works inspection for roosting bats must be undertaken. The methodology and required survey effort for these pre works checks is dependent upon the status of the roosting features within the trees, but may include:
- a climbed or ground based tree inspection using an endoscope and / or torch; and
 - emergence / re-entry surveys.

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- 1.3.20 Should any of the trees to be removed be found to support bat roosts, an EPS licence is likely to be required. The documents associated with this licence will outline the required mitigation, and the required measures are not discussed further within this report.
- 1.3.21 If no roosts are found, the approach outlined below will be undertaken.
- 1.3.22 All trees with PRFs must be soft felled using the following precautionary measures:
- Trees classed as having low potential to support roosting bats, must be felled under the watching brief of the ECoW;
 - Where PRFs cannot be exhaustively checked they must be section felled, with each section carefully lowered to the ground. Cuts must be made at least 50 cm beyond the extent of the potential roost feature;
 - If limbs or large branches require felling, consideration must be given to cracks which may close (crushing any bats inside) once the weight of the limb has been removed. If the crack cannot be thoroughly inspected to ensure bats are not present, the crack must be wedged open prior to removal of the limb/branch;
 - The stems of dense ivy must be cut at ground level at least 48 hours before the tree is felled; and
 - Once the trees have been felled the potential roost features must be checked on the ground by a suitably experienced bat ecologist. If any potential roost feature can still not be exhaustively checked that section must be allowed a rest period of at least 24 hours to ensure that any individual bats that may have been missed are given the opportunity to relocate.
- 1.3.23 If any bats are encountered during the felling operations all works and activity must cease immediately, until the ECoW has advised on the most appropriate manner to deal with the situation.
- 1.3.24 To mitigate for the loss of the trees and potential roost resources, bat boxes must be installed on retained trees in suitable locations within the site boundary, prior to felling. A variety of bat boxes are to be used to support different species. The following re-provision to loss ratios have been specified by Natural England:

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- 1:1 potential roosting features;
- 2:1 low status roost of common species;
- 4:1 maternity roosts of common species; and
- 4:1 low status roost of Annex 2 species.

1.4 Facilitating work requirements

a) Vegetation clearance methods

- 1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. Whilst this document has been produced in relation to bats, further information has been provided to ensure legal compliance in relation to other protected species
- 1.4.2 Vegetation clearance works must, where possible, take place outside of the active bird breeding season (early March and late August inclusive) and it is considered that no nesting bird checks would be required prior to the commencement of works. Nevertheless, if any vegetation clearance works was required within the core bird breeding season, a qualified ECoW must carry out a nesting bird check at least 48 hours before the commencement of works effecting the vegetation within the site. Once nesting birds have been confirmed absent, a habitat manipulation exercise must be undertaken in the form of a two stage vegetation cut, with the initial cut reducing the vegetation to a height of 150mm before a second cut subsequently reduces it to ground level, with a minimum of two hours between cuts to allow reptiles or amphibians to move out of the cutting area.
- 1.4.3 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles. Any vegetation clearance likely to impact vegetation below 150mm or the removal of places of shelter/hibernation features must, where possible, be undertaken outside of the reptile and amphibian hibernating period (October to February inclusive), during periods of warm, dry weather. If this is not possible, vegetation must be cut to the ground (to remove potential bird nesting habitat), but the roots would remain intact until hibernation is complete. The root system of vegetation must then be removed once the hibernation season is over. Clearing of vegetation would be undertaken under the supervision of the suitably experienced Ecological Clerk of Works (ECoW).



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- 1.4.4 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).
- 1.4.5 The habitats present within the site are largely sub-optimal for bats, being intensively managed for arable farming purposes. The sub-optimal arable land supports few invertebrates on which bats can forage.
- 1.4.6 Works must be undertaken outside of all tree and hedgerow root protection zones that are not proposed to be removed as part of the proposed development. Tree protective fencing as described in section 6.2 of British Standard 5837:2012 (Ref 1.6) must be installed (distance of fencing from tree trunk = 12x trunk diameter, distance from hedgerows = 1m from the spread of hedgerow canopy), where required, prior construction works commencing. The fencing must remain intact throughout the duration of the works and only be removed upon completion. Weather-proof notices must be attached to any protective fencing located adjacent to retained trees displaying the words 'Construction Exclusion Zone'. All personnel must be made aware of these restrictions. If works need to be undertaken within the root protection zones an Arboricultural survey must be undertaken and any advice provided adhered to, to secure the long-term survival of the tree/hedgerow.



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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London
- 1.4 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London.
- 1.5 Institution of Lighting Professionals/Bat Conservation Trust (2018). Institution of Lighting Professionals. 2018. Bats and artificial lighting in the UK. Guidance Note 08/2018. ILP/BCT.
- 1.6 British Standards Institute (2012) British Standard for Trees in relation to design, demolition and construction (BS 5837:2012).

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Appendix 7A.6A.1: Ecological Tool Box Talk

1.1. Legislation

1.1.1. Ecology surveys have been completed within the site and have identified the potential for the presence of a legally protected species. The Ecological Method Statement details the mitigation and working methods that should be adopted to avoid contravention of the legislation. If this is not followed, there is a risk that you could break the law by doing actions such as:

- Deliberately capture, injure or kill;
- Damage or destroy a resting place or breeding site;
- Deliberately or recklessly disturb an individual while it's in a structure or place of shelter or protection;
- Block access too structures or places of shelter or protection; or
- Possess, sell, control or transport live or dead individuals.

1.1.2. Any of the following could happen if you're found guilty of any offence:

- You could get an unlimited fine;
- You could be sent to prison for up to 6 months.

1.2. Species identification



Nesting Birds

The bird nesting season extends from March to August inclusive, although in mild climate nesting may start in February.




Nesting occurs in a variety of habitats including agricultural fields (ground nesting birds), dense bramble scrub, buildings

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	<p>and other man-made structures and trees.</p>
	<p><u>Reptiles (slow-worm, common lizard, grass snake and adder)</u></p> <p>They may be found sheltering in vegetation, under debris such as logs, ricks or piles of rubble or waste items. They may also bask in the open on sunny days.</p> <p>DO NOT leave materials in area where it might be colonised by reptiles. Any debris or materials should be moved with care or moved under direct supervision of a suitably qualified ecologist.</p>
	<p><u>Bats</u></p> <p>On site habitats where bats may roost include trees.</p> <p>If works involve trees with cavities, then check with the on-site ecologist that these have been inspected.</p>
	<p><u>Badgers</u></p> <p>It is unlikely that the animals would be seen but signs of their presence include:</p> <ul style="list-style-type: none"> • Setts (d shaped burrow with a large spoil heap); • Latrines or dung pits; and • Snuffle holes and runs.

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	<p><u>Great Crested Newts</u></p> <p>It is possible that great crested newt may be present on site.</p> <p>Newts are associated with water bodies but during the winter they live / hibernate in terrestrial habitat.</p> <p>They can be harmed when clearing vegetation, moving debris such as log piles and ground works.</p>
	<p><u>Water Vole</u></p> <p>Water voles are associated with water courses. It is rare to see these animals, but their burrows are found in banks of ditches, rivers and ponds.</p>
	<p><u>Otter</u></p> <p>Otters are associated with water courses. It is rare to see these animals, but their holts and resting places are found in banks of ditches, streams and rivers and footprints can be easily seen</p>

1.3. Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, or if in any doubt, stop the works immediately and contact the Project ecologist;



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- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and
- Do not attempt to move any species found unless instructed to do so by an ecologist.

**APPENDIX G TWO VILLAGE BYPASS – GREAT CRESTED
NEWT NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 5 CHAPTER 7
APPENDIX 7A ANNEX 7A-6B)**



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TWO VILLAGE BYPASS – GREAT CRESTED NEWT
NON-LICENSABLE METHOD STATEMENT

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None provided.

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None provided.

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1. **Great Crested Newt Non-licensable Method Statement: Two Village Bypass**
 - 1.1 **Introduction**
 - 1.1.1 In order to enable the proposed development of the two village bypass site a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Although not detected during recent surveys, given the habitats present, great crested newts could be present within the site and a number of waterbodies are within the immediate 500m surrounds of the site. The proposed works have the potential to cause injury/mortality to this species should it be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of great crested newt during the facilitation works to be undertaken within the site.
 - 1.1.2 Level 1 control documents will either be certified under the Development Consent Order (DCO) at grant or annexed to the Deed of Obligation (DoO). All are secured and legally enforceable. Some Level 1 documents are compliance documents and must be complied with when certain activities are carried out. Other Level 1 documents are strategies or draft plans which set the boundaries for a subsequent Level 2 document which is required to be approved by a body or governance group. The obligations in the DCO and DoO set out the status of each Level 1 document.
 - 1.1.3 This great crested newt non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.
 - 1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.
 - 1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are

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described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) **Background and Scheme Overview**

1.1.7 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.8 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.9 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;

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- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.10 The components listed above are referred to collectively as the ‘Sizewell C Project’. This method statement is compiled in relation to the two village bypass only.

1.1.11 This great crested newt Method Statement outlines the key approaches to mitigating potential impacts to the great crested newt (*Triturus cristatus*) populations present within or adjacent to the construction site for the two village bypass. It must be used by SZC Co’ in relation to the proposal to build two village bypass.

b) Site Location and Setting

1.1.12 The two village bypass site measures approximately 54.8ha in area and is located to the south and south-east of Stratford St. Andrew, and to the south-west to south-east of Farnham (presented in Plate 1). The proposed development comprises a new permanent two-lane single carriageway road that would depart the A12, creating a new route around the south of Farnham and Stratford St Andrew, before re-joining the A12 east of Farnham.

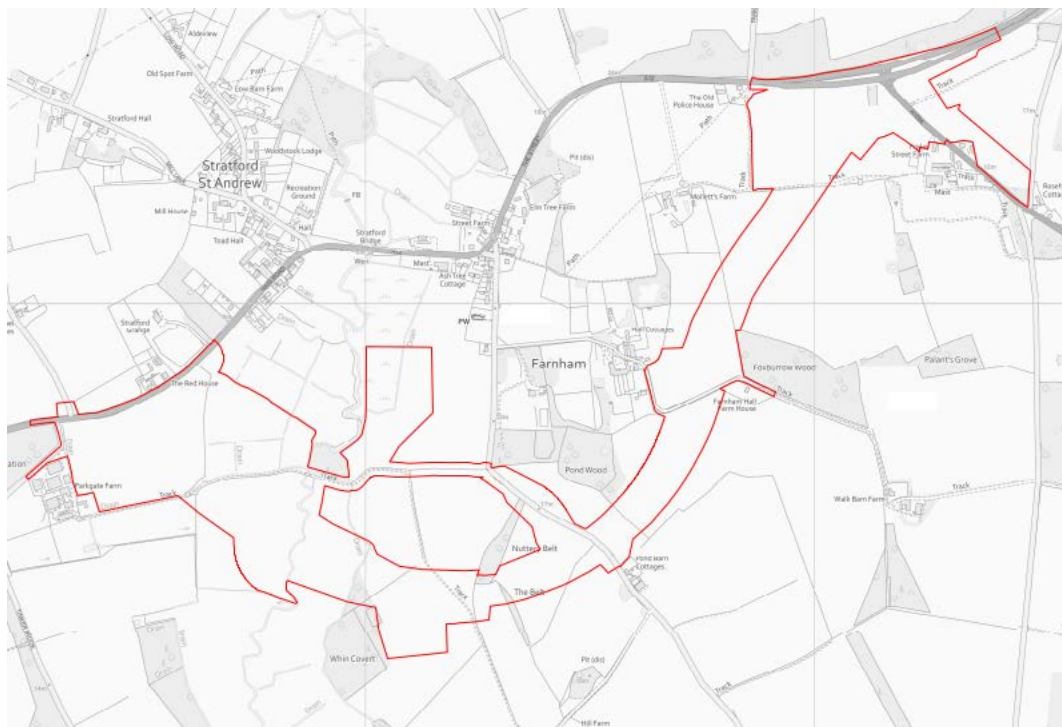
1.1.13 Once operational, the two village bypass would be open to construction traffic associated with the construction of the Sizewell C project as well as to the general public. The proposed development would reduce the volume of construction traffic traveling through Farnham and Stratford St Andrew. As

the proposed development is permanent, once construction of Sizewell C is completed, it will remain open for general use by the public and would provide legacy benefit to the residents of Farnham and Stratford St Andrew.

1.1.14 The two village bypass site is dominated by arable land with field boundaries comprising native, species poor hedgerows and tree lines. The site also supports significant areas of semi-natural woodland. Scattered trees and a number of watercourses are present within the site, whilst the site also contains a number of buildings and associated areas of hardstanding. Whilst no ponds are present within the site itself, a number of waterbodies are present within the immediate 500m surrounding the site.

1.1.15 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



1.1.16 The purpose of the works is to create a permanent road to bypass Stratford St Andrew and Farnham in order to alleviate the increased traffic on the A12 through the villages by the Sizewell development scheme. However, as a

component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) **Key Ecological Constraints**

1.1.17 Within this site, the following are the predicted key potential legislative constraints associated with the facilitation works:

- badger;
- bats;
- great crested newt;
- reptiles
- water vole; and
- otter.

1.1.18 The reasonable avoidance measures method statements included herein only cover guidance relating to great crested newt. However there are other reasonable avoidance measures method statements (provided separately) and draft protected species licences for bats, badger and water vole have also been prepared.

1.2 **Site Reasonable Avoidance Measures Method Statements for great crested newt**

a) **Introduction**

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for great crested newt during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in these reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

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1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from the individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox Talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6B.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, as identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6B.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Great Crested Newt**

a) **Site Status**

1.3.1 Given that the site supports field boundaries comprising native, species poor hedgerows and tree lines, in addition to significant areas of semi-natural woodland, it is considered that the site supports suitable terrestrial habitat for great crested newt. Moreover, a number of ponds are located within the nearby vicinity of the site, such that aquatic opportunities for this species group are present in close proximity to the site.

1.3.2 Whilst desk-study data received from the Suffolk Biodiversity Information Service returned no records of great crested newt within 2km of the site, given the presence of suitable terrestrial habitat within the site and suitable aquatic habitat present within the surrounds of the site, specific presence/

absence eDNA surveys were undertaken with respect to great crested newt within the site. The eDNA surveys carried out with respect to the offsite ponds confirmed the absence of great crested newt within the vicinity of the site. However, access was not obtainable for a number of the offsite ponds, such that there is the potential for great crested newt to be present within the vicinity of the site and to make use of the terrestrial habitats within the site.

b) Legislation

1.3.3 Great crested newt (great crested newt) is listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to:

- intentionally or recklessly kill, injure or take (handle) a great crested newt;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a great crested newt uses for shelter or protection; or
- intentionally or recklessly disturb a great crested newt while it is occupying a structure or place that it uses for shelter or protection.

1.3.4 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2)).

1.3.5 great crested newt receives further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref 1.3). They are listed on Schedule 2 of the Regulations, which makes it an offence, inter alia, to:

- deliberately capture, injure or kill a great crested newt;
- deliberately disturb a great crested newt, in particular any disturbance which is likely:
 - impair their ability to:
 - survive, to breed or reproduce, or to rear or nurture their young, or
 - hibernate or migrate
 - affect significantly the local distribution or abundance of great crested newt; or

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- damage or destroy a breeding site or resting place of a great crested newt.
- 1.3.6 Great crested newt is included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.4). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.
- 1.3.7 The prescriptions of this method statement must be followed during works in any areas which offer terrestrial habitats for great crested newts. These areas include but are not limited to: tree roots, hedgerow bases, grassland areas, arable field margins, earth banks, log piles, rock piles and woodlands.
- 1.3.8 In areas which support sub optimal habitats for great crested newt (i.e. arable fields), these measures do not apply (with the exception of the toolbox talk, which applies to all contractors working on the site).
- 1.3.9 When the precautionary methods of work described in this method statement are taken into account, the cumulative risks and effects on the local great crested newt population(s) will be not significant. It is therefore considered that a great crested newt licence is not required for the facilitation works outlined in this method statement.
- 1.3.10 The Ecological Clerk of Works (ECoW), must oversee and quality-control the implementation of the ecological tasks undertaken.
- c) **Toolbox talk for great crested newt**
- 1.3.11 Prior to commencement of the works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to great crested newt. This applies to contractors working in all habitats across the site, not only habitats likely to support great crested newt in the terrestrial phase.
- 1.3.12 Site-specific toolbox talks, as identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by great crested newt and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on great crested newt that could occur within or in the vicinity of the working area. The toolbox talk stresses that: potential great crested newt refugia / hibernation features must, where

possible, be left undisturbed; and great crested newt must not be handled by contractors.

d) **Precautionary working methods**

1.3.13 A different precautionary working method must be utilised dependent upon whether the works are being undertaken in the great crested newt active or hibernation period. These periods are dependent upon weather conditions (temperature and rainfall) but are likely to be in the region of November to February inclusive (hibernation season) and March to October (active season). The ECoW is responsible for determining the appropriate working methodology.

1.3.14 The prescriptions of this reasonable avoidance measures method statement must be followed during works in any areas with potential to support great crested newts. These areas include but are not limited to: tree roots, hedgerow bases, rough grassland areas, arable field margins, earth banks, log piles, rock piles and woodlands.

1.3.15 If possible, all impacts to terrestrial areas which may offer hibernation potential (i.e. log piles, embankments etc.) must., be removed outside of the hibernation period, as great crested newt are more likely to be active and associated with ponds during this period. However, there are restrictions on certain works due to the potential to impact upon nesting birds (during the bird nesting season, generally March to August inclusive), and all works timings must consider this.

1.3.16 No ponds supporting great crested newt are to be directly impacted by the works therefore an approach to pond removal is not required. For clarity, the precautionary working methodologies have been split down into three scenarios:

- Vegetation clearance in the active season.
- Vegetation clearance in the hibernation season.
- Ground-breaking works in the active and hibernation season.

1.4 **Approach to vegetation clearance**

a) **Vegetation clearance in the active season**

1.4.1 Any clearance within the active season must also consider the potential to impact upon nesting birds. Suitable measures to prevent impacts to nesting birds must be employed, which are likely to include pre-works checks for

nests. These measures in relation to birds are not outlined in full within this document.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW is responsible for liaising with the contractor to clearly demarcate the required working area.

1.4.3 The precautionary working methods to safeguard great crested newt during vegetation clearance in the active season are set out below.

- The ECoW and contractor are to determine a cutting regime whereby any animals present are able to move away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to identify any areas offering great crested newt sheltering opportunities prior to works commencing.
- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These will be dismantled by hand; this should be overseen by the ecologist.
- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential great crested newt shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.
- Vegetation is to be cleared at a minimum 150mm from the ground in the first pass.
- Subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any great crested newt present at the time of works to move away from the cut areas, this also allows the ECoW to check the area for great crested newt, along with other species.
- The vegetation is then to be cut to as close to ground level as possible;
- Vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to great crested newt within the site.

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b) **Vegetation clearance in the hibernation season**

1.4.4 Prior to commencement of the vegetation clearance works, the ECoW and contractor are to clearly demarcate the required working area.

1.4.5 SZC Co. must ensure the following precautionary working methods are put in place to safeguard great crested newt during vegetation clearance in the hibernation season.

- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). If possible, this removal must be undertaken by hand or slowly under close supervision by the ECoW.
- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential great crested newt shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.
- The vegetation is then to be cut to as close to ground level as possible.
- Vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to great crested newt within the site.

c) **Approach to ground-breaking works including top-soil stripping (active season and hibernation period)**

1.4.6 If possible, all impacts to terrestrial areas which may offer hibernation potential (i.e. log piles, embankments etc) must be removed outside of the hibernation period, as great crested newt are more likely to be active and associated with ponds during this period. However, there are restrictions on certain works due to the potential to impact upon nesting birds (during the bird nesting season, generally March to August inclusive), and all works timings need to consider this.

1.4.7 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering great crested newt will be reduced, due to the removal of suitable terrestrial habitat within the areas proposed for ground-breaking works. Ground-breaking works include any ground investigations, archaeology trenching, topsoil stripping etc.

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1.4.8 Prior to commencement of the ground-breaking works, the ECoW and contractor must clearly demarcate the required working area. The methodology outlined below assumes that all vegetation has previously been removed.

1.4.9 SZC Co must ensure the following precautionary working methods to safeguard great crested newt during ground-breaking works in the active season are put in place.

- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). If possible, this removal must be undertaken by hand or slowly under close supervision by the ECoW.
- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential great crested newt shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.
- The topsoil must then be carefully removed using a toothed bucket (if permitted under the contractors RAMS) under close ecological supervision by the ECoW.

d) **Action to take if great crested newts are found**

1.4.10 Should any great crested newts be found during the facilitation works the following must be observed due to the strict level of protection afforded to this species:

- the works must stop;
- the great crested newt must not be handled or moved from its resting place; and
- the ECoW must assess the situation to determine whether a European Protected Species mitigation licence is required before the works can continue; and if Natural England need to be informed.



SIZEWELL C PROJECT
TWO VILLAGE BYPASS – GREAT CRESTED NEWT
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000). The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2017). The Conservation of Habitats and Species Regulations 2017, London
- 1.4 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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SIZEWELL C PROJECT
TWO VILLAGE BYPASS – GREAT CRESTED NEWT
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A.6B.1: Toolbox Talk

Great Crested Newt



Legal Protection
Great crested newts, their breeding habitat and their eggs are protected under the Habitats Directive 2017 (as amended).



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SIZEWELL C PROJECT
TWO VILLAGE BYPASS – GREAT CRESTED NEWT
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A.6B.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

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**APPENDIX H TWO VILLAGE BYPASS – OTTER NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 5 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6C)**



SIZEWELL C PROJECT
TWO VILLAGE BYPASS – OTTER
NON-LICENSABLE METHOD STATEMENT

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SIZEWELL C PROJECT
TWO VILLAGE BYPASS – OTTER
NON-LICENSABLE METHOD STATEMENT

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1 Otter Non-licensable Method Statement: Two Village Bypass

1.1 Introduction

1.1.1 In order to enable the two village bypass a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the habitats present within the site, the proposed facilitating works have the potential to cause injury/ mortality to otters should any be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of otters during the facilitation works to be undertaken within the site.

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

1.1.3 This otter non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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SIZEWELL C PROJECT
TWO VILLAGE BYPASS – OTTER
NON-LICENSABLE METHOD STATEMENT

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

a) **Background and scheme overview**

1.1.7 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.8 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.9 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- Two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- A permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;

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- A permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- Permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- A temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- A temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.10 The components listed above are referred to collectively as the ‘Sizewell C Project’. This method statement relates only to the two village bypass component of the proposals.

1.1.11 This Otter Method Statement outlines the key approaches to mitigating potential impacts to the Otter (*Lutra lutra*) populations present within or adjacent to the construction site the two village bypass. It must be used by SZC Co. in relation to the proposal to build the two village bypass.

b) [Site location and setting](#)

1.1.12 The two village bypass site is located in Sizewell, East Suffolk (site centre grid reference OS Grid Reference TM 36558 59908) and is approximately 54.8 hectares (ha) in area. The site is located to the south and south-east of Stratford St. Andrew, and to the south-west to south-east of Farnham.

1.1.13 The proposed development comprises a new permanent two-lane single carriageway road that would depart the A12, creating a new route around the south of Farnham and Stratford St Andrew, before re-joining the A12 east of Farnham.

1.1.14 Once operational, the two village bypass would be open to construction traffic associated with the construction of the Sizewell C project as well as to the general public. The proposed development would reduce the volume of construction traffic traveling through Farnham and Stratford St Andrew. As

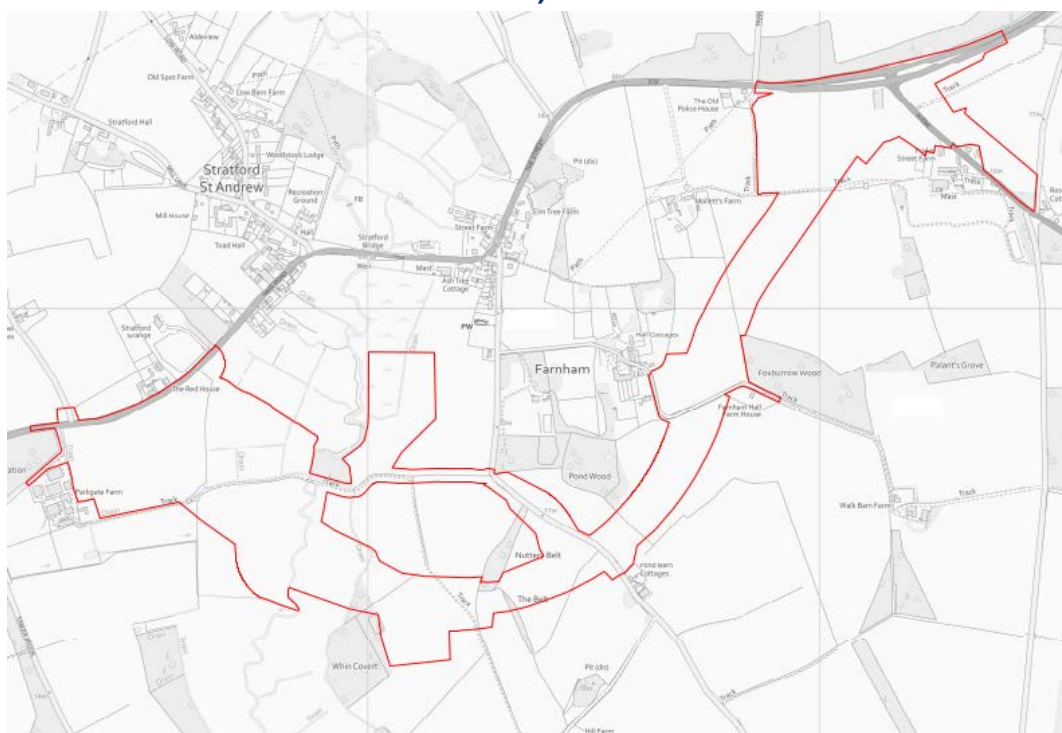
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the proposed development is permanent, once construction of Sizewell C is completed, it will remain open for general use by the public and would provide legacy benefit to the residents of Farnham and Stratford St Andrew.

1.1.15 The two village bypass site is dominated by arable land with field boundaries comprising native, species poor hedgerows and tree lines. The site also supports significant areas of semi-natural woodland. Scattered trees and a number of watercourses are present within the site, whilst the site also contains a number of buildings and associated areas of hardstanding.

1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



1.1.17 The purpose of the works is to create a permanent road to bypass Stratford St Andrew and Farnham in order to alleviate the increased traffic on the A12 through the villages by the Sizewell development scheme. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a

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number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) **Key ecological constraints**

1.1.18 Within this site, the following are the predicted key potential ecological constraints associated with the facilitation works:

- badger;
- bats;
- great crested newt;
- reptiles;
- water vole; and
- otter.

1.1.19 The reasonable avoidance measures method statements detailed herein only cover guidance relating to otter. However, there are associated reasonable avoidance measures method statements (provided separately) and draft protected species licences for bats, badger and water vole have also been prepared.

1.2 **Site Reasonable Avoidance Measures method statements for otter**

a) **Introduction**

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered in relation to otters during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

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1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which are not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6C.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6C.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Otter**

a) **Site status**

1.3.1 Three otter records were identified by the desk study, one of which was located north of the site along a drain which connects to the River Alde which runs through the south of site. During the targeted otter and water vole surveys, an otter footprint was found along the River Alde within the site boundary. The habitat present within the site boundary was considered suitable to support otter, with areas of woodland and scrub suitable to provide resting areas. The most optimal habitat for otter within the site is the River Alde rather than the nearby ditches.

1.3.2 Construction of the proposed development would result in increased levels in light, noise and visual disturbance to any otters close to the construction

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footprint through construction activities, increased vehicle movements and increased human presence.

- 1.3.3 In terms of proportion of an average range size, suitable habitat to be lost is likely to be a small proportion of the overall habitat in Sizewell and Minsmere, most of which would be retained. Land take would have a negative minor, non-significant effect at the local level on the otter population.
- 1.3.4 In the absence of mitigation, the works proposed have the potential to impact otter through:
- habitat loss and habitat fragmentation (including connectivity);
 - disturbance effects on species population (comprising light, noise and visual effects); and
 - incidental mortality.
- 1.3.5 It is reasonable to conclude that disturbance would have a limited effect on the otter population, given that the area of otter habitat likely to be disturbed is small compared to an average otter territory. Disturbance effects could potentially last for the duration of the construction phase (up to 24 months).
- 1.3.6 Overall, it is considered that habitat loss and fragmentation would have a temporary negligible adverse effect on the species. The disturbance on otter would have short term, reversible, minor adverse effect. The habitat loss, fragmentation and potential disturbance to the species is considered not significant.
- b) Legislation
- 1.3.7 Otter are protected under EC Directive (92/43/EEC). This is implemented in Britain under the Conservation of Habitats and Species Regulations (Ref 1.3). Under this legislation it is an offence to damage or destroy an otter's place of shelter, whether intentionally or accidentally and to deliberately disturb an otter.
- 1.3.8 Otter are also protected under the Wildlife and Countryside Act WCA (1981, as amended) (Ref 1.2) which makes a criminal offence to 'intentionally' kill, injure or take an otter without a licence. It is also illegal to damage, destroy or obstruct access to a place used for shelter or protection.

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c) Toolbox talk for otter

1.3.9 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to otters. Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on the species that could occur within or in the vicinity of the working area.

d) Precautionary working methods

1.3.10 Pre-construction surveys must be undertaken to provide up-to-date information on otter activity and as to whether any holts or other resting places are present within the construction footprint. Otter breeding and resting places (“holts”) are typically tunnels under waterside trees, and are legally protected. Natal or breeding holds may be used at any time of the year. Although no natal holts have been found within the site boundary, there remains the possibility that otter may set up a new natal den site.

1.3.11 A European Protected Species Licence application and Method Statement are required to permit works that would otherwise disturb, injure or kill otter, and/or damage or restrict access to their holts, should an active holt be identified. If required, a detailed mitigation strategy for otter would be provided in a method statement, based on Natural England’s standing advice and guidance in relation to otter and mitigation for development projects (Ref 1.4).

1.3.12 The locations of all holts and couches must be identified to contractors in confidence to ensure that they are not accidentally disturbed during the construction process.

1.3.13 Demarcation of a 30m exclusion zone around confirmed otter holts must be clearly marked.

1.3.14 Where possible, a minimum of a 20m buffer should be maintained between the construction activities and the toe of the bank of the River Alde and ditches to attenuate the impacts of lighting and noise from the construction activities.



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- 1.3.15 Works compounds, storage sites and access roads must not be located between important areas of otter habitat. Potential water quality issues associated with the terrestrial (i.e. non-marine) environment, would be dealt with through embedded (primary) mitigation measures.
- 1.3.16 Prior to works commencing an appropriately experienced ECoW must present a toolbox talk to site staff covering the Precautionary Working Methods to be adhered to.
- 1.3.17 Where works are required in areas of otter activity (but not a place of shelter) the ECoW and contractor must demarcate and agree on site in which areas which activity is permitted.
- 1.3.18 If night-time working is required, the works around the areas with suitable habitat for otter, light spill must be minimised to reduce any possible impacts to the species.
- 1.3.19 Such precautions must be put in place to avoid an offence being committed during the proposed works and subsequent development with respect to otter.

1.4 Facilitating work requirements

a) Vegetation clearance methods

- 1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. These works have the potential to impact the local otter population. Should vegetation clearance work occur within the proximity of the River Alde, a qualified ECoW must carry out a pre-construction check for signs of otter and otter activity within the footprint of the works.
- 1.4.2 A European Protected Species Licence application and Method Statement is required to permit works that would otherwise disturb, injure or kill otter, and/or damage or restrict access to their holts, should an active holt be identified.
- 1.4.3 Should otter signs be present the ECoW must demarcate and agree on site in which areas which activity is permitted.




b) Vegetation clearance equipment

- 1.4.4 SZC Co. must ensure equipment specific to each clearance methods as per the reasonable avoidance measures method statement is used. For example:

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- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

	
<p>John Deere 3 series compact tractor</p>	<p>John Deere 4 series tractor</p>
	
<p>Brushcutter</p>	

c) **Ground-breaking works methods**

1.4.5

As set out above, ground-breaking works are required in order to facilitate the development of the site. These works have the potential to impact the local otter population. Where ground-breaking works take occur (20m of the River Alde and within 10m of other watercourses), a qualified ECoW must to carry out a pre-construction check for signs of otter and otter activity within the footprint of the works.



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- 1.4.6 A European Protected Species Licence application and Method Statement is required to permit works that would otherwise disturb, injure or kill otter, and/or damage or restrict access to their holts, should an active holt be identified.
 - 1.4.7 Should otter signs be present the ECoW must demarcate and agree on site in which areas which activity is permitted. The ECoW must ensure demarcation of, and exclusion from, confirmed holts within 30m of working areas, potentially with the use of Heras fencing.
 - 1.4.8 Any excavations made during construction activities must, where possible, be closed at the end of the day to prevent access by otter and other terrestrial nocturnal animals. If it is not be possible for excavations to be closed at night, a means of egress (i.e. a wooden plank or soil ramp) must be provided to ensure that any animals that may access these excavations have a means of escape.



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References

- 1.1 EDF Energy (2018). Lighting Strategy for Construction and Operational Sites. Sizewell C Project.
- 1.2 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.3 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London.
- 1.4 Natural England (2014). Otters: surveys and mitigation for development projects. Available from: <https://www.gov.uk/guidance/otters-protection-surveys-and-licences#mitigation-compensation-methods-and-avoiding-impacts> .

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Appendix 7A.6C.1: Ecological Tool Box Talk

1.1. Legislation

1.1.1. The Eurasian otter is the only native UK otter species. It's fully protected as a European protected species (EPS) and is also protected under sections 9 and 11 of the Wildlife and Countryside Act 1981 (Ref 1.2).

1.1.2. You're breaking the law if you:

- capture, kill, disturb or injure otter (on purpose or by not taking enough care)
- damage or destroy a breeding or resting place (deliberately or by not taking enough care)
- obstruct access to their resting or sheltering places (deliberately or by not taking enough care)
- possess, sell, control or transport live or dead otter, or parts of otter

1.1.3. If you're found guilty of an offence you could get an unlimited fine and up to 6 months in prison.

1.2. Species identification

	<p><u>Otter</u></p> <p>Otter are associated with water courses. It is rare to see these animals but their holts and resting places are found in banks of ditches, streams and rivers and footprints can be easily seen.</p>
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	<p><u>Otter Habitat</u></p> <p>Otter signs can be found:</p> <ul style="list-style-type: none"> Under and near bridges On banksides On boulders or rocks either in river or near the river On old tree stumps or logs At either end of shortcut paths On gravel banks or sand and muddy areas Around ponds and lakes In marshes or reed beds At river junctions or intersections
 	<p><u>Otter Spraint</u></p> <p>Typically 2 – 7cm long, will contain fish bones and scales, be tarry and black but these will turn grey when old and naturally, they will smell very strongly of fish.</p>

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Otter Print

The Otter prints can be found at the edge of river banks, in gravel, sand, mud and on tarmac if they have just left the river. They also have 5 toes which is a distinctive sign that it's an Otter print.

1.3. Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, **OR IF IN ANY DOUBT**, stop the works immediately and contact the Project ecologist;
- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and
- Do not attempt to move any species found unless instructed to do so by an ecologist.

**APPENDIX I TWO VILLAGE BYPASS – REPTILE NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 5 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6D)**



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1. Reptile Non-licensable Method Statement: Two Village Bypass

1.1 Introduction

1.1.1 In order to enable the proposed development of the two village bypass, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the habitats present within the site, the proposed facilitating works have the potential to cause injury/mortality to reptiles, should they be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

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



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described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) **Background and scheme overview**

1.1.7 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.8 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.9 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction and a series of off-site associated development sites in the local area including:

- Two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;

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- A permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- A permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- Permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- A temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- A temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.10 The components listed above are referred to collectively as the ‘Sizewell C Project’.

b) **Site location and setting**

1.1.11 The two village bypass site measures approximately 54.8ha and is located to the south and south-east of Stratford St. Andrew, and to the south-west to south-east of Farnham (presented in Image 1). The proposed development comprises a new permanent two-lane single carriageway road that would depart the A12, creating a new route around the south of Farnham and Stratford St Andrew, before re-joining the A12 east of Farnham.

1.1.12 Once operational, the two village bypass would be open to construction traffic associated with the construction of the Sizewell C project as well as to the general public. The proposed development would reduce the volume of construction traffic traveling through Farnham and Stratford St Andrew. As the proposed development is permanent, once construction of Sizewell C is completed, it will remain open for general use by the public and would provide legacy benefit to the residents of Farnham and Stratford St Andrew.

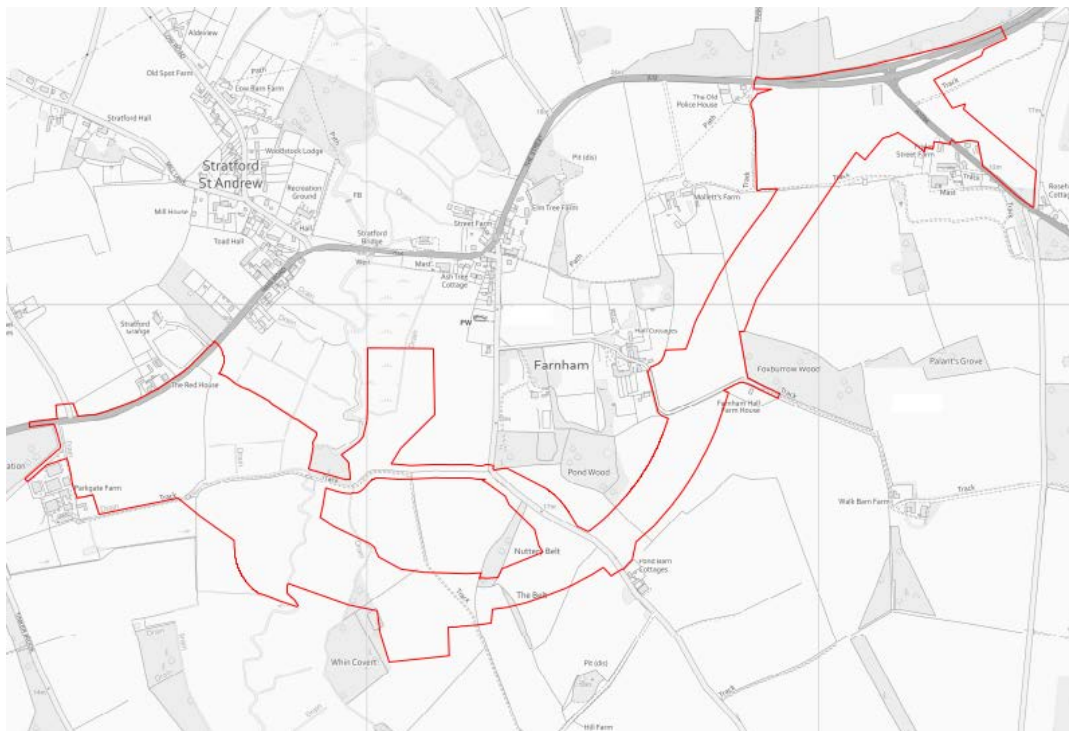
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1.1.13 The two village bypass site is dominated by arable land with field boundaries comprising native, species poor hedgerows and tree lines. The site also supports significant areas of semi-natural woodland. Scattered trees and a number of watercourses are present within the site, whilst the site also contains a number of buildings and associated areas of hardstanding.

1.1.14 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



1.1.15 The purpose of the works is to create a permanent road to bypass Stratford St Andrew and Farnham in order to alleviate the increased traffic on the A12 through the villages associated with the construction of Sizewell C. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

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c) Key ecological constraints

1.1.16 Within this site, the following are the predicted key potential ecological constraints associated with the facilitation works:

- badger;
- bats;
- great crested newt;
- reptiles
- water vole; and
- otter.

1.1.17 The reasonable avoidance measures method statements detailed herein only cover guidance relating to reptiles. However there are also reasonable avoidance measures method statements (provided separately) and draft protected species licences for bats, badger and water vole have also been prepared.

1.2 Site Reasonable Avoidance Measures (RAMs) Method Statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statement is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the RAMs method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these reasonable avoidance

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measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6D.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6D.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Reptiles**

a) **Site status**

1.3.1 The majority of habitat present within the site boundary (arable fields) is considered sub-optimal for reptiles; however, the field margins are considered suitable to support foraging and sheltering common reptile species. Nevertheless, the extent of this habitat is quite limited such that it is unlikely that the site is of elevated potential to this species group. The desk-study data received from the Suffolk Biodiversity Information Service returned only four records of reptiles within 2km of the site.

1.3.2 Given the limited potential for reptiles within the site and the small number of records of this species within the area, no targeted reptile surveys were undertaken. However, a single incidental record of grass snake (*Natrix natrix*) was recorded in rough semi-improved grassland surrounding the nearby River Alde, located to the north of the site. This area is considered to provide

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suitable breeding and foraging opportunities for grass snake and other common reptiles species.

b) Legislation

1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake. Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref 1.2)).

1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

c) Toolbox talk for reptiles

1.3.5 Prior to commencement of the works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.

1.3.6 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that: potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) Precautionary working methods

1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.

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- 1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).
- 1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.
- 1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co. must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:
- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature. The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
 - the ECoW and contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
 - the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;

¹ Advanced works approach would integrate vegetation clearance in relation to breeding birds, reptiles, water voles and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this must be overseen by the ecologist. If a reptile is found the ecologist must decide whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- if reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it must be near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.



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1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This ensures that no net loss of potential reptile shelter features takes place. If possible, shelter features should be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW is responsible for advising upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.

1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) Vegetation clearance equipment




1.4.7 SZC Co. must ensure that equipment specific to the clearance methods as per the reasonable avoidance measures method statement is used. For example:

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and

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- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) Ground-breaking works methods

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the removal of suitable habitat within the areas proposed for ground-breaking works.

1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

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d) Ground-breaking works equipment

1.4.10 SZC Co. must ensure equipment as per the reasonable avoidance measures method statement is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

	
<p><i>JCB 16C-I New Generation 1 Tonne Mini Digger</i></p>	<p><i>Chapter 8 barrier/ Heras fencing</i></p>



SIZEWELL C PROJECT
TWO VILLAGE BYPASS – REPTILE
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000). The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A.6D.1: Toolbox Talk Example

Reptiles

Reptiles in the UK



**IF BITTEN SEEK MEDICAL
HELP IMMEDIATELY.**

Legal Protection
All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brash piles, mammal burrows and tree / hedgerow roots.



SIZEWELL C PROJECT
TWO VILLAGE BYPASS – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A6D.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

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**APPENDIX J SIZEWELL LINK ROAD – BAT NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 6 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6A)**



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
NON-LICENSABLE METHOD STATEMENT

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None provided.

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SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
NON-LICENSABLE METHOD STATEMENT

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1. Bat Non-licensable Method Statement: Sizewell Link Road

1.1 Introduction

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

1.1.2 This bat non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and scheme overview

1.1.6 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
NON-LICENSABLE METHOD STATEMENT

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of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.7 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.8 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

- Two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- A permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- A permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- Permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;

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- A temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- A temporary extension of the existing Saxmundham to Leiston branch line into the main development site ('the green rail route') and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.9 The components listed above are referred to collectively as the 'Sizewell C Project'.

1.1.10 In order to enable the proposed Sizewell link road, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to bats by the habitats present within the site, the proposed facilitating works have the potential to cause injury / mortality and indirect disturbance of bats that may be present. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of bats during the facilitation works to be undertaken within the site.

b) [Site location and setting](#)

1.1.11 The Sizewell Link Road (SLR) site measures approximately 101ha and is located to the south of the B1122 and east of the A12. The site passes to the south of Middleton Moor and Theberton. The proposed development would comprise a new, permanent, 6.8km single carriageway road, with a design speed of 60 miles per hour, which begins at the A12 south of Yoxford, bypasses Middleton Moor and Theberton before joining the B1122.

1.1.12 Once operational, the proposed development would be used by the general public as well as construction workers arriving by car, park and ride buses from both the northern and southern park and ride sites, and goods vehicles (both light and heavy) delivering freight to the Sizewell C main development site.

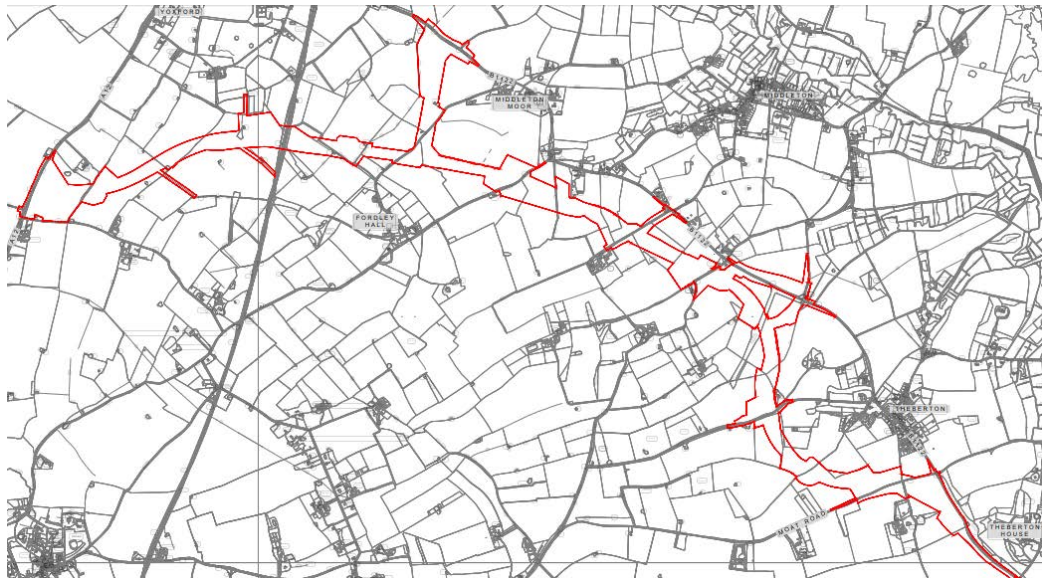
1.1.13 The Sizewell link road site is dominated by arable land with arable field margin habitats. Some limited areas of species-poor, semi-improved grassland and neutral semi-improved grassland are also present within the site, which were recorded to be interspersed with patches of tall ruderal and scattered scrub. Twelve blocks of broadleaved semi-natural woodland and two plantation woodlands are present, wholly or partly, within the site whilst

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hedgerows, the majority of which were notes to be species rich and supported a number of trees, are also present along the boundaries of the arable land that dominates the site. With respect to aquatic habitat, the site supports four watercourses and six ponds.

- 1.1.14 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location *Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown copyright (2021). All Rights reserved. NNB GenCo Licence: 0100060408*



c) **Proposed works**

- 1.1.15 As a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the Sizewell link road. The specific works covered by this method statement include vegetation clearance measures, and the lighting arrangements for the site.

- 1.1.16 A number of potential ecological constraints associated with the proposed facilitating works are set out below.

d) **Key ecological constraints**

- 1.1.17 Within this site, the following are the predicted potential constraints:

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- bats;
- great crested newt; and
- reptiles.

1.1.18 The reasonable avoidance measures method statement detailed herein only cover guidance relating to bats. There are associated reasonable avoidance measures method statements (provided separately) and draft protected species licences for the bats and great crested newt have also been prepared.

1.2 Site Reasonable Avoidance Measures Method Statements for bats

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for bats during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality and disturbance of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) Toolbox talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6A.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally

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protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6A.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Bats

a) Site status

1.3.1 The extended Phase 1 habitat and protected species survey identified the habitats present to be primarily arable fields of limited value to foraging bats. The boundary hedgerows contain several mature trees. These hedgerows together with the woodland blocks and scattered mature trees have the potential to support roosting bats and offer good commuting and foraging opportunities.

1.3.2 Eighty trees were assessed during bat tree assessments as having specific features potentially suitable for use by roosting bats, (three high, 41 moderate, 36 low).

1.3.3 Seven species (noctule, serotine, common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle (*Pipistrellus nathusii*) brown long-eared and barbastelle) and species belonging to two species groups ('big bat' and *Myotis* spp.) were identified during activity surveys at the site. Across all transects, common and soprano pipistrelle were the most frequently recorded. All other species were recorded at very low levels.

1.3.4 During the course of the static detector surveys, eight species were recorded (Natterer's bat, noctule, serotine common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, barbastelle and brown long-eared bat) as well as unidentified species belonging to four species groups ('big bat', *Myotis* spp., common/soprano pipistrelle and *Plecotus* spp., assumed to be brown long-eared bat). Recorded activity levels largely reflected those recorded during transect surveys, with activity dominated by common and soprano pipistrelle. All other species groups were recorded at significantly lower levels.

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- 1.3.5 Bats using the site are unlikely to be dependent on the sub-optimal habitats present within the site and would also be using a range of additional habitats in the Zol. This includes the more valuable broadleaved woodland, adjacent to the site.
- 1.3.6 The construction of the proposed development would result in the loss of primarily arable land, as well as hedgerows, broadleaved woodland, and mature trees with bat potential. There would be the loss of 43 trees with the potential to support roosting bats (two with high potential, 25 with moderate potential, 16 with low potential). The loss of habitat would cause a reduction in foraging habitat available to bats and the loss of features suitable for bats to roost in.
- 1.3.7 The proposed development would result in the loss of approximately 2.5ha of sub-optimal arable foraging habitat, 0.4ha broadleaved woodland and 4537m of hedgerow. During the construction phase there would be a temporary loss of habitat suitable to support foraging bats, this would be re-instated and new habitat planted upon the completion of the construction phase.
- 1.3.8 Bats will be impacted by both increased noise levels and increased lighting at this site. Provided the proposed mitigation measures are implemented, no significant effects on bat populations are expected as a result of the proposed development and those habitats most suitable for bats are retained.

b) Legislation

- 1.3.9 All bat species in England are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to:
- intentionally or recklessly kill, injure or take a bat;
 - intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection; or
 - intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.
- 1.3.10 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2).
- 1.3.11 All bat species in England receive further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref 1.3). They

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are listed on Schedule 2 of the Regulations, which makes it an offence, *inter alia*, to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat, in particular any disturbance which is likely:
 - Impair their ability
 - i. to survive, to breed or reproduce, or to rear or nurture their young, or
 - ii. to hibernate or migrate
 - Affect significantly the local distribution or abundance of that bat species; or
- damage or destroy a breeding site or resting place of a bat.

1.3.12 Noctule (*Nyctalus noctule*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auratus*) are also included on Section 41 of the NERC Act 2006 (Ref 1.4). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

c) [Toolbox talk for bats](#)

1.3.13 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to bats. Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by bats and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area.

d) [Precautionary working methods](#)

1.3.14 Provision of 10m buffer areas between the edge of the proposed development and lowland mixed deciduous woodland.

1.3.15 Provision of 10m buffer areas between the edge of the proposed development and watercourses where practicable.

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- 1.3.16 Provision of close-boarded fencing where the proposed development site abuts woodland.
- 1.3.17 Construction lighting must be designed to minimise light spill and the potential for light disturbance on adjacent land. The lighting design for the proposed development must comply with the lighting strategy and use light fittings chosen to limit stray light. Guidance within the latest Institution of Lighting Professionals Guidance Note (Ref 1.5) must be followed as far as possible. These measures will minimise impacts on nocturnal species such as bats that may use the nearby tree lines or habitats for roosting or foraging.
- 1.3.18 In addition, although limited activities may require 24 hour working, the majority of construction would take place Monday to Saturday 07:00 to 19:00 hours. This means night-time works will be avoided, which is when bats are most active. Incidental mortality associated with traffic movements would therefore not have a significant effect on the bat assemblage.
- 1.3.19 All trees to be removed must be reassessed for bat roosting potential prior to felling.
- 1.3.20 Any trees identified as having low bat roosting potential must be removed using a soft felling methodology with a suitability experienced, appropriately licensed, bat worker or bat worker assistant present. This is outlined below. Where possible, trees must be removed in October, thereby avoiding the sensitive maternity (April-September) and hibernation (November-February) periods for bats.
- 1.3.21 For any trees with moderate or high roosting potential, a pre works inspection for roosting bats must be undertaken. The methodology and required survey effort for these pre works checks is dependent upon the status of the roosting features within the trees, but may include:
- a climbed or ground based tree inspection using an endoscope and / or torch; and
 - emergence / re-entry surveys.
- 1.3.22 Should any of the trees to be removed be found to support bat roosts, an EPS licence is likely to be required. The documents associated with this licence will outline the required mitigation, and the required measures are not discussed further within this report. If no roosts are found, the approach outlined below will be undertaken.
- 1.3.23 All trees with PRFs must be soft felled using the following precautionary measures:

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- where PRFs cannot be exhaustively checked they must be section felled, with each section carefully lowered to the ground. Cuts must be made at least 50 cm beyond the extent of the potential roost feature;
- if limbs or large branches require felling, consideration must be given to cracks which may close (crushing any bats inside) once the weight of the limb has been removed. If the crack cannot be thoroughly inspected to ensure bats are not present, the crack must be wedged open prior to removal of the limb/branch;
- the stems of dense ivy must be cut at ground level at least 48 hours before the tree is felled; and
- once the trees have been felled the potential roost features must be checked on the ground by a suitably experienced bat ecologist. If any potential roost feature can still not be exhaustively checked that section must be allowed a rest period of at least 24 hours to ensure that any individual bats that may have been missed are given the opportunity to relocate.

1.3.24 If any bats are encountered during the felling operations all works and activity must cease immediately, until the ECoW has advised on the most appropriate manner to deal with the situation.

1.3.25 To mitigate for the loss of the trees and potential roost resources, bat boxes must be installed on retained trees in suitable locations within the site boundary, prior to felling. A variety of bat boxes are to be used to support different species. The following re-provision to loss ratios have been specified by Natural England:

- 1:1 potential roosting features;
- 2:1 low status roost of common species;
- 4:1 maternity roosts of common species; and
- 4:1 low status roost of Annex 2 species.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. Whilst this document has been

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produced in relation to bats, further information has been provided to ensure legal compliance in relation to other protected species.

- 1.4.2 Vegetation clearance works must, where possible, take place outside of the active bird breeding season (early March and late August inclusive) and it is considered that no nesting bird checks would be required prior to the commencement of works. Nevertheless, if any vegetation clearance works was required within the core bird breeding season, a qualified ECoW must carry out a nesting bird check at least 48 hours before the commencement of works effecting the vegetation within the site. Once nesting birds have been confirmed absent, a habitat manipulation exercise must be undertaken in the form of a two stage vegetation cut, with the initial cut reducing the vegetation to a height of 150mm before a second cut subsequently reduces it to ground level, with a minimum of two hours between cuts to allow reptiles or amphibians to move out of the cutting area.
- 1.4.3 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles. Any vegetation clearance likely to impact vegetation below 150mm or the removal of places of shelter/hibernation features must, where possible, be undertaken outside of the reptile and amphibian hibernating period (October to February inclusive), during periods of warm, dry weather. If this is not possible, vegetation must be cut to the ground (to remove potential bird nesting habitat), but the roots would remain intact until hibernation is complete. The root system of vegetation must then be removed once the hibernation season is over. Clearing of vegetation must be undertaken under the supervision of the suitably experienced Ecological Clerk of Works (ECoW).
- 1.4.4 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).
- 1.4.5 The habitats present within the site are largely sub-optimal for bats, being intensively managed for arable farming purposes. The sub-optimal arable land supports few invertebrates on which bats can forage.
- 1.4.6 Works must be undertaken outside of all tree and hedgerow root protection zones that are not proposed to be removed as part of the proposed development. Tree protective fencing as described in section 6.2 of British Standard 5837:2012 (Ref 1.6) must be installed (distance of fencing from tree trunk = 12x trunk diameter, distance from hedgerows = 1m from the spread of hedgerow canopy), where required, prior to plant and machinery arriving on site and construction works commencing. The fencing must remain intact



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
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throughout the duration of the works and only be removed upon completion. Weather-proof notices must be attached to any protective fencing located adjacent to retained trees displaying the words 'Construction Exclusion Zone'. All personnel must be made aware of these restrictions. If works need to be undertaken within the root protection zones an Arboricultural survey must be undertaken and any advice provided adhered to, to secure the long-term survival of the tree/hedgerow.



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London
- 1.4 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London
- 1.5 Institution of Lighting Professionals/Bat Conservation Trust (2018). Institution of Lighting Professionals. 2018. Bats and artificial lighting in the UK. Guidance Note 08/2018.
- 1.6 British Standards Institute (2012). British Standard for Trees in relation to design, demolition and construction (BS 5837:2012).

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SIZEWELL C PROJECT
SIZEWELL LINK ROAD – BAT
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A.6A.1: Ecological Toolbox Talk

1.1. Legislation

1.1.1. Ecology surveys have been completed within the site and have identified the potential for the presence of a legally protected species. The Ecological Method Statement details the mitigation and working methods that should be adopted to avoid contravention of the legislation. If this is not followed, there is a risk that you could break the law by doing actions such as:

- Deliberately capture, injure or kill;
- Damage or destroy a resting place or breeding site;
- Deliberately or recklessly disturb an individual while it's in a structure or place of shelter or protection;
- Block access too structures or places of shelter or protection; or
- Possess, sell, control or transport live or dead individuals.


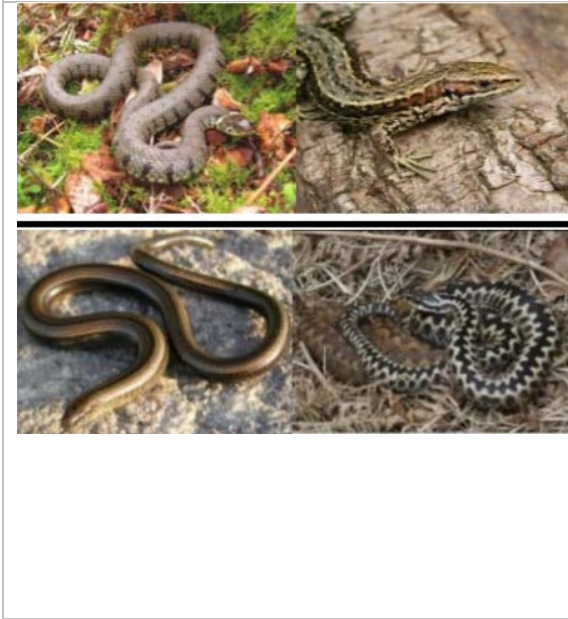

1.1.2. Any of the following could happen if you're found guilty of any offence:

- You could get an unlimited fine;
- You could be sent to prison for up to 6 months.

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1.2. Species Identification

	<p><u>Nesting Birds</u></p> <p>The bird nesting season extends from March to August inclusive, although in mild climate nesting may start in February.</p> <p>Nesting occurs in a variety of habitats including agricultural fields (ground nesting birds), dense bramble scrub, buildings and other man-made structures and trees.</p>
	<p><u>Reptiles (slow-worm, common lizard, grass snake and adder)</u></p> <p>They may be found sheltering in vegetation, under debris such as logs, ricks or piles of rubble or waste items. They may also bask in the open on sunny days.</p> <p>DO NOT leave materials in area where it might be colonised by reptiles. Any debris or materials should be moved with care or moved under direct supervision of a suitably qualified ecologist.</p>
	<p><u>Bats</u></p> <p>On site habitats where bats may roost include trees.</p> <p>If works involve trees with cavities, then check with the on-site ecologist that these have been inspected.</p>

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Badgers

It is unlikely that the animals would be seen but signs of their presence include:

- Setts (d shaped burrow with a large spoil heap);
- Latrines or dung pits; and
- Snuffle holes and runs.



Great Crested Newts

It is possible that great crested newt may be present on site.

Newts are associated with water bodies but during the winter they live / hibernate in terrestrial habitat.

They can be harmed when clearing vegetation, moving debris such as log piles and ground works.

1.3. Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, **OR IF IN ANY DOUBT**, stop the works immediately and contact the Project ecologist;
- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and
- Do not attempt to move any species found unless instructed to do so by an ecologist.

APPENDIX K SIZEWELL LINK ROAD – REPTILE NON- LICENSABLE METHOD STATEMENT (ENVIRONMENTAL STATEMENT VOLUME 6 CHAPTER 7 APPENDIX 7A ANNEX 7A-6B)



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – REPTILE
NON-LICENSABLE METHOD STATEMENT

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None provided.

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SIZEWELL C PROJECT
SIZEWELL LINK ROAD – REPTILE
NON-LICENSABLE METHOD STATEMENT

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1. Reptile Non-Licensable Method Statement: Sizewell Link Road

1.1 Introduction

1.1.1 Given the presence of reptiles within the Sizewell link road site, the works have the potential to cause injury/ mortality of reptiles that may be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by the SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – REPTILE
NON-LICENSABLE METHOD STATEMENT

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- 1.1.6 For the purposes of this document the term ‘SZC Co.’ refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by the dDCO), its appointed representatives and the appointed construction contractors.
- a) **Background and scheme overview**
- 1.1.7 SZC Co is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.
- 1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).
- 1.1.9 This Reptile Method Statement compiled by Arcadis Consulting (UK) Limited (hereafter referred to as ‘Arcadis’) outlines the key approaches to mitigating potential impacts to the reptile populations present within or adjacent to the construction site for Sizewell link road. It must be used by SZC Co. in relation to the proposal to build the Sizewell link road
- 1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.
- 1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area, including:

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- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.12 The components listed above are referred to collectively as the ‘Sizewell C Project’.

b) [Site location and setting](#)

1.1.13 The Sizewell Link Road (SLR) site measures approximately 101ha in area and is located to the south of the B1122 and east of the A12. The site passes to the south of Middleton Moor and Theberton. The proposed development would comprise a new, permanent, 6.8km single carriageway road, with a design speed of 60 miles per hour, which begins at the A12 south of Yoxford, bypasses Middleton Moor and Theberton before joining the B1122.

1.1.14 Once operational, the proposed development would be used by the general public as well as construction workers arriving by car, park and ride buses from both the northern and southern park and ride sites, and goods vehicles

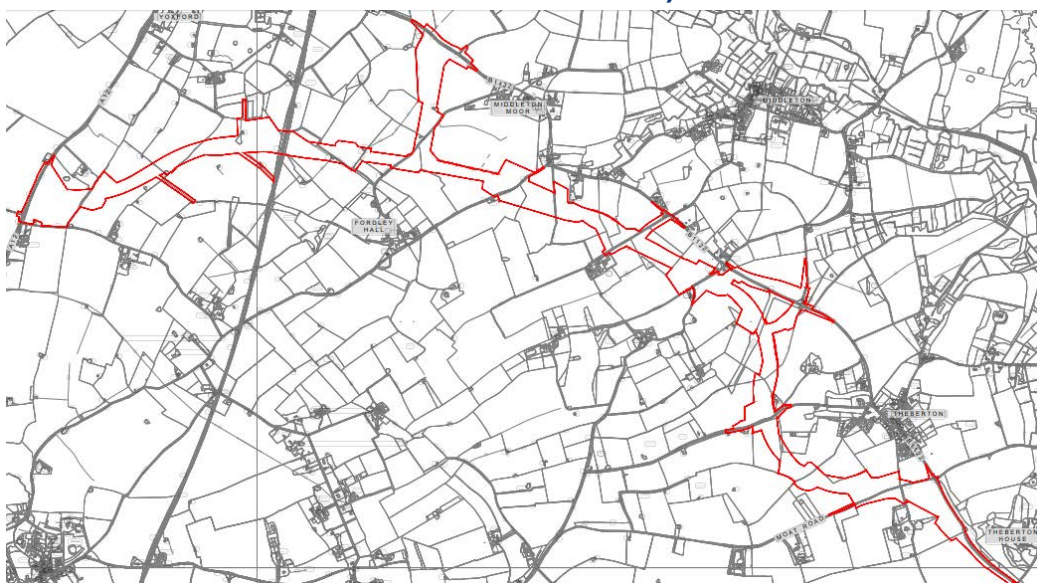
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(both light and heavy) delivering freight to the Sizewell C main development site.

1.1.15 The SLR site is dominated by arable land with arable field margin habitats. Some limited areas of species-poor, semi-improved grassland and neutral semi-improved grassland are also present within the site, which were recorded to be interspersed with patches of tall ruderal and scattered scrub. Twelve blocks of broadleaved semi-natural woodland and two plantation woodlands are present, wholly or partly, within the site whilst hedgerows, the majority of which were noted to be species rich and supported a number of trees, are also present along the boundaries of the arable land that dominates the site. With respect to aquatic habitat, the site supports four watercourses and six ponds.

1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown copyright (2021). All Rights reserved. NNB GenCo Licence: 0100060408)



1.1.17 Vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

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c) Key ecological constraints

1.1.18 The key potential ecological constraints associated with the site include:

- bats;
- great crested newt; and
- reptiles.

1.1.19 The reasonable avoidance measures method statements detailed herein only covers guidance relating to reptiles. However there are reasonable avoidance measures method statements (provided separately) and draft protected species licences for bats and great crested newt have also been prepared.

1.2 Site Reasonable Avoidance Measures Method Statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statement is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in these reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

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b) Toolbox talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (Appendix 1) will provide a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (Appendix 2) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Reptiles

a) Site status

1.3.1 Within the site boundary, most of the land comprises arable fields with a small portion of semi-improved grassland to the south-east. The margins of the arable fields present within the site are regularly ploughed and therefore have limited potential to provide sheltering and foraging habitat for common reptile species. The arable fields themselves are also considered sub-optimal to support reptiles. The desk-study data received from the Suffolk Biodiversity Information Service (SBIS) returned 17 desk-study records of reptiles within 2km of the site.

1.3.2 Given the limited potential for reptiles within the site and the small number of records of this species group within the area, no targeted reptile surveys were conducted. However, during the Phase 1 habitat survey of the site, a single incidental observation of a grass snake (*Natrix natrix*) basking at the base of a hedgerow, south of B1122 Yoxford Road within the site boundary, was recorded, such that there is potential for reptiles to make at least occasional use of the site.

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b) Legislation

- 1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref 1.2)).
- 1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

c) Toolbox talk for reptiles

- 1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.
- 1.3.6 Site-specific toolbox talks, as identified by the ECoW, will also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) Precautionary working methods

- 1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.
- 1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential

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impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).

1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.

1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature. The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
- the ECoW and contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);

¹ Advanced works approach would integrate vegetation clearance in relation to breeding birds, reptiles, water voles and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this must be overseen by the ECoW. If a reptile is found the ECoW must decide whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- if reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any

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reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.




1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) [Vegetation clearance equipment](#)

1.4.7 SZC Co. must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example: For example (**Plate 1.2**):

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) **Ground-breaking works methods**

- 1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles are to be reduced, due to the removal of suitable habitat within the areas proposed for ground-breaking works.
- 1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the

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ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

d) **Ground-breaking works equipment**

1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method statement is used. For example (**Plate 1.3**):

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

	
<p><i>JCB 16C-I New Generation 1 Tonne Mini Digger</i></p>	<p><i>Chapter 8 barrier/ Heras fencing</i></p>



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – REPTILE
NON-LICENSABLE METHOD STATEMENT

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References

- 1.1 Her Majesties Stationary Office (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A6B.1 Toolbox talk example

Reptiles

Reptiles in the UK



IF BITTEN SEEK MEDICAL HELP IMMEDIATELY.

Legal Protection
All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brush piles, mammal burrows and tree / hedgerow roots.



SIZEWELL C PROJECT
SIZEWELL LINK ROAD – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Appendix 7A6B.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

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**APPENDIX L YOXFORD ROUNDABOUT – REPTILE NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 7 CHAPTER 7 APPENDIX 7A
ANNEX 7A-5A)**



SIZEWELL C PROJECT
YOXFORD ROUNDABOUT – REPTILE
NON-LICENSABLE METHOD STATEMENT

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Figures

None provided.

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SIZEWELL C PROJECT
YOXFORD ROUNDABOUT – REPTILE
NON-LICENSABLE METHOD STATEMENT

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1. Reptile Non-licensable Method Statement: Yoxford Roundabout

1.1 Introduction

1.1.1 In order to enable the proposed development of the Yoxford site a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to reptiles by the habitats present within the site, the proposed facilitating works have the potential to cause injury/ mortality to this species group should it be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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SIZEWELL C PROJECT
YOXFORD ROUNDABOUT – REPTILE
NON-LICENSABLE METHOD STATEMENT

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

b) Background and scheme overview

1.1.7 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.

1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.

1.1.9 This Reptile Method Statement must be used by SZC Co. in relation to the proposal to build the Yoxford roundabout.

1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;

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- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.12 The components listed above are referred to collectively as the ‘Sizewell C Project’.

c) [Site location and setting](#)

1.1.13 The Yoxford site measures approximately 2.9ha in area, and consists of existing road infrastructure and roadside vegetation, together with some grazing land and an element of private garden. The new roundabout would replace the existing A12 and B1122 ghost island junction in Yoxford approximately 90m north of the existing junction.

1.1.14 The proposed Yoxford roundabout would be a permanent, three-arm roundabout, and would replace the existing ghost island for this junction to the east of Yoxford. The roundabout would increase capacity of the existing A12 and B1122 junction to minimise disruption during the peak construction phase of the Sizewell C Project.

1.1.15 The site comprises predominantly poor semi-improved grassland as pasture fields and highway land. The fields within the site are bounded by hedgerows, a number of which are considered to be species rich. In addition, areas of tall ruderal vegetation, amenity grassland and the River Yox are present adjacent to the boundaries of the site.

- 1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



- 1.1.17 The purpose of the proposed development would be to increase capacity of the existing A12 and B1122 junction to minimise disruption during the peak construction phase of the Sizewell C Project. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

d) **Key ecological constraints**

- 1.1.18 The key potential ecological constraints associated with the facilitation works within the site are reptiles, for which this document provides guidance.

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1.2 Site Reasonable Avoidance Measures Method Statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determine exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) Toolbox talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.5.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, as identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

NOT PROTECTIVELY MARKED

1.2.6 There is a declaration (**Appendix 7A.5.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Reptiles

a) Site status

1.3.1 Within the site boundary, habitats comprise species-poor semi-improved grassland, hedgerows, scrub, and road verges; however, large areas of species-poor semi-improved grassland, disturbed by grazing animals, make up most of the site and the site does not provide the mosaic of varied habitat that is required by reptiles to bask, forage and shelter. The habitats on site are, therefore, considered to be of limited value to reptiles. The desk-study data received from the Suffolk Biodiversity Information Service returned no records of reptiles within 2km of the site.

1.3.2 Accordingly, given that the extent of this habitat is quite limited such that it is unlikely that the site is of elevated potential to this species group. As a result, targeted presence/ absence surveys were not conducted on site. Nevertheless, given the presence of suitable habitat within and adjacent to the site, there is limited potential for this species group to be present on site.

b) Legislation

1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref 1.2)).

1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

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c) **Toolbox talk for reptiles**

- 1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.
- 1.3.6 Site-specific toolbox talks, as identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible be left undisturbed; and reptiles must not be handled by contractors.

d) **Precautionary working methods**

- 1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.
- 1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).
- 1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.
- 1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

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- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant) and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature). The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
- the ECoW and contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this must be overseen by the ECoW. If a reptile is found the ECoW must decide whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and

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- if reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features should be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.



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1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).




b) **Vegetation clearance equipment**

1.4.7 SZC Co. must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example (**Plate 1.2**):

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

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Plate 1.2: Vegetation clearance equipment

<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) **Ground-breaking works methods**

- 1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the removal of suitable habitat within the areas proposed for ground-breaking works.
- 1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.



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d) Ground-breaking works equipment

1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example (**Plate 1.3**):

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment

<i>JCB 16C-I New Generation 1 Tonne Mini Digger</i>	<i>Chapter 8 barrier/ Heras fencing</i>
	



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References

- 1.1 HMSO (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A5.1: Toolbox Talk

Reptiles

Reptiles in the UK



IF BITTEN SEEK MEDICAL HELP IMMEDIATELY.

Legal Protection

All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brash piles, mammal burrows and tree / hedgerow roots.

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Appendix 7A5.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

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**APPENDIX M FREIGHT MANAGEMENT FACILITY – BAT
NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 8 CHAPTER 7
APPENDIX 7A ANNEX 7A-4A)**



SIZEWELL C PROJECT
FREIGHT MANAGEMENT FACILITY –
BAT NON-LICENSABLE METHOD STATEMENT

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Figures

None provided.

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SIZEWELL C PROJECT
FREIGHT MANAGEMENT FACILITY –
BAT NON-LICENSABLE METHOD STATEMENT

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1. Bat Non-licensable Method Statement: Freight Management Facility

1.1 Introduction

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

1.1.2 This bat non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and scheme overview

1.1.6 SZC Co is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. Located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east

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SIZEWELL C PROJECT
FREIGHT MANAGEMENT FACILITY –
BAT NON-LICENSABLE METHOD STATEMENT

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of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).

1.1.7 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.8 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;

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- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site ('the green rail route') and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.9 The components listed above are referred to collectively as the 'Sizewell C Project'.

1.1.10 In order to enable the proposed development of the freight management facility, as detailed above, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to bats by the habitats present within the site, the proposed facilitating works have the potential to cause injury / mortality and indirect disturbance of bats that may be present. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of bats during the facilitation works to be undertaken within the site.

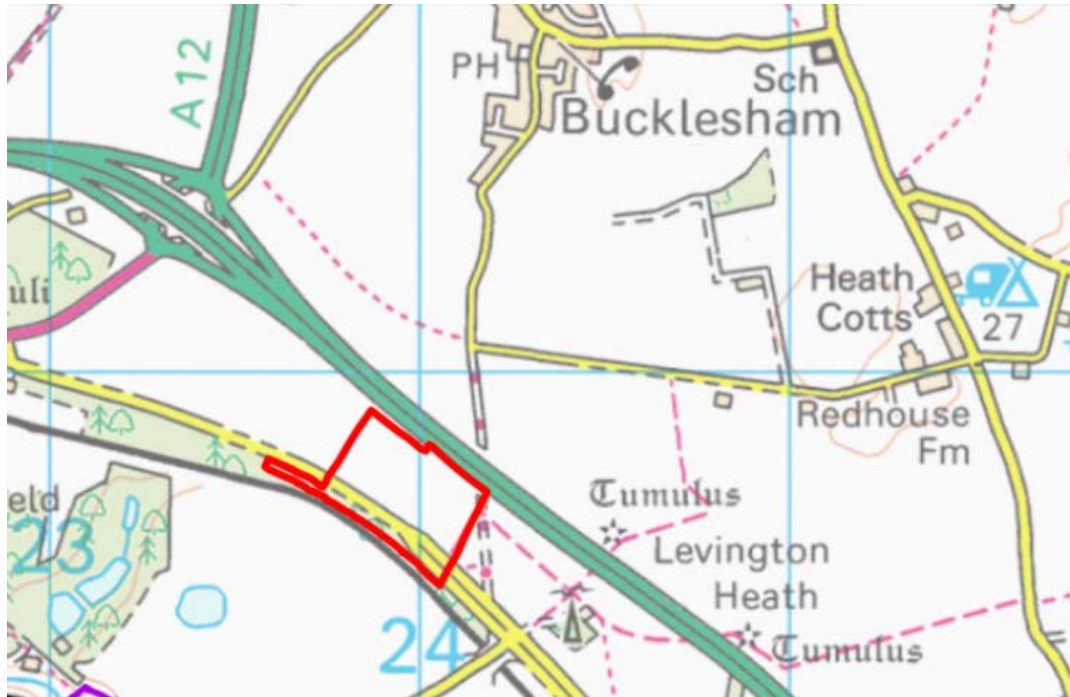
b) [Site location and setting](#)

1.1.11 The Site is located in Sizewell, East Suffolk (site centre grid reference OS Grid Reference TM 23962 40698) and is approximately 11 hectares (ha) in area. It is located to the south-west of the A12/A14/A1156 Seven Hills junction near Ipswich. The site is accessed off the Old Felixstowe Road and is bounded by the A1156 to the west, Old Felixstowe Road to the south and the A14 westbound off-slip to the north-east.

1.1.12 The site predominantly comprises intensively managed arable fields. The fields are ploughed and cropped to the hedgerows and fence lines, such that no scarce arable weeds or other notable plant species were recorded on the site. The fields are bounded by fences and hedgerows.

1.1.13 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location



c) Proposed works

- 1.1.14 The specific works covered by this method statement include vegetation clearance measures specifically in relation to the felling of trees, and the lighting arrangements for the site.
- 1.1.15 Perimeter and parking area lighting Lanterns will utilise LED based light fittings with zero-degree tilt, and lighting columns along the perimeter would be fitted with a demountable shield to reduce backward spill of light.

d) Key ecological constraints

- 1.1.16 The key potential ecological constraints associated with the facilitation works within the site include:
- bats; and
 - reptiles.
- 1.1.17 The reasonable avoidance measures method statement detailed herein only covers bats. However a series of reasonable avoidance measures methods

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for reptiles have also been prepared and are provided separately. A draft protected species licence for bats has also been prepared.

1.2 Site Reasonable Avoidance Measures Method Statements for bats

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for bats during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality and disturbance of the protected species and avoid contravention of the relevant legislation. The ECoW is responsible for determining exactly when and where it is appropriate to apply the measures described in this reasonable avoidance measures Method Statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) Toolbox talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.4A.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or

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adverse effects on protected species that could occur within or in the vicinity of the working area.

- 1.2.6 There is a declaration (**Appendix 7A.4A.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Bats

a) Site status and potential impacts

- 1.3.1 Surveys identified the habitats present on the site to be primarily arable fields of limited value to bats. Mature trees were also recorded, which have potential to support roosting bats and the hedgerows provide limited foraging and commuting opportunities. There is no woodland within the site. An area of plantation woodland is present to the west of the site, between the secondary road and the railway line, connecting to larger areas of woodland in the wider area to the west and north of the site. This area is likely to contain trees with potential to support roosting bats and provide foraging and commuting opportunities.
- 1.3.2 The bat tree roost assessment survey identified 18 trees with the potential to support roosting bats (supporting a total of 41 potential roost features) within the boundary of the site, (ten trees with moderate potential, and eight trees with low). These trees would be retained, with the exception of two: one low potential tree and one moderate potential tree within the central hedgerow that is to be removed.
- 1.3.3 The construction of proposed development would result in the loss of primarily arable fields and field margins (11 hectares (ha)), one defunct, species-poor hedgerow (230m in length), and two trees with bat roost potential. Most of the hedgerows and associated trees assessed as suitable to support roosting bats would be retained, therefore this loss would not significantly reduce the overall tree roost resource available. The loss of the hedgerow could remove a linear feature used by commuting bats. Construction could therefore affect foraging, commuting and roosting bats; however, the defunct hedgerow to be lost is sub-optimal for commuting bats due to the existing gaps in the hedgerow.
- 1.3.4 Bats are potentially impacted by both increased noise levels and increased lighting but only a relatively small number of bats have been recorded within the proposed development site on any one occasion. Evidence suggests that bats using the site are not dependent on the habitats present and will also be

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using a range of additional habitats in the wider area. No significant effects on bat populations are expected as a result of construction noise or lighting.

b) Legislation

1.3.5 All bat species in England are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, *inter alia*, to:

- intentionally or recklessly kill, injure or take a bat;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection; or
- intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.

1.3.6 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2).

1.3.7 All bat species in England receive further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (Ref 1.4). They are listed on Schedule 2 of the Regulations, which makes it an offence, *inter alia*, to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat, in particular any disturbance which is likely:
 - impair their ability
 - to survive, to breed or reproduce, or to rear or nurture their young, or
 - to hibernate or migrate
 - affect significantly the local distribution or abundance of that bat species; or
- damage or destroy a breeding site or resting place of a bat.

1.3.8 Noctule (*Nyctalus noctule*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auratus*) are also included on Section 41 of the NERC Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal

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Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

c) **Toolbox talk for bats**

- 1.3.9 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to bats. Site-specific toolbox talks, to be identified by the ECoW must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by bats and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area.

d) **Precautionary working methods**

- 1.3.10 Lighting must be provided at the perimeter, and parking areas, for security and safety reasons. Lanterns must utilise LED based light fittings to ensure energy efficiency with zero-degree tilt, and lighting columns along the perimeter must use focused optics to reduce backward spill of light. To further assist on mitigating obtrusive light, a Central Management System has been proposed for the lighting capable of dimming of parts of the site independently from other parts (with the site envisaged to be divided in 6-8 main sections), as usage changes through the day. Guidance within the latest Institution of Lighting Professionals Guidance Note (Ref 1.5) must be followed as far as possible. These measures would minimise impacts on nocturnal species such as bats that use the nearby tree lines or habitats for roosting or foraging;
- 1.3.11 In addition, although some activities may require 24 hour working, the majority of construction would take place Monday to Saturday 07:00 to 19:00 hours. This means night-time works would be avoided, which is when bats are most active. Incidental mortality associated with traffic movements would therefore not have a significant effect on the bat assemblage.
- 1.3.12 All trees to be removed must be reassessed for bat roosting potential prior to felling.
- 1.3.13 Any trees identified as having low bat roosting potential must be removed using a soft felling methodology with a suitability experienced, appropriately licensed, bat worker or bat worker assistant present. This is outlined below. Where possible, Trees must be removed in October, thereby avoiding the

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sensitive maternity (April-September) and hibernation (November-February) periods for bats.

1.3.14 For any trees with moderate or high roosting potential, a pre works inspection for roosting bats must be undertaken. The methodology and required survey effort for these pre works checks is dependent upon the status of the roosting features within the trees, but may include:

- a climbed or ground based tree inspection using an endoscope and / or torch; and
- emergence / re-entry surveys.

1.3.15 Should any of the trees to be removed be found to support bat roosts, an European Protected Species licence is likely to be required. The documents associated with this licence will outline the required mitigation, and the required measures are not discussed further within this report.

1.3.16 If no roosts are found, the approach outlined below must be followed.

1.3.17 All trees with potential roost features for bats must be soft felled using the following precautionary measures:

- trees classed as having low potential to support roosting bats, must be felled under the watching brief of the ECoW;
- where potential roost features for bats cannot be exhaustively checked they must be section felled, with each section carefully lowered to the ground. Cuts must be made at least 50 cm beyond the extent of the potential roost feature;
- if limbs or large branches require felling, consideration must be given to cracks which may close (crushing any bats inside) once the weight of the limb has been removed. If the crack cannot be thoroughly inspected to ensure bats are not present, the crack must be wedged open prior to removal of the limb/branch;
- the stems of dense ivy must be cut at ground level at least 48 hours before the tree is felled; and
- once the trees have been felled the potential roost features must be checked on the ground by a suitably experienced bat ecologist. If any potential roost feature can still not be exhaustively checked that section must be allowed a rest period of at least 24 hours to ensure that any

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individual bats that may have been missed are given the opportunity to relocate.

1.3.18 If any bats are encountered during the felling operations all works and activity must cease immediately, until the ECoW has advised on the most appropriate manner to deal with the situation.

1.3.19 To mitigate for the loss of the tree and potential roost resources, bat boxes are to be installed on retained trees in suitable locations within the site boundary prior to felling. A variety of bat boxes are to be used to support different species. The following reprovision to loss ratios have been specified by Natural England:

- 1:1 potential roosting features;
- 2:1 low status roost of common species;
- 4:1 maternity roosts of common species; and
- 4:1 low status roost of Annex 2 species.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. Whilst this document has been produced in relation to bats, other species do need to be considered to ensure legal compliance. Given that the works are to take place outside of the active bird breeding season (early March and late August inclusive), it is considered that no nesting bird checks are required prior to the commencement of works. Nevertheless, should vegetation clearance works take place within the core bird breeding season, a qualified ECoW must carry out a nesting bird check at least 48 hours before the commencement of works effecting the vegetation within the site. Once nesting birds have been confirmed absent, then a habitat manipulation exercise must be undertaken in the form of a two stage vegetation cut, with the initial cut reducing the vegetation to a height of 150mm before a second cut subsequently reduces it to ground level, with a minimum of two hours between cuts to allow reptiles or amphibians to move out of the cutting area.

1.4.2 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles. Any vegetation clearance likely to impact vegetation below 150mm

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or the removal of places of shelter/hibernation features must be, where possible, undertaken outside of the reptile hibernating period (October to February inclusive), during periods of warm, dry weather. If this is not possible, vegetation must be cut to the ground (to remove potential bird nesting habitat), but the roots would remain intact until hibernation is complete. The root system of vegetation must then be removed once the hibernation season is over. Clearing of vegetation would be undertaken under the supervision of the suitably experienced Ecological Clerk of Works (ECoW).

1.4.3 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

1.4.4 Works must be undertaken outside of all tree and hedgerow root protection zones that are not proposed to be removed as part of the proposed development. Tree protective fencing as described in section 6.2 of British Standard 5837:2012 (Ref 1.6) must be installed (distance of fencing from tree trunk = 12x trunk diameter, distance from hedgerows = 1m from the spread of hedgerow canopy), where required, prior to plant and machinery arriving on site and construction works commencing. The fencing must remain intact throughout the duration of the works and only be removed upon completion. Weather-proof notices must be attached to any protective fencing located adjacent to retained trees displaying the words 'Construction Exclusion Zone'. All personnel must be made aware of these restrictions. If works need to be undertaken within the root protection zones an Arboricultural survey must be undertaken and any advice provided adhered to, to secure the long-term survival of the tree/hedgerow.



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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000). The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London
- 1.4 HMSO (2017). The Conservation of Habitats and Species Regulations. HMSO, London.
- 1.5 Institute of Lighting Professionals/Bat Conservation Trust (2018). Institution of Lighting Professionals. 2018. Bats and artificial lighting in the UK. Guidance Note 08/2018.
- 1.6 British Standards Institute. 2012. British Standard for Trees in relation to design, demolition and construction (BS 5837:2012). British Standards Institute. 2012

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Appendix 7A4A.1: Ecological Tool Box Talk

Legislation

Ecology surveys have been completed within the site and have identified the potential for the presence of a legally protected species. The Ecological Method Statement details the mitigation and working methods that should be adopted to avoid contravention of the legislation. If this is not followed, there is a risk that you could break the law by doing actions such as:

- Deliberately capture, injure or kill;
- Damage or destroy a resting place or breeding site;
- Deliberately or recklessly disturb an individual while it's in a structure or place of shelter or protection;
- Block access too structures or places of shelter or protection; or
- Possess, sell, control or transport live or dead individuals.

Any of the following could happen if you're found guilty of any offence:

- You could get an unlimited fine;
- You could be sent to prison for up to 6 months.

Species identification

	<p>Nesting Birds</p> <p>The bird nesting season extends from March to August inclusive, although in mild climate nesting may start in February.</p> <p>Nesting occurs in a variety of habitats including agricultural fields (ground nesting birds), dense bramble scrub, buildings and other man-made structures and trees.</p>
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	<p>Reptiles (slow-worm, common lizard, grass snake and adder)</p> <p>They may be found sheltering in vegetation, under debris such as logs, ricks or piles of rubble or waste items. They may also bask in the open on sunny days.</p> <p>DO NOT leave materials in area where it might be colonised by reptiles. Any debris or materials should be moved with care or moved under direct supervision of a suitably qualified ecologist.</p>
	<p>Bats</p> <p>On site habitats where bats may roost include buildings and tree.</p> <p>If works involve trees with cavities then check with the on-site ecologist that these have been inspected.</p>
	<p>Badgers</p> <p>It is unlikely that the animals would be seen but signs of their presence include:</p> <ul style="list-style-type: none"> • Setts (d shaped burrow with a large spoil heap); • Latrines or dung pits; and • Snuffle holes and runs.

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Great Crested Newts

It is possible that great crested newt may be present on site.

Newts are associated with water bodies but during the winter they live / hibernate in terrestrial habitat.

They can be harmed when clearing vegetation, moving debris such as log piles and ground works.

Action

- If any species, or signs characteristic of protected species in the vicinity of the works are apparent, OR IF IN ANY DOUBT, stop the works immediately and contact the Project ecologist;
- The species involved may then be identified and appropriate action such as further surveys or mitigation taken; and
- Do not attempt to move any species found unless instructed to do so by an ecologist.

**APPENDIX N FREIGHT MANAGEMENT FACILITY –
REPTILE NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 8 CHAPTER 7
APPENDIX 7A ANNEX 7A-4B)**



SIZEWELL C PROJECT
FREIGHT MANAGEMENT FACILITY –
REPTILE NON-LICENSABLE METHOD STATEMENT

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None Provided.

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SIZEWELL C PROJECT
FREIGHT MANAGEMENT FACILITY –
REPTILE NON-LICENSABLE METHOD STATEMENT

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1. Reptiles Non-licensable Method Statement: Freight Management Facility

1.1 Introduction

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

1.1.2 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.3 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.4 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) Background and Scheme Overview

1.1.6 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as 'Sizewell C') located to the north of the existing Sizewell B Power Station.

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- 1.1.7 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.
- 1.1.8 This Reptile Method Statement must be used by SZC Co. in relation to the proposal to build the freight management facility.
- 1.1.9 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.
- 1.1.10 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:
- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;
 - a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
 - a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;

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- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of Heavy Goods Vehicles (HGVs) from the regional and local road network.

1.1.11 The components listed above are referred to collectively as the ‘Sizewell C Project’. []

b) **Site Location and Setting**

1.1.1 The Freight Management Facility site comprises approximately 11ha of agricultural land and highway land located to the south-east of the A12 and A14 junction south-east of Ipswich, and bounded by the A14 to the north, Felixstowe Road to the south and arable land to the east and west (and is centred on Ordnance Survey grid reference TM239406. The site is located approximately 40km to the south-west of the main development site.

1.1.2 The site would provide spaces for up to 154 HGVs, and would allow a controlled pattern of deliveries to the Sizewell C main development site with reduced movements during peak or sensitive hours on the highway network. It would provide facilities where paperwork and goods can be checked prior to delivery to the Sizewell C main development site, and a location where HGVs can be held while they wait for their delivery time to enter the main development site. In the event of an accident on the local road network which prevents access to the site, HGVs would be held here (or at the Traffic Incident Management Area (TIMA)) at the southern park and ride at Wickham) to take them off of the local highway network. The proposed development of the site is temporary and would remain in situ until the construction of the Sizewell C power station is complete (approximately 9-12 years).

1.1.3 The site is dominated by intensively managed arable fields which lacked any botanically rich arable field margins within the site boundary, although a small area of semi-improved grassland is present along the northern site boundary.



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Moreover, the boundaries of the site are enclosed by a number of hedgerows, in addition to areas of dense scrub, bracken and tall ruderal vegetation. In addition, two waterbodies are present within an area of dense scrub immediately adjacent to the northern site boundary.

- 1.1.4 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

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Plate 1.1: Site location



- 1.1.5** The purpose of the proposed development would be to allow a controlled pattern of deliveries of construction material to the Sizewell C main development site, with reduced movements during peak or sensitive hours on the network. It would provide buildings and external areas where paperwork and goods can be checked prior to delivery to the Sizewell C main development site, and a location where HGVs can be held while they wait to enter the Sizewell C main development site, or in the event of an accident on the local road network which prevents access to the Sizewell C main development site. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) Key Ecological Constraints

- 1.1.6** The key potential ecological constraints associated with the facilitation works within the site include:
- bats; and
 - reptiles.

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The reasonable avoidance measures method statements detailed herein only cover guidance relating to reptiles. However a series of reasonable avoidance measures method statements and a draft protected species licence for bats have also been prepared and are provided separately.

1.2 Site Reasonable Avoidance Measures Method Statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) Toolbox Talk

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.4B.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or

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adverse effects on protected species that could occur within or in the vicinity of the working area.

- 1.2.6 There is a declaration (**Appendix 7A.4B.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Reptiles

a) Site Status

- 1.3.1 Within the site boundary, suitable habitat for reptiles is extremely limited, but includes marginal habitats, such as field boundaries. These are restricted in extent and often isolated within large tracts of arable farmland, and therefore, of limited value to reptiles. The desk-study data received from the Suffolk Biodiversity Information Service returned no records of reptiles within 2km of the site.

- 1.3.2 Accordingly, given that the extent of this habitat is quite limited such that it is unlikely that the site is of elevated potential to this species group, targeted presence/ absence surveys for reptiles were not undertaken. Nevertheless, given the presence of suitable habitat within and adjacent to the site, there is limited potential for this species group to be present on the site.

b) Legislation

- 1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*). Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way (CroW) Act 2000 (Ref 1.2)).

- 1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

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c) **Toolbox talk for reptiles**

- 1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.
- 1.3.6 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) **Precautionary working methods**

- 1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.
- 1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).
- 1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.
- 1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

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- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant)¹ and when the weather is suitable (i.e. it is warm, approximately 8°C should be the minimum temperature. The works must not be conducted early in the morning before reptiles have had a chance to ‘warm up’;
- the ECoW and contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk. Initially vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;
- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this must be overseen by the ecologist. If a reptile is found the ecologist must decide whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible,

¹ Advanced works approach would integrate vegetation clearance in relation to reptiles and bats as necessary; each having preferential periods for vegetation removal; an integrated approach could include cutting to near ground level during winter, then clearance of the lowest trunks and roots under supervision in spring

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shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and

- if reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.

1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).

1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.

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1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) **Vegetation clearance equipment**

1.4.7 SZC Co. must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example:

- John Deere 3 series compact with cut and collector flail;
- John Deere 4 series compact tractor with side arm flail; and
- brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearing equipment

	
<i>John Deere 3 series compact tractor</i>	<i>John Deere 4 series tractor</i>
	
<i>Brushcutter</i>	

c) **Ground-breaking works methods**

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the removal of suitable habitat within the areas proposed for ground-breaking works.

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1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil removed and inspected by the ECoW before the next section is removed.. Hand-digging under ECoW supervision may also be required.

d) **Ground-breaking works equipment**

1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

Plate 1.3: Ground-breaking works equipment



References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London



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- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A.4B.1: Toolbox Talk

Reptiles

Reptiles in the UK



**IF BITTEN SEEK MEDICAL
HELP IMMEDIATELY.**

Legal Protection
All reptile species are protected.

Likely to be found in:



Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brush piles, mammal burrows and tree / hedgerow roots.



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Appendix 7A.4B.2: Appendix 2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

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**APPENDIX O GREEN RAIL ROUTE – GREAT CRESTED
NEWT NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 9 CHAPTER 7
APPENDIX 7A ANNEX 7A-6A)**

**APPENDIX O GREEN RAIL ROUTE – GREAT CRESTED
NEWT NON-LICENSABLE METHOD STATEMENT
(ENVIRONMENTAL STATEMENT VOLUME 9 CHAPTER 7
APPENDIX 7A ANNEX 7A-6A)**



SIZEWELL C PROJECT
GREEN RAIL ROUTE – GREAT CRESTED
NEWT NON-LICENSABLE METHOD STATEMENT

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1 Great Crested Newt Non-licensable Method Statement: Green Rail Route

1.1 Introduction

1.1.1 In order to enable the proposed development of the proposed development a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the great crested newt presence of great crested newts within the site, the proposed facilitating works have the potential to cause injury/ mortality to this species should it be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by SZC Co. to ensure the safeguarding of great crested newt during the facilitation works to be undertaken within the site.

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

1.1.3 This great crested newt non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

1.1.5 Where separate Level 1 or Level 2 control documents include measures that are relevant to the measures within this document, those measures have not been duplicated in this document, but cross-references have been included for context. Where separate legislation, consents, permits and licences are described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).



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- 1.1.6 For the purposes of this document the term ‘SZC Co.’ refers to NNB Nuclear Generation (SZC) Limited (or any other undertaker as defined by the dDCO), its appointed representatives and the appointed construction contractors.
- a) **Background and scheme overview**
- 1.1.7 SZC Co. is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.
- 1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The project is being submitted as a component Nationally Significant Infrastructure Project (NSIP) and will be approved through the Development Control Order Process (DCO).
- 1.1.9 This great crested newt Method Statement outlines the key approaches to mitigating potential impacts to the great crested newt (great crested newt) (*Triturus cristatus*) populations at the site and must be used by SZC Co. in relation to the proposal to build the green rail route.
- 1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.
- 1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus, and a series of off-site associated development sites in the local area including:
- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at

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Wickham Market (the ‘southern park and ride’) to reduce the amount of traffic generated by the construction workforce on local roads and through local villages;

- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

1.1.12 The components listed above are referred to collectively as the ‘Sizewell C Project’.

b) [Site location and setting](#)

1.1.13 The proposed rail extension route site comprises part of the green rail route. The proposed rail extension route comprises the approximately 1.8km from the existing Saxmundham to Leiston branch line to the proposed B1122 (Abbey Road) level crossing. In addition, works (including track replacement and level crossing upgrades) are also required along the existing to the Saxmundham to Leiston branch.

1.1.14 Once operational, the proposed development would be used during the construction phase of the Sizewell C Project to transport construction materials to the main development site. It would support up to three freight trains per day (six movements) at the peak of construction.

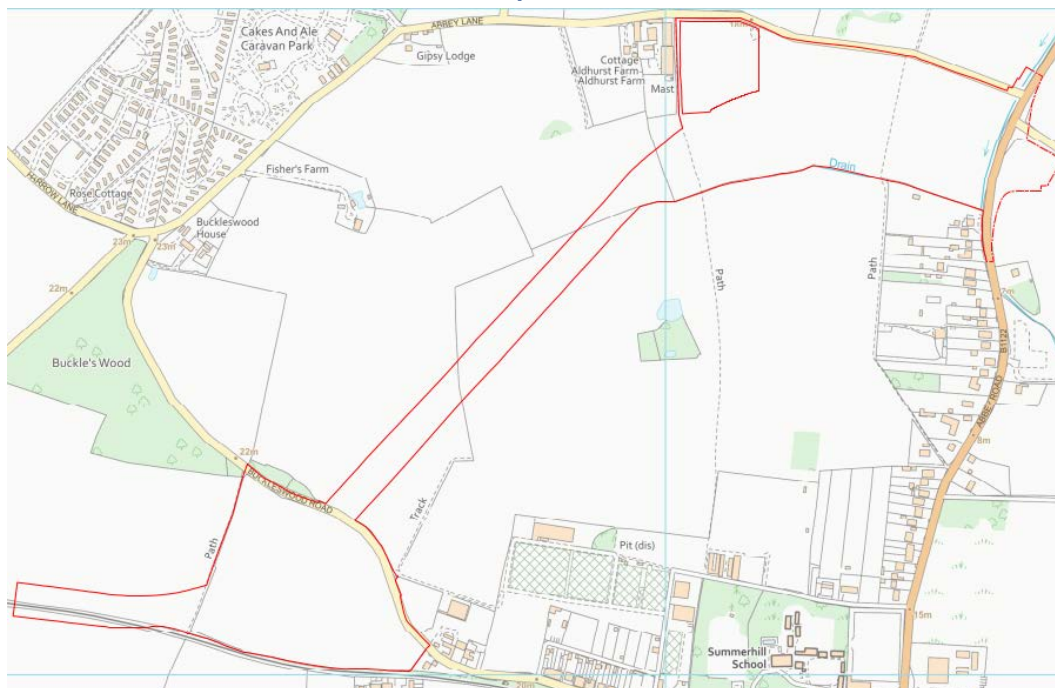
1.1.15 The proposed rail extension route site is dominated by intensively managed arable fields bounded by hedgerows, the majority of which have been

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recorded as species-poor with large gaps. Whilst no woodland habitat is present within the site, several blocks of woodland are present in close proximity to the site, particularly within the south of the site. Although the site is dominated by arable land, some limited areas of improved grassland habitat are present immediately adjacent to the north-western boundary of the site.

1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



1.1.17 The purpose of the works is to enable the transport of building materials for the construction of the various developments associated with the Sizewell C project, which would minimise additional HGV traffic on the road network surrounding the site. However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development. Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

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c) Key ecological constraints

1.1.18 The key potential ecological constraints associated with the facilitation works within the site include:

- great crested newt;
- reptiles; and
- bats.

1.1.19 The reasonable avoidance measures method statements detailed herein only cover guidance relating to great crested newts. There are also reasonable avoidance measures method statements for reptiles which are detailed separately and draft protected species licences prepared for bats and great crested newt.

1.2 Site Reasonable Avoidance Measures Method Statements for Great Crested Newt

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for great crested newt during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in these reasonable avoidance measures method statements. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no changes to the timings or methods outlined below are made without prior agreement from the ECoW.

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b) Toolbox talk

- 1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6B.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.
- 1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.
- 1.2.6 There is a declaration (**Appendix 7A.6B.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 Great Crested Newt

a) Site status

- 1.3.1 Great crested newts are found throughout the Zone of Influence (Zol) in the ponds located: to the north in the land around Leiston Abbey; in the middle of the Zol; to the west within adjacent woodland and gardens; and adjacent to Crossings Farm and Crossing Cottages. The animals found within these ponds are considered to be part of a single, wider meta-population.
- 1.3.2 Although the majority of the proposed development consists of arable fields of limited suitability for foraging great crested newts, the field margins, hedgerows and blocks of woodland are suitable foraging habitat, with the woodland providing suitable hibernation sites, and hedgerows and associated margins providing connectivity between ponds.
- 1.3.3 Evidence suggests that great crested newt using the site are not dependent on the habitats present and will also be using a range of additional habitats in the wider area. No significant effects on the great crested newt population are expected as a result of the proposed works.

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b) Legislation

1.3.4 Great crested newt is listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to:

- intentionally or recklessly kill, injure or take (handle) a great crested newt;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place that a great crested newt uses for shelter or protection; or
- intentionally or recklessly disturb a great crested newt while it is occupying a structure or place that it uses for shelter or protection.

1.3.5 The offence “recklessly” was added by the Countryside and Rights of Way Act 2000 (CRoW) (Ref 1.2).

1.3.6 great crested newt receives further protection under Regulation 41 of The Conservation of Habitats and Species Regulations 2017. They are listed on Schedule 2 of the Regulations, which makes it an offence, inter alia, to:

- deliberately capture, injure or kill a great crested newt;
- deliberately disturb a great crested newt, in particular any disturbance which is likely:
 - impair their ability to:
 - survive, to breed or reproduce, or to rear or nurture their young, or
 - hibernate or migrate
 - affect significantly the local distribution or abundance of great crested newt; or
- damage or destroy a breeding site or resting place of a great crested newt.

1.3.7 Great crested newt are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are ‘Species of Principal Importance for the conservation of biodiversity in England’ for which conservation steps should be taken or promoted.

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- 1.3.8 When the reasonable avoidance measures methods described in this Method Statement are taken into account, the cumulative risks and effects on the local great crested newt population(s) will be not significant. It is therefore considered that a great crested newt licence is not required for the facilitation works outlined in this Method Statement.
- 1.3.9 The Ecological Clerk of Works (ECoW), must oversee and quality-control the implementation of the ecological tasks undertaken.
- c) **Toolbox talk for great crested newts**
- 1.3.10 Prior to commencement of the works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to great crested newt.
- 1.3.11 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by great crested newt and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on great crested newt that could occur within or in the vicinity of the working area. The toolbox talk will stress that: potential great crested newt refugia / hibernation features must, where possible, be left undisturbed; and great crested newt must not be handled by contractors.
- d) **Precautionary working methods**
- 1.3.12 A different precautionary working method must be utilised dependent upon whether the works are being undertaken in the great crested newt active or hibernation period. These periods are dependent upon weather conditions (temperature and rainfall) but are likely to be in the region of November to February inclusive (hibernation season) and March to October (active season). The ECoW is responsible for determining the appropriate working methodology.
- 1.3.13 The prescriptions of these reasonable avoidance measures method statements must be followed during works in any areas with potential to support great crested newts. These areas include but are not limited to: tree roots, hedgerow bases, rough grassland areas, arable field margins, earth banks, log piles, rock piles and woodlands.
- 1.3.14 If possible, all impacts to terrestrial areas which may offer hibernation potential (i.e. log piles, embankments etc.) must be removed outside of the

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hibernation period, as great crested newt are more likely to be active and associated with ponds during this period. However, there are restrictions on certain works due to the potential to impact upon nesting birds (during the bird nesting season, generally March to August inclusive), and all works timings must consider this.

1.3.15 No ponds supporting great crested newt are to be directly impacted by the works therefore an approach to pond removal is not required. For clarity, the precautionary working methodologies have been split down into three scenarios:

- Vegetation clearance in the active season.
- Vegetation clearance in the hibernation season.
- Ground-breaking works in the active and hibernation season.

1.4 Approach to vegetation clearance

a) Vegetation clearance in the active season

1.4.1 Any clearance within the active season must also consider the potential to impact upon nesting birds. Suitable measures to prevent impacts to nesting birds must be employed, which are likely to include pre-works checks for nests. These measures in relation to birds are not outlined in full within this document.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working area.

1.4.3 The precautionary working methods to safeguard great crested newt during vegetation clearance in the active season are set out below.

- The ECoW and contractor must determine a cutting regime whereby any animals present are able to move away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to identify any areas offering great crested newt sheltering opportunities prior to works commencing.
- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of

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sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this should be overseen by the ecologist.

- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential great crested newt shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.
- Vegetation is to be cleared at a minimum 150mm from the ground in the first pass.
- Subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any great crested newt present at the time of works to move away from the cut areas, this will also allow the ECoW to check the area for great crested newt, along with other species.
- The vegetation is then to be cut to as close to ground level as possible.
- Vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to great crested newt within the site.

b) **Vegetation clearance in the hibernation season**

1.4.4 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working area.

1.4.5 SZC Co. must ensure the following precautionary working methods are put in place to safeguard great crested newt during vegetation clearance in the hibernation season.

- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). If possible, this removal must be undertaken by hand or slowly under close supervision by the ECoW.
- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential great crested newt shelter features takes place. If possible, shelter features must be dismantled by hand and moved out

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of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

- The vegetation is then to be cut to as close to ground level as possible.
 - Vegetation cuttings must be piled within the site so as to create additional sheltering opportunities to great crested newt within the site.
- c) **Approach to ground-breaking works including top-soil stripping (active season and hibernation period)**

1.4.6 If possible, all impacts to terrestrial areas which may offer hibernation potential (i.e. log piles, embankments etc) must, be removed outside of the hibernation period, as great crested newt are more likely to be active and associated with ponds during this period. However, there are restrictions on certain works due to the potential to impact upon nesting birds (during the bird nesting season, generally March to August inclusive), and all works timings need to consider this.

1.4.7 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering great crested newt will be reduced, due to the removal of suitable terrestrial habitat within the areas proposed for ground-breaking works. Ground-breaking works include any ground investigations, archaeology trenching, topsoil stripping etc.

1.4.8 Prior to commencement of the ground-breaking works, the ECoW and contractor must clearly demarcate the required working area. The methodology outlined below assumes that all vegetation has previously been removed.

1.4.9 SZC Co. must ensure the following precautionary working methods to safeguard great crested newt during ground-breaking works in the active season are put in place.

- Any suitable great crested newt sheltering features (e.g. log piles, compost heaps or debris) must be identified by the on-site ecologist. These must be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). If possible, this removal must be undertaken by hand or slowly under close supervision by the ECoW.
- Shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net

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loss of potential great crested newt shelter features takes place. If possible, shelter features should be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.

- The topsoil is then to be carefully removed using a toothed bucket (if permitted under the contractors reasonable avoidance measures method statement) under close ecological supervision by the ECoW.

d) **Action to take if great crested newt are found**

1.4.10 Should any great crested newt be found during the facilitation works the following must be observed due to the strict level of protection afforded to this species:

- the works must stop;
- the great crested newt must not be handled or moved from its resting place; and
- the ECoW must assess the situation to determine whether a European Protected Species mitigation licence is required before the works can continue; and if Natural England need to be informed.



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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London.
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London.

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Appendix 7A6A.1: Toolbox Talk

Ecology Toolbox Talk - Great Crested Newt

GCN identification:



Great Crested Newts are typically dormant between November and February. Sheltering/hibernation sites include log/brush piles, mammal burrows and tree/hedgerow roots.



GCNs, their habitats, and their eggs are legally protected from harm.



If a amphibian is found, stop work and report to the ECoW - do not handle.

Moving amphibians can be relocated by the ECoW away from works. Sheltering/dormant amphibians & their sheltering/hibernation site must be left in-situ, undisturbed.

Where amphibians are found:



**APPENDIX P GREEN RAIL ROUTE – REPTILE NON-
LICENSABLE METHOD STATEMENT (ENVIRONMENTAL
STATEMENT VOLUME 9 CHAPTER 7 APPENDIX 7A
ANNEX 7A-6B)**



SIZEWELL C PROJECT
GREEN RAIL ROUTE – REPTILES
NON-LICENSABLE METHOD STATEMENT

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SIZEWELL C PROJECT
GREEN RAIL ROUTE – REPTILES
NON-LICENSABLE METHOD STATEMENT

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1. Reptile Non-licensable Method Statement: Green Rail Route

1.1 Introduction

1.1.1 In order to enable the proposed development of the proposed rail extension route site, a number of facilitating works (including vegetation clearance works and ground-breaking works) are required. Given the opportunities afforded to reptiles by the habitats present within the site, the proposed facilitating works have the potential to cause injury/ mortality to this species group should it be present within the site at the time of the works. Accordingly, the purpose of this document is to provide a reasonable avoidance measures method statement that must be used by the SZC Co. to ensure the safeguarding of reptiles during the facilitation works to be undertaken within the site.

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

1.1.3 This reptile non-licensable method statement (hereafter referred to as the 'reasonable avoidance measures method statements') is a Level 1 document secured as part of the Code of Construction Practice by Requirement 2 of the draft DCO. This document may be updated prior to construction and any updated approach must be agreed with the Ecology Working Group (EWG). The EWG has a variety of roles in this strategy in approving future variations to the approach and these are set out where relevant below.

1.1.4 The Deed of Obligation establishes the governance groups and sets out how these governance groups will run and, where appropriate, how decisions (including approvals) should be made.

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described in this document they are set out in the **Schedule of Other Consents, Licences and Agreements** (Doc Ref. 5.11(C)).

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

a) **Background and Scheme Overview**

1.1.7 SZC Co is proposing to build and operate a new nuclear power station on the Suffolk coast, known as Sizewell C Power Station (hereafter referred to as ‘Sizewell C’) located to the north of the existing Sizewell B Power Station.

1.1.8 It is located to the north of the existing Sizewell B power station, the Sizewell C site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston.

1.1.9 This Reptile Method Statement must be used by SZC Co. in relation to the proposal to build the proposed rail extension route.

1.1.10 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 megawatts (MW) per unit, giving a total site capacity of approximately 3,340MW. The design of the UK EPR™ units is based on technology used successfully and safely around the world for many years, which has been enhanced by innovations to improve performance and safety. The UK EPR™ design has passed the Generic Design Assessment process undertaken by UK regulators (Office for Nuclear Regulation and Environment Agency), and has been licenced and permitted at Hinkley Point C. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the UK.

1.1.11 In addition to the key operational elements of the UK EPR™ units, the Sizewell C Project comprises other permanent and temporary development to support the construction and operation of the Sizewell C nuclear power station. The key elements are the main development site, comprising the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus and a series of off-site associated development sites in the local area including:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (the ‘northern park and ride’), and one to the south-west at Wickham Market (the ‘southern park and ride’) to reduce the amount of

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traffic generated by the construction workforce on local roads and through local villages;

- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘two village bypass’) to alleviate traffic on the A12 through the villages;
- a permanent road linking the A12 to the Sizewell C main development site (referred to as ‘Sizewell link road’) to alleviate traffic from the B1122 through Theberton and Middleton Moor;
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford roundabout’) and other road junctions to accommodate Sizewell C construction traffic;
- a temporary freight management facility at Seven Hills on land to the south-east of the A12/A14 junction to manage the flow of freight to the main development site; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (‘the green rail route’) and other permanent rail improvements on the Saxmundham to Leiston branch line, to transport freight by rail in order to remove large numbers of HGVs from the regional and local road network.

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b) [Site location and setting](#)

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1.1.14 Once operational, the proposed development would be used during the construction phase of the Sizewell C Project to transport construction materials to the main development site. It would support up to three freight trains per day (six movements) at the peak of construction.

1.1.15 The proposed rail extension route site is dominated by intensively managed arable fields bounded by hedgerows, the majority of which have been

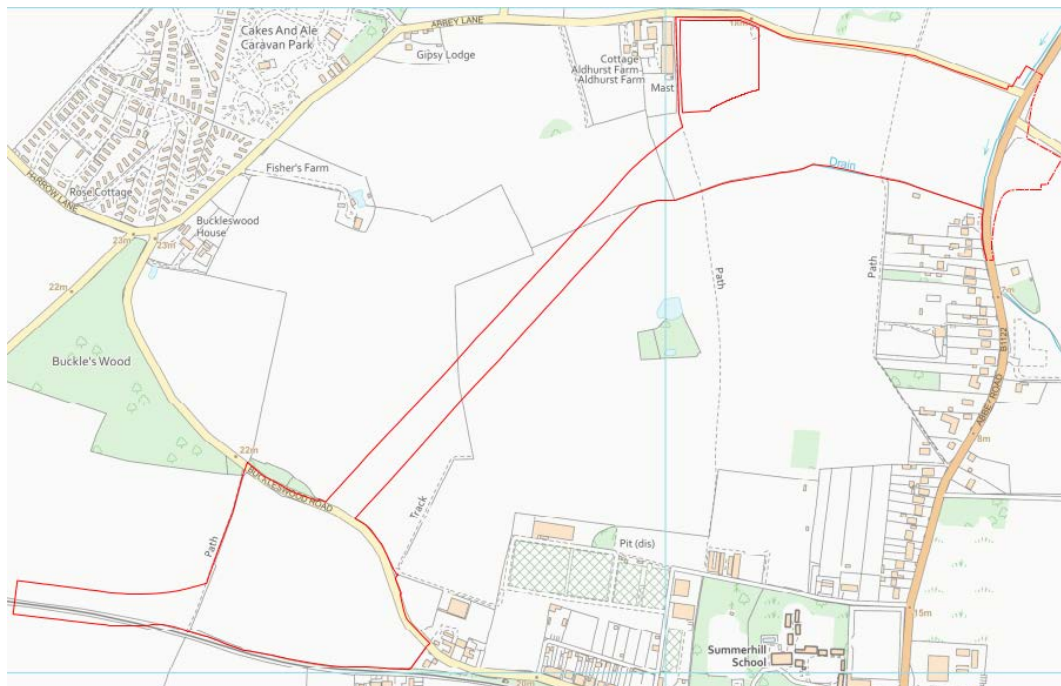
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recorded as species-poor with large gaps. Whilst no woodland habitat is present within the site, several blocks of woodland are present in close proximity to the site, particularly within the south of the site. Although the site is dominated by arable land, some limited areas of improved grassland habitat are present immediately adjacent to the north-western boundary of the site.

- 1.1.16 The area covered by the reasonable avoidance measures method statements detailed herein is presented in **Plate 1.1** below.

Plate 1.1: Site location (Copyright: Reproduced from Ordnance Survey map with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office © Crown Copyright (2021). All Rights reserved. NNB GenCo 0100060408.)



- 1.1.17 The purpose of the works is to transport construction materials to the main development site during the proposed construction works, and it would support up to regular transport of materials during the peak construction period (2028). However, as a component of this, vegetation clearance and ground-breaking works (collectively referred to as “facilitating works” within this report) will be required in order to facilitate the proposed development.

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Accordingly, a number of potential ecological constraints are associated with the proposed facilitating works, as are set out below.

c) Key ecological constraints

1.1.18 The key potential ecological constraints associated with the facilitation works within the site include:

- great Crested Newts;
- bats; and
- reptiles.

The reasonable avoidance measures method statement detailed herein only cover guidance relating to reptiles, however a second reasonable avoidance measures method statement has been prepared for great crested newts and a draft protected species licences for bats and great crested newts has also been prepared.

1.2 Site Reasonable Avoidance Measures Method Statements for reptiles

a) Introduction

1.2.1 This section provides a suite of dedicated reasonable avoidance measures method statements for the ecological constraints that may be encountered for reptiles during the facilitation works.

1.2.2 In all cases the aim of these reasonable avoidance measures method statements is to reduce the risk of causing injury / mortality of the protected species and avoid contravention of the relevant legislation. The Ecological Clerk of Works (ECoW) is responsible for determining exactly when and where it is appropriate to apply the measures described in the reasonable avoidance measures method statement. The ECoW must oversee and quality-control the implementation of the tasks undertaken.

1.2.3 It is the responsibility of SZC Co. to ensure the site contractors carry out the works in a manner which do not contravene the legislation with regards to protected species in the areas identified as having potential to support protected species. Any variations from these individual reasonable avoidance measures method statements may contravene legislation and therefore risk prosecution. Thus, it is their responsibility to ensure that no

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changes to the timings or methods outlined below are made without prior agreement from the ECoW.

b) **Toolbox talk**

1.2.4 Prior to commencement of the facilitation works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction. The toolbox talk (**Appendix 7A.6B.1**) provides a basic overview of the life history, habitat requirements, identification and legal protection granted to the legally protected species / other species of conservation concern present on within the site that may be encountered during the works.

1.2.5 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present on site that have the potential to be used by these species and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on protected species that could occur within or in the vicinity of the working area.

1.2.6 There is a declaration (**Appendix 7A.6B.2**) for those present to sign to confirm they have understood the constraints and actions presented. Evidence of such training must be available for inspection.

1.3 **Reptiles**

a) **Site status**

1.3.1 Given that the site supports a number of hedgerows and is located in close proximity areas of woodland and improved grassland habitats, it is considered that the site may be used opportunistically by foraging and commuting reptiles. Nevertheless, the desk-study data received from the Suffolk Biodiversity Information Service returned a number of records of reptiles within 200m of the site, including those of reptiles recorded within the nearby Wood Farm present to the southeast of the site. Whilst records of this species group were returned from the area surrounding the site, given the dominance of sub-optimal reptile habitat within the site, it is unlikely that the site is of elevated potential to this species group.

1.3.2 Whilst no targeted reptile surveys were undertaken an incidental sighting of a single grass snake (*Natrix natrix*) was observed, outside the site boundary, to the west of a pond in the woodland block south of Aldhurst Farm during survey work carried out within the site, such that there is potential for reptiles to make at least occasional use of the site.

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b) Legislation

- 1.3.3 There are four common and widespread species of reptile that are native to Britain, i.e. common or viviparous lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake. Grass snake is also listed on Schedule 5 of the Wildlife and Countryside Act (as amended) (Ref 1.1) in respect of Section 9, which makes it an offence, inter alia, to intentionally (or recklessly) kill or injure this species (recklessly as added by the Countryside and Rights of Way Act (CroW) Act (Ref 1.2))
- 1.3.4 Common lizard, slow worm, adder and grass snake are also included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (Ref 1.3). This Act places a duty upon public bodies to have regard to the purpose of conserving biodiversity within all of their actions. The species listed under Section 41 are 'Species of Principal Importance for the conservation of biodiversity in England' for which conservation steps should be taken or promoted.

c) Toolbox talk for reptiles

- 1.3.5 Prior to commencement of the vegetation clearance works, SZC Co. must ensure all site contractors are briefed by the ECoW as part of the site induction to provide them with a basic overview of the life history, habitat requirements, identification and legal protection granted to reptiles.
- 1.3.6 Site-specific toolbox talks, to be identified by the ECoW, must also be undertaken as necessary to identify the habitats present within the site that have the potential to be used by reptiles and outline the environmental measures to be followed in order to avoid breaches of legislation and / or adverse effects on reptiles that could occur within or in the vicinity of the working area. The toolbox talk will stress that potential reptile refugia / hibernation features must, where possible, be left undisturbed; and reptiles must not be handled by contractors.

d) Precautionary working methods

- 1.3.7 The exact timings of the vegetation clearance works are currently unknown. However, these works must consider potential impacts to other receptors in addition to reptiles, particularly nesting birds, dependent upon the timings of the works.
- 1.3.8 Vegetation clearance which does not disturb the ground or vegetation below 150mm can be conducted year-round with a low risk of impacting upon reptiles, however there are seasonal constraints in relation to birds. Potential

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impacts to nesting birds must be considered if vegetation removal is required between March and August inclusive (generally considered to be the bird nesting season).

1.3.9 Any vegetation clearance likely to impact vegetation below 150mm or which is likely to impact the ground layer or features which offer reptiles shelter or protection must, where possible, take place during the active reptile period (March to October (inclusive), although the exact timings are weather dependant). In order to avoid disturbing reptiles during hibernation (the period where reptiles are most vulnerable). Accordingly, with respect to the proposed clearance of suitable reptile habitat, a staged vegetation clearance exercise must be undertaken under the direct supervision of the ECoW, in order to reduce the suitability of the habitats within the site.

1.3.10 Where it is necessary to undertake vegetation clearance in and around suitable reptile habitat, SZC Co. must ensure the following precautionary measures are put in place to avoid encountering and accidentally injuring reptiles:

- vegetation clearance (below 150mm) and ground-breaking works must, where possible, only be conducted in the active season (March to October inclusive seasonally dependant) and when the weather is suitable i.e. it is warm, approximately 8°C should be the minimum temperature. The works must not be conducted early in the morning before reptiles have had a chance to 'warm up';
- the ECoW and the contractor must determine a cutting regime whereby any animals present are encouraged away from the cutting into retained habitats and not isolated in an unsuitable area. This area must be walked by the ECoW to disturb reptiles prior to works commencing;
- the ECoW must also consider any impacts to ground nesting birds, if appropriate and assess any risk;
- initially, vegetation is to be cleared to reduce cover for reptiles (at a minimum 150mm from the ground in the first pass);
- subsequent to this, a suitable period of time as decided by the ECoW must be given to allow for any reptiles present at the time of works to move away from the cut areas;
- the grassland / remaining vegetation is then to be cut to as close to ground level as possible;

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- vegetation cuttings are to be piled within the site so as to create additional sheltering opportunities to reptiles within the site;
- any suitable reptile sheltering features (e.g. log piles, compost heaps or debris) will be identified by the ECoW. These are to be avoided if possible, if not they must be checked by the ECoW before their removal (should this be required). Any removal of sheltering habitats must be supervised by the ECoW. These must be dismantled by hand; this must be overseen by the ECoW. If a reptile is found the ECoW must decide whether or not it is appropriate to relocate the animal;
- shelter features that require removal must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area; and
- if reptiles are found, the ECoW must move the animals out of the way to a place of safety. This location must be decided on a case-by-case basis, but it would be near to a suitable refuge or hibernation feature, surrounded by suitable foraging and basking habitat and judged to be a safe distance from the ongoing vegetation clearance works. Reptiles must not be handled by contractors, as common lizards and slow worms may shed their tails if handled inappropriately.

1.3.11 Should any reptiles be found on site during the works when the ECoW isn't present, the ECoW must be contacted immediately for advice.

1.4 Facilitating work requirements

a) Vegetation clearance methods

1.4.1 As set out above, vegetation clearance works are required in order to facilitate the development of the site. A staged vegetation clearance exercise at a suitable time of year must be undertaken in order to safeguard any reptiles present at the time of works. Such works must take place under the supervision of the ECoW. Such an approach will minimise the potential harm caused to reptiles within the site as it will avoid disturbing this species group during the hibernation period.

1.4.2 Prior to commencement of the vegetation clearance works, the ECoW and contractor must clearly demarcate the required working areas.



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- 1.4.3 If shelter features are present (i.e. log and vegetation piles), they must be checked by the ECoW before their removal (should this be required).
- 1.4.4 If shelter features are present that require removal, they must be reinstated near the clearance area in a quiet, sheltered location. This will ensure that no net loss of potential reptile shelter features takes place. If possible, shelter features must be dismantled by hand and moved out of the working area, supervised by the ECoW where appropriate. Such materials must be lifted (not dragged) out of the working area.
- 1.4.5 Should works be required in winter (November to February inclusive) or in cold weather (below 8°C overnight temperature) the ECoW must advise upon bespoke working methods. Likely to require a hand search and a staged vegetation clearance approach under direct supervision.
- 1.4.6 The vegetation arisings must be collected and used to create habitat piles in areas adjacent to the site (which are to be retained during the development works).

b) **Vegetation clearance equipment**

- 1.4.7 SZC Co must ensure that equipment specific to each clearance methods as per the reasonable avoidance measures is used. For example:
 - John Deere 3 series compact with cut and collector flail;
 - John Deere 4 series compact tractor with side arm flail; and
 - brushcutter, rakes, pitchforks and other hand tools.

Plate 1.2: Vegetation clearance equipment

John Deere 3 series compact tractor	John Deere 4 series tractor
	

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c) Ground-breaking Works Methods

1.4.8 Given that vegetation clearance works are to take place within the site prior to the commencement of any ground-breaking works, it is likely that the risk of encountering reptiles will be reduced, due to the absence of suitable habitat within the areas proposed for ground-breaking works.

1.4.9 Reptiles are known to enter hibernation by burrowing underground, by settling into tree root systems or by entering voids and crevices in the ground or surrounding material. Accordingly, where the works take place during the reptile hibernation period (the dormancy period runs from November to February (inclusive) and must be avoided where possible), it is considered necessary for the ground-breaking works to be undertaken under direct supervision of the ECoW. This must involve the works being undertaken in stages whereby small sections of the topsoil are removed and inspected by the ECoW before the next section is removed. Hand-digging under ECoW supervision may also be required.

d) Ground-breaking Works Equipment


1.4.10 SZC Co. must ensure equipment as detailed in the reasonable avoidance measures method is used. For example:

- JCB 16C-I new generation 1 tonne mini digger;
- spade;
- spill kits; and
- Chapter 8 barrier/ Heras fencing.

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Plate 1.3: Ground-breaking works equipment

<p align="center">JCB 16C-I New Generation 1 Tonne Mini Digger</p>	<p align="center">Chapter 8 barrier/ Heras fencing</p>
	

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References

- 1.1 Her Majesties Stationary Office (HMSO) (1981). The Wildlife and Countryside Act (as amended). HMSO, London.
- 1.2 HMSO (2000) The Countryside Rights of Way (CRoW) Act. HMSO, London
- 1.3 HMSO (2006). The Natural Environment and Rural Communities Act. HMSO, London

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Appendix 7A6B.1: Toolbox Talk

Reptiles

Reptiles in the UK



Legal Protection
All reptile species are protected.

Likely to be found in:



**IF BITTEN SEEK MEDICAL
HELP IMMEDIATELY.**

Reptiles typically dormant between November and February. Sheltering/hibernation sites include log / brash piles, mammal burrows and tree / hedgerow roots.



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Appendix 7A6B.2: Declaration of Understanding

Toolbox talk title:	Ecology
Given by:	
Site:	
Date:	

Name	Company	Signature

Name	Company	Signature

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