



# The Sizewell C Project

## 8.4 Planning Statement

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## Executive Summary

### Introduction

SZC Co. is proposing to build a new nuclear power station at Sizewell in East Suffolk, known as Sizewell C. It would be located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston. The power station, together with the proposed associated developments, is referred to as the Sizewell C Project.

The purpose of this **Planning Statement** (Doc Ref. 8.4) is to consider the case for granting a development consent order (DCO) for the Sizewell C Project, having regard to relevant planning policy. It sets out the legislative and planning policy context against which a decision will be made, draws together the evidence on the key issues, and examines the application against the relevant policy tests.

### The Sizewell C Project

The proposed Sizewell C nuclear power station would comprise two UK EPR™ units, with an expected net electrical output of approximately 1,670 megawatts per unit, giving a total site capacity of approximately 3,340MW. Once operational, Sizewell C would be able to generate enough electricity to supply approximately six million homes in the United Kingdom.

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, which comprises the Sizewell C nuclear power station itself, offshore works, land used temporarily to support construction including an accommodation campus, the enhancement of sports facilities in Leiston, fen meadow compensation sites south of Benhall and east of Halesworth and, if required, a marsh harrier habitat improvement area (Westleton), and a series of off-site associated development sites in the local area.

These associated development sites 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; 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.

## Need for Nuclear Power

Government policy acknowledges that there is a clear and urgent need for significant new electricity generating capacity in the UK. This need arises from:

- a forecast increase in demand for electricity;
- the retirement of existing sources of supply;
- the need to shift the UK’s energy supply mix toward low-carbon sources; and
- the need for energy security.



The Government has identified that, in order to meet its energy and climate change objectives, there is an urgent need for new electricity generating stations and that new nuclear power should contribute to the UK's energy mix. This is identified in the National Policy Statement (NPS) Overarching National Policy Statement for Energy (EN-1) (Ref. 1.1) and NPS for Nuclear Power Generation (EN-6) (referred to as the Nuclear NPS) (Ref. 1.2). Within the Nuclear NPS eight potentially suitable sites for deployment of new nuclear power stations were identified on the basis of a strategic siting assessment carried out by the Government. This included an area of land to the north of Sizewell A and B nuclear power stations.

## Planning Framework

The Sizewell C Project meets the criteria of a Nationally Significant Infrastructure Project (NSIP) under section 15 of the Planning Act 2008 (the Act) (Ref. 1.3), as it would bring forward a new onshore generating station in England with a capacity of over 50 MW. Therefore, the Act is the primary legislation which establishes the legal framework for applying for, examining and determining the application for the proposed development. The application for development consent is submitted to the Planning Inspectorate. Consent for the Sizewell C Project would take the form of a DCO and would be granted by the Secretary of State for Business, Energy and Industrial Strategy.

NPS EN-1 and NPS EN-6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025. Sizewell was one of the sites listed in NPS EN-6 as potentially suitable for the deployment of new nuclear power stations in England and Wales by the end of 2025. Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025.

On 7 December 2017, the Government published a Written Statement on Energy Infrastructure (ref. HLWS316) (2017 Ministerial Statement), which reiterated the continuing need for new nuclear. The 2017 Ministerial Statement explained that the Government had published a Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a NPS for Nuclear Power between 2026-2035, as the beginning of a process towards designating a new NPS for nuclear plants expected to be deployed after 2025 and capable of deployment by the end of 2035 and with over 1GW of single-reactor electricity generating capacity (Ref. 1.13).

With regard to the applicability of the existing NPSs, the 2017 Ministerial Statement explained that: *“Government considers that the current nuclear NPS, EN-6, only “has effect” for the purposes of section 104 of the Planning Act 2008 (“the Act”) for development which forms parts of a project able to demonstrate expected deployment by the end of 2025”*.

For projects yet to apply for development consent and due to deploy beyond 2025, which includes the Sizewell C Project, the 2017 Ministerial Statement confirmed that: *“...Government continues to give its strong in principle support to project proposals at those sites currently listed in EN-6. Even if EN-6 is considered not to have effect under section 104 of the Act for such a project, section 105 of the Act would apply to the decision on whether or not to grant development consent for the project”*.

The 2017 Ministerial Statement underlined the continued relevance of the NPSs, as follows:

*“Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters **where there is no relevant change of circumstances** it is likely that significant weight would be given to the policy in EN-1 and EN-6”* (emphasis added).

With regard to the applicability of the new NPS, the 2017 Ministerial Statement stated that:

*“The new NPS, once designated, will “have effect” for the purposes of section 104 of the Act for development which forms parts of a project able to demonstrate expected deployment after 2025 and before the end of 2035.*

*The Government also considers that a published new NPS in draft form would be considered as relevant to a decision on whether or not to grant development consent under section 105 of the Act”*.

In July 2018 the Government published its response to the consultation following its consideration of the consultation responses. The Government’s Response (Ref. 1.69) reiterated the statements made in the 2017 Ministerial Statement and confirmed again the important role of nuclear in the UK’s energy future. It also confirmed that the Government’s view is that those sites listed in EN-6 continue to be those sites which can deploy the soonest and are likely to be the only sites capable of deploying a nuclear power station by 2035.

The Government considers that neither NPS EN-1 nor NPS EN-6 “has effect” for the Sizewell C DCO application and if the decision on the application were made today it would be made pursuant to section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. For reasons which are explained in this **Planning Statement**, there has been no relevant change of circumstances and therefore significant weight is considered to apply to the policy in NPS EN-1 and EN-6.

## Planning analysis

**Sections 7 - 9** of this **Planning Statement** consider relevant national and local planning policies within the overarching context of NPS EN-1 and NPS EN-6. They demonstrate, when assessed against these relevant policies and material considerations, that the Sizewell C Project benefits from strong policy support and is acceptable in principle.

Whilst the Sizewell C Project would result in some adverse effects, as would be expected with any nationally significant infrastructure, these do not outweigh the significant benefits to the UK, including the provision of safe and secure low carbon electricity for which there is a nationally recognised urgent need.

## Benefits of the Sizewell C Project

The contribution that the Sizewell C Project would make to meeting the urgent need for low carbon, secure and reliable energy is substantial and should be given considerable weight. When operational, the new power station would help to bring a stable supply of low-carbon electricity to the UK.

SZC Co. has worked closely with stakeholders in the region to develop a strategy with a range of measures that combine to create an environment in which education, skills and workforce development can flourish, to the benefit of both the Sizewell C Project and the region.

The Sizewell C Project would create substantial economic benefits, including:

- Construction output and job creation: a boost to the local economy as a result of the construction phase, equating to £2.5bn of output and supporting over 40,000 person years of construction employment.
- Wages and spending: total for wages over the construction phase could be substantial:
- Spending by non-home-based workers in the area could average around £21.5 million per year or around £260 million over the construction phase.

- Extra wages from home-based workers during the construction phase could represent an average boost to incomes each year of £15 million. The boost to local spending would be less than that (after taxes and savings) but could still be £5 million per year or £60 million over the construction phase.
- Together these add up to around £320 million of extra local spending during the construction phase.
- Local employment creation: at the peak of construction, around a third of jobs are expected to be filled by existing local residents. If proportions are similar to Sizewell B, up to 480 of these roles would be filled by people who were formerly unemployed or previously inactive workers.
- Supply chain opportunities: the total value of the Sizewell C Project is estimated at £20bn. It is anticipated that – if similar levels of local and regional supply chain usage are achieved at Sizewell C as at Hinkley Point C - there could be a local retention of in excess of £1.5bn over the construction phase, equivalent to an average of £125m per year.
- A long term boost to the economy as a result of the operational phase: boosting GDP by around £225m per year and supporting 900 permanent jobs with associated wages of £44.5m per year, and an additional workforce of around 1,000 during planned outages. Further, multiplier effects across the UK for nuclear power suggests an additional local indirect employment of around 60% of direct employment, representing a further 360 jobs as an indirect result of the operational phase of the Sizewell C Project.

SZC Co. would provide support for housing in the local area by the establishment of a Housing Fund (which will be secured via the Section 106 Agreement) to address potential adverse effects on local accommodation markets and sectors.

In addition to the delivery of the nuclear power station, which has **significant** benefits in providing long term, sustainable infrastructure for the benefit of the UK as a whole, the Sizewell C Project would result in local and regional infrastructure benefits through the delivery of the upgrades to the Saxmundham to Leiston branch rail line, the two village bypass, the Sizewell link road and a series of potential road safety improvement schemes which address existing accident issues at junctions on the local highway network. Additionally, there are a number of enhancements proposed to facilities for pedestrians, cyclists and equestrians which would benefit existing users as well as new ones. The infrastructure investment and package of road safety improvements put

forward would not only benefit the proposed Sizewell C Project but would also provide a lasting legacy to residents of the surrounding towns and villages.

Following the construction period, temporary associated development such as the park and ride sites, the green rail route and the freight management facility would be removed and the land restored to re-provide habitats lost. In addition, the creation of new habitats across the main development site, two village bypass, Sizewell link road and Yoxford roundabout would deliver an overall net gain in biodiversity for the Sizewell C Project.

## Mitigation

Mitigation and good practice measures are proposed in order to avoid, reduce or compensate for adverse impacts of the Sizewell C Project where possible.

An iterative design and consultation process has helped to develop the ‘primary mitigation’. The primary mitigation includes modifications to the location or design of the development made during the pre-application phase that are now an inherent part of the Sizewell C Project and have become a fundamental part of the design for which consent is sought. Examples include architectural treatment of proposed facilities, reduction in the height of buildings and screening to reduce visual impact, and identifying key habitat that is safeguarded to remain enhanced or unaffected by the development’s layout and operation. Where necessary, additional ‘secondary’ mitigation (which includes actions that will require further activity in order to achieve the anticipated outcome) and ‘tertiary’ mitigation (which will be required regardless of any environmental impact assessment as it is imposed, for example, as a result of legislative requirements and/or standard sectoral practices) is proposed.

The delivery of the Sizewell C Project would be controlled through:

- identifying parameters within which certain works can be located and constructed;
- requiring construction and operation to be undertaken in accordance with defined details and mitigation measures;
- other controls secured through the development consent; and
- planning obligations within the Section 106 Agreement, which require SZC Co. to provide either a financial contribution towards the provision of mitigation or to secure the provision of certain services or works.

## Adverse Impacts

Even with mitigation in place, the Nuclear NPS recognises that the development of Sizewell C is likely to result in some residual adverse effects.

This **Planning Statement** provides an assessment of these potential adverse effects for each of the components of the Sizewell C Project, following the assessment principles and generic and nuclear considerations in NPS EN-1 and NPS EN-6, and national and local policy where relevant. It demonstrates that these works do not cause any potential adverse effects that, considered individually, cumulatively or as a whole would warrant the decision maker refusing the application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies.

## Conclusions

This **Planning Statement** considers relevant national and local planning policies within the overarching context of NPS EN-1 and NPS EN-6. It demonstrates that, when assessed against these relevant policies and material considerations, the Sizewell C Project benefits from strong policy support and is acceptable in land use planning terms.

Whilst the Sizewell C Project would, in common with any national infrastructure project, result in some adverse effects to the environment and local community these (considered individually or collectively) do not outweigh the important benefits. These benefits would be delivered for the UK as a whole, including a vital role in the provision of safe and secure low carbon electricity, as well as significant local benefits including jobs creation, investment in the local economy and the provision of lasting skills for the local workforce.

## 1 Introduction

### 1.1 The Planning Statement

1.1.1 This **Planning Statement** relates to the application made by SZC Co. to the Secretary of State for Business, Energy and Industrial Strategy under the Act for powers to construct, operate and maintain a nuclear power station in Suffolk, Sizewell C, and the associated development in the vicinity necessary to facilitate the construction or operation of the power station or to mitigate its impacts. The elements of the scheme being applied for as part of the application are together referred to as the ‘Sizewell C Project’.

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

1.1.3 The purpose of this **Planning Statement** is to consider the case for granting a DCO for the Sizewell C Project, having regard to relevant planning policy. It sets out the legislative and planning policy context against which a decision will be made, draws together the evidence on the key issues, and examines the application against the relevant policy tests.

1.1.4 This Statement does not cover all of the detail on every issue and it draws on the information held in the rest of the application documents. References to those documents are included, based on the full list set out in the **Navigation Document** (Doc Ref. 1.3).

### 1.2 The Applicant

1.2.1 NNB Generation Company (SZC) Limited (referred to in this application as “SZC Co.”) is the company within the EDF Energy group that is applying for development consent to construct, operate and maintain Sizewell C.

1.2.2 EDF Energy Group is one of the largest businesses in the energy sector in the UK; producing around 20% of the nation’s electricity and supplying electricity and gas to its residential and business customers. EDF Energy Group’s installed capacity is around 16.5GW, and the company has over 5.5 million businesses and residential customers.

1.2.3 Currently, EDF Energy Group operates eight nuclear power stations across the UK, with a combined capacity of almost 9,000MW. These comprise seven Advanced Gas-cooled Reactor (AGR) power stations (each with two reactors) at six locations on the coast of Britain, and a Pressurised Water Reactor (PWR) located at Sizewell B. Notably, in addition to the eight

existing, operational nuclear power plants, EDF Energy Group was granted a DCO to construct and operate a new nuclear power station in Somerset, known as Hinkley Point C, in March 2013. Hinkley Point C is under construction and is expected to start generating in 2025. Hinkley Point C is the first new nuclear power station to be constructed in the UK for more than 20 years. Like Sizewell C, it will use the UK EPR™ technology.

### 1.3 The Proposal

1.3.1 The site largely comprises an area of flat grassland immediately north of the existing Sizewell B power station. Part of the site, in the south west corner, is occupied by existing Sizewell B infrastructure. To the north lies Dunwich forest, to the west is the Sizewell Belts Nature Reserve. To the east is the Suffolk Coast Path and the North Sea.

1.3.2 The proposed Sizewell C nuclear power station would comprise two UK EPR™ units with an expected net electrical output of approximately 1,670 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 (Ref. 1.5) 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.

1.3.3 In addition to the key operational elements of the nuclear power station, the Sizewell C Project comprises other permanent and temporary development to support the construction, operation and maintenance of Sizewell C. The key elements are the main development site and a series of off-site associated development sites in the local area. The main development site where the power station would be located also includes a temporary construction area, offshore works, works LEEIE, a temporary accommodation campus, the enhancement of sports facilities in Leiston, fen meadow compensation sites south of Benhall and east of Halesworth and, if required, a marsh harrier habitat improvement area (at Westleton). The off-site associated development sites in the local area are:

- two temporary park and ride sites; one to the north-west of Sizewell C at Darsham (referred to as the ‘Northern Park and Ride’), and one to the south-west at Wickham Market (referred to as the ‘Southern Park and Ride’);



- a permanent road to bypass Stratford St Andrew and Farnham (referred to as the ‘Two Village Bypass’);
- a permanent road to bypass Theberton and Middleton Moor (referred to as ‘Sizewell link road’);
- permanent highway improvements at the junction of the A12 and B1122 east of Yoxford (referred to as the ‘Yoxford Roundabout’) and other road junction improvements;
- a temporary Freight Management Facility at Seven Hills on land to the south-east of the A12/A14 junction; and
- a temporary extension of the existing Saxmundham to Leiston branch line into the main development site (referred to as the ‘Green Rail Route’) and other permanent rail improvements on the Saxmundham to Leiston branch line.

1.3.4 An overview of the main development site is set out in **Section 4**, and the proposals are assessed against policy requirements in **Sections 7 and 8** of this **Statement**. Individual planning assessments of the off-site associated development sites are appended to this **Planning Statement**, provided in Appendix B – H of this **Statement** and reviewed in **Section 9**.

## 1.4 Planning and Environmental Designations

1.4.1 The main development site is located on the Suffolk coast, approximately halfway between Felixstowe and Lowestoft; to the north-east of the town of Leiston and within the administrative boundary of East Suffolk Council (ESC) (refer to **Plate 1.1**). Once constructed, the Sizewell C nuclear power station would be located directly to the north of the existing Sizewell A and B power station complex.

1.4.2 National policy in the form of the National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identifies the Sizewell site as a potentially suitable location for a new nuclear power station. This followed a Strategic Siting Assessment (SSA) undertaken by the Government of eleven ‘nominated sites’ to identify the eight included in NPS EN-6 as potentially suitable for the deployment of new nuclear power stations by the end of 2025. The status and effect of the NPS is discussed in **Section 3** of this **Statement**.

1.4.3 There are also a number of statutory environmental designations affecting the site. The majority of the onshore portion of the main development site is

located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The main development site is located in the Suffolk Coast and Heaths National Character Area which is a predominantly low-lying landscape characterised by productive agricultural areas.

- 1.4.4 The site includes approximately 10ha of the Sizewell Marshes Site of Special Scientific Interest (SSSI). The permanent land take forms approximately 6.7% of the total area of the designated site with a further 2.8% being used temporarily during construction only. The site also borders the Minsmere to Walberswick Special Protection Area (SPA) and Ramsar site. The Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC) and SSSI are located to the north-east of the site.
- 1.4.5 Two designated heritage assets lie within the site, both of which are Grade II listed buildings – Upper Abbey Farmhouse (asset reference LB 1216394), and the Barn, 400m north of Upper Abbey Farmhouse (asset reference LB 1216655). There are 86 Historic Environment Records (HERs) within the site, and a further 159 HERs in the wider area reflecting a variety of heritage features ranging from prehistoric flint artefact scatters to Second World War (WWII) defences. There are three marine HERs in the site offshore area.
- 1.4.6 There are a further 12 listed buildings within a 10-kilometre (km) radius, most notably the Leiston Abbey and moated site Scheduled Monument which is located approximately 250m from the site. The remains of St Mary's Abbey, which forms part of the Scheduled Monument, is a Grade I listed building.
- 1.4.7 There are no sites designated under the Protection of Wrecks Act 1973 (Ref. 1.6) within the offshore area of the main development site. The closest designated site, the Dunwich Bank wreck (List entry 1000073), is located 3.2km north of the main development site. There are no sites protected under the Protection of Military Remains Act 1986 (Ref. 1.7), or Scheduled Monuments designated under the Ancient Monuments and Archaeological Areas Act 1979 (Ref. 1.8), below the Mean High Water Mark (MHWM) within 5km of the main development site.
- 1.4.8 The offshore area of the main development site forms part of the Outer Thames Estuary SPA, and the Southern North Sea SAC for harbour porpoises, and the Suffolk Coastal waterbody.
- 1.4.9 There are seven non-statutory local designated County Wildlife Sites (CWS) within a 2km radius of the site, including the Sizewell Levels and associated areas CWS, and the Suffolk Shingle Beaches CWS.
- 1.4.10 In terms of local planning designations, the site lies partially within a Coastal Change Management Area (Policy SSP42 of East Suffolk Council's Site

Allocations and Area Specific Policies Development Plan Document (January 2017)<sup>1</sup>.

- 1.4.11 The individual statutory environmental designations affecting the off-site associated development sites listed above are provided at **Chapter 1** of each of the relevant Volumes of the **Environmental Statement**.

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<sup>1</sup> A summary of the local Development Plan is set out in Section 3 of this Statement.

Plate 1.1: Site location



## 1.5 Planning History

### a) Sizewell A and Sizewell B

- 1.5.1 In the 1950s, Sizewell was confirmed as an appropriate location for the construction and operation of the Sizewell A power station. Sizewell A was subsequently commissioned in 1966 and operated for 40 years. It is currently being decommissioned.
- 1.5.2 Sizewell B power station was granted planning permission in 1987 following a public inquiry, constructed between 1988 and 1995, and began generating power in 1995. Its expected decommissioning date is 2035. Throughout the public inquiry there was a recognition that an application for Sizewell C would follow. This was reflected in the Inspector's Report (Ref 1.9) at paragraphs 96.5, 96.38 and 108.23. The landscape strategy put in place for Sizewell B included advanced mounding and planting to define and protect a potential Sizewell C site. SZC Co.'s current proposals locate the proposed power station on the area identified for the anticipated Sizewell C proposals.
- 1.5.3 The site's identification in NPS EN-6 reconfirms the historic recognition of Sizewell as a suitable location in principle for nuclear power generation.

b) [Other Related Applications](#)

- 1.5.4 SZC Co. has progressed two separate early works planning applications under the Town and Country Planning Act 1990 (Ref. 1.10) that are related to the Sizewell C Project – the Aldhurst Farm habitat creation scheme (application Ref. DC/14/4224/FUL – granted permission in March 2015) and the Sizewell B relocated facilities project (application Ref. DC/19/1637/FUL – granted permission in November 2019). Both applications are summarised separately below.

i. [Aldhurst Farm Habitat Creation Scheme](#)

- 1.5.5 A planning application for the Aldhurst Farm habitat creation scheme was submitted to Suffolk Coastal District Council (SCDC) (now East Suffolk Council) as the local planning authority in December 2014 (application ref. DC/14/4224/FUL). The application sought permission for:

*“Creation of approximately 6ha of wetland habitat, including wet reedbed, open-water and perimeter ditches within 4 ground water basins together with marginal drier reed habitat. Soils excavated to create the basins, would be used across the wider site to establish a landscape including grassland, heathland, scrub and scattered trees. Other associated works include realignment of the existing watercourse, the relocation of groundwater abstraction boreholes, a new pump house and fencing.”*

- 1.5.6 The site extends from Abbey Road in Leiston to Lover’s Lane, on the edge of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Sizewell Marshes Site of Special Scientific Interest (SSSI).
- 1.5.7 Permission for this application was granted in March 2015 and the physical form, including the main earthworks and waterbodies of the habitat creation scheme was created in 2015 and 2016.
- 1.5.8 The scheme was designed to compensate for future land-take from the Sizewell Marshes SSSI should the Sizewell C nuclear power station be granted consent and built; notably to compensate for the loss of reedbed and lowland ditch habitat within the SSSI, and their associated invertebrate and rare vascular plant assemblages.
- 1.5.9 Low-lying land on the site has been further lowered to create the conditions needed for wetland habitat. The excavated soil, which includes peat, has then been spread across the surrounding fields to reduce the fertility of the soils and create conditions suitable for the establishment of acidic grassland and heathland. The wetland and drier habitats are already benefitting a variety of wildlife in advance of construction activity on the main development site, including water voles, otters, eels, amphibians, reptiles and birds, as well as rare plants.
- 1.5.10 The habitats created as part of the scheme have been considered, within the Environmental Impact Assessment (EIA), to form part of the existing baseline environment. Given the purpose of the scheme was to compensate for the loss of SSSI, the scheme has also been considered to form primary mitigation for the purposes of the EIA. Further information on the assessment approach is provided in **Volume 1, Chapter 6** of the **Environmental Statement** (Doc. Ref. 6.3).

#### ii. Sizewell B Relocated Facilities

- 1.5.11 A hybrid planning application for the relocation, demolition and replacement of a number of existing Sizewell B facilities (known as the Sizewell B relocated facilities project) was submitted to ESC in April 2019 by EDF Energy Nuclear Generation Company Limited who operate the Sizewell B power station (application ref. DC/19/1637/FUL). Planning permission was granted by ESC on 13 November 2019. ESC’s decision to grant permission is currently the subject of a legal challenge. However, the grant of permission remains valid unless and until quashed by the Court.
- 1.5.12 The facilities that would be relocated, demolished or replaced are ancillary to the process of electricity generation and have a broad range of functions including industrial, workplace, education, cultural and infrastructure. The

facilities would be upgraded to comply with current standards and regulations. Some of these facilities to be relocated are within the area of land that is nominated for Sizewell C whilst the other facilities, or areas of land, would be impacted as a consequence of relocating the facilities from the north to the Sizewell B site.

- 1.5.13 Applying for these proposed works through a separate planning application to ESC facilitates the Government's policy objective of more rapid development of new nuclear power, by ensuring earlier delivery of the Sizewell C Project than if the relocation proposals were only included as part of SZC Co.'s application for development consent. This is in line with the approach advocated in the Department for Communities and Local Government's (DCLG) letter to local authorities, dated 16 July 2009 (Ref 1.11), in relation to the new consenting process for NSIPs.
- 1.5.14 Nevertheless, as these are such critical elements to facilitate the construction of Sizewell C, it is important for SZC Co. to be sure that these works will be consented. Therefore, the proposals for the above facilities are also included in the application for development consent for the Sizewell C Project and have been considered to form part of the Sizewell C Project in the **Environmental Statement** (Doc Ref 6.3).

## 1.6 Overview of the Consultation Process

- 1.6.1 SZC Co. has undertaken pre-application consultation in accordance with the Act, having regard to the former DCLG Guidance on the Pre-Application Process for Major Infrastructure Projects and other relevant guidance.
- 1.6.2 Engagement with the local community and stakeholders about a new nuclear power station at Sizewell has been ongoing since 2008. There were four principal stages of statutory pre-application consultation, between 2012 and 2019, and two targeted consultations following the close of Stage 4. Prior to, between and after the principal stages of consultation, informal consultation and engagement also took place.
- 1.6.3 Through the formal stages of consultation and design development, SZC Co. has developed various strategies for how the power station should be constructed, in particular the transport and accommodation strategies. Each strategy would require different associated development and, therefore, amounts of land, to support the construction of Sizewell C. Taking account of feedback from the consultation, as well as design development, further modelling and technical and environmental studies, SZC Co. has identified the strategies that are most suitable for the development. It is on the basis of

these strategies that SZC Co. is making its application for development consent.

- 1.6.4 The **Consultation Report** (Doc Ref 5.1) sets out what SZC Co. has done during the statutory and non-statutory pre-application consultation process. It explains the issues raised in the relevant consultation responses, how the Sizewell C proposals have evolved through the consultation stages, and how feedback from consultees has influenced the options and choices made in the Sizewell C DCO application.

## 1.7 Legislative and Policy Summary

- 1.7.1 The proposed Sizewell C power station (being an onshore generating station over 50MW) constitutes an NSIP within the meaning of the Act. The Act is the primary legislation which establishes the legal framework for applying for, examining and determining applications for NSIPs. Consent for NSIPs takes the form of a DCO, and applications are determined in the context of the relevant NPS.
- 1.7.2 The Overarching National Policy Statement for Energy (NPS EN-1) and National Policy Statement for Nuclear Power Generation (NPS EN-6) were considered by Parliament and formally designated in July 2011. Together, NPS EN-1 and NPS EN-6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025. Sizewell was one of the sites listed in NPS EN-6 as potentially suitable for the deployment of a new nuclear power station in England and Wales by the end of 2025. Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025.
- 1.7.3 On 7 December 2017, the Government published a Written Statement on Energy Infrastructure (ref. HLWS316) (2017 Ministerial Statement), which reiterated the continuing need for new nuclear. The 2017 Ministerial Statement explained that the Government had published a Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a NPS for Nuclear Power between 2026-2035, as the beginning of a process towards designating a new NPS for nuclear plants expected to be deployed after 2025 and capable of deployment by the end of 2035 and with over 1GW of single-reactor electricity generating capacity (Ref. 1.13).
- 1.7.4 With regard to the applicability of the existing NPSs, the 2017 Ministerial Statement explained that: *“Government considers that the current nuclear NPS, EN-6, only “has effect” for the purposes of section 104 of the Planning*



*Act 2008 (“the Act”) for development which forms parts of a project able to demonstrate expected deployment by the end of 2025”.*

1.7.5 For projects yet to apply for development consent and due to deploy beyond 2025, which includes the Sizewell C Project, the 2017 Ministerial Statement confirmed that: *“...Government continues to give its strong in principle support to project proposals at those sites currently listed in EN-6. Even if EN-6 is considered not to have effect under section 104 of the Act for such a project, section 105 of the Act would apply to the decision on whether or not to grant development consent for the project”.*

1.7.6 The 2017 Ministerial Statement underlined the continued relevance of the NPSs, as follows:

*“Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters **where there is no relevant change of circumstances** it is likely that significant weight would be given to the policy in EN-1 and EN-6” (emphasis added).*

1.7.7 With regard to the applicability of the new NPS, the 2017 Ministerial Statement stated that:

*“The new NPS, once designated, will “have effect” for the purposes of section 104 of the Act for development which forms parts of a project able to demonstrate expected deployment after 2025 and before the end of 2035.*

*The Government also considers that a published new NPS in draft form would be considered as relevant to a decision on whether or not to grant development consent under section 105 of the Act”.*

1.7.8 In July 2018 the Government published its response to the consultation following its consideration of the consultation responses. The Government’s Response (Ref. 1.69) reiterated the statements made in the 2017 Ministerial

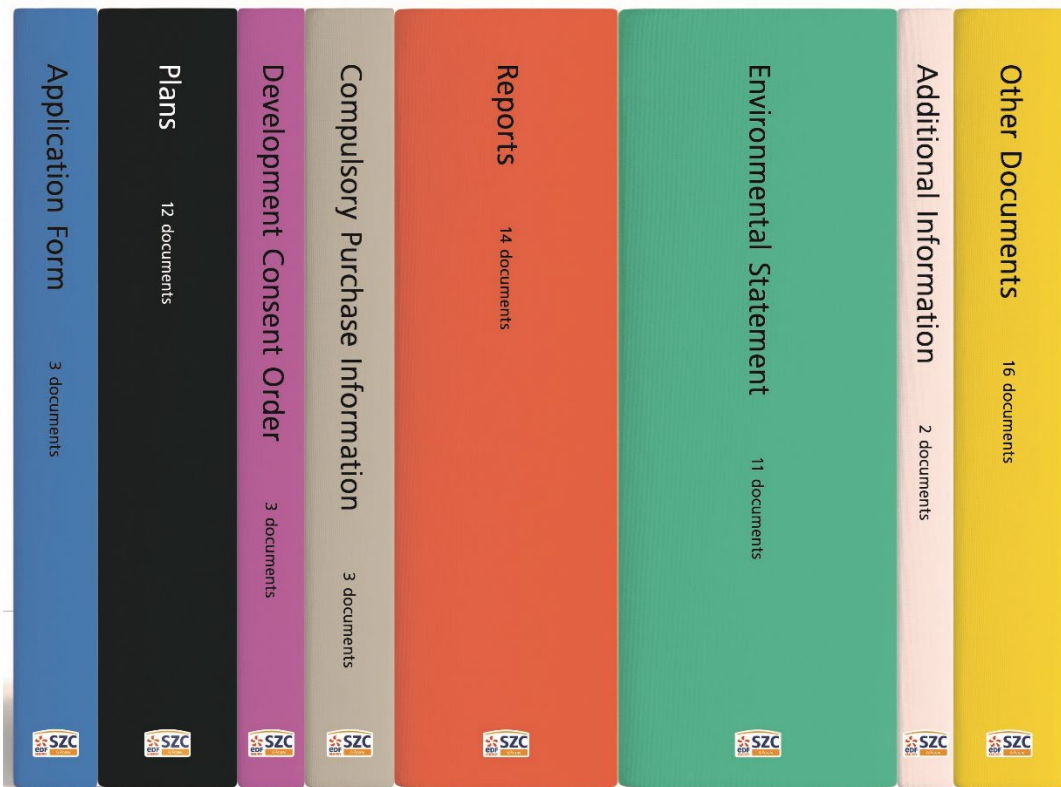
Statement and confirmed again the important role of nuclear in the UK's energy future. Annex II of the response confirmed that the *“Government's view is that those sites listed in EN-6 continue to be those sites which can deploy the soonest and are likely to be the only sites capable of deploying a nuclear power station by 2035”* (paragraph II.4).

- 1.7.9 On this basis, the Government considers that neither NPS EN-1 nor NPS EN-6 “has effect” for the Sizewell C DCO application and if the decision on the application were made today it would be made pursuant to section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project.
- 1.7.10 For the reasons set out in **Section 3** of this **Planning Statement**, there has been no relevant change of circumstances which would suggest that anything less than significant weight should be given to the policy in EN-1 and EN-6. Indeed, the need for new nuclear power is now even greater than when NPS EN-1 and NPS EN-6 were designated.
- 1.7.11 **Sections 7, 8 and 9** of this **Planning Statement** consider relevant national and local planning policies within the overarching context of NPS EN-1 and NPS EN-6. They demonstrate, when assessed against these relevant policies and material considerations that the Sizewell C Project benefits from strong policy support and is acceptable in land use planning terms.
- 1.7.12 Whilst the Sizewell C Project would result in some adverse effects, as would be expected with any nationally significant infrastructure, these do not outweigh the significant benefits to the UK, including the provision of safe and secure low carbon electricity supplies for which there is a nationally recognised urgent need.

## 1.8 Guide to the Application

- 1.8.1 A **Navigation Document** (Doc Ref 1.3) is provided and summarises the structure of SZC Co.'s application for development consent for the Sizewell C Project.
- 1.8.2 Due to the size and scale of the Application, the application documents have been grouped to correspond with the Planning Inspectorate's suggested categories for application documents which have been grouped into 'Books'. The purpose of the **Navigation Document** (Doc Ref. 1.3) is to provide an understanding of the structure of the application for development consent and the principal contents within each Book of documents.
- 1.8.3 There are eight different Books as shown in **Plate 1.2**.

**Plate 1.2: Books forming the Sizewell C Project application for development consent**



1.8.4 The content of each Book is described within the **Navigation Document**.

## 1.9 Planning Statement Structure

1.9.1 The remainder of this **Planning Statement** is set out as follows:

- **Section 2:** Location and Site Description - provides a site description for each of the component parts of the Sizewell C Project.
- **Section 3:** Legislative and policy context – describes the decision-making process and policies against which the decision must be made.
- **Section 4:** The DCO application – this describes the nature and scope of the application.
- **Section 5:** Main Development Site – provides a summary of the main development site proposals.

- **Section 6:** The Development of Related Strategies – sets out the strategies which have been developed to address anticipated effects of the proposals during the construction phase, notably the economic and social effects of the workforce and the transport effects of the workforce and freight movements. The section explains how the strategies have led to the inclusion of associated development proposals within the DCO application.
- **Section 7:** Planning Assessment – Assessment Principles – assesses the Sizewell C Project against the assessment principles set out in NPS EN-1 and NPS EN-6.
- **Section 8:** Planning Assessment – Main Development Site – assesses the main development site proposals against relevant policy, most significantly the generic and nuclear impact policies set out in NPS EN-1 and NPS EN-6.
- **Section 9:** Planning Assessment – Off-Site Associated Development Sites – summarises the individual assessments of the associated development sites against planning policy. Planning Statements for each off-site associated development site are provided in the appendices.
- **Section 10:** Requirements and Securing Mitigation – sets out the requirements for the proposal that will ensure the delivery of the necessary mitigation.
- **Section 11:** Planning Balance and Conclusions – considers how the Sizewell C Project complies with relevant policy and weighs its benefits against any residual adverse effects in the overall planning balance.

## 2 Location and Site Description

### 2.1 Introduction

2.1.1 This section provides a brief overview of the sites that would accommodate the various components of the Sizewell C Project.

2.1.2 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.

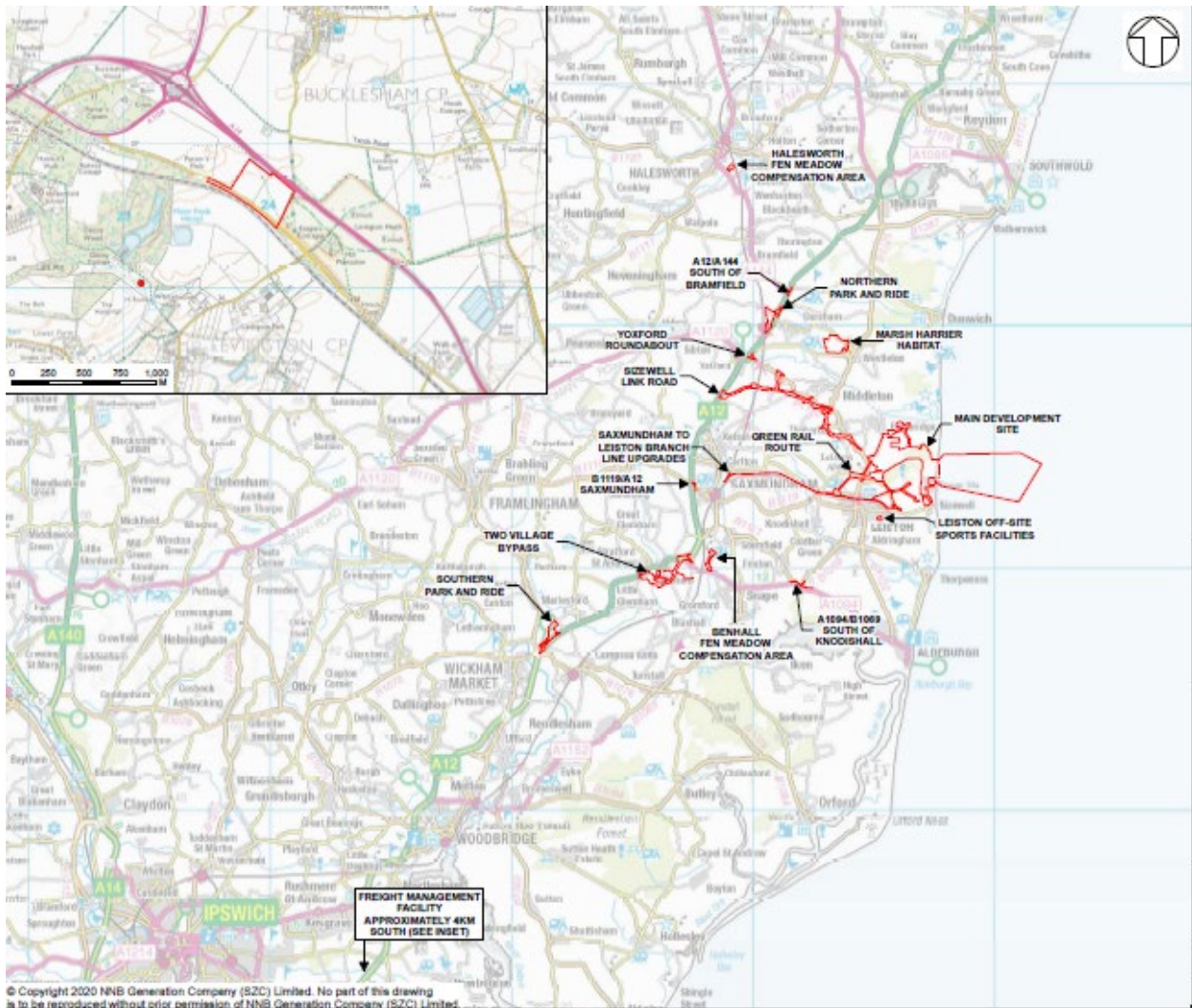
2.1.3 In addition to the nuclear power station itself, other permanent and temporary development is necessary to support the construction and operation of the Sizewell C nuclear power station, primarily to transport workers and materials. The proposals for this supporting development are:

- The Northern Park and Ride at Darsham - situated to the west of the A12, to the east of the East Suffolk line and to the north of Darsham rail station.
- The Southern Park and Ride at Wickham Market - 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.
- The Two Village Bypass - located to the south and south-east of Stratford St. Andrew, and to the south-west to south-east of Farnham. The bypass would depart from the A12 to the south-west of Stratford St. Andrew before re-joining the A12 to the east of Farnham.
- The Sizewell Link Road – located to the south of the B1122 and east of the A12. The link road would begin at the A12 south of Yoxford, bypass Middleton Moor and Theberton before joining the B1122.
- The Yoxford and other highway improvements - located across various road junctions and highways across East Suffolk.
- The Freight Management Facility - 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.
- The Green Rail Route and rail improvements – the green rail route would extend approximately 4.5km in a north-eastern direction from the existing Saxmundham to Leiston branch line, at a point approximately 1.5km west

of Leiston, into the main development site at the intersection of Lover’s Lane. Other rail improvements include the replacement of the track on the Saxmundham to Leiston branch line and improvements to eight existing level crossings.

2.1.4 **Plate 2.1** shows the locations of the development sites which comprise the Sizewell C Project.

**Plate 2.1: Site Locations**



## 2.2 The Main Development Site

2.2.1 The proposals cover a total site area of 1011.6ha; of which 371.7ha are onshore and the remaining 639.9ha are offshore.

- 2.2.2 The main platform within the main development site would be located to the north of the existing Sizewell B power station, approximately 500m north of the hamlet of Sizewell, and 2km north-east of the town of Leiston, at its closest point. Its location would be approximately halfway between the towns of Felixstowe and Lowestoft and within the civil parish of Leiston, East Suffolk district and the county of Suffolk.
- 2.2.3 The primary highway access to the main development site would be located along the B1122 between Theberton and Lover's Lane. The secondary highway access to the main development site would be located along Lover's Lane east of the B1122 Abbey Road. An extension to the existing Sizewell B access road would from a secondary highway access to the main platform.
- 2.2.4 The existing character of the main development site is described below:
- Sizewell C main power station platform – This area comprises the land that would accommodate the new nuclear power station buildings and majority of ancillary and supporting buildings and infrastructure. It was used during the construction of the existing Sizewell B nuclear power station and is now characterised by regenerating scrub, semi improved grassland coniferous plantations and tree belts. To the west and north are areas characterised by semi-natural and plantation woodlands, scrub and marsh/marshy grassland and open water forming part of the Sizewell Marshes SSSI. To the north lies the Northern Mound, a vegetated engineered embankment (known as Bent Hills) and a lower vegetated shingle bund which together form the sea defences to the existing Sizewell power stations. Between these features is an area of dune grassland. East of the lower bund is a shingle beach (Sizewell Beach), which shelves into the offshore area of the main development site.
  - Sizewell B Relocated Facilities – This area encompasses land within and adjacent to the existing Sizewell B nuclear power station and is characterised by buildings and infrastructure associated with the operational nuclear power station. Whilst there are some landscaped areas, it displays a strong planned and industrial character. This area also encompasses Coronation Wood, a woodland compartment with a species makeup consisting of a mix of coniferous and broadleaf trees; and Pillbox Field which comprises former arable land that has been allowed to revert to grassland.
  - Temporary Construction Area – The temporary construction area extends across woodland plantations at Dunwich Forest and Goose Hill and relatively large geometric arable fields defined by hedgerows and linear

tree belts. At Black Walks, south of Lower Abbey Farm, the area comprises semi-improved acid grassland and neutral grassland with scattered scrub. Fields of improved pasture are characteristic of land in the vicinity of Upper Abbey Farm (west of Bridleway 19) and north of Lover's Lane. Semi improved grassland and acid grassland are also noted at Broom Covert and the land south of Sandy Lane and north of Sizewell Gap.

- LEEIE – This area is located on the eastern edge of Leiston and comprises arable fields defined by hedgerows and hardstanding and rail/road infrastructure at Sizewell Halt.
- Offshore component – This area of the main development site extends seaward from Sizewell Beach and includes the open water environment of Sizewell Bay, in which there are no significant structures or features above sea level.

2.2.5 The Sizewell site was nominated by EDF Energy and assessed by the Government by way of a Strategic Siting Assessment (SSA) and an Appraisal of Sustainability (AoS), which assessed the sustainability of the NPS for Nuclear Power Generation (EN-6), taking account of potential alternative strategies and the potential impacts of nominated sites, provided in **Section 3** of this **Statement**. The location and characteristics of the site were contributory factors in its selection as a potentially suitable site for a nuclear power station.

## 2.3 The Associated Development Sites

2.3.1 Full details of off-site associated development are set out in **Volumes 3 to 9** of the **Environmental Statement** (Book 6) and in the site-specific **Planning Statements** appended in **Appendix B - H** to this **Statement**.

### a) Northern Park and Ride at Darsham

2.3.2 The site of the Northern Park and Ride at Darsham is approximately 29.5ha in size and is located to the west of the village of Darsham and the A12, to the east of the East Suffolk line and to the north of Darsham railway station. The site is approximately 9km to the north-west of the main development site. The site predominately comprises agricultural land, and also includes highway land on the eastern side of the site along the A12.

2.3.3 The western boundary of the site is defined, in part, by the East Suffolk railway line and Little Nursery, a parcel of semi-natural broadleaved woodland. The northern boundary is defined by agricultural fields and Willow



Marsh Lane, except at the north-eastern corner where the site's boundary crosses Willow Marsh Lane and encompasses a section of the A12. The eastern boundary is defined by the A12 at the northern and southern end and follows the line of the rear boundaries of the properties along the A12 (Moate Hall, Darsham Cottage, and White House Farm Bed and Breakfast). The site encompasses the A12 carriageway and pavement in part, including existing abnormal load lay-bys to the south-east.

- 2.3.4 The surrounding area is predominantly comprised of agricultural fields, separated by hedgerows and pockets of woodland, with the closest residential properties located along the northbound A12. Darsham service station and Darsham Nurseries, Shop and Cafe are located opposite the site to the east, adjacent to the southbound A12 carriageway.
- 2.3.5 The topography of the site slopes generally north to south, occupying a local ridgeline running east to west towards the valley of the River Minmere and the River Yox.

b) [Southern Park and Ride at Wickham Market](#)

- 2.3.6 The site of the Southern Park and Ride at Wickham Market is located to the north of Lower Hacheston, and to the north-east of Wickham Market. The site comprises approximately 26ha, of which 18ha is Grade 3 arable. The remaining part of the site comprises the A12 to the south, and a section of the B1078 between Fiveways roundabout and Station road.
- 2.3.7 The eastern and western site boundaries for the park and ride facility element of the proposal follow the existing field boundaries. The northern boundary cuts horizontally from west to east across a field, and the southern boundary aligns with the northern edge of the A12 embankment and northbound slip road. The remaining part of the site, for the highway improvements, largely follows the route of the A12 and B1078.
- 2.3.8 Four wooded copses lie along the outer edges of the site along the eastern, northern and western boundaries, including Wonder Grove and Whin Belt.
- 2.3.9 The surrounding area is dominated by agricultural fields separated by hedgerows, and a number of small settlements, including Marlesford, Wickham Market and Lower Hacheston.
- 2.3.10 The topography of the site slopes gradually towards the south.

### c) Two Village Bypass

- 2.3.11 The proposed route of the Two Village Bypass would be approximately 2.4km in length and would be located to the south and east of the villages of Farnham and Stratford St Andrew. The route would depart the A12 to the east of Stratford St Andrew and re-join the A12 to the east of Farnham at the A12/A1094 Friday Street junction.
- 2.3.12 The site of the Two Village Bypass predominately comprises Grade 2 to Grade 4 agricultural land (very good to poor) and hedgerows. The River Alde also flows through the site from north to south.
- 2.3.13 There are two main settlements which sit to the west of the proposed route, Stratford St Andrew and Farnham. There are also a number of dispersed farmsteads along the route, with the closest residential properties being at Friday Street Farm to the north-east; Mollett's Farm to the north-west; Farnham Hall, Pond Barn Cottages and Hill Farm to the south of Farnham; and Parkgate Farm and properties along the A12 at the western end of the route

### d) Sizewell Link Road

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

e) **Yoxford and Other Highway Improvements**

2.3.18 This associated development is spread across a number of sites covering road junctions and highways across the East Suffolk (formerly Suffolk Coastal) district, from Bramfield to the north to Wickham Market to the south.

2.3.19 The sites are:

- the junction of the A12 and B1122 (Yoxford Roundabout) – an existing roundabout and roadside vegetation located to the east of Yoxford on the junction of the B1122 (Middleton Road) and the A12;
- improvements at the A1094/B1069 junction south of Knodishall - a single carriageway priority T-junction located approximately 2.6km south-west of Knodishall, and 1.1km south-east of Friston;
- improvements at the A12/A144 junction south of Bramfield – a rural ghost island priority T-junction situated approximately 2.7km south-east of Bramfield, and 3.2km north-east of Yoxford; and
- improvements at the A12/B1119 junction at Saxmundham - a ghost island staggered crossroads on the A12 situated 1.1km west of Saxmundham and 1.2km south of Carlton.

f) **Freight Management Facility**

2.3.20 The Freight Management Facility site is approximately 11ha in size and is located to the north of Levington and to the south of Bucklesham, and to the south-east of the A12/A14 junction near Ipswich.

2.3.21 The site of the Freight Management Facility predominately comprises Grade 3 and 4 agricultural land (good to poor), with a small infiltration pond located in the north-western corner of the site.

2.3.22 The site of the Freight Management Facility is bounded by the A14 to the north, and Felixstowe Road to the south. The eastern boundary is defined, in part, by arable land except for the north-eastern corner which is bounded by Levington Lane. The western boundary is defined by arable land.

2.3.23 The surrounding area is dominated by agricultural fields separated by hedgerows and pockets of woodland, with the closest residential property located 0.3km to the south-east of the site. Seven Hills Crematorium is located further to the west of the site, and an intervening area of land, less than 0.2km west of the site, is allocated for a high quality business park in

Policy SCLP12.20A of the emerging Suffolk Coastal Local Plan (January 2019).

2.3.24 The site of the Freight Management Facility is relatively open, and the topography of the site is generally flat with a very slight slope from west to east of up to 2-3m.

g) Rail

2.3.25 The green rail route in its entirety comprises a temporary rail extension of approximately 4.5km from the existing Saxmundham to Leiston branch line to a terminal within the main development site.

2.3.26 The green rail route is split across two main work areas:

- The part of the green rail route comprising a temporary rail extension of approximately 1.8 kilometres (km) in length from a junction with the existing Saxmundham to Leiston branch line to the proposed B1122 (Abbey Road) level crossing inclusive, provided in **Book 6, Volume 9** of the **Environmental Statement**.
- The part of the green rail route comprising a temporary rail extension of approximately 2.7 km in length between the proposed B1122 (Abbey Road) level crossing and the terminal within the main development site, provided in **Book 6, Volume 2** of the **Environmental Statement**.

2.3.27 The site predominately comprises Grade 2 arable land (very good). The land use in the surrounding area is also predominantly arable farmland, with well-defined hedgerow field boundaries, interspersed with scattered woodlands and copses.

2.3.28 The Saxmundham to Leiston branch line upgrades (including track replacement and level crossing upgrades) would take place on a single-track branch line approximately 7.5km long, running from Saxmundham to Leiston and terminating at Sizewell Halt. The line branches off the East Suffolk line at Saxmundham. The proposed rail improvement works concern the 7.2km of the line from the Saxmundham junction to the Sizewell level crossing at King George's Avenue.

### 3 Legislative and Policy Context

#### 3.1 Introduction

3.1.1 The purpose of this section is to explain the decision-making framework for the Sizewell C Project.

3.1.2 The section also explains that the need for the project has been established as a matter of national policy.

3.1.3 Whilst other policy documents can be important and relevant, the principal policy for new nuclear power stations is set out in two NPSs:

- NPS EN-1: ‘Overarching Policy Statement for Energy’, July 2011.
- NPS EN-6: ‘National Policy Statement for Nuclear Power Generation’, July 2011.

3.1.4 This **Planning Statement** explains the role and weight of the NPSs, having regard to the Government’s announcement in December 2017 that it was beginning the process towards designating a new NPS for nuclear power generation.

3.1.5 Accordingly, this section begins by explaining the legislative and policy context before summarising the consequent approach to decision making in this case. The remainder of the section then assesses the consequences for the decision maker of the following matters:

- NPS EN-1 and EN-6: background and summary.
- Established need.
- NPS EN-1 and EN-6: current role and status.
- The identification of Sizewell C.
- Assessment principles and generic impacts.
- Other planning policy considerations.
- Other legislative requirements.

## 3.2 Legislative and Policy Context

3.2.1 The regime established by the Act for NSIPs is clear that the primary policy considerations are set out in a series of NPSs. As NPS EN-1 explains:

*“1.1.1 This NPS sets out national policy for the energy infrastructure defined in Section 1.3 below...for such applications this NPS, when combined with the relevant technology-specific energy NPS, provides the primary basis for decisions by the IPC.<sup>2</sup>”*

3.2.2 In particular, NPSs are intended to assist the process of determining applications for nationally significant infrastructure by settling certain important issues as a matter of policy so that those issues do not need to be debated in the consideration of the application. For example, the White Paper for Nuclear Power in 2008 (Ref 1.12) referred directly to the then emerging DCO process, including proposals to establish the IPC to determine applications for major infrastructure proposals within the context of new NPSs. The Nuclear White Paper then explained:

*“3.4 The Government’s intention is that the inquiry phase of any application for a new nuclear power station should examine the proposals in the context of the national strategic or regulatory material considerations, which will already have been established through our facilitative action. It should examine the local benefits of the development and how local impacts of the construction and operation of the plant can be minimised. The purpose of our facilitative action is, therefore, to handle these national strategic and regulatory material considerations and enable the consideration of the proposal to progress effectively and efficiently.”*

3.2.3 As would be expected for policy with such status, legislation provides a particular role for NPSs and sets out exacting requirements for their preparation. In particular, the Act provides that:

- the Secretary of State may designate a statement as an NPS if it is issued by the Secretary of State and sets out national policy for a specified description of development (section 5(1));

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<sup>2</sup> By virtue of the Localism Act 2011, the decision making role of the IPC has now been passed to the Secretary of State.

- any NPS must first be subject to an appraisal of sustainability (section 5(3));
- if an NPS sets out policy in relation to a particular description of development, the NPS must set out criteria to be taken into account in the design of that description of development (Section 5(6));
- any NPS must give reasons for the policy it sets out (section 5(7));
- any NPS must explain how the NPS takes account of the Government's policy in relation to mitigation of and adaption to climate change (section 5(8)) and must have regard to the desirability of mitigating and adapting to climate change and achieving good design (section 10(3));
- any NPS must be subject to the specific consultation and publicity set out in Section 7) and the parliamentary requirements set out in Section 9; and
- any NPS must be kept under review (section 6).

3.2.4 Consequently, in examining a development consent application made for an NSIP, section 87(3) of the Act provides that the examining authority may disregard representations where they relate to the merits of policy set out in an NPS and Section 106(1) provides that the Secretary of State may do the same in deciding an application. NPSs, therefore, have a deliberate and very particular role in the determination of DCO applications.

3.2.5 Where an NPS “has effect”, section 104(3) of the Act requires that the Secretary of State must decide an application for an NSIP in accordance with the relevant NPS, except in a limited number of specified circumstances. Section 104(2) provides that in deciding the application, the Secretary of State must have regard to a relevant NPS, the appropriate marine policy documents (if any), any local impact report, any matters prescribed in relation to the development and any other matters which the Secretary of State thinks are both importance and relevant to the decision.

3.2.6 Where no NPS has effect, section 105(2) of the Act provides that in deciding the application, the Secretary of State must have regard to any local impact report, any matters prescribed in relation to the development and any other matters which the Secretary of State thinks are both important and relevant to the decision.

### 3.3 The Approach to Decision Making in this Case

- 3.3.1 On 7 December 2017, the Government published a Written Statement on Energy Infrastructure (ref. HLWS316) (2017 Ministerial Statement), which reiterated the continuing need for new nuclear:

*“New nuclear power stations have an important role to play. As confirmed in the Industrial Strategy, nuclear is a vital part of our energy mix, providing low carbon power now and into the future. The Government’s framework to bring forward new nuclear power stations was established in the 2008 White Paper on Nuclear Power, as was the principle the Government should take active steps to help facilitate the construction of new nuclear.*

*The overarching National Policy Statement (“NPS”) for Energy (“EN-1”) published in July 2011, made clear that nuclear power is a low-carbon, proven technology which can play an important role increasing the resilience and diversity of the UK’s energy system. The assessment of the need for new electricity generation carried out to support EN-1 remains valuable and continues to be relevant.*

*My Department’s annual updated energy and emissions projections state that by 2035 overall demand for electricity is expected to have increased. Therefore, with a number of the existing coal and nuclear fleet due to close by 2030, new nuclear power generation remains key to meeting our 2050 obligations. ...The need for the UK to transition to a low-carbon electricity market is underlined by the 2015 United Nations Framework Convention on Climate Change (“UNFCCC”) Paris Agreement. The Government believes that it is important that there is a strong pipeline of new nuclear power to contribute to the UK’s future energy system.”*

- 3.3.2 The 2017 Ministerial Statement explained that the Government had published a Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a NPS for Nuclear Power between 2026-2035, as the beginning of a process towards designating a new NPS for nuclear plants expected to be deployed after 2025 and capable of deployment by the end of 2035 and with over 1GW of single-reactor electricity generating capacity (Ref. 1.13).



- 3.3.3 With regard to the applicability of the existing NPSs, the 2017 Ministerial Statement explained that:

*“Government considers that the current nuclear NPS, EN-6, only “has effect” for the purposes of section 104 of the Planning Act 2008 (“the Act”) for development which forms parts of a project able to demonstrate expected deployment by the end of 2025”.*

- 3.3.4 For projects yet to apply for development consent and due to deploy beyond 2025, which includes the Sizewell C Project, the 2017 Ministerial Statement confirmed that:

*“...Government continues to give its strong in principle support to project proposals at those sites currently listed in EN-6. Even if EN-6 is considered not to have effect under section 104 of the Act for such a project, section 105 of the Act would apply to the decision on whether or not to grant development consent for the project”.*

- 3.3.5 The 2017 Ministerial Statement underlined the continued relevance of the NPSs, as follows:

*“Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant for projects which will deploy after 2025, including statements concerning the need for nuclear power – as well as environmental and other assessments that continue to be relevant for those projects. As such, in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters **where there is no relevant change of circumstances** it is likely that significant weight would be given to the policy in EN-1 and EN-6” (emphasis added).*

- 3.3.6 With regard to the applicability of the new NPS, the 2017 Ministerial Statement stated that:

*“The new NPS, once designated, will “have effect” for the purposes of section 104 of the Act for development which forms parts of a project able to demonstrate expected deployment after 2025 and before the end of 2035.*

*The Government also considers that a published new NPS in draft form would be considered as relevant to a decision on whether or not to grant development consent under section 105 of the Act”.*

- 3.3.7 In July 2018 the Government published its response to the consultation following its consideration of the consultation responses. The Government’s Response (Ref. 1.69) reiterated the statements made in the 2017 Ministerial Statement and confirmed again that the Government “*continues to believe nuclear has an important role to play in the UK’s energy future as we transition to the low-carbon economy*” (paragraph 3.9). It explained that the proposed process for assessing and designating potential sites included carrying the list of potentially suitable sites from EN-6 through to the new NPS subject to them meeting the updated siting criteria and updates of their environmental statements. It further explained that there would be no window for new site nominations until the 2020s. Annex II of the response to confirmed that the “*Government’s view is that those sites listed in EN-6 continue to be those sites which can deploy the soonest and are likely to be the only sites capable of deploying a nuclear power station by 2035*” (paragraph II.4).
- 3.3.8 On this basis, the Government considers that neither NPS EN-1 nor NPS EN-6 “*has effect*” for the Sizewell C DCO application and if the decision on the application were made today it would be made pursuant to Section 105 of the Act. However, EN-1 and EN-6 incorporate information, assessments and statements, including concerning the need for nuclear power, which continue to be important and relevant to the Sizewell C Project. For reasons which are explained further below, there has been no relevant change of circumstances and therefore significant weight is considered to apply to the policy in NPS EN-1 and EN-6.

## 3.4 NPS EN-1 and EN-6

- 3.4.1 Where an NPS is identified as being important and relevant to a decision, and significant weight attaches to it, the decision-maker should appropriately have regard to the NPS as the primary source of policy in determining the application. This is not least because NPSs seek to set out all relevant government policy in one place.
- 3.4.2 Notably, there is no obligation on the decision maker to have regard to any other statements of national policy. NPS EN-1 explains at paragraph 4.1.5 that the NPS is intended to make existing policy clearer and more transparent and:

*“The energy NPSs have taken account of relevant Planning Policy Statements (PPSs) and older style Planning Policy Guidance Notes (PPGs)...”.*

- 3.4.3 Despite the subsequent cancellation of PPSs and PPGs and their replacement with the National Planning Policy Framework (NPPF) (Ref 1.14), the principle that the NPSs encapsulate all relevant national planning policy is confirmed by the NPPF 2019 (Ref. 1.15) at paragraph 5 which explains that the NPPF “*does not contain specific policies for nationally significant infrastructure projects*” and that NSIPs “*are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)*”.
- 3.4.4 Similarly, it is notable that the Act does not incorporate section 38(6) of the Planning and Compulsory Purchase Act 2004 (Ref. 1.16) (either in section 104 or section 105 of the Act), which provides the principal basis in law for the determination of town and country planning applications – namely that they must be determined in accordance with the development plan, unless material considerations indicate to the contrary. The local development plan, therefore, is not the starting point for the consideration of the DCO application and the extent to which it is deemed material is a matter for the Secretary of State.
- 3.4.5 There are three principal characteristics of the NPSs which are of particular significance to this application and these are their provisions in relation to:
- Need.
  - Sites, including Sizewell C.
  - Assessment Principles.
- 3.4.6 This **Planning Statement** assesses the application proposals comprehensively against the terms of the NPSs’ Assessment Principles.
- 3.4.7 In this section of the **Planning Statement**, particular attention is given to the significance for the Secretary of State’s decision of the terms of the NPSs in relation first to need and secondly to sites. In respect of each it is also appropriate to consider whether there has been a relevant change of circumstances which would call into question whether the assessment of need or sites set out in the NPSs remains up to date.

### 3.5 NPS EN-1 and EN-6: Established Need

3.5.1 As set out further below, NPS EN-1 and EN-6 establish an urgent need for new nuclear power generation in the UK.

3.5.2 The statements of established need set out in the NPSs followed an extensive review of national energy requirements.

3.5.3 In the period 2005-2008, the Government undertook a comprehensive review of national energy policy, within the context of its policies for climate change. As part of that review, a series of consultation documents and subsequent policy statements were published relating to the UK's energy needs and the strategy for meeting those needs. These included the following:

- *'The Energy Challenge'* Energy Review Report, July 2006 (Ref. 1.17).
- *Meeting the Energy Challenge'*: A White Paper on Energy, May 2007 (Ref. 1.18).
- Consultation paper *'The Future of Nuclear Power: The Role of Nuclear Power in a Low Carbon Economy'*, May 2007 (Ref. 1.19).
- *'Meeting the Energy Challenge'*: A White Paper on Nuclear Power, January 2008 (Ref. 1.20).

3.5.4 The Energy White Paper, May 2007 and the Nuclear Power White Paper, January 2008 established that new nuclear power stations should have a role to play in this country's future energy mix, alongside other low-carbon sources. In particular, the White Paper on Nuclear Power included a foreword from the then Prime Minister which advised:

*"More than ever before, nuclear power has a key role to play as part of the UK's energy mix. I am confident that nuclear power can and will make a real contribution to meeting our commitments to damaging climate change."*

3.5.5 And the separate foreword from the then Energy Minister advised:

*"Against the challenges of climate change and security of supply, I believe that the evidence in support of nuclear power is compelling and that we should positively embrace the opportunity of delivering this important part of our energy policy."*

- 3.5.6 The White Paper itself established what the Government would do to implement its policy, i.e.:

*“3.1 The Government has reached the conclusion that new nuclear power stations can help the UK to meet its objectives on climate change and energy security. We conclude, therefore, that it would be in the public interest to allow energy companies the option to invest in new nuclear power stations. The Government will take a number of facilitative actions to reduce regulatory and planning risks associated with investing in new nuclear power stations and to ensure that owners and operators of new nuclear power stations set aside funds over the operating life of the power stations to cover the full costs of decommissioning and their full share of long-term waste management and disposal costs. These facilitative steps...will reduce uncertainties in the pre-construction period through improvements in the regulatory and planning processes.”*

- 3.5.7 One purpose of the NPSs is to settle issues relating to the need for different types of energy infrastructure. In this respect, EN-1 advises:

*“3.1.3 The IPC should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this (NPS).”*

- 3.5.8 The principle of the need for new nuclear plants such as Sizewell C, therefore, is established in the NPS. The weight to be given to that need, however, is important and is further described within the NPSs. In this respect, EN-1 advises:

*“3.2.3 This Part of the NPS explains why the Government considers that, without significant amounts of new large-scale energy infrastructure, the objectives of its energy and climate change policy cannot be fulfilled...This Part also shows why the Government considers that the need for such infrastructure will often be urgent. The IPC should therefore give substantial weight to considerations of need. The weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project’s actual contribution to satisfying the need for a particular type of infrastructure.”*

3.5.9 NPS EN-1 explains that there is an urgent need for new electricity NSIPs and Part 3 of EN-1 sets out the principal considerations which have informed this conclusion. The NPS should be read as a whole but the principles can be summarised briefly as follows:

- in the UK at least 22 GW of existing electricity generating capacity will need to be replaced in the coming years, particularly by 2020. This amounts to about a quarter of the UK's current electricity generating capacity of 85 GW (paragraph 3.3.7);
- in addition, the overall demand for electricity is likely to increase as significant sectors of energy demand switch from being powered by fossil fuels to using electricity, so that total electricity consumption could double by 2050 (paragraph 3.3.14);
- forecasts suggest that a minimum need of 59 GW of new electricity capacity needs to be provided by 2025 to avoid the severe social and economic disruption that would be caused by insufficient electricity supply (paragraph 3.3.19 and 3.3.23); and
- stretching targets for renewable energy are set out in the NPS but, even if these are achieved, there is a balance of 18 GW to come forward from non-renewable capacity and it is Government policy that nuclear power should be free to contribute as much as possible towards meeting the need for around 18 GW of new non-renewable capacity by 2025 (paragraph 3.3.22).

3.5.10 Consequently, the NPS is in no doubt about the need for new electricity capacity and, in particular, low carbon capacity:

*“3.3.15 In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to 15 years, given the crucial role of electricity as the UK decarbonises its energy sector.”*

3.5.11 The NPS provides specific conclusions in relation to nuclear energy generation, as follows:

- for the UK to meet its energy and climate change objectives, the Government believes there is an urgent need for new electricity generation plant, including new nuclear power. Nuclear power generation

is a low carbon, proven technology, which is anticipated to play an increasingly important role as we move to diversify and decarbonise our sources of electricity (paragraph 3.5.1); and

- it is Government policy that new nuclear power should be able to contribute “**as much as possible**” to the UK’s need for new capacity (paragraph 3.5.2) (emphasis added).

3.5.12 The NPS identifies a number of advantages of nuclear power generation including:

- new nuclear will help to secure a diverse mix of technology and fuel sources, which will increase the resilience of the UK’s energy system. It will reduce exposures to risk of supply interruptions and of sudden and large spikes in electricity prices (paragraph 3.5.3);
- nuclear fuel fabrication is a stable and mature industry with a separate supply chain from gas and coal (paragraph 3.5.4); and
- fluctuations in fuel prices do not significantly affect the cost of electricity from nuclear power stations and the relatively low generation costs of nuclear power means that it can place downward pressure on the long-run wholesale prices of electricity (paragraph 3.5.4).

3.5.13 Consequently, the NPS confirms the urgency of the need for nuclear power in the following terms:

*“...3.5.9...it is important that new nuclear power stations are constructed and start generating as soon as possible and significantly earlier than 2025...The Government believes that it is realistic for new nuclear power stations to be operational in the UK from 2018, with deployment increasing as we move towards 2025”*

3.5.14 Further confirmation of the urgency for new nuclear generation is set out in NPS EN-6 which provides specific national policy for nuclear power generation. The NPS explains that, in order to be considered potentially suitable and therefore listed in the NPS, sites had to be shown as being capable of deployment by the end of 2025:

*“2.2.2 However, given the urgent need to decarbonise our electricity supply and enhance the UK’s energy security and diversity of supply, the Government believes that new*

*nuclear power stations need to be developed significantly earlier than the end of 2025.”*

- 3.5.15 Accordingly, NPS EN-6 advises that the decision maker should give “*substantial weight*” to the benefits (including the benefit of displacing carbon dioxide emissions) that would result from a DCO application for a nuclear power station (paragraph 2.2.24).
- 3.5.16 The references cited in the NPS to 2025 and to “*the next 10 to 15 years*” are important in the context of the Government’s 2017 Ministerial Statement, provided in **Section 3.3** of this **Statement**, which states that Government considers that the NPS only has effect for nuclear projects likely to be deployed before 2025. The 2025 date is used in the NPS to emphasise the urgency of the need for new nuclear generation. It does not follow that the need is any less after 2025, indeed the fact that the need has not been met as quickly as policy desired (and that sufficient sites have not come forward quickly enough) makes the need all the more urgent now. In its July 2018 response to the Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a NPS for Nuclear Power between 2026-2035, the Government confirmed again that the Government “*continues to believe nuclear has an important role to play in the UK’s energy future as we transition to the low-carbon economy*” (paragraph 3.9).

### 3.6 Need – Changes in circumstances?

- 3.6.1 As set out in **Section 3.3** of this **Statement**, the 2017 Ministerial Statement explained that significant weight should be given to the policy in NPS EN-1 and EN-6 where there has been no relevant change of circumstances.
- 3.6.2 In relation to the need for new nuclear power generation, up to date circumstances can be examined to test whether circumstances have changed in a way that would lead to a materially different conclusion (see further below).
- 3.6.3 Before doing so, however, it is important to note that the 2017 Ministerial Statement itself confirms the Government’s view that “*the assessment of the need for new electricity generation carried out to support EN-1 remains valuable and continues to be relevant*” and that “*new nuclear power generation remains key to meeting our 2050 obligations.*”
- 3.6.4 The Government has also taken the opportunity to confirm the up to date status of the need assessments set out in the NPSs and the status of NPS EN-1. On 4 October 2019 the Secretary of State’s decision in respect of a DCO application for a new gas-fired power station at Drax was published (Ref. 1.21). Paragraphs 4.9-4.20 confirm the Secretary of State’s up to date



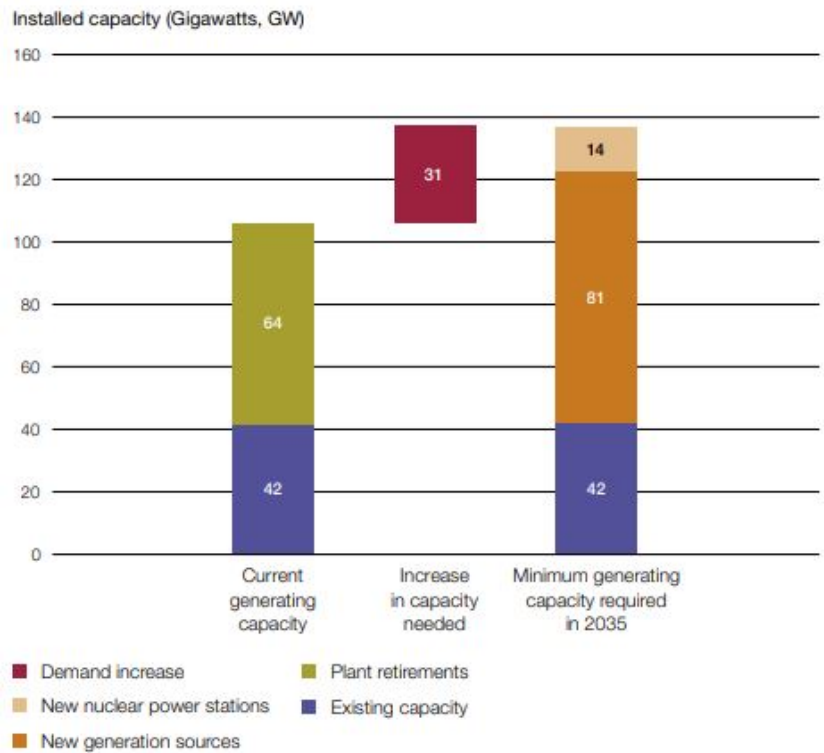
view that the need assessment set out in NPS EN-1 is both up to date and authoritative.

- 3.6.5 These important matters which are established as a matter of up to date policy are confirmed by recent studies and events.
- 3.6.6 There is, for instance, expected to be a significant increase in demand for electricity over the coming decades. The National Audit Office in their 2016 report ‘Nuclear power in the UK’ (Ref. 1.22) state that current generating capacity in the UK, from all sources, amounts to 108 GW. The same report predicts an increase in demand over the next two decades of 31GW, due to a combination of demographic change, economic growth and the electrification of heat and transport. At the same time, the National Audit Office identifies that c. 64GW – i.e. over 60% of current UK generating capacity – is expected to be lost due to plant retirements by 2035. This comprises coal-fired power stations closing due to the need to reduce carbon emissions, and nuclear power stations reaching the end of their operational life. Indeed, all of the UK’s current nuclear power stations are due to close by 2035 when Sizewell B also reaches its planned decommissioning date.

**Plate 3.1: The UK’s energy challenge up to 2035**

The UK’s energy challenge up to 2035

The Department projects that electricity demand may increase at the same time that a large proportion of existing generating capacity retires



**Notes**

- 1 The Department projects a range of scenarios for the future of electricity generation. This figure uses the scenario based on its central estimate of economic growth and fossil-fuel prices and shows the generating capacity required to meet the Department’s security of electricity supply and decarbonisation objectives.
- 2 The figure shows total installed capacity – the maximum electrical output that power generators can produce unadjusted for plant availability and outages.
- 3 New generation sources includes 17 GW from European electricity interconnectors.

Source: National Audit Office analysis of Department of Energy & Climate Change energy and emissions projections data

3.6.7 The latest Department for Business, Energy and Industrial Strategy (BEIS) *Updated energy and emissions projections: 2018* (Ref. 1.23) predict a steady increase in demand for electricity (final consumption) by around 19% by 2035 compared to 2019 consumption<sup>3</sup>. Notably, the rise in the number of electric

<sup>3</sup> Derived from Annex F which identifies Electricity final consumption at 24,823ktoe at 2019 and 29,649ktoe at 2035 (i.e. a 19% increase). <https://www.gov.uk/government/publications/updated-energy-and-emissions-projections-2018>

vehicles is likely to continue, with as many as 36 million such vehicles expected to be on UK roads by 2040 (Ref. 1.24).

- 3.6.8 Alongside this picture of increasing demand and diminishing supply is the need to shift toward low carbon sources of energy. At the time of designation of NPS EN-1 and EN-6, the UK had set itself a legally binding target of reducing net greenhouse gas emissions by 80% from 1990 levels by 2050. This was set out in the Climate Change Act 2008 (Ref. 1.25). In 2015 the Government went further by signing the United Nations Framework Convention on Climate Change Paris Agreement (Ref. 1.26). Article 2 of this Agreement commits the signatories to:

*“Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change”.*

- 3.6.9 The Paris Agreement was ratified by the UK Parliament in November 2016.
- 3.6.10 In October 2018 the Government requested advice from the Committee on Climate Change as to whether the UK’s target for greenhouse gas (GHG) emission reduction (of 80% from 1990 levels by 2050, required by the Climate Change Act 2008) should be revised. The Committee on Climate Change advised in May 2019 that it should, and the new target should be “net-zero” emissions by 2050 (in their report *Net Zero the UK’s contribution to stopping global warming*). In June 2019, the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref. 1.27) was brought into force, which legally changed the Government’s greenhouse gas emissions target to at least 100% lower emissions by 2050 from 1990 baseline levels.
- 3.6.11 Therefore, the need is for significant new electricity generating capacity that accords with the existing and emerging targets for emissions reduction. Renewable energy sources (wind, solar, tidal, geothermal) are expected to make an increasing contribution, but are incapable of meeting forecast demand. Furthermore, most renewable energy supplies depend upon weather conditions: low winds or overcast days reduce the amount generated. The need to ensure continuous supply means there must be excess generating capacity to account for such fluctuations. Therefore, the more renewable energy that is part of the energy mix, the more overall capacity is required to guarantee continuous supply.
- 3.6.12 The final driver of need is the requirement for energy security. Over the course of the 20th century the UK moved from reliance on indigenous coal reserves to supplies of coal, oil and gas from overseas. With this comes a

vulnerability to political shocks beyond the control of the UK Government, the 1970s Organisation of the Petroleum Exporting Countries induced oil crisis being the most obvious example. Energy security as identified in NPS EN-1 comes from diversity of supply – a balanced mix of generating technologies without over-reliance on one particular type. Energy security also comes from having sufficient generating capacity, including a margin of spare capacity capable of accommodating unforeseen fluctuations in demand.

- 3.6.13 Nuclear power has the twin advantages of being low carbon and capable of delivering electricity at scale. It is for these reasons that it forms a key part of the Government’s energy strategy for meeting electricity needs. The Government’s Industrial Strategy (*Building a Britain Fit for the Future*), published in November 2017 (Ref. 1.28), states that:

*“Nuclear is a vital part of our energy mix, providing low carbon power now and into the future” (page 206).*

- 3.6.14 The Clean Growth Strategy (October 2017) (Ref. 1.29) also identifies nuclear power as a key part of the future energy mix, supporting delivery of EDF Energy’s Hinkley Point C power station, and committing to discussions with developers to secure a competitive price for future projects.

- 3.6.15 The latest report from the Committee on Climate Change, Reducing UK Emissions – 2019 Progress Report to Parliament (Ref. 1.30), reaffirms the need for nuclear power, as part of a balanced energy mix:

*“Alongside new renewables, technologies which can offer firm and flexible power, such as nuclear and Carbon Capture and Storage, will be required for a power system in 2050 contributing fully to achieving overall net-zero emissions. The scale of deployment required by 2050 will necessitate continued investment in these options between now and 2050.”*

- 3.6.16 These factors confirm the national importance of meeting the forecast growth in demand, the need to replace retiring generating capacity, the need to maximise energy security and the importance of affordability. These objectives also need to be met at the same time as enabling achievement of the UK’s commitment to reduce carbon emissions results. It is unsurprising that the 2017 Ministerial Statement confirmed the important role of new nuclear generation and that the assessment of need which underpins NPS EN-1 remains valuable and relevant. New nuclear is key to meeting the Government’s commitments to carbon reduction by 2050. At the time of designation of the NPSs, that commitment was less exacting than it is today but the NPS nevertheless considered it appropriate to identify eight sites as

potentially suitable for new nuclear generation and to make clear that they were not alternatives to each other (NPS EN-6 paragraph 2.5.4). Of those sites, only Hinkley Point C is under construction and the forecast reduction in the capacity of existing plants is now closer. Against this background, it is unsurprising that the Government has confirmed its continuing support for those sites listed as potentially suitable in the NPS.

3.6.17 There is no relevant change of circumstances which would cause anything other than significant weight to be given to government policy in NPS EN-1 and EN-6.

3.6.18 Accordingly, this **Planning Statement** attaches significant weight to the policy, including statements of need, set out in NPS EN-1 and EN-6 and considers them to be up to date in that respect. It considers that the urgent need for new nuclear generation is established and that there is no requirement, for example, to consider the relevance of other technologies as alternatives.

### 3.7 NPS EN-1 and EN-6: Site Specific Assessment

3.7.1 For nuclear power stations, the new approach to planning for nationally important infrastructure heralded by the Act involved the identification of specific sites.

3.7.2 The Energy White Paper of 2007 and the Nuclear Power White Paper of 2008 put in train a series of actions for this purpose. Those steps taken in accordance with the White Papers included the following:

- consultation on draft criteria for a Strategic Siting Assessment (SSA) of potential sites for new nuclear power stations;
- undertaking a Strategic Environmental Assessment (SEA) as part of the SSA process and a Habitat Regulations Screening Report;
- inviting nominations for potential sites to be considered in the SSA and consulting on a draft list of nominated sites, followed by the assessment of appropriate nominated sites against the SSA criteria and a further public consultation exercise inviting views on those nominated sites judged by the Government to meet the criteria;
- undertaking an Alternative Sites Study (a Government-commissioned strategic level screening exercise to identify whether there are any other sites in England and Wales that are potentially suitable for the deployment

of new nuclear power stations before the end of 2025 and which had not been nominated);

- preparing an Appraisal of Sustainability (AoS) and a Habitat Regulation Assessment at a strategic level for each site and for an emerging NPS on nuclear power;
- consultation on draft NPSs;
- taking advice from specialists such as the Nuclear Regulators, including on the assessment of sites against specific criteria;
- parliamentary scrutiny of the NPS; and
- designation of NPS EN-6 listing potential suitable sites for new nuclear development.

3.7.3 Following exhaustive review through the SSA and Alternative Sites Study, NPS EN-6 states that only those sites listed in part 4 of the NPS are potentially suitable for the deployment of new nuclear power stations by the end of 2025.

3.7.4 Part 4 of the NPS identifies eight potentially suitable sites including Sizewell (paragraph 2.3.2 – see further below). As a result of the SSA and the Alternative Sites Study, the Government stated in NPS EN-6 that it does not believe that there are any alternatives to the listed sites that are potentially suitable for the deployment of new nuclear power stations in England and Wales before 2025 (EN-6 paragraph 2.4.3). Accordingly, the NPS considers that all eight sites are required to be listed in the NPS so that they are each available as a potential opportunity for nuclear development subject to consideration through the DCO process (paragraph 2.3.2).

3.7.5 The SSA criteria for site assessment were based upon selected exclusionary and discretionary criteria. Exclusionary criteria were those which, if breached, would categorically exclude all or part of a site from further consideration (for example demographic risk or proximity to certain military activities). Discretionary criteria were those criteria that the Government considered, for various reasons, could, either singly or in combination, make all or part of a site unsuitable for a new nuclear power station but which needed to be carefully considered in order to come to a conclusion as to the site's strategic suitability (for example, flood risk and proximity to hazardous facilities).

- 3.7.6 The outcome of the AoS was published in October 2010 (Appraisal of Sustainability of the revised draft nuclear National Policy Statement: Main Report) (Ref. 1.31). The AoS concluded that the preferred approach should be the preparation of a Nuclear NPS, based on the case for nuclear in relation to other alternatives (paragraph S.8.7).
- 3.7.7 The AoS reviewed the sustainability characteristics of the potentially suitable new nuclear sites then proposed to be identified in the draft NPS and identified key issues that were recommended to be identified for the decision maker to consider when determining individual applications for nuclear power stations.
- 3.7.8 Of particular relevance to Sizewell, the AoS identified “*potential likely effects*” to include (paragraph S.12.15 and S.12.16):
- adverse effects on nationally designated landscape areas. The site lies within an AONB and is part of a Heritage Coast and this would be difficult to mitigate;
  - adverse effects on at least five national and internationally protected nature conservation sites; and effects on water quality, and fish/shellfish populations in nearby coastal waters. Possible mitigations include avoidance of need to develop in or disturb sensitive areas; suitable design and location of coastal and fluvial flood defence works and marine landing station; suitable construction methods; and suitable design and location of cooling water abstraction and discharge points;
  - positive effects associated with long-term employment and enhanced prosperity for local communities; and
  - adverse effects from Bradwell and Sizewell on the European designated site of the Outer Thames Estuary based on indications that there may be interactions and cumulative effects on biodiversity.
- 3.7.9 Annex C to NPS EN-6 contains the outcomes of the individual site assessments referred to above. The Annex provides the results of the assessment of the nominated Sizewell C proposal against the SSA criteria which reflects advice from specialists and the regulators.
- 3.7.10 **Table 3.1** below shows the list of criteria considered for Sizewell C and a summary of the assessment results.

**Table 3.1: Strategic Siting Assessment**

SSA criteria.	Assessment Summary.
Deployment by end of 2025.	Passes: credible for deployment by the end of 2025 “regardless of whether it is deployed by that date”.
Demographics	Passes.
Proximity to military activities.	Passes.
Flooding, storm surge and tsunami.	Passes. Taking into account the advice of the Environment Agency that any new nuclear power station on the site could potentially be protected against flood risk throughout its lifetime, including the potential effects of climate change, storm surge and tsunami and considering possible countermeasures. The impacts of possible countermeasures will need to be considered when an application comes forward.
Coastal processes.	Passes. Understanding the long term trends which are occurring regarding erosion at this site will need to include an assessment of the effects on the surrounding area.
Proximity to hazardous industrial facilities and operations.	Passes.
Proximity to civil aircraft movements.	Passes.
Internationally designated sites of ecological importance.	<p>Passes. The potential for adverse effects on a number of European Sites cannot be ruled out. The Government notes the scope for avoidance and mitigation identified in the Habitats Regulation Assessment and the need for more detailed studies should an application come forward.</p> <p>Annex A of the NPS sets out that the Government has concluded that there is an Imperative Reason of Overriding Public Interest that favours the inclusion of Sizewell C in the Nuclear NPS despite the inability to rule out adverse effects on European Sites at this stage.</p>
Nationally designated sites of ecological importance.	<p>Passes. Given the scope for mitigation it is reasonable to conclude that it may be possible to avoid or mitigate impacts to an extent.</p> <p>The AoS highlighted that the site includes land take from Sizewell Marshes SSSI. However, given the need to ensure sufficient sites are available for development, the Government considers that the site meets the criterion. EN-</p>



SSA criteria.	Assessment Summary.
	1 sets out matters to which detailed consideration will need to be given at the project level.
Areas of amenity, cultural heritage and landscape value.	<p>Passes. The AoS noted that the existing power station structures are already prominent features within the AONB. Whilst the new power station would be seen in that context, there are likely to be some long distance lasting adverse effects on landscape character and visual impacts on the AONB. This includes impacts from new roadways, access connections to the rail head and potential new transmission lines, as well as potential impact from new flood defences.</p> <p>In addition, there are potential effects on the setting of cultural heritage features.</p> <p>The Government notes some potential for mitigation but that some adverse effects are likely to remain. Nevertheless, given the need to ensure that sufficient sites are available, the Government does not think that these issues are sufficient to justify not including the site in the NPS.</p>
Size to accommodate operation.	Passes.
Access to suitable sources of cooling.	Passes.

3.7.11 Other factors considered during the assessment are also listed in the NPS from paragraph C.8.06. In summary, these included:

- Health: the rigorous system of regulation of any new nuclear power station should ensure that there are no unacceptable risks to the health of the local population under normal operating conditions.
- Detailed proposals for Sizewell: recognising that detailed proposals may bring forward a new road access in the Goose and Kenton Hills, or that concerns exist regarding the extent of land take or the nature of marine landing facilities, the NPS finds that these types of matters are best considered through the Sizewell C DCO application process.

- Socio-economic impacts: again, these are matters to be considered on any application.
- Transport: concerns had been expressed by some respondents that transport issues might arise for instance on the A12 at Stratford/Farnham, whilst some felt that the use of rail would be important. The NPS finds that these matters can be considered on any application against criteria set out in NPS EN-1.

3.7.12 The site assessment for Sizewell (at NPS EN-6 Annex C) concludes that Sizewell meets the SSA criteria. Regarding nationally and internationally designated sites of ecological importance and areas of amenity, cultural heritage and landscape value, the SSA recognised and could not rule out the potential for adverse impacts. However, the Government concluded that none of these factors is sufficient to prevent the site from being considered potentially suitable (paragraph C.8.126).

3.7.13 A number of matters fall to be considered in detail, therefore, through the examination of this application. However, NPS EN-1 is clear on the importance of ensuring the development of significant amounts of large-scale new energy infrastructure and that:

*"...it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. (paragraph 3.2.3)*

3.7.14 Page 261 of EN-6 Volume II identifies the nominated site for Sizewell C and is reproduced below.

Plate 3.2: Nominated site area for Sizewell C (from NPS EN-6)



3.7.15 The policy support explicitly identifies Sizewell C itself as one of only eight potentially suitable locations for a new nuclear power station (NPS EN-6 paragraphs 2.3.2 and 2.4.3-4). As identified above, that identification arose from a comprehensive process of site identification and appraisal. The purpose of that exercise was to bring clarity and confidence. Whilst the process of nomination and assessment identified issues which will need to be addressed by any application pertaining to Sizewell C, none of those issues were considered to be sufficiently serious to prevent Sizewell C being identified in the NPS. Properly undertaken, therefore, a development proposal for Sizewell C which heeds the advice emerging from the site nominations process and which limits and mitigates its impacts in accordance with the assessment principles set out in the NPS should not expect that its residual adverse effects could amount to a sufficient reason to withhold development consent. In principle, Sizewell C is identified as a site suitable for the development of a new nuclear power station.

### 3.8 Site Specific Assessment: Change in circumstances?

- 3.8.1 Whilst the urgency of the need for new nuclear generation has not diminished since the designation of the NPSs, it is also relevant to consider whether site circumstances have changed at Sizewell to such an extent that the NPS policies for Sizewell C may no longer be considered to be up to date.
- 3.8.2 In this context, it is relevant to note that the assessments which underpinned the NPS were comprehensive and recognised the presence of constraints and environmental sensitivity affecting the nominated site and its surroundings, as set out in Section 3.7 above. The physical circumstances of the site have not changed materially since its original nomination.
- 3.8.3 The SSA identified sites in England and Wales that are potentially suitable for the deployment of new nuclear power stations, and nominated areas were defined for each of those sites (as shown at **Plate 3.2**). However, paragraph 2.3.3 of EN-6 recognises that *“The boundary of the nominated area may, however, vary from the site boundary that is proposed for development consent. It was not considered reasonable to expect nominators to have established, at the time of requesting nominations, detailed lay-outs for the whole of their proposed developments, including for example any additional land needed for construction or decommissioning.”*
- 3.8.4 Paragraph 2.3.4 goes on to state that:
- “The SSA has therefore been carried out on the basis that applications for development consent may also include land additional to the boundary of the listed site for other elements of the power station, such as car parks, access roads or marine landing facilities, or for the construction and/or decommissioning of the nuclear power station.*
- 3.8.5 In its DCO application, SZC Co. has chosen to site the temporary construction area in close proximity to the main construction area in order to maximise both efficiency and safety during construction. Siting the temporary construction area in a location remote from the main construction area would not be feasible given the large quantities of construction material required and the size of components involved.
- 3.8.6 Whilst the boundary of the main development site is not identical to the nominated site area for Sizewell C set out in the SSA, this possibility was anticipated by the NPS and the proposal is in accordance with paragraphs 2.3.3 and 2.3.4.

- 3.8.7 Between December 2017 and March 2018, the Government consulted on the siting criteria and process for a new NPS for nuclear power with single reactor capacity over 1 gigawatt beyond 2025. The Government Response (July 2018) confirmed that the proposed process for assessing and designating potential sites included carrying the list of potentially suitable sites from EN-6 through to the new NPS subject to them meeting the updated siting criteria and updates of their environmental statements.
- 3.8.8 Against this background, SZC Co. nominated Sizewell in November 2018 as a site that is suitable for the deployment of a new nuclear power station by 2035. In due course, this and any other nominations will be considered in the preparation of a new NPS. As part of its nomination, SZC Co. drew attention to minor changes to the nominated site boundary, all of which remain within land under SZC Co.'s control and concluded that there were no factors or constraints that should prevent the ability of Sizewell C to be deployed as a new nuclear power station.
- 3.8.9 Further details of the evolution of the main development site boundary and the alternatives considered by SZC Co. are provided at **Volume 2, Chapter 6 (Alternatives)** of the **ES** (Doc Ref 6.2).

### 3.9 [NPS EN-1 and NPS EN-6: Applying the Policies to the Sizewell C Application](#)

- 3.9.1 The NPSs establish that the need for new nuclear power generation is urgent and that it is in the national interest that it is met as soon as is practicable. New nuclear power generation is needed to meet the nation's energy requirements, to provide security of supply and as an essential component of the Government's determination to meet pressing national carbon reduction targets, which are necessary if the country is to play its part in avoiding unacceptable levels of global climate change. Sizewell C is an appropriate location in principle to contribute to meet that need.
- 3.9.2 As explained above, whilst NPS EN-1 and EN-6 do not formally have effect to the Sizewell C DCO application, it is appropriate to treat them as providing the primary policies relevant to the determination of the application. It needs to be recognised in doing so that, whilst the policies do not technically have effect for the application, they do carry **significant** weight.
- 3.9.3 As an example of this approach, NPS EN-1 explains:

*“4.1.2 Given the level and urgency of need for infrastructure of the types covered by the energy NPSs..., the [Secretary of State] should start with a presumption in favour of*

*granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.”*

- 3.9.4 Whilst the policy presumption does not formally have effect where the decision falls to be made under section 105, it nevertheless constitutes an important and relevant consideration weighing in favour of granting development consent because it reflects the Government’s underlying assessments of need, impacts and alternatives, all of which remain directly relevant to the application.
- 3.9.5 In the same way, the overall policy approach of the NPSs carries significant weight in its treatment of the balance to be struck in relation to residual impacts from the proposed development. In the light of the strength and urgency of the need, and the absence of alternatives, it is directly relevant to note that, in identifying the potential suitability of the Sizewell C location, the Government undertook considerable assessment to assure itself of the potential suitability of sites and, in doing so, it was conscious that the consequence of the NPS was that there were likely to be some negative effects, for instance, on biodiversity, landscape/visual amenity and cultural heritage from the development of nuclear power stations (NPS EN-1 paragraph 1.7.2).
- 3.9.6 The AoS considered potential alternatives to the approach of the NPSs, including a policy regime that would place more emphasis on reducing environmental impacts. Such an approach was rejected, however, because:
- “1.7.11 Tightening the development consent policies in EN-1 to make it harder for energy infrastructure to be consented which would have adverse landscape or townscape effects would be likely to make it significantly more difficult to gain consent for a range of large scale energy infrastructure projects.”*
- 3.9.7 The same paragraph explains that such an approach was rejected, at least until such time as the need for new large-scale energy infrastructure had become very much lower. That assessment is directly material to the current Sizewell C application.
- 3.9.8 Some environmental effects from NSIP development, therefore, are expected. Each of the sites identified in NPS EN-6 as potentially suitable have been the subject of their own Strategic Siting Assessment (SSA) and the Government’s AoS and Habitats Regulations Assessment (HRA) (Ref. 1.33), which have considered each site at a strategic level, so that, at this

level at least, the potential effects of the development of each site for nuclear power generation were understood when their potential suitability was confirmed within the NPS. The assessments are helpful in identifying issues that may be raised in relation to the individual sites but, as NPS EN-1 explains:

*“1.7.2 In general, it should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs and they (the NPSs) explain ways in which this can be done; however, the impacts on landscape/visual amenity in particular will sometimes be hard to mitigate”.*

- 3.9.9 The principle of this approach remains relevant to Sizewell C, and the detailed policies of the NPSs continue to provide the relevant policy tests for the application.
- 3.9.10 The NPSs contain detailed guidance on a topic by topic basis to guide both applicants and the Secretary of State in their detailed approach to NSIPs – i.e. their design, assessment and mitigation. Based on the paragraphs set out above, however, it is apparent that, properly designed and mitigated, development of energy NSIPs such as this should be acceptable, particularly where that development gives effect to nuclear power generation on one of the listed sites.
- 3.9.11 The NPSs are also helpful in identifying those matters which are not relevant to the determination of an NSIP, principally because they have already been considered by Government or because they are subject to control through other regimes. Matters identified as not relevant for the decision maker include:
- The need for the NSIP (NPS EN-1 paragraph 3.1.3).
  - The availability of alternatives to the proposed development – either in terms of alternative technologies or alternative sites. In particular, the NPSs are clear that they do not create any requirement to consider alternatives<sup>4</sup>; that there are no alternatives to the sites listed and that

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<sup>4</sup> However, in some circumstances there are specific legislative requirements to consider alternatives, notably under the Habitats Directive.

these sites are not to be regarded as alternatives to one another (NPS EN-1 paragraph 4.4.1 and EN-6 paragraphs 2.4.3 and 2.5.4).

- The effects of any necessary Grid connection which can be promoted and assessed separately where this makes sense in terms of timescale and the delivery of the Sizewell C Project (EN-1 paragraph 4.9.2).
- Matters covered by other regulatory regimes including pollution control (EN-1 paragraph 4.10.3).
- Safety matters which are subject to other regimes (EN-1 paragraph 4.11.3).
- Health issues, in respect of which NPS EN-1 advises: “Generally those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refuse consents or require specific mitigation under the Planning Act 2008. However the IPC will want to take account of health concerns when setting requirements relating to a range of impacts such as noise” (EN-1 paragraph 4.13.5).
- The question of whether effective arrangements exist to manage and dispose of nuclear waste, because this has been addressed by the Government and the Secretary of State should not consider it further (EN-6 paragraph 2.11.4).
- Security - where the Centre for the Protection of National Infrastructure, the Office for Civil Nuclear Security (now the Office for Nuclear Regulation) or the Department of Energy and Climate Change (now the Department for Business, Energy & Industrial Strategy) are satisfied that security issues have been adequately addressed in the Sizewell C Project when the application is submitted to the Secretary of State and have confirmed this to the Secretary of State (EN-1 paragraph 4.15.3).
- Emergency planning (EN-6 paragraph 3.5.3).

3.9.12 There are, however, a large number of matters which the Secretary of State is required to consider, and these are set out under a series of topic headings in the NPSs. The acceptability of the Sizewell C Project against these



assessment principles is considered in **Sections 7, 8 and 9** of this **Planning Statement**.

3.9.13 The principle of development of a new nuclear power station at Sizewell, therefore, has been accepted and that acceptance is important and relevant and continues to carry **significant** weight. What remains is to assess the suitability of the application proposals having regard to the key effects and associated mitigation of those effects against the assessment principles set out in NPS EN-1 and NPS EN-6. These are in summary:

- Air Quality and Emissions (NPS EN-1).
- Biodiversity and Geological Conservation (NPS EN-1 and NPS EN-6).
- Coastal Change (NPS EN-1 and NPS EN-6).
- Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation (NPS EN-1).
- Flood Risk (NPS EN-1 and NPS EN-6).
- Historic Environment (NPS EN-1).
- Landscape and Visual (NPS EN-1 and NPS EN-6).
- Land Use, Including Open Space, Green Infrastructure and Green Belt (NPS EN-1).
- Noise and Vibration.
- Socio-economics (NPS EN-1 and NPS EN-6).
- Traffic and Transport (NPS EN-1).
- Waste Management (NPS EN-1).
- Water Quality and Resources (NPS EN-1 and NPS EN-6).
- Human Health and Well-being (NPS EN-6).

3.9.14 NPS EN-6 also requires the following further issues to be considered where relevant:

- proximity to civil aircraft movements;
- access to transmission networks;
- impact on significant infrastructure and resources; and
- size of site to accommodate construction and decommissioning.

3.9.15 SZC Co. has considered all of these issues in the development of its strategies and proposals for the Sizewell C Project. Each is addressed within this application for development consent. **Tables 3.2** and **3.3** provide an NPS tracker that identifies where in the submitted documents information related to each issue can be found.

**Table 3.2: Summary of generic impacts identified in NPS EN-1**

Topic	NPS paragraphs.	ES paragraphs.
Air quality and emissions.	5.2.1 – 5.2.13	<b>Volume 2, Chapter 12.</b>
Biodiversity and geological conservation.	5.3.1 – 5.3.20	<b>Volume 2, Chapters 14 and 22.</b>
Coastal change.	5.5.1 – 5.5.17	<b>Volume 2, Chapter 20.</b>
Dust, odour, artificial light, smoke, steam and insect infestation.	5.6.1 – 5.6.11	<b>Volume 2, Chapters 8 and 12.</b>
Flood risk.	5.7.1 – 5.7.25	<b>Main Development Site Flood Risk Assessment (Doc Ref. 5.2).</b>
Historic environment.	5.8.1 – 5.8.22	<b>Volume 2, Chapters 16 and 23.</b>
Landscape and visual impacts.	5.9.1 – 5.9.23	<b>Volume 2, Chapter 13.</b>
Land use including open space, green infrastructure and green belt.	5.10.1 – 5.10.24	<b>Volume 2, Chapter 15.</b>

Noise and vibration.	5.11.1 – 5.11.13	<b>Volume 2, Chapters 11 and 28.</b>
Socio-economics.	5.12.1 – 5.12.9	<b>Volume 2, Chapter 9.</b>
Traffic and transport.	5.13.1 – 5.13.12	<b>Volume 2, Chapter 10.</b>
Waste management.	5.14.1 – 5.14.9	<b>Volume 2, Chapter 8.</b>
Water quality and resources.	5.15.1 – 5.15.10	<b>Volume 2, Chapters 19 and 21.</b>

**Table 3.3: Summary of nuclear impacts identified in NPS EN-6**

<b>Topic</b>	<b>NPS paragraph.</b>	<b>ES paragraph.</b>
Flood risk (including storm surge and tsunami).	3.6.1 – 3.6.16	<b>Main Development Site Flood Risk Assessment Volume 2, Chapter 27.</b>
Water quality and resources.	3.7.1 – 3.7.8	<b>Volume 2, Chapters 19 and 21.</b>
Coastal change.	3.8.1 – 3.8.5	<b>Volume 2, Chapter 20.</b>
Biodiversity and geological conservation.	3.9.1 – 3.9.6	<b>Volume 2, Chapter 14. Volume 2, Chapter 22.</b>
Landscape and visual impacts.	3.10.1 – 3.10.8	<b>Volume 2, Chapter 13.</b>
Socio-economics.	3.11.1 – 3.11.5	<b>Volume 2, Chapter 9.</b>
Human health and well-being.	3.12.1 – 3.12.11	<b>Volume 2, Chapter 28.</b>

3.9.16 **Sections 7, 8 and 9** of this **Planning Statement** consider the Sizewell C proposals against the principal policy requirements of the NPSs and other important and relevant issues.

### 3.10 Other Planning Policy Considerations

#### a) [The National Planning Policy Framework \(NPPF\) \(February 2019\)](#)

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

*"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications."*

#### b) Regional and Local Planning Policy

- 3.10.2 NPS EN-1 and NPS EN-6 are important and relevant to the decision on the application for the Sizewell C Project and should be afforded significant weight. Paragraph 4.1.5 of NPS EN-1 states that other matters which the decision maker may consider both "important and relevant" to its decision-making include development plan documents or other documents in the local development framework. Paragraph 4.1.5 of NPS EN-1 then explains that, in the event of a conflict between local policy and an NPS, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure.
- 3.10.3 It is clear from the NPSs that a project should be considered as a whole and that the same planning principles apply to each element of the Sizewell C Project. The weight to be attached to local policy, for instance, is the same for the associated development as it is for the main development site.
- 3.10.4 Under section 105(2)(a) of the Act the decision maker is also required to have regard to a local impact report produced by the relevant local authorities. Local authorities can determine the content of their own local impact reports, and this may include reference to development plan documents. This is likely to be particularly relevant to planning policy designations that are not replicated in the NPSs.
- 3.10.5 The host local planning authority is ESC. This authority was formed through the merger of SCDC and Waveney District Council (WDC) on 1 April 2019. The development plan for East Suffolk comprises those development plan documents that were adopted by the two former authorities. The Sizewell C DCO application site lies entirely within the former Suffolk Coastal District. The development plan documents of the former SCDC comprise:
- The Suffolk Coastal Local Plan remaining Saved Policies – July 2018.

- The Suffolk Coastal District Local Plan Core Strategy & Development Management Policies (July 2013).
- The Site Allocations and Area Specific Policies Development Plan Document (January 2017).
- The Area Action Plan for the Felixstowe Peninsula (January 2017).
- The Leiston Neighbourhood Plan 2015-2029.

3.10.6 The primary Development Plan Document is the Core Strategy and Development Management Policies (July 2013) (the Local Plan) (Ref. 1.34). The Local Plan recognises that national policy has identified Sizewell as a potentially suitable site for the development of an additional nuclear power station (at paragraphs 1.14, 2.19 and 2.42). The Local Plan is clear that any decisions on such an application will be taken ‘at a national level’ and that the role of the local planning authority is as a statutory consultee (paragraphs 3.76, 3.130 and 3.132).

3.10.7 The Local Plan recognises that the need for a new nuclear power station has been established in national policy and that the role of the planning process is limited to considering the suitability of any specific proposal and the mitigation of local impacts. Consequently, whilst Local Plan Policy SP13 sets out a range of issues which “the Council considers to be the local issues that need to be adequately addressed”, paragraph 3.132 is clear that these matters are listed in the plan in order to inform the local impact report to be prepared by SCDC (now ESC), rather than as tests for the acceptability of any application for development consent. Consistent with that approach the Local Plan recognises, for example, that the transport effects of a new nuclear power station would be assessed “in line with policies set out in NPS EN-1 and NPS EN-6” (paragraph 3.116).

3.10.8 The strategies of the Local Plan may be considered important and relevant, but where these relate to generic issues, such as the protection of the environment, the relevant policy tests are those set out in the NPS. Consistent with the NPSs, the Local Plan Policy SP13 recognises that there would be disbenefits arising from the development. However, it sees the role of SCDC (now ESC) as seeking to maximise local benefits. An example of this is in securing local economic and training benefits from the scale of investment involved in the construction and operation of the new nuclear power station.

- 3.10.9 The emerging local plan for the former Suffolk Coastal area is the Suffolk Coastal Local Plan (Ref. 1.35). This was submitted to the Secretary of State for examination on 29 March 2019. An examination took place through the summer of 2019 and the plan is expected to be adopted in early 2020.
- 3.10.10 The emerging local plan takes a positive approach to the prospective development of Sizewell C, recognising its importance to the economic growth of the country (paragraph 3.2) and the significant opportunities that can arise from the scale of investment proposed (paragraph 3.13). This includes, for instance, a recognition that the development of Sizewell C would support the strategic growth of Saxmundham (paragraph 3.31).
- 3.10.11 Paragraphs 3.52 onwards deal with the plan’s approach to major new energy infrastructure, including Sizewell C and new offshore wind proposals. The plan recognises that decisions in respect of nuclear power will be taken by government but that the council has an important role as a consultee. Policy SCLP3.4 of the emerging plan relates to “Proposals for Major Energy Infrastructure Projects” and, similarly to adopted Policy SP13, it sets out a series of matters against which the Council believes major infrastructure proposals should be considered. As with Policy SP13, however, all of these matters are addressed by the NPSs, which would prevail in the event of any conflict between national and local policy.
- 3.10.12 The emerging local plan contains a number of site-specific policies, including for sites relevant to some of the Sizewell C Project’s associated development sites, such as at Darsham, the four villages or the vicinity of SZC Co.’s proposed freight management facility. These emerging policies are considered in the site-specific **Planning Statements** appended to this **Statement**, provided in **Appendix B – H**. As a matter of principle, however, the emerging plan recognises that the development of major infrastructure projects such as at the Port of Felixstowe or Sizewell C will generate a requirement for supporting land and that the local plan should seek to provide land to meet the needs of such main economic activities (paragraph 3.15) and helpfully provides:
- “...the Local Plan will take a positive approach to land allocations which are required to meet the demands of these sectors over the plan period which are well related to the A12 and A14 corridors.”* (paragraph 3.15)
- 3.10.13 In addition to the local policy documents, there are also a number of regional or other policy documents which are relevant to the Sizewell C Project and, as such, have been considered within the technical assessments within the ES. These include but are not limited to:

- East Inshore and East Offshore Marine Plan (Ref. 1.36).
  - Suffolk Local Transport Plan 2011–2031 (Ref. 1.37).
  - Suffolk Growth Strategy 2013 (Ref. 1.38).
  - Transforming Suffolk: Suffolk’s Community Strategy 2008–2028 (Ref. 1.39).
  - Draft Local Industrial Strategy for Norfolk and Suffolk 2019 (Ref. 1.40).
  - East Norfolk and Suffolk Economic Strategy, November 2017 (Ref. 1.41).
  - Suffolk Flood Risk Management Strategy (Ref. 1.42).
  - Suffolk Waste Core Strategy, March 2011 (Ref. 1.43).
  - Suffolk Minerals Core Strategy, September 2008 (Ref. 1.44).
  - Suffolk Minerals Site Specific Allocations DPD, September 2008 (Ref. 1.45).
  - Suffolk’s Nature Strategy, 2015 (Ref. 1.46).
  - Suffolk Local Biodiversity Action Plan (BAP), May 2012 (Ref. 1.47).
  - Suffolk Shoreline Management Plan (SMP7, Policy Development Zone 4: Dunwich Cliffs to Thorpeness) (Ref. 1.48).
- 3.10.14 There are no adopted or emerging regional or local planning policies that relate to matters not covered by the NPSs that are relevant to the application.
- 3.10.15 Principal planning and environmental descriptions relating to the site are set out in **Section 1.4** of this **Statement** and have been fully taken into account in the design of the application proposals.

## c) Other Policy Requirements

## i. UK Marine Policy Statement 2011

3.10.16 The Marine Policy Statement (Ref. 1.49) was adopted in March 2011 pursuant to the Marine and Coastal Access Act 2009 (Ref. 1.50). The Marine Policy Statement is the framework for preparing marine plans and taking decisions affecting the marine environment. It aims to facilitate and support the formulation of marine plans, ensuring that marine resources are used in a sustainable way in line with a number of high-level marine objectives. The aim of the statement is to<sup>5</sup>:

- Promote sustainable economic development.
- Enable the UK's move towards a low-carbon economy, in order to mitigate the causes of climate change and ocean acidification and adapt to their effects.
- Ensure a sustainable marine environment that promotes healthy, functioning marine ecosystems and protects marine habitats, species and heritage assets.
- Contribute to the societal benefits of the marine area, including the sustainable use of marine resources to address local social and economic issues.

3.10.17 The Marine Policy Statement recognises that power stations in coastal areas will make an important contribution to the UK's energy mix (paragraph 3.3.3) and may have impacts on the marine environment (paragraph 3.3.6). For nuclear power stations, the Statement relies upon NPS EN-6 for detail on avoiding or minimising impact.

3.10.18 In some parts of the UK, power stations may be sited in coastal locations, and will have an important contribution to play in the UK's energy mix. The construction, operation, or decommissioning of a coastal power station may have impacts on the local marine environment through *“for example the construction of the plants and associated development and marine offloading facilities, such as jetties and marinas, for heavy plant items. There may also be impacts from abstraction and discharge of cooling water during operation. More detail on impacts and specific measures and actions to avoid or*

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<sup>5</sup> UK Marine Policy Statement (March 2011) page 3.



*minimise adverse impacts including on marine ecology is contained in the NPS EN-6" (paragraph 3.3.6).*

- 3.10.19 NPS EN-1 contains a direct reference to the Marine Policy Statement and explains that the Secretary of State must have regard to the Marine Policy Statement and applicable marine plans in taking any decision which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area. In the event of a conflict between any of these marine planning documents and an NPS, the NPS prevails for the purposes of Secretary of State decision-making given the national significance of the infrastructure.

### 3.11 Other Legislative Requirements

- 3.11.1 There is a wide range of primary and secondary legislation that will be relevant to the construction, operation and maintenance of the Sizewell C Project. These are identified throughout the **ES** and can be found within the 'Legislation and policy context' sections at Chapter 1 of each volume. The **Schedule of Other Licences, Consents and Agreements** (Doc Ref. 5.11) also lists the licences, consents and agreements required for the Sizewell C Project and the status of their application.

## 4 The DCO Application

### 4.1 Introduction

4.1.1 This section of the **Planning Statement** provides an overview of the Draft DCO and summarises the consents and powers which would be provided to construct, operate and maintain the Sizewell C Project. This section also explains the approach to environmental mitigation, management and development flexibility which is being sought by the Draft DCO. Finally, this section provides a summary of the separate sets of plans that have been submitted with the application.

### 4.2 The Draft DCO Overview

4.2.1 The Act created a system of development consent for NSIPs in England and Wales. Development consent for the Sizewell C Project would be granted in the form of a DCO, which would include the legal powers and rights being applied for in order to construct, operate and maintain the Sizewell C Project.

4.2.2 The **Draft DCO** (Doc Ref 3.1) submitted as part of the application includes a total of 24 Schedules. **Schedule 1** includes the individual work packages which comprise the construction of the Sizewell C Project and **Schedule 2** sets out the requirements that would apply to the construction, operation and maintenance of the Sizewell C Project.

4.2.3 **Schedules 3 – 7** identify and secure specific plans which have been submitted with the application and, in accordance with the requirements, control how the Sizewell C Project would be constructed, operated and maintained. These Schedules comprise:

- Schedules 3 - Land Plans
- Schedule 4 - Works Plans
- Schedule 5 - Rights of Way Plans
- Schedule 6 - Parameter Plans
- Schedule 7 - Approved Plans

4.2.4 Further details of the above schedules are included in this Section of the **Planning Statement**. The **Explanatory Memorandum** (Doc Ref. 3.2)

summarises all 24 Schedules and provides further details of the purpose and effect of each provision of the **Draft DCO** (Doc Ref. 3.1).

### 4.3 Consents and Powers in the Draft DCO

4.3.1 The **Draft DCO** would, if confirmed, grant development consent for the ‘*authorised development*’ as defined in the **Draft DCO** (ie, the Sizewell C Project). The ‘*authorised development*’ is described in more detail in the next section of this Statement.

4.3.2 In addition to development consent for the ‘*authorised development*’, the **Draft DCO** contains a range of powers and controls necessary to construct, operate and maintain the Sizewell C Project, including:

- provisions relating to the discharge of requirements;
- provisions specifying who may take the benefit of the development consent;
- power to undertake works on and to public highways and provisions relating to the regulation of traffic;
- powers to stop up public highways (including rights of way) permanently, and temporarily, and power to extinguish or suspend public rights of navigation;
- powers to conduct survey works and monitoring works on land (including buildings and structures) and to undertake protective or remedial works to buildings and structures;
- powers to compulsorily acquire land, new rights over land and to extinguish existing rights (a more detailed summary of these powers is provided below);
- power to use land temporarily during construction of the Sizewell C Project;
- the requirement to pay compensation in respect of compulsory acquisition of land and rights over land, and the temporary use of land, and in respect of the exercise of certain other powers, for example in respect of carrying out protective works to buildings;

- powers to undertake works to statutory undertakers' apparatus including provisions for the protection of those undertakers' assets;
- a deemed marine licence for works below the Mean High Water Mark (MHWM);
- provisions relating to the safeguarding of land required for construction and operation of the Sizewell C Project; and
- various other powers required to construct and operate the Sizewell C Project including the ability to discharge water to watercourses, public sewers or drains and power to do works to trees.

4.3.3 The **Explanatory Memorandum** (Doc Ref. 3.4) that accompanies the **Draft DCO** (Doc Ref. 3.1) provides a fuller description of the powers included within it.

a) **Compulsory Land Acquisition Summary**

4.3.4 As set out above, the **Draft DCO** (Doc Ref. 3.1) contains specific powers to enable SZC Co. to acquire compulsorily land and rights over land, and to take possession of land temporarily, to enable the construction and delivery of the proposals. Without the acquisition or temporary use of the land, the Sizewell C Project cannot be delivered. Whilst SZC Co. will acquire the land by agreement wherever possible, the need to ensure that the Sizewell C Project can be delivered requires the acquisition of a number of interests. Powers of compulsory acquisition are also required as a means of overriding existing rights and interests in or over land, as well as creating new rights over land, and granting the right to take temporary possession of land.

4.3.5 The following submission documents relate to compulsory acquisition:

- **Statement of Reasons** (Doc Ref. 4.1).
- **Funding Statement** (Doc Ref. 4.2).
- **Book of Reference** (Doc Ref. 4.3).
- **Land Plans** (Doc Ref. 2.1).
- **Works Plans** (Doc Ref. 2.3).

4.3.6 The Statement of Reasons explains how the proposals (if authorised by the DCO) would affect each plot of land to be acquired or temporarily used, and how, and why, each plot of land is needed for the proposals. The Funding Statement is required to show how the acquisition of the land or interest in land would be funded. The Book of Reference describes all the land and interests in land that would be affected by the Order.

4.3.7 The Statement of Reasons also explains why there is a compelling case in the public interest for SZC Co., as promoter of the Sizewell C Project, to be granted these powers of compulsory acquisition and temporary possession in respect of the land.

#### 4.4 The ‘Authorised Development’ and Works Numbers

4.4.1 As stated above, **Schedule 1** of the **Draft DCO** (Doc Ref 3.1) provides a description of works for which development consent is sought (referred to as the ‘authorised development’).

4.4.2 All of the authorised development falls within the definition of a "generating station" for the purpose of sections 14 and 15 of the 2008 Act or meets the definition of "associated development" under the 2008 Act.

4.4.3 Each of the main components of the authorised development is attributed a work number (‘Work No.’). The work numbers should be read alongside the **Work Plans** (Doc Ref. 2.3) which are set out at **Schedule 4** of the **Draft DCO** and define the location of the authorised development as well as any limits of deviation.

4.4.4 The main components of the Sizewell C Project and corresponding works numbers are set out in **Table 4.1** below:

**Table 4.1: Sizewell C Project Works Numbers**

Main component.	Work No.
Main development site: operational infrastructure and Sizewell B relocated facilities.	Work No. 1A. Work No. 1B. Work No. 1C. Work No. 1D.
Main development site: off shore infrastructure.	Work No. 2A. Work No. 2B. Work No. 2C. Work No. 2D. Work No. 2E. Work No. 2F. Work No. 2G.

Main component.	Work No.
	Work No. 2H. Work No. 2I. Work No. 2J. Work No. 2K. Work No. 2L.
Main development site: accommodation campus.	Work No. 3.
Rail infrastructure.	Work No. 4A. Work No. 4B. Work No. 4C. Work No. 4D.
Off-site sports facilities.	Work No. 5.
Fen meadow compensation sites and, if required, marsh harrier habitat improvement area (Westleton).	Work No. 6. Work No. 7. Work No. 8.
Northern park and ride.	Work No. 9.
Southern park and ride.	Work No. 10.
Two village bypass.	Work No. 11A. Work No. 11B. Work No. 11C.
Sizewell link road.	Work No. 12A. Work No. 12B. Work No. 12C. Work No. 12D.
Freight management facility.	Work No. 13.
Yoxford roundabout and other highway improvement works.	Work No. 14A. Work No. 14B. Work No. 15. Work No. 16. Work No. 17.

4.4.5 The scope and function of the **Work Plans** (Doc Ref. 2.3) is described in more detail in the following section of this **Statement**.

4.4.6 **Schedule 1** of the **Draft DCO** (Doc Ref. 3.1) also includes a provision which sets out a number of minor works that are common to a number of work packages, under the heading “Other Associated Development”. These include works such as landscaping and drainage, establishment of construction compounds, vegetation clearance, works to trees, shrubs and hedges and utilities installation.

## 4.5 Approach to Environmental Mitigation and Management

- 4.5.1 **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1) sets out the requirements that are necessary to control the construction, operation and maintenance of the Sizewell C Project. **Draft Heads of Terms**, provided in **Appendix J** of the **Draft DCO** (Doc Ref. 3.1), are also included in the submission and set out the obligations that SZC Co. considers to be appropriate in the context of the proposals presented in this Application. The requirements and obligations closely relate to the mitigation set out in the **ES** and have been drafted to ensure that the mitigation relied upon for conclusions of the Environmental Impact Assessment are secured. **Section 10** of this **Planning Statement** provides a more detailed summary of the requirements and securing mechanisms.
- 4.5.2 Mitigation measures for the Sizewell C Project are set out within specific documents, which are then to be secured by Requirement, or the **Section 106 Agreement** (see the **draft Section 106 Heads of Terms (Appendix J)**). These documents include the mitigation measures that SZC Co. would be committed to.
- 4.5.3 **Article 80** of the **Draft DCO** (Doc Ref. 3.1) requires SZC Co. to submit copies of specific plans and documents to the Secretary of State to be certified as true copies following the making of the Order ('certified documents'). A list of the certified documents is set out at **Schedule 22** (Certified Documents) of the **Draft DCO** (Doc Ref. 3.1).
- 4.5.4 A total of 18 documents will be certified through the DCO, with the documents most relevant to mitigation including:
- **Construction Method Statement (CMS)**: The CMS sets out the anticipated construction methodologies, works, and machinery that has been assumed for the construction stage at the main development site. The assumed methodologies identified in the CMS have been used to inform the environmental impact assessment. The construction of the main development site would be undertaken in general accordance with the CMS and SZC Co. would be able to deviate from the methodologies used from those identified in the CMS provided there were no materially new or different environmental effects from those identified in the Environmental Statement.
  - **Approved Plans**: As set out in the following section, SZC Co. would be required to undertake works in accordance with the approved plans set out at Schedule 7 of the Draft DCO.

- **Main Development Site Design and Access Statement (DAS)** (Doc Ref. 8.1): The DAS sets out the "detailed design principles" that would guide SZC Co. in constructing the power station itself and provides indicative design concepts which demonstrate how the Sizewell C Project could be brought forward in accordance with those principles. It also provides commentary on the parameters and how they are intended to operate in practice. Detailed designs for the main development site that have been submitted and approved must be carried out in accordance with the detailed design principles. Any revised designs must be in general accordance with the detailed design principles set out in the DAS.
- **Associated Development Design Principles** (Doc Ref. 8.3): For each associated development site there are a set of "design principles" that would guide the construction and operation of that associated development site. Detailed designs must be carried out in accordance with the design principles. The Principles have helped to inform the assessment presented in the Environmental Statement including general/masterplanning principles, building design principles, landscape design principles and sustainability design principles. Any revised designs for the associated development sites must be in general accordance with these design principles.
- **Code of Construction Practice (CoCP)** (Doc Ref. 8.11): The CoCP sets out how construction activities would be managed and controlled in order to deliver the mitigation commitments set out in the **ES** as well as other assessment processes undertaken (e.g. Habitat Regulation Assessment). Part A of the CoCP applies to all construction activities undertaken as part of the Sizewell C Project, Part B applies to works on the main development site and Part C applies to work on the offsite associated developments. The CoCP sets out the general and topic-specific measures that are proposed to avoid or reduce environmental effects. The CoCP will be a certified document and compliance will be secured through requirements.
- **Outline Landscape and Ecological management plan (oLEMP)** (Doc Ref. 8.2): The oLEMP provides the objectives and general principles for the establishment and longer-term management of the landscape and ecological mitigation proposals identified for the main development site in order to mitigate adverse ecological effects identified in the Environmental Statement.

4.5.5 Where the specific details of the proposed mitigation are yet to be determined, SZC Co. has committed through the requirements to prepare



further details, which would be submitted to and approved by the appropriate authority, such as East Suffolk Council (ESC) or Suffolk County Council (SCC)), and where relevant in consultation with other stakeholders.

## 4.6 The Approach to Flexibility

4.6.1 PINS Advice Note 9 “Using the Rochdale Envelope” (Ref. 1.51) recognises that large scale infrastructure projects may require an element of flexibility within clearly defined parameters. Those parameters can set defined envelopes within which the development can take place, such as maximum and minimum heights and the location of buildings.

4.6.2 Sizewell C, like most other NSIPs consented through the DCO process, is a complex development that must satisfy a wide range of operational and regulatory requirements. The design process is lengthy, subject to extensive consultation, and requires continuous refinement. This refinement process extends beyond the granting of the DCO.

4.6.3 Experience at Hinkley Point C has been that even the most carefully prepared application can require revision when the process of contracting and detailed design for project implementation is engaged. The scale and intensity of the Sizewell C Project once construction has begun is such that unnecessary delays must be avoided if possible. The DCO has a critical role in fixing the environmental parameters for the Sizewell C Project but does not need to control the detail of project implementation, as long as that implementation remains within those parameters.

4.6.4 Therefore, in order to take account of changes that may arise for example from complying with the Nuclear Site Licence, or the design development process, SZC Co. proposes a parameter-based approach for the construction and operation of the power station. Parameters are also provided for both construction and operational of the associated developments.

4.6.5 Some elements of the Sizewell C Project require minimal flexibility (i.e. the location and dimensions of the nuclear reactors) owing to the advanced stage of design, and their potential to cause significant adverse environmental effects. Parameters for these elements are, therefore, relatively constrained compared with other elements of the Sizewell C Project where designs are less advanced, and/or flexibility is less likely to cause significant adverse effects.

## 4.7 Plans Submitted with the Application

4.7.1 Twelve separate sets of plans have been submitted with this application and are contained in **Book 2**:

- **Land Plans** (Doc Ref. 2.1).
- **Crown Land Plans** (Doc Ref. 2.2).
- **Work Plans** (Doc Ref. 2.3).
- **Access/Rights of Way Plans** (Doc Ref. 2.4).
- **Main Development Site Plans** (Doc Ref. 2.5).
- **Northern Park and Ride Plans** (Doc Ref. 2.6).
- **Southern Park and Ride Plans** (Doc Ref. 2.7).
- **Two Village Bypass Plans** (Doc Ref. 2.8).
- **Yoxford Roundabout and Other Highway Improvement Plans** (Doc Ref. 2.9).
- **Sizewell Link Road Plans** (Doc Ref. 2.10).
- **Freight Management Facility Plans** (Doc Ref. 2.11).
- **Rail Plans** (Doc Ref. 2.12).

4.7.2 Each of these sets of plans has particular functions and this is summarised below.

4.7.3 Each of the site-specific sets of plans for the main development site and the off-site associated development sites also takes a particular approach to flexibility through the use of Parameter Plans and/or Work Plans. The approach to flexibility reflects the specific proposals, their nature, scale and timescales. For example, the park and ride and freight management associated developments sites are temporary facilities and will be built in accordance with specific parameter plans which identify zones within which buildings, structures and works must be located. Whereas, the rail and

highways works are permanent infrastructure and will be constructed, operated and maintained in accordance with the relevant Work Plans.

a) **Land Plans** (Doc. Ref 2.1)

4.7.4 The **Land Plans** identify the Order Limits which define the area within which the Sizewell C Project may be constructed, operated and maintained. The **Land Plans** also identify the individual plots SZC Co. intends to exercise its compulsory acquisition powers over. The plot numbers on the **Land Plans** relate to the plots contained in the **Book of Reference** (Doc Ref. 4.3).

4.7.5 The Order Limits shown on the **Land Plans** are fixed and do not include any flexibility or limits of deviation.

a) **Crown Land Plans** (Doc. Ref 2.1)

4.7.6 The **Crown Land Plans** identify any land owned by the Crown included within the Order Limits. This includes interest in land owned by a Crown body, such as a central government department, the Duchy of Lancaster or the Duchy of Cornwall.

b) **Work Plans** (Doc. Ref 2.3)

4.7.7 The **Work Plans** are summarised above in **Section 4.4** of this **Statement** and illustrate the location and overall layout of the authorised development. The **Work Plans** also include limits of deviation within which specific elements of the Sizewell C Project may be constructed.

4.7.8 The DCO states that the development will be constructed, operated and maintained anywhere within the area as shown on the **Work Plans** (showing lateral limits of deviation) and to a maximum of +/- 1 metre vertically, and in general accordance with the design principles set out in the relevant Design Principles document.

c) **Access/Rights of Way Plans** (Doc Ref. 2.4)

4.7.9 The **Access/Rights of Way Plans** show the location of the existing public and private rights of way that would be stopped up or diverted and any new rights of way to be provided either during construction or operation.

d) **Main Development Site Plans** (Doc Ref. 2.5)

4.7.10 The **Main Development Site Plans** consist of a set of plans and drawings which provide the parameters within which the main site development would

be advanced, as well as detailed plans for approval and indicative plans for information.

- 4.7.11 As part of the **Main Development Site Plans** (Doc Ref. 2.5), a series of construction and operation parameter plans are submitted for approval and would be secured by **Schedule 6** of the **draft DCO** (Doc Ref 3.1).
- 4.7.12 **Main Development Site: Construction Parameter Plans** set parameters within which construction activity on the main development site would take place, including the accommodation campus. The accommodation campus is a temporary development and described in detail at **Appendix A** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1). Detailed designs for the campus would be developed in general accordance with the design principles set out in **Appendix A** and in accordance with the **Main Development Site: Construction Parameter Plans** (Doc Ref. 8.1).
- 4.7.13 The operation parameter plans for the main development site define zones within which specific buildings, plant and structures would be located. The parameter plans also set maximum (and where appropriate, minimum) heights for buildings, plant and structures.
- 4.7.14 The main development site parameter plans comprise:
- Main Development Site – Operational platform.
  - Main Development Site – Upper Abbey Farm and surrounding area.
  - Main Development Site – Sizewell B relocated facilities and National Grid land.
- 4.7.15 These parameter plans have informed the assessment presented in the **ES Volume 2** and any flexibility being sought is consistent with the findings of the **ES**.
- 4.7.16 In addition to the parameter plans, detailed designs for approximately 65 buildings and structures within the main development site have been submitted for approval as part of this application for development consent. These typically comprise a general arrangement, elevations and roof plans. The full list of buildings and structures this applies to is set out in **Chapter 1** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) and the list of **Main Development Site Plans** (Doc Ref. 2.5) which are provided for approval are set out at **Schedule 7** of the **draft DCO** (Doc Ref. 3.1).

- 4.7.17 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1) ensure that the Sizewell C Project must be carried out in accordance with the relevant Parameter Plans, Approved Plans and the design principles set out in **Chapter 5** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1), save to the extent that alternative plans or details are submitted for approval. In this instance the revised details must be in accordance with the Parameter Plans and in general accordance with the design principles.
- 4.7.18 The **Main Development Site Plans** (Doc Ref 2.5) also include indicative plans which are submitted to demonstrate how the development could be delivered in line with the Works Plans, Parameter Plans and the plans for approval listed above.
- 4.7.19 The indicative plans are not submitted for approval and include illustrative designs of detailed elements such as drainage plans, proposed lighting and signage plans and utilities plans.
- e) **Northern Park and Ride Plans** (Doc Ref. 2.6)
- 4.7.20 The **Northern Park and Ride Plans** consist of a set of plans and drawings which provide the parameters within which the park and ride development would be advanced, as well as detailed plans for approval and illustrative plans for information.
- 4.7.21 As part of the **Northern Park and Ride Plans**, the **Northern Park and Ride Proposed Parameter Plan** is submitted for approval and would be secured by **Schedule 6** of the **draft DCO** (Doc Ref. 3.1). The **Parameter Plan** identifies zones within which specific buildings, structures and works must be located. The **Parameter Plan** is consistent with the limits of deviation in **Article 4** of the **Draft DCO** (Doc Ref. 3.1) and shown on the **Northern Park and Ride Work Plan** and should be read alongside the parameter table, provided at **Table 2.1** at **Volume 3, Chapter 2** of the **ES**, which provides maximum building dimensions within the zones shown on the **Parameter Plan**.
- 4.7.22 The **Parameter Plan** has informed the assessment presented in the **ES Volume 3** and the flexibility being sought is consistent with the findings of the **ES**.
- 4.7.23 Several plans within the **Northern Park and Ride Plans** set are also submitted for approval as part of this application for development consent and would be secured by **Schedule 7** of the **draft DCO** (Doc Ref. 3.1). SZC Co. would be required to undertake works in accordance with these approved plans. These comprise:

- Northern Park and Ride Proposed General Arrangement.
- Northern Park and Ride Site Clearance Plan.
- Northern Park and Ride Proposed Landscape Masterplan and Finished Levels.
- Northern Park and Ride Removal and Reinstatement Plan.

4.7.24 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1), ensure that the Northern Park and Ride development must be carried out in accordance with the **Northern Park and Ride Proposed Parameter Plan**, the plans as set out in Schedule 7 of the **Draft DCO** (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref 8.3).

4.7.25 Illustrative plans are also submitted which demonstrate how the development could be delivered in line with the **Parameter Plan** and the plans for approval listed above. The illustrative plans include a drainage plan, proposed lighting and CCTV plan, proposed signage plan, as well as illustrative plans for key structures such as the amenity/welfare building, security building, smoking shelter, cycle shelter and bus shelter.

f) **Southern Park and Ride Plans** (Doc Ref. 2.7)

4.7.26 The **Southern Park and Ride Plans** follow the same approach as the **Northern Park and Ride Plans** (Doc Ref 5.3) and provide the parameter plans within which the park and ride development would be advanced, as well as illustrative plans.

4.7.27 The **Southern Park and Ride Proposed Parameter Plan** is submitted for approval and would be secured by **Schedule 6** of the **draft DCO** (Doc Ref. 3.1). The **Parameter Plan** identifies zones within which specific buildings, structures and works must be located. The **Parameter Plan** is consistent with the limits of deviation in **Article 4** of the **Draft DCO** (Doc Ref. 3.1) and shown on the **Southern Park and Ride Work Plan** (Work No. 10) and should be read alongside the parameter table, provided in **Table 2.1** at **Volume 4, Chapter 2** of the **ES**, which provides maximum building dimensions within the zones shown on the **Parameter Plan**.

4.7.28 The **Parameter Plan** has informed the assessment presented in the **ES Volume 4** and the flexibility being sought is consistent with the findings of the **ES**.

- 4.7.29 Several other plans within the **Southern Park and Ride Plans** set are also submitted for approval as part of this application for development consent and would be secured by **Schedule 7** of the **draft DCO** (Doc Ref. 3.1). SZC Co. would be required to undertake works in accordance with these approved plans. These comprise:
- Southern Park and Ride Proposed General Arrangement.
  - Southern Park and Ride Proposed Highways General Arrangement Plan.
  - Southern Park and Ride Site Clearance Plan.
  - Southern Park and Ride Proposed Landscape Masterplan and Finished Levels.
  - Southern Park and Ride Removal and Reinstatement Plan.
- 4.7.30 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the Southern Park and Ride development must be carried out in accordance with the **Southern Park and Ride Proposed Parameter Plan**, the plans as set out in Schedule 7 of the **Draft DCO** (Doc Ref. 3.1) (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref 8.3).
- 4.7.31 Illustrative plans are also submitted which demonstrate how the development could be delivered in line with the **Parameter Plan** and the plans for approval listed above. The illustrative plans include a drainage plan, proposed lighting and CCTV plan, proposed signage plan, as well as detailed illustrative plans for key structures such as the amenity/welfare building, security building, smoking shelter, postal consolidation building, cycle shelter and bus shelter.
- g) Two Village Bypass Plans (Doc Ref. 2.8)**
- 4.7.32 The approach to the **Two Village Bypass Plans** is different from the set of plans provided for the Park and Ride developments summarised above.
- 4.7.33 The **Two Village Bypass Plans** do not include a separate parameter plan. Instead, the parameters within which the Two Village Bypass would be constructed, operated and maintained are shown on the relevant **Work Plans** (Doc Ref 2.3) (Work No. 11A, 11B and 11C). These are included within the **Work Plans** (Doc Ref. 2.3) set of drawings and not the **Two Village Bypass Plans** (Doc Ref. 2.8) set.

- 4.7.34 The Draft DCO states that the Two Village Bypass would be constructed, operated and maintained anywhere within the area as shown on the **Work Plans No. 11A, 11B and 11C** (Doc Ref 2.3), which includes lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 4.7.35 These parameters have informed the assessment presented in the **ES Volume 5** and the flexibility being sought is consistent with the findings of the **ES**.
- 4.7.36 There are several plans within the **Two Village Bypass Plans** (Doc Ref. 2.8) set which provide additional detail and are submitted for approval as part of this application for development consent. These plans would be secured by **Schedule 7** of the **draft DCO** (Doc Ref. 3.1) and SZC Co. would be required to undertake works in accordance with these approved plans. These comprise:
- Two Village Bypass Proposed Layout and Profile.
  - Two Village Bypass Site Clearance Plan.
  - Two Village Bypass Landscape Masterplan and Finished Levels.
  - Two Village Bypass A12/A1094 Eastern Roundabout Proposed Layout.
  - Two Village Bypass A12/A1094 Eastern Roundabout Proposed Profiles.
  - Two Village Bypass A12 Western Roundabout Proposed Layout.
  - Two Village Bypass A12 Western Roundabout Proposed Profiles.
  - Two Village Bypass Proposed Staggered Junction Plan and Profiles.
  - River Alde Road Bridge General Arrangement.
  - Foxburrow Wood Footbridge General Arrangement and Elevation.
- 4.7.37 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1), ensure that the Two Village Bypass development must be carried out in accordance with the plans as set out in Schedule 7 of the **Draft DCO** (Doc Ref. 3.1) (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref. 8.3).



4.7.38 Illustrative plans are also submitted as part of the **Two Village Bypass Plans** (Doc Ref. 2.8) which provide further illustrative details and demonstrate how the development could be delivered in line with the **Work Plans** (Doc Ref. 2.3) and the plans for approval listed above. The illustrative plans include Cross Sections, a Drainage Plan, Proposed Street Lighting Plans and Existing Utilities and Diversions Drawings.

h) **Yoxford Roundabout and Other Highway Improvement Plans** (Doc Ref. 2.9)

4.7.39 The **Yoxford Roundabout and Other Highway Improvement Plans** follow the same approach as the **Two Village Bypass Plans** (Doc Ref. 2.8). The parameters within which the highway improvements would be constructed, operated and maintained are shown on the relevant **Work Plans** (Doc Ref. 2.3):

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

4.7.40 The **draft DCO** (Doc Ref. 3.1) states that the highway improvements will be constructed, operated and maintained anywhere within the area as shown on the **Work Plans** (Doc Ref. 2.3) (listed above), which includes lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.

4.7.41 These parameters have informed the assessment presented in the **Volume 7** of the **ES** and the flexibility being sought is consistent with the findings of the **ES**.

4.7.42 There are several plans within the **Yoxford Roundabout and Other Highway Improvement Plans** set which provide additional detail and are submitted for approval as part of this application for development consent. These plans would be secured by **Schedule 7** of the **draft DCO** (Doc Ref 3.1) and SZC Co. would be required to undertake works in accordance with these approved plans. These comprise:

- Yoxford Roundabout Site Clearance Plan.

- Yoxford Roundabout Proposed Landscape Masterplan and Finished Levels.
  - Yoxford Roundabout Proposed Highway Layout.
  - A1094 / B1069 Junction South of Knodishall Highway.
  - A12 / A144 Junction Proposed General Arrangement.
  - A12 / B1119 Junction Saxmundham Proposed Highway Layout.
- 4.7.43 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref 3.1) ensure that the highway improvements must be carried out in accordance with the plans as set out in **Schedule 7** of the **Draft DCO** (Doc Ref. 3.1) (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref. 8.3).
- 4.7.44 Illustrative plans are also submitted as part of the **Yoxford Roundabout and Other Highway Improvement Plans** (Doc Ref. 2.10) which provided further illustrative details and demonstrate how the highway improvements could be delivered in line with the **Work Plans** (Doc Ref. 2.3) and the plans for approval listed above. The illustrative plans include Existing Site Plans, Cross Sections and Long Sections, Drainage Plan, Proposed Street Lighting Plans and Existing Utilities and Diversions Drawings.
- i) **Sizewell Link Road Plans** (Doc Ref. 2.10)
- 4.7.45 As with the other transport related associated developments, the parameters within which the Sizewell link road would be constructed, operated and maintained are shown on the relevant **Work Plans** (Doc Ref. 2.3) (Works No. 12A, 12B, 12C and 12D).
- 4.7.46 Sizewell link road would be constructed, operated and maintained anywhere within the area as shown on the **Work Plans** (Doc Ref. 2.3), which includes lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 4.7.47 These parameters have informed the assessment presented in the **Volume 6** of the **ES** and the flexibility being sought is consistent with the findings of the **ES**.
- 4.7.48 There are several plans within the Sizewell Link Road Plans set which provide additional detail and are submitted for approval. These plans would

be secured by **Schedule 7** of the **draft DCO** (Doc Ref 3.1) and SZC Co. would be required to undertake works in accordance with these approved plans. These include:

- Proposed Site Layout Plan.
- Sizewell Link Road Proposed Landscape Masterplan and Finished Levels.
- Sizewell Link Road Site Clearance Plans.
- Sizewell Link Road Proposed Layout and Profile Plans.
- Pretty Road Footbridge General Arrangement Plan and Elevation.
- Suffolk Rail Bridge General Arrangement Plan.
- Detailed plans of the proposed Sizewell Link Road's junctions with the A12, B1122 / B1125, B1122 / Theberton, Moat Road, Hawthorn Road, Fordley Road and the Trust Farm Staggered Junction.

4.7.49 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1), ensure that the Sizewell link road must be carried out in accordance with the plans as set out in **Schedule 7** of the **Draft DCO** (Doc Ref. 3.1) (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref. 8.3).

4.7.50 Illustrative plans are also submitted as part of the **Sizewell Link Road Plans** (Doc Ref. 2.10) which provided further illustrative details and demonstrate how the highway improvements could be delivered in line with the **Work Plans** (Doc Ref. 2.3) and the plans for approval listed above. The illustrative plans include Existing Site Plans, Cross Sections, Drainage Plans, Proposed Street Lighting Plans and Existing Utilities and Diversions Drawings.

j) **Freight Management Facility Plans** (Doc Ref. 2.11)

4.7.51 The **Freight Management Facility Plans** consist of a set of plans and drawings which provide the parameters within which the Freight Management Facility would progress, as well as detailed plans for approval and illustrative plans for information.

4.7.52 The **Freight Management Facility Proposed Parameter Plan** is submitted for approval and would be secured by **Schedule 6** of the **draft DCO** (Doc

Ref. 3.1). The **Parameter Plan** identifies zones within which specific buildings, structures and works must be located. The **Parameter Plan** is consistent with the limits of deviation in **Article 4** of the **Draft DCO** (Doc Ref. 3.1) and shown on the **Freight Management Facility Work Plan** (Work No. 13) and should be read alongside the parameter table, provided in **Table 2.1** at **ES Volume 8, Chapter 2**, which provides maximum building dimensions within the zones shown on the **Parameter Plan**.

4.7.53 The **Parameter Plan** has informed the assessment presented in the **ES Volume 8** and the flexibility being sought is consistent with the findings of the **ES**.

4.7.54 Several other plans within the **Freight Management Facility Plans** (Doc Ref. 2.11) set are also submitted for approval as part of this application for development consent and would be secured by **Schedule 7** of the **draft DCO**. SZC Co. would be required to undertake works in accordance with these approved plans. These comprise:

- Freight Management Facility Proposed General Arrangement.
- Freight Management Facility Proposed Highway Works.
- Freight Management Facility Site Clearance Plan.
- Freight Management Facility Proposed Landscape Masterplan and Finished Levels.
- Freight Management Facility Removal and Reinstatement Plan.

4.7.55 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1), ensure that the Freight Management Facility must be carried out in accordance with the **Freight Management Facility Proposed Parameter Plan**, the plans as set out in Schedule 7 of the **Draft DCO** (Approved Plans) and in general accordance with the **Associated Development Design Principles** (Doc Ref. 8.3).

4.7.56 Illustrative plans are also included as part of the **Freight Management Facility Plans** (Doc Ref. 2.11) which demonstrate how the development could be delivered in line with the **Parameter Plan** and the plans for approval listed above. The illustrative plans include a Drainage Plan, Proposed Lighting and CCTV Plan, Proposed Signage Plan, Cross Section Plan, Points of Connection Plan, Utility Plan as well as detailed illustrative plans for key

structures such as the Amenity/Welfare Building, Security Building, Smoking Shelter, Cycle Shelter and Proposed Covered Screen and Search Area.

k) **Rail Plans** (Doc Ref. 2.12)

- 4.7.57 The **Rail Plans** do not include a separate parameter plan. Instead, the parameters within which the proposed rail extension route and rail improvement works would be constructed, operated and maintained are shown on the relevant **Work Plans** (Doc Ref. 2.3) (Work Nos. 4A, 4B (green rail route), 4C (branch line) and 4D (rail spur)). These are included within the **Work Plans** (Doc Ref. 2.3) set of drawings, not the **Rail Plans** (Doc Ref. 2.12) set.
- 4.7.58 The green rail route and rail improvement works would be constructed, operated and maintained anywhere within the area as shown on the Work Plans, which includes lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 4.7.59 These parameters have informed the assessment presented in the **ES Volume 9** and the flexibility being sought is consistent with the findings of the ES.
- 4.7.60 There are several plans within the Rail Plans set which provide additional detail and are submitted for approval. These plans would be secured by **Schedule 7** of the **draft DCO** (Doc Ref 3.1) and SZC Co. would be required to undertake works in accordance with these approved plans. These include:
- Proposed General Arrangement Plans.
  - Proposed Horizontal and Vertical Alignment.
  - Proposed cross sections.
  - Green Rail Route Proposed Landscape Masterplan and Finished Levels.
  - Green Rail Route Site Clearance Plan.
  - Green Rail Route Removal and Reinstatement Plan.
- 4.7.61 The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1) ensure that the green rail route and rail improvement works would be carried out in accordance with the plans as set out in **Schedule 7** of the **Draft**

**DCO** (Doc Ref. 3.1) (Approved Plans) and in general accordance with the relevant **Associated Development Design Principles** (Doc Ref. 8.3).

4.7.62 Several illustrative plans are also submitted as part of the **Rail Plans** (Doc Ref. 2.12) which provide further illustrative details and demonstrate how the green rail route and rail improvement works could be delivered in line with the **Work Plans** (Doc Ref. 2.3) and the plans for approval listed above. The illustrative plans include proposed general arrangement plans, drainage plan, signage plan, lighting and CCTV plan and existing utilities plan.

## 4.8 Approach to Subsequent Approvals

4.8.1 Provided development consent is granted, there would be details and elements of the Sizewell C Project that would require subsequent approvals. The DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1) identifies different discharging authorities depending on the works and the nature of the Requirement. Suffolk County Council are identified as the relevant planning authority for matters relating to highways, with East Suffolk Council identified for the remaining requirements where a subsequent approval may be necessary for onshore works. The Marine Management Organisation is the discharging authority in respect of land seaward of the MHWS and the marine works.

4.8.2 This section summarises the specific approach across the proposed development.

### a) Main Development Site

4.8.3 In accordance with the DCO Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1), outstanding details for buildings and structures within the main development site, such as the colour of the turbine halls for example, would be delivered in accordance with the detailed design principles set out in **Chapter 5** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1).

4.8.4 SZC Co. also intends to bring forward detailed designs for the following permanent buildings, structures and plant following receipt of development consent, and would do so in general accordance with the design principles set out in **Chapter 5** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) and the **parameter plans** listed above:

- Intermediate level waste store.
- Interim spent fuel store.

- Sizewell visitor centre.
- Main access control building.
- Auxiliary administration building.
- Emergency response centre.
- Emergency response energy centre.
- Secondary access control building.
- Meteorological station.
- Demineralisation station.
- Valve room.
- Auxiliary boilers.
- Hydrogen storage.
- Oxygen storage.
- Hydrazine storage.
- Chlorination plant.
- Service ventilation building.
- Raw water & potable water supply tank.
- Degassed water storage tanks.
- Cooling water discharge shaft.
- Chemical products storage.
- Garage for handling materials.
- Oil & grease storage.
- Contaminated tools store.
- Sewage treatment plant.

- Conventional island water tanks.
- Nuclear island water tank.
- Conventional waste storage.
- Transit area for very low and low level waste.
- Service access buildings.
- Service access buildings.
- Battery load banks.
- Warehouse.
- Interim spent fuel store equipment storage building.
- Emergency equipment store.
- 132kV substation and associated compound.
- Off-site delivery check point.
- SSSI crossing.
- Beach landing facility.
- Soft coastal defence feature.
- Hard coastal defence feature.
- National Grid substation.
- Alterations to the existing National Grid substation.
- National Grid pylon and associated infrastructure.

4.8.5 The Accommodation Campus is a temporary development and described separately in **Appendix A** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1). Detailed designs for the campus would be developed in accordance with the design principles set out in **Appendix A** and the parameter plan listed below, as secured by DCO Requirement in **Schedule 2** of the **draft DCO** (Doc Ref. 3.1):



- Main Development Site: Construction parameter plan (Ref: SZC-SZ0100-XX-000- DRW-100046).

4.8.6 A Statement of Compliance would be submitted by SZC Co. for approval by the local planning authority to demonstrate compliance with the relevant design principles.

4.8.7 Should SZC Co. decide to propose an alternative design for the main development site buildings or structures, it must do so in accordance with the main development site **Parameter Plans** and in general accordance with the design principles set out in Chapter 5 of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1), as secured by DCO Requirement in **Schedule 2** of the **draft DCO** (Doc Ref. 3.1). The following parameter plans would be secured by **Schedule 7** of the **draft DCO** (Doc Ref. 3.1) and are contained within **Main Development Site Plans** (Doc Ref. 2.5):

- Main Development Site – Operational platform (Ref. SZC-SZ0100-XX-000-DRW-100043);
- Main Development Site – Upper Abbey Farm and surrounding area (Ref. SZC-SZ0100-XX-000-DRW-100047); and
- Main Development Site – Sizewell B relocated facilities and National Grid land (Ref. SZC-SZ0100-XX-000-DRW-100048).

**b) Associated Development Sites**

4.8.8 The park and rides, green rail route and freight management facilities are temporary developments. As summarised above, detailed designs for these associated development sites will be developed in accordance with the relevant Approved Plans set out in **Schedule 7** of the **Draft DCO** (Doc Ref. 3.1), as well as the relevant Parameter Plans, and the Associated Development Design Principles. A Statement of Compliance would be submitted by SZC Co. for approval by the local planning authority to demonstrate compliance with the relevant design principles.

4.8.9 Should SZC Co. decide to propose alternative designs to the siting, scale or appearance of the temporary associated developments which differ from the Approved Plans set out in **Schedule 7** of the **Draft DCO** (Doc Ref 3.1), it must still do so in general accordance with the relevant site-specific parameter plans and the relevant sections of the Associated Development Design Principles. Any alternative designs which differ from the Approved Plans must be submitted to and approved by East Suffolk Council.

- 4.8.10 Similarly, the transport associated development works would be carried out in accordance with the relevant Approved Plans set out in **Schedule 7** of the **Draft DCO** (Doc Ref. 3.1), as well as in general accordance with the **Associated Development Design Principles** (Doc Ref. 8.3). Any alternative designs which differs from the Approved Plans must be approved by Suffolk County Council and must still be in general accordance with the relevant Work Plans and the relevant sections of the **Associated Development Design Principles** (Doc Ref 8.3).

## 5 Main Development Site

### 5.1 Introduction

5.1.1 This section provides a summary of the design evolution, principles and rationale that have led to the designs for the main development site proposals.

### 5.2 Design Evolution

5.2.1 The design process for the Sizewell C power station has been influenced by EDF Energy's experience operating eight nuclear power stations in the UK and 58 nuclear power stations in France, and SZC Co.'s consultation with statutory consultees, the local community and the general public, as well as with the Design Council. In carrying out consultation, SZC Co. has always made clear that the scope for design changes is necessarily restricted by the need to adhere to the power station design approved by the Environment Agency and the Office for Nuclear Regulation via the UK Generic Design Assessment (GDA) process. This is the process by which the reactor design is approved for use in the United Kingdom and any deviation from the design is strictly limited. For this reason, there is only limited flexibility around the design of the main part of the power station, though greater flexibility exists regarding the other buildings on the site. The **Main Development Site Design and Access Statement** (Doc Ref. 8.1) explains the GDA process.

5.2.2 It has been EDF Energy's experience at Hinkley Point C that design changes have been necessary to the plot plan layout for the main site and these have necessitated non-material amendments to be made to the DCO. Those minor changes to the layout, however, have not been of such significance as to require additional environmental information or to cause significantly different environmental effects from those assessed in the DCO ES. A material change application is also in the pre-application stage to remove the Acoustic Fish Deterrent from the Hinkley Point C DCO. Further details on the consideration of biota exclusion technology for Sizewell C, including the Acoustic Fish Deterrent, are set out **Volume 2, Chapter 6** of the **Environmental Statement** (Book 6).

5.2.3 **Table 3.1** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) sets out the main changes to the design that have been made in response to consultation. Full details of the consultation stages can be found in the **Consultation Report, Chapter 2** (Doc Ref. 5.1).

### 5.3 Design Principles and Rationale

5.3.1 As well as being guided by EDF Energy’s extensive experience, the Sizewell C Project has been guided by a set of overarching design principles, which have been the subject of consultation. The overarching design principles are complemented by detailed design principles. The DCO would require future or alternative detailed designs to be in general accordance with the detailed design principles, as well as the relevant parameter plans, to ensure good design is achieved. Detailed designs that will be approved as part of the application must be in accordance with the detailed design principles.

5.3.2 The **Main Development Site Design and Access Statement** (Doc Ref. 8.1) sets out the process which has been undertaken to take the Sizewell C Project from its aim, through the design stages and ultimately to the DCO application submission. **Figure 5.1** in the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) illustrates this process, which begins with the Sizewell C Project aim:

*"Design and build a new generation nuclear power station in Sizewell as stipulated in the National Policy Statement for Nuclear Power Generation (EN-6) in July 2011."*

5.3.3 The detailed design principles would control the detailed design process to help to fulfil the criteria of “good design”, set out in NPS EN-1 and NPS EN-6. Section 4.5 of NPS EN-1 (also referenced in section 2.8 of NPS EN-6) states:

*"Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."*

5.3.4 The design of the main development site has been underpinned by a strategy to screen lower lying buildings in views from the publicly accessible coastline using the proposed sea defences and establish the turbine halls as the main feature on a continuous north-south building line, established by Sizewell B. These larger, taller buildings within the site would be configured as simple rectangular forms with limited articulation and a purposefully limited palette of materials and colours. Colour studies have been undertaken to address the integration of the turbine halls in the landscape of the AONB. The reactor buildings are required to be constructed of concrete and lie west and inland of the turbine halls and form a series of background elements when viewed from the coastline. Ancillary, office and storage buildings would be lower in

height and located to the periphery of the site and are substantially screened from the coast. Where views of the proposed buildings are possible, including from inland areas, they would be partially screened and softened by existing intervening vegetation.

5.3.5 The principles for the design of the landscape include the integration of the main development site and associated infrastructure with the surrounding landscape, where appropriate, to screen the development with landform and planting and to draw upon the wider EDF Energy Estate landscape to provide screening using existing areas of forestry and natural topography. The landscape strategy for the main development site and ultimately for the wider EDF Energy Estate is to establish a coastal grassland and dune landscape that connects to the existing coastal areas to the north and south and, through long term management, establish acid grassland in lieu of intensive farmland and new woodland planting to support the long term presence of woodland in the landscape and enhance biodiversity.

5.3.6 Following completion of construction activity on the main development site, an enhanced network of public and permissive rights of way would be implemented.

5.3.7 Following design review with Design Council CABE, the design panel noted:

*“The extension of the Sizewell Nuclear Facility to create Sizewell C is a significant intervention in a sensitive and remarkable landscape. Extensive steps are being taken by the project team to carefully integrate the Sizewell C site into its historic, coastal setting. Overall, we think the proposal is being approached with great care and attention across architecture, engineering, landscape design and ecology.”*

5.3.8 The following sections set out the permanent proposals for the main development site, which comprise the total area needed for constructing and operating the Sizewell C nuclear power station.

## 5.4 Site Composition

5.4.1 The main development site comprises the following five components:

- 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 other land for

the proposed development, and land required for the National Grid infrastructure.

- Offshore works area: the area where offshore cooling water infrastructure and other marine works would be located.
- Temporary construction area: the area located primarily to the north and west of the proposed site of special scientific interest (SSSI) crossing, which would be used to support construction activity on the main platform.
- Land to the East of Eastlands Industrial Estate (LEEIE): the area to the north of Sizewell Halt and King George's Avenue, which would be used to support construction on the main platform and temporary construction area.

5.4.2 Furthermore, the following additional areas form part of the main development site:

- Permanent off-site sports facilities at Leiston, which would be used during the construction stage as a shared outdoor sports facility for Alde Valley School, the local community and construction workers.
- Permanent Fen meadow compensation sites to the south of Benhall and to the east of Halesworth.
- Marsh Harrier habitat improvement area (Westleton) (if required).

## 5.5 Permanent development

5.5.1 Sizewell C would be located immediately to the north of the existing Sizewell B power station and would comprise two United Kingdom European Pressurised Reactor (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.

5.5.2 In summary, permanent development at the main development site would comprise the following building, engineering or other operations:

### a) Nuclear Islands

- Two nuclear islands, including two UK EPR™ reactor buildings and associated annexed buildings containing the safety systems, fuel handling

systems and access facilities, together with the adjacent emergency diesel generator (EDG) buildings.

b) **Conventional Islands**

- Two conventional islands, each including a turbine hall and associated electrical buildings for the export and distribution of electrical power.

c) **Operational Building**

- An operational service centre (a multi-purpose building), which allows for access into the nuclear islands, including storage areas, workshops, store rooms, laboratories, data centre, offices and associated support and welfare facilities, including the staff restaurant.

d) **Cooling Water Pumphouses and Associated Buildings**

- Two cooling water pumphouses with related infrastructure (one for each UK EPR™ reactor).

e) **Ancillary Buildings**

- Plant, office/access, storage and fuel and waste management.
- National Grid 400 kilovolt (kV) substation, alterations to the existing National Grid substation and associated diversion of overhead lines.
- Relocation of several Sizewell B ancillary buildings including the outage store, training centre; administrative buildings; visitor centre; and office, canteen and welfare facilities.
- Associated buildings, structures and plant outside of the power station perimeter.

f) **Marine Works and Associated Infrastructure**

- The cooling water system and combined drainage outfall in the North Sea.

- g) **Other Site Structures, Infrastructure and Works, including Highway Works and Earthworks.**
- Overhead power lines and pylons connecting the conventional islands to the National Grid substation.
  - Replacement of an existing National Grid pylon and power line south of Sizewell C.
  - Installation of a cut-off wall and cut-off wall platform and associated deep excavations within the main platform.
  - Vehicular and pedestrian crossing over the Sizewell Marshes SSSI south of Goose Hill in the form of a culverted embankment.
  - A beach landing facility (BLF) proposed for freight and abnormal indivisible loads (AILs) arriving by sea, including associated dredging.
  - Relocation of certain Sizewell B infrastructure, including: outage laydown area; up to 112 replacement car parking spaces; access roads; up to 576 outage car parking space; and, outage car park access roads.
  - Diversion of rights of way including Bridleway 19.
  - Power station access road, linking the SSSI crossing with a new roundabout onto Abbey Road (B1122).
  - Up to 770 operational car parking spaces and up to 600 outage car parking spaces.
  - Flood defences and coastal protection measures.
  - Onshore components of the marine infrastructure.
  - Water supply and drainage measures.
  - Landscape restoration works and planting.
  - Fencing, lighting and other security provisions.



- New sports facilities located on existing playing fields at Alde Valley school in Leiston.
- Fen meadow compensation areas located at Halesworth and Benhall.

## 5.6 Construction Works

5.6.1 Temporary development across the main development site during construction, which would be removed at the end of the construction period, includes the following:

### a) All Areas

- Earthworks, excavation and site ground preparation works.
- Site hoardings (including perimeter enclosures and security fencing) and acoustic mitigation measures as required (including fencing or bunds).
- Formation of construction vehicle access routes, and provision of temporary gated site accesses and provision of construction and traffic signage and notices.
- Construction-related compounds, material management areas, buildings, structures, facilities, plant, equipment, cranes and machinery.
- Construction services and utilities, including electricity, telecommunications, water and power supplies (including substations) and construction lighting.
- Temporary landscaping, hard-standing areas and drainage works, including water control measures and sewage treatment works.
- Temporary construction areas and compounds.
- provision of temporary haul and access roads, highway works and temporary diversions of public rights of way (PRoW).

### b) Main platform

- Construction of a temporary crossing over Sizewell Marshes SSSI, prior to construction of a permanent crossing.

- Dewatering operations.
- c) **Temporary Construction Area**
  - Common user facilities, including: approximately six concrete batching plants; access and storage areas; logistical facilities, including waste handling areas; water treatment plants and water pumping stations; fabrication areas; and pre-cast concrete production areas.
  - Railway infrastructure, including: railway tracks; a terminal facility for offloading goods; railway sidings; and a passing loop for locomotives and associated works.
  - Material management areas, including borrow pits and stockpiles.
  - Accommodation campus, including: 3-storey and 4-storey residential buildings providing up to 2,400 bed spaces; non-residential welfare, administration and amenity facilities; approximately 1,600 campus car parking spaces; approximately 60 disabled car parking spaces, 120 motorbike spaces, 120 pedal cycle spaces and a drop-off and pick-up area; and, associated plant and infrastructure.
  - Approximately 1,000 parking spaces.
  - Railway infrastructure including railway tracks, a terminal facility for offloading goods, railway sidings, a passing loop for locomotives and associated works.
  - Water resource storage area for the storage of non-potable water.
- d) **Land East of Eastlands Industrial Estate**
  - Vehicular accesses onto Lover’s Lane, Valley Road and King George’s Avenue.
  - Material management areas, including stockpiles and a material transfer laydown area.
  - Up to 400 caravan pitches providing up to 600 bed spaces (based on 1.5 people per caravan), including serviced plots and associated facilities for staff welfare and amenity.

- Freight management facility, including approximately 80 HGV parking spaces and associated infrastructure.
  - Park and ride facility including up to 600 car parking spaces, up to 20 bus spaces and a terminal area.
  - Railway infrastructure including railway tracks, a passing loop for locomotives and associated works.
- e) **Offshore works area**
- Construction and tunnelling works related to marine infrastructure set out above.
  - Dredging works with associated disposal of material at sea.
- f) **Other temporary development**
- Marsh Harrier habitat improvement area (Westleton) (if required)<sup>6</sup>.

## 5.7 Construction Programme

- 5.7.1 Construction would commence following the grant of the Sizewell C Development Consent Order (assumed 2022, Year 1), and is likely to be completed approximately nine to twelve years later (Years 9 to 12).
- 5.7.2 Construction of the main development site is anticipated to be undertaken in the following five main phases, although these phases would overlap as work on different phases would be undertaken simultaneously in different areas across the main development site:
- Phase 1: site establishment and preparation for earthworks.
  - Phase 2: main site earthworks and completion of temporary infrastructure.

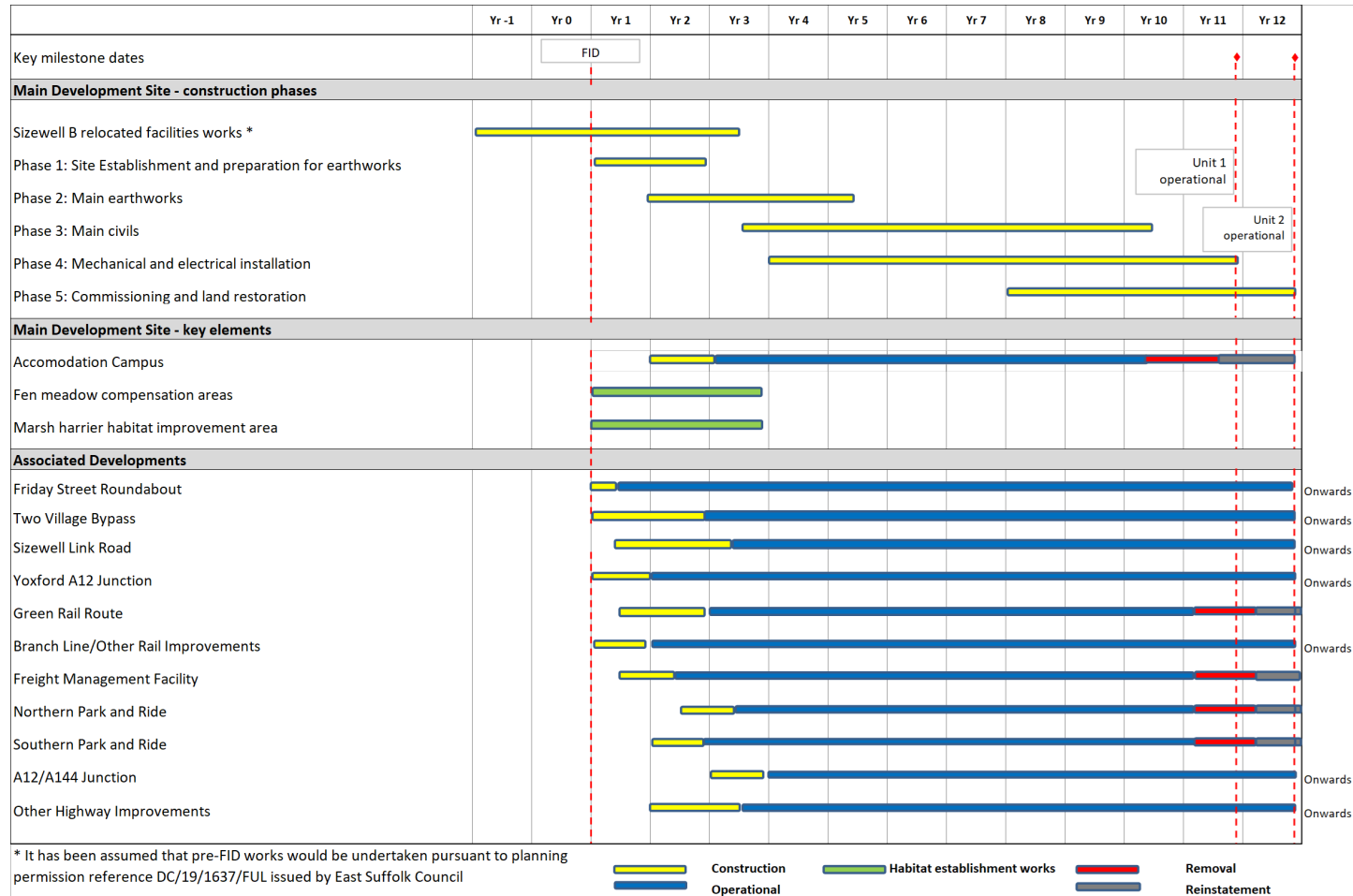
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<sup>6</sup> The Shadow Habitats Regulation Assessment Report (Doc Ref. 5.10) and the Shadow Habitats Regulation Assessment – Compensatory Measures Report (Doc Ref. 5.10) conclude that the permanent habitat improvement area of 47.8ha that has been developed at the northern edge of the EDF Energy Estate (UK grid reference: TM 46318 65222) would provide sufficient foraging to be regarded as appropriate compensation for the predicted 'loss of foraging' over the Sizewell Marshes SSSI arising as a result of a barrier effect created by the temporary construction area. However, if it is determined by the Secretary of State that additional marsh harrier habitats are required, then the marsh harrier improvement area (Westleton) would be used to provide this.

- Phase 3: main civil engineering works.
- Phase 4: mechanical and electrical installation.
- Phase 5: commissioning and land restoration.

- 5.7.3 It has been assumed that works relating to the relocation of certain Sizewell B facilities would begin approximately two years prior to the start of Phase 1, pursuant to planning permission reference DC/19/1637/FUL issued by East Suffolk Council. These works are referred as Phase 0.
- 5.7.4 Following construction of the units, they would undergo commissioning, with an expected phasing of 12 months between the commissioning of Unit 1 and Unit 2 of the Sizewell C nuclear power station.
- 5.7.5 Further details on the construction of the Sizewell C nuclear power station are provided in **Volume 2, Chapter 3** of the **ES**.
- 5.7.6 The construction of the off-site associated developments would be undertaken early in the construction programme. The construction period of each associated development would vary, although each is assumed to take no longer than 24 months.
- 5.7.7 Following construction, the temporary associated development sites would remain operational for approximately ten years to support and mitigate the effects of the construction of the main development site. Once these temporary facilities are no longer required, they would be removed and the land restored, where applicable. The removal and reinstatement of the associated development sites would vary, however is assumed to take no longer than 12 months for the purposes of the EIA.
- 5.7.8 An indicative phasing schedule for the Sizewell C Project as a whole is provided in **Plate 5.1**. More detailed descriptions of the construction sequence and programmes for each of the Sizewell C Project sites are included within the site-specific volumes of the **Environmental Statement** (Doc Ref. 6).

Plate 5.1: Sizewell indicative phasing schedule.



## 6 The Development of Related Strategies

### 6.1 Introduction

- 6.1.1 The NPS EN-1 and NPS EN-6 establish the need for new nuclear power generating capacity and the potential suitability of the Sizewell site. It falls to the applicant to develop a proposal for Sizewell C taking account of the environmental and economic effects of that development in the context of the characteristics of the local area.
- 6.1.2 The construction and operation of such a large project in a rural, coastal location means that significant effects could arise, for example, through the need to transport large quantities of construction material through the local road network or the need to provide accommodation for large numbers of construction workers. To address these issues, SZC Co. has developed a range of transport and accommodation initiatives through consultation and engagement to limit and mitigate those potential effects. Those bespoke strategies are explained in this section. As explained further below, the successful implementation of those strategies requires a number of associated development facilities to be included within the DCO application.
- 6.1.3 This section of the **Planning Statement** deals first with strategies relating to the workforce, and then with strategies relating to freight management.

### 6.2 Workforce

#### a) Numbers and Profile

- 6.2.1 Based on experience elsewhere, notably at Hinkley Point C, the forecast number of construction workers shows a peak at 7,900, plus a further 600 workers to operate the associated development facilities during the construction phase. Detailed assumptions that feed into the Workforce Profile are set out in **Appendix 9A to Volume 2, Chapter 9 (Socio-economics)** of the **Environmental Statement**. Once construction is complete, the permanent workforce would number approximately 900. Roughly one quarter of the permanent operational workforce would be on-site at the peak of construction.
- 6.2.2 This construction workforce would be employed in a variety of roles requiring differing skills. Some of these roles would be filled by local residents but there would be a need to draw on skills from elsewhere, although SZC Co.'s proposals for education, skills and training would maximise the potential of recruitment from the local workforce - see below and the **Economic Statement** (Doc Ref. 8.9), and its appended **Employment, Skills and**

**Education Strategy** (Doc Ref. 8.9A). There would therefore be a proportion of the workforce that would be Home-Based (HB) and a proportion that would be Non-Home Based (NHB).

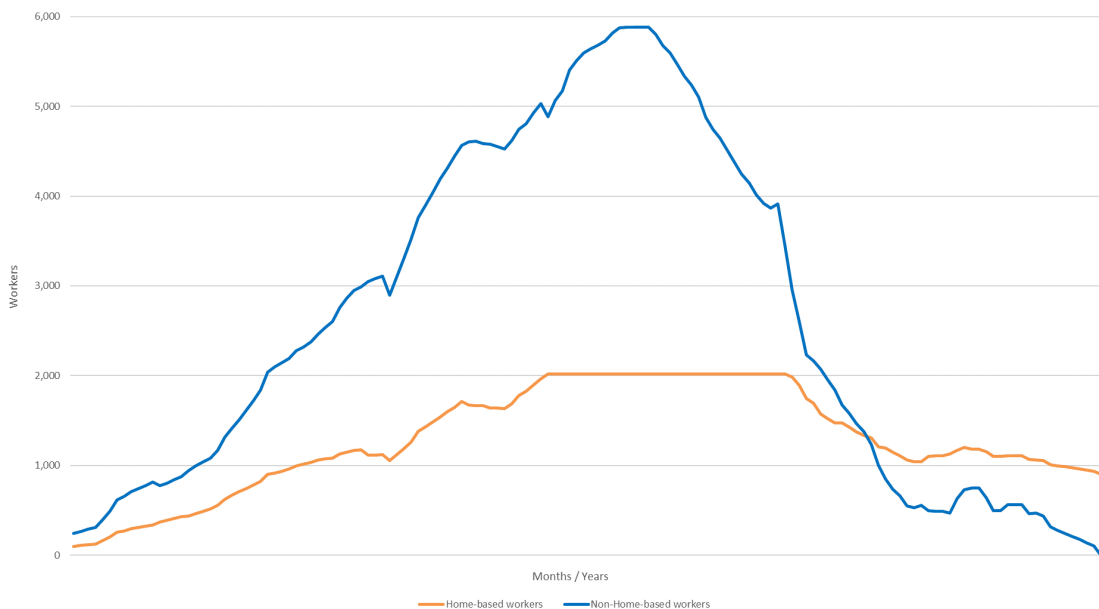
6.2.3 The proportion of HB and NHB workers would change over the course of construction. The degree of change would depend upon the demand for different skills/roles at each stage of the Sizewell C Project. The peak level of HB recruitment would be driven by the availability of specialist skills in the local labour market, the characteristics and mobility of the UK construction workforce and to some extent the ability of the Sizewell C Project to recruit local residents to the Sizewell C Project, and retain and upskill them across different roles.

6.2.4 **Plate 6.1** shows how the proportion of HB and NHB workers is anticipated to change over the course of construction.

6.2.5 Throughout the ES, the effects of the workforce are considered in terms of their influence on the economy and labour market, accommodation and public services.

6.2.6 These assumptions are consistent with the **Transport Assessment** (Doc Ref. 8.5).

**Plate 6.1: Sizewell C main development site workforce profile (by home-based/non home-based)**



**b) Workforce Distribution (via a "Gravity Model")**

6.2.7 To forecast where the HB workforce may be drawn from, and where and in what types of accommodation the NHB workforce might be expected to stay, a Gravity Model has been developed to predict the spatial distribution of the workforce. This draws on socio-economic information, accommodation data, research by the Construction Industry Training Board (CITB) on workers' willingness to travel and transport-related data on average speeds, routes and journey times. It also incorporates assumptions regarding preferred accommodation choices and commuting times.

6.2.8 The Gravity Model spatial distribution is based on the best and most spatially detailed available data and methodology. It is recognised that this is a modelled prediction, and cannot take full account of all the factors which may influence accommodation and employment decisions which are still many years away, but it is considered a rational estimate and provides a founding platform to the assessment. The Gravity Model's assumptions and mechanics have been reviewed by Suffolk County Council (SCC).

6.2.9 The Gravity Model shows that at the peak of construction:

- NHB workers are likely to live within a 60-minute travel distance reflecting their preference to live close to the site and reduce travel time, and the availability of accommodation (i.e. local tourist, caravan and private rented accommodation). As such, more workers are anticipated to stay relatively close to the site in areas to the east of the A12 (e.g. Leiston, Aldeburgh and Saxmundham) than in areas further from the site (e.g. Lowestoft or Ipswich).
- HB workers are mainly drawn from within a 90-minute travel distance of the site, including locations close to the site and further afield such as Ipswich, Lowestoft, Felixstowe, Colchester, Great Yarmouth and parts of Norfolk.

**c) Potential Effects**

6.2.10 The scale of the construction workforce, and the number of NHB workers who would be likely to seek accommodation in the local area, needs to be seen in the context of the wider residential population. The NHB workforce would be a relatively small number in the context of the existing population of Suffolk (equivalent to 0.7% of the current population) or East Suffolk District (equivalent to 2.2% of the current population).



6.2.11 However, it is understood that the construction workforce may represent a disproportionate level of temporary population change in more local areas, and in particular accommodation sectors. The scale and distribution of the construction workforce may have effects on:

- housing need in the private rented sector - there is likely to be some overlap of demand from incoming workers with that from local residents, particularly in the lower 30 percentile of the market which is relied upon by local authorities to support people with housing need or vulnerability to housing need;
- demand for tourist-sector accommodation – though in some cases the workforce represents an opportunity for economic gain (e.g. in off-season months), there may be localised demand that has the potential to overlap with demand from tourists, in certain parts of the sector; and
- demand for community facilities and public services – though this may be limited by the likelihood for workers to contribute to demand through general taxation, there may be a transitional effect, or effects on particular services such as social care or emergency services.

6.2.12 These potential effects are assessed within **Volume 2, Chapter 9** of the **ES**. The following section describes SZC Co.'s strategies for addressing them.

## 6.3 SZC Co.'s Workforce Strategies

### a) Introduction

6.3.1 SZC Co.'s objective is to avoid or mitigate the potential adverse effects and also to enhance the benefits of the Sizewell C Project to the local economy and communities.

6.3.2 There are three main sets of plans and implementation strategies:

- An **Economic Statement**, which includes an **Employment, Skills and Education Strategy** and Appendix B, **Supply Chain Engagement Strategy** (Doc Ref.8.9).
- An **Accommodation Strategy** (Doc Ref. 8.10).
- A **Transport Strategy** (Doc Ref. 8.5).

6.3.3 The draft DCO Requirements, provided in **Schedule 2** of the **draft DCO** (Doc Ref 3.1) and the **draft Heads of Terms**, provided in **Appendix J** of this **Statement**, commit to apply the measures set out in these documents, which are described further below.

b) **The Employment, Skills and Education Strategy**

6.3.4 The **Economic Statement** (Doc Ref. 8.9) explains that the Sizewell C Project is of a scale that can make a material, positive contribution to local employment, and create a catalyst for change, but can do so whilst not overwhelming the ability of the dynamic local economy to cope. SZC Co. shares the objective of SCC to generate as much employment as possible from out-of-work residents or new entrants to the labour market. It also looks to enable local residents to access higher-paid and higher-skilled roles, address the productivity gap and projections of employment decline.

6.3.5 The **Employment, Skills and Education Strategy** (Doc Ref. 8.9A) is key to achieving these objectives. Broadly, the strategy sets out how SZC Co. would work with partners in the region (including SCC, New Anglia Local Enterprise Partnership, schools, colleges and further education providers) to promote and catalyse existing plans for growth, and develop a complementary suite of initiatives for the benefit of the Sizewell C Project, local residents and the sustainable economic future of the region. These initiatives include:

- A future Sizewell C jobs service - SZC Co.'s focus on recruitment would be on targeting the right people into the right jobs through the enhancement of the Jobs Service provided at Hinkley Point C. This would provide a service that is managed centrally but delivers locally through a small number of dedicated staff in Suffolk and through optimising external partnerships.
- Skills initiatives – including:
  - A flexible Asset Skills Enhancement and Capability (ASEC) Fund with a strong, accountable governance structure including Tier 1 contractors and local stakeholders.
  - A commitment to funding a Regional Skills Coordinator post to provide a focal point of coordination and skills planning between project and providers.
  - Supporting contractors in exploring options for training and assessment facilities to enable the competence of workers to be assessed and to identify areas of additional training.

- Supply chain initiatives - in order to help jobseekers find roles on the Sizewell C Project and to backfill occurrences of displacement within the supply chain. The strategy would be an integral part of the wider Energy Coast strategy and will not work in isolation.
- Education initiatives – partnering with regional stakeholders to invest in a range of activities including:
  - Supporting specific and existing educational initiatives in the region that are working well or are supporting young people in raising their aspirations for careers in energy, engineering or construction.
  - Supporting and investing in specific interventions with a focus on career introduction and development.
  - Starting early with ‘aspiration raising’ activities.
  - Introducing actual opportunities to ‘have a go’ with an emphasis on the promotion of the Sizewell C Project’s critical skills that are in short supply.
  - Creating an innovative and ‘first of a kind’ Bursary Scheme to support the creation of alternative pathways for those that have not reached the required entry level, providing a ‘second chance’ for young people in rural Leiston, Lowestoft, Great Yarmouth and Ipswich.
  - Establishing a Young Sizewell C programme providing an insight programme to inspire and build awareness of opportunities among young people who are closest to the workplace and to help pipeline them into actual Sizewell C opportunities.

6.3.6 Full details can be found in the **Economic Statement** (Doc Ref. 8.9).

c) **Supply Chain Engagement Strategy**

6.3.7 The **Economic Statement** (Doc Ref. 8.9) explains that the Sizewell C Project would require a substantial input from international, national, regional and local providers of goods, services and labour across construction and non-construction packages. It identifies that the regional benefit of the scheme in this sense earnings and spending by workers could be well in excess of £1 billion over the construction phase of the Sizewell C Project.

6.3.8 The **Supply Chain Engagement Strategy** (Doc Ref. 8.9B) sets out a range of measures to promote the skillsets of local and regional businesses, inform

them of the Sizewell C Project and how to seek contract opportunities, and commits to a programme of events and activities that would ensure that organic local benefits are captured and enhanced – providing an important footing for firms to work on this project and other national infrastructure projects, meeting the aims and objectives of regional sector strategies for construction and energy. Building on experience from Hinkley Point C, measures include:

- A Sizewell C Supply Chain Team, partnering with the Suffolk Chamber of Commerce. The Team would assist local and regional businesses in winning contracts on the Sizewell C Project through:
  - Management of a supply chain website with project information, details of work packages and professional standards, signposting to relevant support, details of events and examples of success.
  - Chairing and enabling steering groups that oversee the developing supply chain response.
- A Sizewell C Supply Chain Portal capturing details and core capabilities of regional businesses and mapping them against requirements of the Sizewell C Project, brokering business support and matching suppliers with SZC Co. and Tier 1 contractors.
- Contractor engagement including senior leadership commitments from Tier 1 contractors to engage with the local supply chain, ‘meet the buyer’ events and coordination of wider networking with key public and private sector stakeholders.
- Facilitation of local business consortia and business support activities.
- Monitoring and reporting in order to compare and contrast local and regional levels of engagement.

6.3.9 The Sizewell C Project’s strategy is to integrate employment, skills and education with the supply chain development activity in order to help jobseekers find roles on the Sizewell C Project and to backfill occurrences of hard to fill vacancies within the supply chain through the Sizewell C Jobs Service.

6.3.10 Full details can be found in the **Economic Statement** (Doc Ref. 8.9).

#### d) The Accommodation Strategy

- 6.3.11 The overall aim of the **Accommodation Strategy** (Doc Ref. 8.10) is to strike a balance between providing temporary worker accommodation and workers using existing local accommodation, in order to minimise impacts on the local housing market and community, while promoting the economic benefits of workers living and spending in the area, and attracting a high quality workforce to safely and efficiently deliver an NSIP.
- 6.3.12 During the construction phase, NHB workers would seek temporary accommodation across a range of types depending on their roles, skill level and tenure on the Sizewell C Project. The analysis shows that at the peak of construction activity it is estimated that approx. 5,880 of the 7,900 peak workforce would need temporary accommodation in the local area. Some workers would buy homes in the area, particularly if they are in longer-term, management and high-skilled roles, or part of the operational (permanent) workforce which would start to build up before the peak of construction. Others would look to the private rented sector or to tourist accommodation. Feedback from Hinkley Point C has suggested that more workers are likely to look for accommodation in the private rented sector (PRS) than the tourist sector<sup>7</sup>.
- 6.3.13 Demand for PRS accommodation would predominantly be for smaller one or two bed properties and houses in multiple occupation. Serviced and self-catering tourist accommodation and existing caravan sites are likely to be used by some construction workers in shorter-term roles on the Sizewell C Project. These would offer the workers some flexibility in tenure. There is a range of availability and affordability in this sector in Suffolk (though this may be restricted by high occupancy rates from Easter to the end of October).
- 6.3.14 In order to reduce the potential significant effect of these workers on local housing markets and communities, the strategy includes:
- an accommodation campus comprising 2,400 bed spaces on the main development site;
  - a caravan site of up to 400 pitches, equivalent to 600 bed spaces (based on occupancy of 1.5 per caravan) at LEEIE; and

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<sup>7</sup> Impact Assessment Unit (IAU), School of the Built Environment, Faculty of Technology Design and Environment, Oxford Brookes University (Commissioned by the New Nuclear Local Authorities Group (NNLAG)) (July 2019) Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station Monitoring and Auditing Study: Final Report

- other measures, including a Housing Fund, summarised in **Section 7.2** below, and Accommodation Management System.

6.3.15 The aim of the Accommodation Strategy is primarily to manage the potential for effects on the most vulnerable sectors of the housing market, including the lower 30<sup>th</sup> percentile of PRS accommodation. In light of the consultation feedback and more information on potential for demand from civils construction workers, the strategy has developed to also include additional Temporary Worker Accommodation (TWA) in the form of a caravan park at the LEEIE site.

6.3.16 There is potentially a significant amount of accommodation, such as spare rooms across all tenures, and currently un-rated tourist accommodation, that could potentially be made available to workers (this is referred to as “latent accommodation”). While it is not possible to fully identify and model the extent of this sector, experience from Hinkley Point C suggests that some workers would use this sector for short periods of time instead of PRS or tourist accommodation<sup>8</sup>.

6.3.17 The full accommodation strategy for Sizewell C is set out in the **Accommodation Strategy** (Doc. Ref 8.10).

6.3.18 The following sections describe the direct provision of accommodation through the accommodation campus and the caravan park at the LEEIE site, as well as indirect measures through interventions in the housing market.

#### Accommodation Campus

6.3.19 The proposed accommodation campus would be located to the east of Eastbridge Road and would accommodate up to 2,400 workers on a single site. It would be retained for the duration of the construction period before being removed and the land restored. The campus would comprise:

- 3-storey and 4-storey residential buildings placed in a broadly east–west orientation and providing up to 2,400 bed spaces;
- non-residential welfare, administration and amenity facilities, including: a 2-storey recreation building with a restaurant, kitchen, two bars, gym,

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<sup>8</sup> Impact Assessment Unit (IAU), School of the Built Environment, Faculty of Technology Design and Environment, Oxford Brookes University (Commissioned by the New Nuclear Local Authorities Group (NNLAG)) (July 2019) Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station Monitoring and Auditing Study: Final Report

multi-functional room, prayer / quiet room, plant and services; and a two storey reception building, incorporating administration /management space and a medical facility;

- 300 surface car parking spaces and a covered accommodation campus multi-storey car park, providing approximately 1,300 car parking spaces;
- provision of approximately 60 disabled car parking spaces, 120 motorbike spaces, 120 pedal cycle spaces, plus a drop-off and pick-up area.
- plant associated with the operation of the accommodation campus;
- access roads and footpaths;
- security office;
- access to the temporary construction area; and
- drainage and landscaping features, including recreational areas.

6.3.20 Sports facilities are proposed to be provided off-site at Leiston, at a site adjacent to the Leisure Centre and Alde Valley Academy. They would comprise a full size 3G artificial football pitch and 1-2 Multi Use Games Areas. Use of the facilities would be shared between the Academy, the local community and the workforce. They would be retained following the construction period as a permanent benefit for the community.

Plate 6.2: Plan view of the accommodation campus



6.3.21 **Plate 6.2** illustrates the layout of the proposed accommodation campus. Three-storey buildings would be located nearest to Eastbridge Road, with the four-storey buildings close to Bridleway 19 (access to which would be maintained). There would be a separation distance between habitable rooms of typically 17m between blocks north and south and 9m between blocks east and west.

6.3.22 SZC Co. concluded through consultation and experience on Hinkley Point B and Sizewell B (and emerging experience at Hinkley Point C) that it was preferable to have as many workers accommodated on-site as possible.

6.3.23 A single site campus would enable SZC Co. to provide the most flexible accommodation offering, making it easy for workers and contractors to manage their accommodation needs. Providing a single, on-site accommodation campus would also help to mitigate the impacts of large groups of construction workers in a number of otherwise small rural communities. An alternative multiple-campus option – with locations further afield - would spread the workforce across a wider area and increase the



difficulty in managing effects on those communities, as well as increasing traffic through more (and longer) journeys across multiple shifts.

#### Caravan Site at Land East of Eastlands Industrial Estate (LEEIE)

6.3.24 The other element of the TWA provision is a new temporary caravan area at the LEEIE site. This would comprise a 400-pitch temporary caravan site for construction workers along with associated welfare and parking facilities.

6.3.25 The caravan site at the LEEIE would be available in the early years of construction, before the campus is established, as well as helping to provide resilience for the workforce at the peak of construction and reduce effects on other accommodation sectors.

#### Other Measures

6.3.26 In addition to this direct provision, the Strategy proposes a series of further measures:

- An Accommodation Management System - in order to help manage the distribution of workers and avoid, or reduce, potential adverse effects on accommodation capacity in local areas in a responsive way, SZC Co. would work with partners to develop mechanisms that:
  - allow local landlords, tourism businesses and residents to register accommodation available for workers; and
  - enable SZC Co. and its contractors to signpost workers towards this accommodation and provide information to accommodation providers.
- The Accommodation Management System has the following components:
  - Collection of information from the workforce, contractors and local housing market.
  - Provision of information to workers, contractors and accommodation providers, and working with providers to help them understand opportunities to support the Sizewell C Project's workforce.
  - SZC Co. would collect and share information about the local accommodation market (including registrations from providers with accommodation) that can be used to provide contractors and

workers with a means of finding the most suitable accommodation and location.

- In addition, information would be provided to prospective or existing landlords that could help to make sure they are providing accommodation that meets safety and quality standards. This would help to avoid the risk of landlords being unaware of rules and regulations that apply to letting property, or new providers entering the market with accommodation of an unacceptably low standard.
- An Accommodation Portal would serve to raise understanding of applicable regulations and sources of further information as well as confirming SZC Co.'s expectations. This would be an online resource publicised through the Sizewell C Project's website and via newsletters, community engagement (including regular community forums) and through partners and stakeholders.
- SZC Co. would run a series of 'one-stop-shop' open events – for potential providers of accommodation, along with East Suffolk Council, in order to:
  - inform them of the likely scale of demand from workers, how this changes over time, and the likely accommodation requirements and characteristics of the workforce;
  - set out expected safety and quality standards, as well as planning and licensing that may be required to provide accommodation to workers, for example amendments of residency criteria for caravan sites;
  - respond to any concerns that accommodation providers may have about NHB construction workers, including how the Sizewell C Project uses the **Worker Code of Conduct**, found in **Appendix A** to the **Community Safety Management Plan** (Doc Ref 8.16) to enforce high standards of behaviour both on and off-site; and
  - explain what providers can / cannot expect from the Sizewell C Project based on lessons learnt from Hinkley Point C, e.g. the Sizewell C Project will not reimburse unpaid rent and – due to the large number of people on site - can only enforce the Worker Code of Conduct if accommodation providers collect a full name / contractor name from tenants.
- A Housing Fund (secured via the Section 106 Agreement) to finance interventions in the market, both precautionary and reactive. These would

include measures to boost supply, improve the efficiency of existing stock and support the delivery of local authority housing services. Measures would include:

- Developing supply through e.g.:
  - supporting rent/deposit guarantee schemes – interventions to make the market work better, and support rent deposits for people at risk of homelessness;
  - providing equity loans to residents in the owner-occupied and private rented sector to enable them to secure suitable accommodation and free up homes/rooms in the private rented sector;
  - providing equity loans to residents in the social rented sector to help them access owner-occupied and rented property;
  - supporting empty homes back into use;
  - providing loans/grants/guaranteed lets, e.g. renovation grants;
  - helping to deliver the East Suffolk Housing Strategy (2017) pledge to work with housing associations to explore opportunities for mixed schemes of private sale and affordable housing to generate profits to replace grant funding; and
  - tackling under-occupation.
- Providing resilience for demand – to support and provide resilience to services, staffing, advice and short-term response such as temporary accommodation and the use of bed and breakfast accommodation.
- Supporting growth in the tourist accommodation sector through provision of information and communication with the Sizewell C Project, support with planning, licensing and development, and funding for increases in capacity or re-design of sites.

6.3.27 Whilst decisions about how the Housing Fund would be distributed and managed to support the above initiatives have yet to be settled, it is clear that the fund would need to be partly precautionary and applied ahead of the peak effects to ensure resilience, and partly reactive to issues as they arise.

6.3.28 The key principle would be to ensure that the fund is directed toward the areas likely to experience significant impacts but provides the local authority (as the local experts) with flexibility as to how it is best used.

6.3.29 The local authority would continue to review the effectiveness of the response to homeless presentations and identify the measures that are most effective in preventing homelessness. Going forward, this would provide a guide to which interventions would benefit most from the housing fund to avoid or reduce significant effects.

e) **Social/Community Mitigation**

6.3.30 The presence of a temporary construction workforce with a demographic profile different from the local area has the potential to alter the population of existing communities close to the Sizewell C Project in the short-term. In turn, this could potentially lead to effects on these communities and service providers, including from:

- construction workers (and their families in some instances) seeking access to existing public services and community facilities such as sport/recreation, healthcare and education; and
- Sizewell C Project indirect effects (e.g. through traffic generation) on the delivery of existing services such as police, ambulance and fire and rescue.

6.3.31 There may also be real and perceived effects on community safety and the potential for changes to community cohesion and integration, for example in terms of equality of access to services and facilities between the Sizewell C Project's construction workforce and existing residents. Feedback during the consultation stages suggested the following concerns:

- effect on social cohesion;
- concern about worker behaviour, particularly in areas close to the campus and other NHB accommodation; and
- cumulative environmental effects impacting on existing residents' quality of life.

6.3.32 To ensure that any effects on social infrastructure and community cohesion would be limited, the Sizewell C Project's approach addresses the following potential effects and identifies mitigation in **Volume 2, Chapter 9 (Socio-Economics)** of the **Environmental Statement**:

- Access to public services and community facilities including:

- schools and childcare provision;
- social services;
- emergency services and community safety;
- sports and leisure; and
- other County and District level services.
- Potential for effects on community cohesion/integration.

6.3.33 Local-scale significant environmental effects (as identified through the Environmental Statement) are summarised via a **Community Impact Report** (Doc Ref. 5.13) which reports on sensitive receptors, effects and the mitigation that is proposed to be available to local communities.

6.3.34 The primary source of mitigation for potential effects identified above is via the Section 106 Agreement (see the **draft Section 106 Heads of Terms (Appendix J)**). This includes commitment to:

- Provision of a **Community Fund**; and
- A **Community Safety Management Plan** (Doc Ref. 8.16) and Worker Code of Conduct.

i. **Community Fund**

6.3.35 SZC Co. recognises that there would be intangible residual impacts on local communities as a result of combined environmental effects, both perceived and real. In some instances, these cannot be directly mitigated through physical design measures, and require a more reactive approach.

6.3.36 As a result, SZC Co. would offer a Community Fund to help mitigate these effects through schemes, measures, and projects which promote the economic, social, or environmental well-being of those communities and enhance their quality of life. The Community Fund would be secured via the **Section 106 Agreement** and a detailed summary is provided at **Section 10.5** of this **Planning Statement**.

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ii. **Community Safety Management Plan / Worker Code of Conduct**

- 6.3.37 SZC Co. has developed a **Community Safety Management Plan** (Doc Ref. 8.16) in collaboration with local authorities, emergency services and public services, among other stakeholder groups. It outlines the approach to community safety in the area including:
- a precautionary approach to manage impacts on community safety, cohesion and public services, with a focus on prevention where possible and measures to raise awareness of the Sizewell C Project's changes/risks to community safety;
  - information for accommodation providers in the PRS and tourism sectors, setting out details of the workforce profile and the Code of Conduct;
  - a mechanism for the local community to register public concerns, through (for example) a hotline;
  - provision of occupational health services to reduce pressure on existing facilities and a review of any residual public health care requirements from NHB workers and their dependants; and
  - provision of project-recreational facilities, including off-site sports pitches, helping to manage the demand from workers.
- 6.3.38 The implementation of the Community Safety Management Plan would be secured via the **Section 106 Agreement**.
- 6.3.39 The Hinkley Point C **Worker Code of Conduct** is attached as an Appendix to the **Community Safety Management Plan** (Doc Ref. 8.16), and provides an example of how workers use accommodation and the way they interact with the local community.
- 6.3.40 A Sizewell C Worker Code of Conduct will be developed and put in place ahead of the start of construction of the Sizewell C Project. This will be very similar to the Hinkley Point C Worker Code of Conduct appended, but will be subject to any updates following engagement with local partners and continuing lessons learnt from Hinkley Point C.
- 6.3.41 The final Sizewell C Worker Code of Conduct and the **Community Safety Management Plan** (Doc Ref. 8.16) would:

- communicate the behaviour expected of workers and outline the means by which this would be communicated to all workers;
- outline the role of employers;
- include drug and alcohol testing policies; and
- inform the community of the standard of behaviour they should expect from workers and their employers.

6.3.42 The final Worker Code of Conduct would be explained to workers at induction and reinforced in the course of the Sizewell C Project through ongoing training and awareness campaigns. Each worker would be required to sign a copy of the document at induction.

## 6.4 Transport Strategy

6.4.1 The DCO application is accompanied by a **Transport Assessment** (Doc Ref. 8.5), **Section 5** of which sets out the overall transport strategy. The effects of the transport strategy are assessed by **Volume 2, Chapter 10** of the **Environmental Statement**.

6.4.2 The Sizewell C Project would involve the construction of a major piece of nationally significant infrastructure in a rural location. The movement of a large number of construction workers over the nine to 12 year construction period requires a strategy that would avoid or mitigate harm caused by traffic movements to the local population and environment, optimise the use of sustainable modes and enable the efficient movement of the workforce.

6.4.3 As explained in **Section 6.2**, a Gravity Model has been used to forecast the spatial distribution of the construction workforce (which is anticipated to peak at 7,900 on the main development site). To manage the movement of this workforce a series of measures are proposed, specifically:

- two park and ride facilities;
- car park management;
- direct bus services;
- facilitation of walking and cycling; and

- implementation of a **Construction Worker Travel Plan (CWTP)** (Doc Ref. 8.8).

a) **Park and Ride**

- 6.4.4 The geographic distribution of the workforce estimated by the gravity modelling work supports two park and ride developments to help reduce traffic from construction workforce movements. One would intercept traffic travelling on the A12 from the south, and one would intercept traffic travelling on the A12 from the north. Both park and ride developments would intercept traffic movements from locations west of the A12.
- 6.4.5 Through a detailed site selection process (**Appendix A**), two locations have been identified for the park and ride facilities. The northern park and ride facility is proposed at Darsham, the southern facility at Wickham Market. Separate **Planning Statements** for both facilities can be seen at **Appendices 2 (Northern Park and Ride)** and **3 (Southern Park and Ride)**.
- 6.4.6 A park and ride facility would be constructed at the LEEIE comprising up to 600 car parking spaces and an associated bus parking (20 spaces) and terminal area, which would remain in use until the northern and southern park and ride sites become operational.

b) **Car Park Management**

- 6.4.7 An actively managed parking permit system for the construction workforce is proposed. This would limit and control the allocation of permits for the car park on the main development site during construction.
- 6.4.8 Only workers living inside the area bounded by the A12, River Blyth and River Deben (except those living in the Leiston area or other locations with a direct bus service) would be issued a parking permit. Each worker arriving at the site by car would need a valid parking permit to enter the site, i.e. workers, not vehicles, would be allocated permits. This approach seeks to eliminate the possibility of workers from outside the area bounded by the A12 and the rivers Blyth and Deben driving into the zone to access the construction area.
- 6.4.9 Workers without a parking permit (including those living on a direct bus route) would need to use one of the park and ride sites, a rail pick-up or the direct bus services from Ipswich, Lowestoft, Saxmundham station or the Leiston area. Cycling or walking would also be possible for some living in Leiston (see below).



c) **Direct Bus Services**

- 6.4.10 SZC Co. proposes to run direct bus services to the main development site from Ipswich, Lowestoft and Leiston during the peak years of construction. The Ipswich and Lowestoft services would be an alternative to the use of park and ride for workers living beyond the area bounded by the A12, River Deben and River Blyth. The service from Leiston would serve the concentration of workers expected to be accommodated there.
- 6.4.11 The services from Ipswich and Lowestoft would use the A12 and then follow the same routes as the park and ride buses, taking approximately 40 and 35 minutes respectively. The Leiston service would take approximately 15 minutes.

d) **Facilitation of Walking and Cycling**

- 6.4.12 Although it is expected that some workers living relatively near to the main development site would walk or cycle to site, the number is uncertain and, for robustness, the traffic modelling for the **Transport Assessment** (Doc Ref. 8.5) assumes no construction workers would walk or cycle either to the main development site or to the park and ride facilities.
- 6.4.13 An assessment of the existing network of local walking and cycling routes has been made and improvement measures identified in **Volume 2, Chapter 15** of the **Environmental Statement**. Improvement measures would be carried out within existing highway land to encourage safe cycling to site during both construction and the operation of the Sizewell C power station.
- 6.4.14 Bridleway 19 currently runs through what would be the main construction area for Sizewell C. It would be diverted throughout the construction phase onto a single 3m-wide route, surfaced to bridleway standards and with waiting boxes at crossing points. The route will include a footpath linking the caravan accommodation site to the main construction site.

e) **Implementation of a Construction Worker Travel Plan**

- 6.4.15 A **CWTP** (Doc Ref. 8.8) has been developed. This includes proposals for encouraging walking or cycling to the main site and park and ride facilities where practicable.
- 6.4.16 Travel to work by car would be restricted to the availability of car parking on the construction site, which is approximately 1,000 spaces. The **CWTP** (Doc Ref. 8.8) addresses the potential to encourage a mode shift from car to more sustainable modes of travel.

- 6.4.17 Compliance with the **CWTP** (Doc Ref. 8.8) and its parking strategy would be a requirement of all construction employees and contractors working at the construction site. It would be reinforced through a consenting and management process which would be produced in discussion with the local authorities.
- 6.4.18 The **CWTP** (Doc Ref. 8.8) would monitor the two park and ride sites from the early years of construction, through peak construction activities to completion. It is expected that the number of workers using the park and ride sites would vary significantly over these construction phases, but they have been sized to accommodate the expected demand at peak construction.
- 6.4.19 Although the estimate of 200 workers travelling to and from the construction site by direct bus from Lowestoft and Ipswich is considered reasonable, the **CWTP** (Doc Ref. 8.8) seeks to encourage more workers to use this mode of travel.
- 6.4.20 The implementation of the **CWTP** (Doc Ref. 8.8) will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms (Appendix J)**).

## 6.5 Freight Management Strategy

- 6.5.1 Construction of Sizewell C would require large volumes of freight to be transported to the main development site. The principles informing SZC Co.'s overall strategy for managing materials and freight movements are as follows:
- Firstly, wherever practical and cost effective, to seek to reduce the volume of materials that requires movement off-site, either through the re-use of excavated material as fill, landscaping or via the deployment of borrow pits to both source material on-site and deposit other material.
  - Secondly, where materials must be imported to or exported from the site, to seek to move bulk materials and containerised goods by sea or by rail where this is practical and cost effective.
  - Thirdly, where movement of materials by road remains necessary, to manage this in a way which reduces local impacts via the use of defined routes for HGVs and systems which can monitor, manage and control the number and timing of HGV movements to the site.

6.5.2 In line with this strategy and NPS EN-6, SZC Co. has evaluated the possibility of moving bulk materials and containerised goods by sea or by rail. This has included:

- evaluating the capability of the options for sea and rail deliveries, including assessment of potential constraints on delivery (e.g. weather and navigational constraints in respect of sea delivery and rail pathing/infrastructure constraints in respect of rail deliveries);
- assessing the key material requirements that would arise over time during the construction phase, for each key area of the Sizewell C Project build, and from this identifying the periods during which demand for materials is greatest;
- considering the scope to move each major category of materials by sea and rail, taking account of the nature of the materials and possible supply sources; and
- consideration of the environmental impact of each of the main strategies.

6.5.3 NPS EN-1 (paragraph 5.13.10) states that water borne and rail transport is preferred over road transport at all stages of the project, where cost-effective. Paragraph 5.13.11 goes on to note that requirements to the DCO may be attached where there is likely to be substantial HGV traffic. NPS EN-1 does therefore not seek to preclude or prevent road borne options during the construction phase. This is recognised in C.8.123 of Volume II of NPS EN-6, which states:

*“Development at the Sizewell site is assessed by the Appraisal of Sustainability as having the potential for some adverse impacts locally from additional traffic generated during construction and wider negative effects on regional road infrastructure.”*

a) **Movement by sea**

6.5.4 As part of Stage 1 consultation a jetty (known as a Marine Off-loading Facility) was proposed, which would have enabled the delivery of bulk materials, containerised goods and AILs by sea during the construction phase. At Stage 2 consultation, three options were proposed: a wide jetty, a narrow jetty or a beach landing facility.

- 6.5.5 Preliminary environmental assessment of the three sea transport options was undertaken by SZC Co. between Stages 2 and 3, which identified several **significant** environmental impacts associated with a jetty. These included:
- Both jetty options would have resulted in severe underwater noise during construction as a result of the nature of the construction works, and a significant amount of time would have been required to construct the jetty. This noise would have been likely to extend to a radius of several kilometres. This would have caused significant adverse effects on marine ecology and fisheries, which could only be limited, but not removed, by extensive seasonal controls on construction activity, which would have greatly extended the construction programme and the commencement of operation of the power station.
  - The jetty options would have resulted in greater habitat loss associated with the footprint of the piles.
- 6.5.6 The beach landing facility also requires piling, but to a greatly reduced extent, and only in shallow waters which greatly attenuates the radius of underwater noise. The beach landing facility is therefore predicted to have a more limited impact on the environment, shipping and navigation activities compared with either of the jetty options and would not require removal after the construction period ends, as it would be retained for use during the operation of the power station.
- 6.5.7 A beach landing facility is now the only marine based facility promoted. It would allow for the delivery of AILs throughout the construction phase and during the operational phase, to remove heavy and oversized loads from the road network.
- b) [Movement by rail or road](#)
- 6.5.8 Funding the construction of nuclear power stations poses unique challenges due to the high cost of construction and the long construction period. It is necessary for SZC Co. to take into account the potential cost implications of the respective transport options, along with any potential risks of delay to delivery in connection with each option.
- 6.5.9 In order for these issues to be taken into account in the proposed freight management strategy, the deliverability of the road and rail-led strategies was considered in detail by SZC Co., in consultation with Network Rail, between Stage 3 consultation and the submission of the DCO Application.

- 6.5.10 Rail reduces the number of HGVs on the road, and/or mitigates road traffic capacity issues. Bypass(es) would also provide amenity (noise/emissions) mitigation. However, as Network Rail identified in response to Stage 2 Consultation, the rail-led strategy would cause a number of risks that could impact on the deliverability of the Sizewell C Project within the required programme.
- 6.5.11 The same risks were not identified for the road-led scheme, but such a strategy would lead to greater levels of impacts associated with HGV movements, leading to **significant** noise and air quality impacts.
- 6.5.12 SZC Co. and Network Rail undertook feasibility work in relation to the rail works necessary for the road and rail led strategies, including indicative scheme designs and programme. This work identified that the rail-led strategy required significant improvement works to the East Suffolk Line. Due to the complexity of these works Network Rail was unable to give SZC Co. the necessary level of assurance regarding the programme for the East Suffolk line.
- 6.5.13 The feasibility work indicated a series of critical, major and significant risks that could further delay the programme or unknown cost increases. SZC Co. has considered the potential for the works to the East Suffolk line to be included as part of the DCO, but the risks identified in the feasibility work are not unique to Network Rail delivering those works and would apply equally to a scenario where SZC Co. elected to deliver those works. This is principally because the risks arise from undertaking complex rail works to an operational passenger line.
- 6.5.14 SZC Co. and Network Rail agree that the extent of rail works needed for the rail led strategy could not be guaranteed to be delivered within the required timescales. This position was confirmed in Network Rail’s Stage 4 consultation response which noted:
- As previously noted, Network Rail has identified a number of risks to the viability of a rail-led solution that could potentially impact the programme in terms of the submission date for the DCO. Therefore, EDF and Network Rail recognise that this could affect their decision as to which strategy to pursue.*
- 6.5.15 SZC Co. considers that the uncertainty that would be caused as a result of the deliverability risks of the rail-led strategy would have affected SZC Co.’s ability to secure the necessary funding for the Sizewell C Project, and its ability to demonstrate to the Government that the Sizewell C Project could be deployed by 2035, and meet the urgent need for new nuclear power

generation. SZC Co. therefore concluded that the rail-led strategy would not be deliverable. Instead, an integrated strategy (see below) was developed to seek to secure the best deliverable rail outcome, whilst addressing the concerns expressed by consultees in relation to the road-led strategy.

6.5.16 SZC Co. and Network Rail have continued discussions and it is understood that Network Rail supports an integrated strategy.

c) [Integrated Strategy](#)

6.5.17 The integrated strategy includes the following components:

- The green rail route.
- Refurbishment of the Saxmundham to Leiston branch line.
- Freight management facility.
- Sizewell link road.
- The two village bypass.
- Upgrades to eight level crossings.
- Beach landing facility.

6.5.18 **Plate 6.3** below sets out a summary of the three freight management options that were presented in the Stage 4 Consultation.

**Plate 6.3: Stage 4 Consultation Freight Management Options**

Rail-led	Integrated	Road-led
<b>Rail works proposed</b>		
Green rail route	Green rail route	-
East Suffolk line improvements including a new passing loop between Melton and Campsea Ashe	-	-
East Suffolk line level crossing works: 12 closures, 33 upgrades	-	-
Saxmundham to Leiston branch line track upgrade	Saxmundham to Leiston branch line track upgrade	Saxmundham to Leiston branch line track upgrade
Saxmundham to Leiston branch level crossing works: 9 upgrades	Saxmundham to Leiston branch level crossing works: 9 upgrades	Saxmundham to Leiston branch level crossing works: 9 upgrades
<b>Highway works proposed</b>		
Theberton bypass	Sizewell link road	Sizewell link road
Two village bypass	Two village bypass	Two village bypass
Nine other highway improvements (including Yoxford roundabout and Mill Street)	Eight other highway improvements (including Yoxford roundabout)	Eight other highway improvements (including Yoxford roundabout)
-	Freight management facility along the A14	Freight management facility along the A14
<b>Marine works proposed</b>		
Beach landing facility	Beach landing facility	Beach landing facility

6.5.19 The integrated strategy seeks to overcome the deliverability issues associated with the rail-led strategy by relying only on those rail improvements which could be carried out by SZC Co., or where there is sufficient programme certainty. The integrated strategy would allow for up to three trains per day (five overnight movements and 1 daytime movement), meaning that the delivery of construction materials by rail would play an important and meaningful role in the construction of the project. The integrated strategy would include the green rail route and the works needed to upgrade the Saxmundham to Leiston branch line.

6.5.20 To increase SZC Co.’s confidence in delivering these works, it is proposed to include all the necessary powers to undertake the works within the DCO.

6.5.21 The key benefits of the integrated strategy are as follows:

- Increased proportion of material transported by rail: the integrated strategy allows for 38% of construction materials (by weight) to be transported to the main development site by rail, or 39% by rail and sea. This is 9% more than that possible under the road led option and provides a significant advantage in terms of overall sustainability.
- Reduction in HGV movements: the integrated strategy would reduce the busiest day HGV limits by a third, from 750 to 500. The average would also be reduced from 375 to 325 HGVs. This reduction in HGVs would

substantially reduce noise and air quality impacts to the receptors along the HGV routes, along with reducing the amount of traffic on the roads themselves.

6.5.22 SZC Co. has concluded that the integrated strategy provides the most appropriate strategy to move materials for the construction of the Sizewell C Project.

6.5.23 The process of optioneering, which considered alternative strategies including marine led, rail led and road led strategies, is set out in detail in the **Site Selection Report**, provided in **Appendix A** of this **Statement**.

## 6.6 Water Supply Strategy

6.6.1 SZC Co. has developed a **Water Supply Strategy**, provided in **Appendix K** of this **Statement**, by engaging with stakeholders including the Environment Agency, Essex and Suffolk Water and Anglian Water to discuss and assess potential sources for this water supply. The principal supply for the Sizewell C Project will come from mains water, provided by Essex and Suffolk Water. This will be drawn from within the Blyth Water Resource Zone, the zone that includes Sizewell C.

6.6.2 In order to provide security of supply and to ensure that all the water requirements of the Sizewell C Project can be met, SZC Co. has worked with stakeholders to assess several additional water supply options. The **Water Supply Strategy**, provided in **Appendix K** of the **Statement**, provides a detailed summary and assessment of these options and outlines the delivery approach and characteristics of the options that have been shortlisted.

6.6.3 As a result of the assessment, and in order to provide a robust and sustainable water supply, SZC Co. has chosen to carry forward four water supply options, alongside water efficiency measures to reduce demand for mains supply, such as using water efficient fixtures and fittings, rainwater harvesting and grey water reuse. Using a combination of water supply options would ensure security of supply and help to reduce the demand for potable water from the mains supply.

6.6.4 The primary components of the sustainable **Water Supply Strategy**, provided in **Appendix K** of this **Statement**, for Sizewell C power station are:

- Mains water supply provided by Essex and Suffolk Water from within the Blyth WRZ.



- Mains water supply provided by Essex and Suffolk Water from within the Northern/Central WRZ via new pipeline transfer connection to the Blyth WRZ.
- Additional potential mains water supply enabled by licence trading with local licence holders.
- Storage of non-potable water in the proposed water storage area in the north of the main development site. Water may be derived from a number of sources including water pumped from a new pumping station at Minsmere Sluice, effluent from Sizewell B or Sizewell C, or greywater from Sizewell C.
- Water efficiency measures to reduce the demand from mains supply (e.g. using water efficient fixtures and fittings, rainwater harvesting and greywater reuse).

6.6.5 In addition, SZC Co. continues to work closely with the Environment Agency and others to work through the options to secure additional potential sources of supply to ensure resilience. Together these options would provide sufficient and sustainable supply for the Sizewell C Project.

6.6.6 Any supplementary option adopted in due course as part of the supply strategy for Sizewell C may need to be the subject of its own consenting and assessment process.

6.6.7 SZC Co. is aware that other projects in the region may also create demand on the water infrastructure in future. Future demands on regional water supply from domestic use are captured within Essex and Suffolk Water's Water Resource Management Plans. SZC Co. has taken a pro-active approach, engaging early with regulators and water companies, to produce a robust, sustainable supply strategy. When developing the **Water Supply Strategy**, provided in **Appendix K** of this **Statement**, for the Sizewell C power station, other demands on regional water supply have been accounted for and adequate surplus provision has been factored in.

## 6.7 Associated Development

6.7.1 The Sizewell C Project is a large-scale NSIP. Such a large and complex development would inevitably have physical and economic effects that must be mitigated by the strategies described in this section. These strategies give rise to requirements for further infrastructure located away from the main

development site. The Sizewell C DCO application therefore includes proposals for associated development.

6.7.2 Principally, the associated development sites relate to transport infrastructure required for the construction phase. The following off-site development is proposed:

- Northern park and ride (Darsham).
- Southern park and ride (Wickham Market).
- Freight management facility.
- Two village bypass.
- Sizewell link road.
- Yoxford and other highway improvements.
- Green rail route and rail improvements.

6.7.3 The proposals for each off-site associated development site are summarised in the remainder of this section. Planning assessments of each can be found at **Appendices 2 – 8** of this **Statement** and these assessments identify any significant effects against the generic and nuclear impacts set out in NPS EN-1 and NPS EN-6. Those effects are then summarised in **Section 8** and weighed in the overall planning balance at **Section 11**, respectively provided in this **Statement**.

a) [Northern Park and Ride \(Darsham\) and Southern Park and Ride \(Wickham Market\)](#)

6.7.4 The park and ride facilities would play an important role in reducing the amount of additional traffic generated by the construction workforce on local roads and through local villages. Two temporary off-site park and ride facilities are proposed, one at Darsham for construction workers approaching Sizewell C from the north on the A12 and the other at Wickham Market for those approaching from the south on the A12. Both park and ride facilities would also intercept traffic movements from locations west of the A12. Construction workers would then be transported to and from the Sizewell C main development site by bus.

6.7.5 Each park and ride facility would comprise:

- car parking areas for up to 1,250 car parking spaces (of which up to 40 would be accessible spaces) and up to 12 pick up only spaces;
  - up to ten spaces for minibuses/vans/buses;
  - up to 80 motorcycle parking spaces;
  - secure cycle parking for up to 20 bicycles;
  - bus terminus area and parking;
  - security fencing and lighting;
  - an amenity and welfare building comprising toilets and staff room;
  - a security building including an administration office;
  - a security booth adjacent to an exit loop for errant vehicles;
  - bus shelters;
  - other ancillary development, including signage, road markings, CCTV and utilities; and
  - external areas including roadways, footways, landscaping, and drainage infrastructure.
- 6.7.6 In addition to the above described facilities, the southern park and ride would also contain a postal consolidation building and Traffic Incident Management Area (TIMA).
- 6.7.7 The postal consolidation building would handle and process postal deliveries for the Sizewell C main development site. On receipt at the facility, all mail and courier packages would be checked, sorted and consolidated. Outgoing mail would be collected from the main development site for postal or courier services.
- 6.7.8 If there is an incident within the Sizewell C main development site or external to the Sizewell C main development site on the local road network, which requires construction-related vehicles to be held or diverted, the TIMA at the

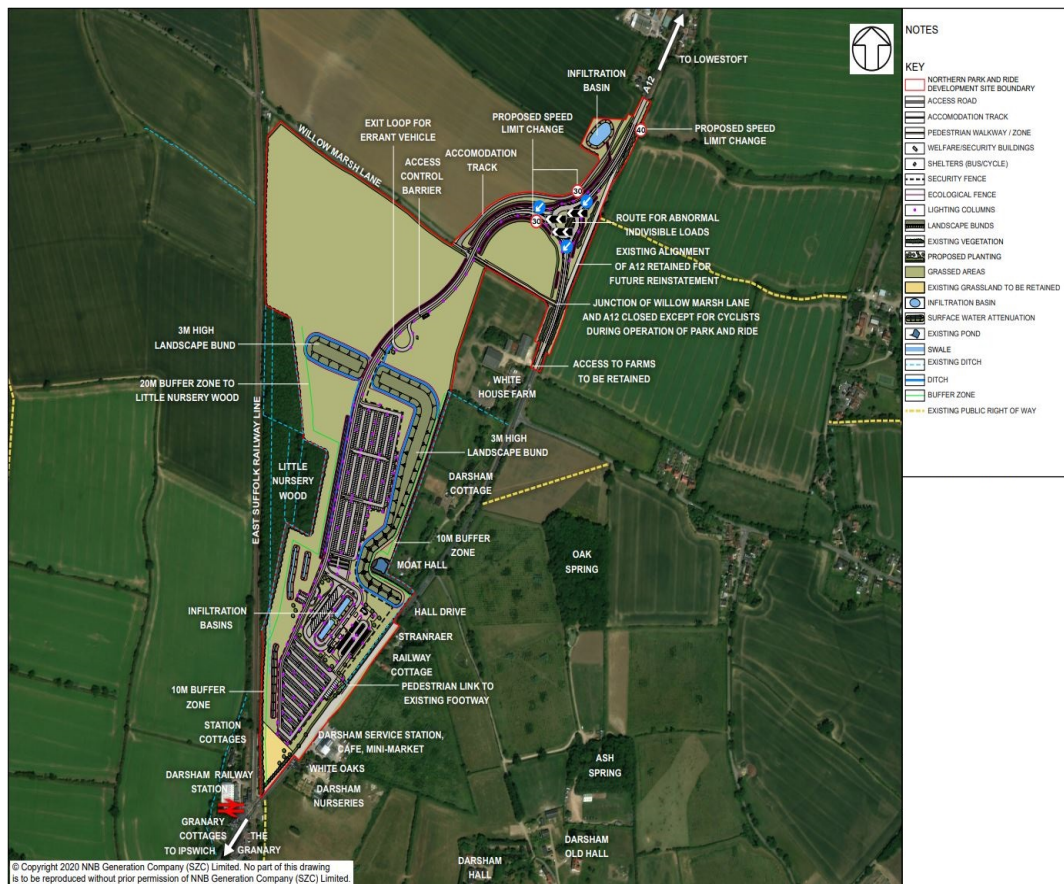
southern park and ride could be utilised to manage vehicles, and remove them from the public road network while the incident is being resolved.

- 6.7.9 It is anticipated that construction of the proposed park and ride sites would last for approximately 12 to 18 months.
- 6.7.10 It is anticipated that the park and rides would be operated by SZC Co. seven days a week between the hours of 05:00 and 01:00.
- 6.7.11 Once the need for the park and ride facilities has ceased, the facilities would be removed in accordance with the relevant demolition and restoration schemes, which would consider the feasibility of re-using buildings, modules and materials. When the sites have been cleared, they would be returned to agricultural use.
- 6.7.12 A full description of the park and ride facilities is set out within **Volumes 3 and 4** of the **ES**.

*Northern park and ride at Darsham*

6.7.13 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 railway station. Access to the site would be via a new three arm roundabout, with realignments of Willow Marsh Lane and the A12.

**Plate 6.4: Northern Park and Ride masterplan**



*Southern park and ride at Wickham Market*

6.7.14 The southern park and ride would be 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.

Plate 6.5: Southern Park and Ride masterplan



b) Freight Management Facility

6.7.15 The freight management facility would assist in allowing a controlled pattern of deliveries to the Sizewell C main development site with reduced movements during peak or sensitive hours on the network. The facility would provide buildings and external areas where paperwork and goods can be checked prior to delivery to the Sizewell C main development site, and be a location where HGVs are held before they leave to access the main development site or in the event of an accident on the local road network which prevented access to the main development site.

6.7.16 The freight management facility would include:

- a parking area to accommodate approximately:
  - 154 HGVs;
  - 12 car parking spaces for staff and visitors,

- one accessible space,
- ten spaces for minibuses/vans,
- four motorcycle spaces,
- covered and secure cycle parking for up to ten bicycles; and
- six HGV spaces for screen and search activities;
- buildings and structures including
  - amenity and welfare buildings;
  - security buildings and structures;
  - bus and smoking shelters;
  - covered cycle parking; and
  - covered search lanes to conduct search and screen activities;
- site access, including a ghost island;
- internal circulation routes and footpaths;
- landscape works, including vegetation clearance and removal, new boundary planting and three landscape bunds; and
- associated works and development, such as drainage, signage, fencing, lighting, CCTV and utilities.

6.7.17 It is anticipated that construction of the freight management facility would take place over a period of four to five months. It would be operational for a minimum of seven and a half hours a day, for five days a week, to a maximum of 24 hours a day, seven days a week, during the peak construction of the Sizewell C main development site.

Plate 6.6: Freight Management Facility masterplan



6.7.18 Once the need for the facilities has ceased, the temporary buildings and structures would be removed in accordance with the relevant demolition and restoration schemes, which would consider the feasibility of re-using buildings, modules and materials. When the site has been cleared, it would be returned to agricultural use.

c) Two Village Bypass

6.7.19 The two village bypass would allow construction traffic to avoid the A12 through Farnham and Stratford St Andrew and would be open to the public.

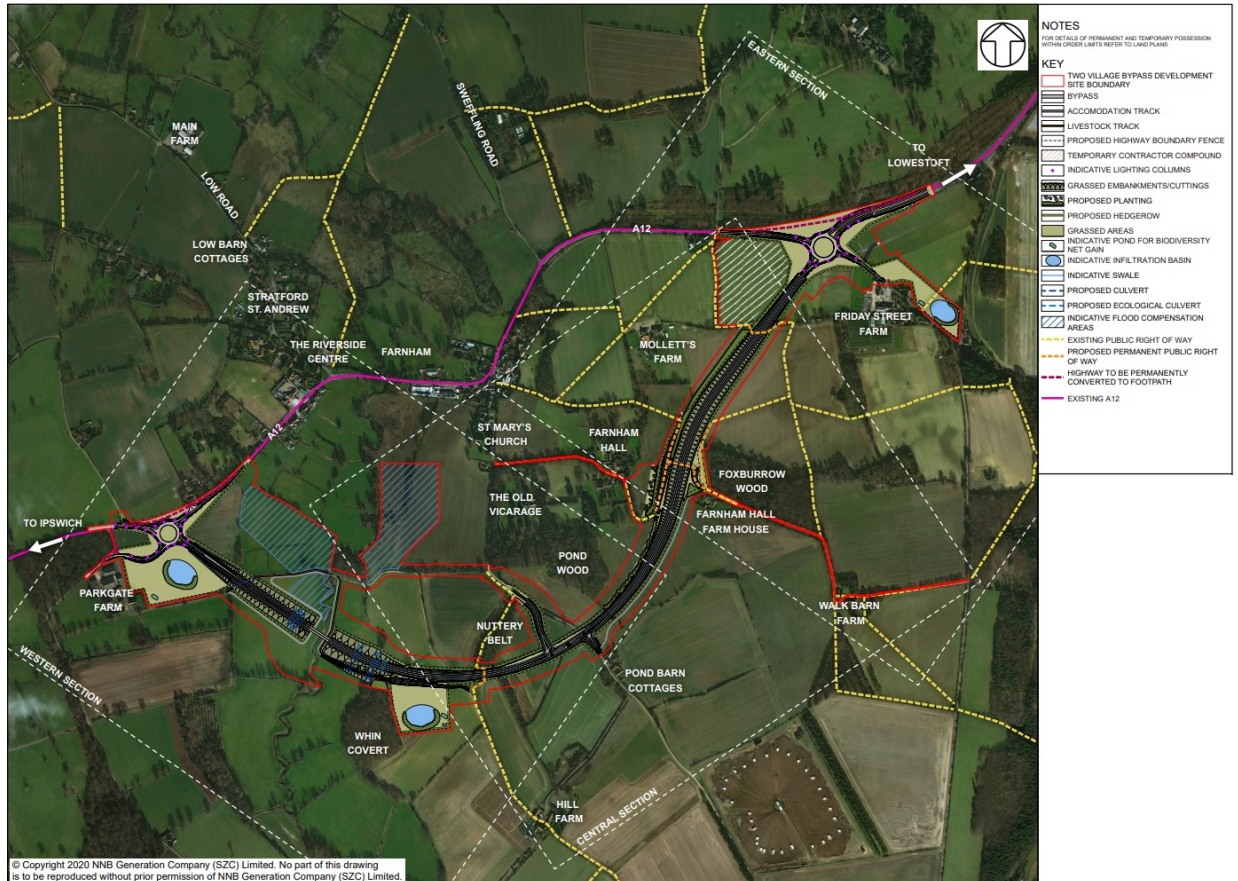
6.7.20 The proposed alignment of the highway runs across land to the south of the existing A12. In a west to east direction, it would begin at the A12 to the west of Stratford St. Andrew via a new four-arm roundabout, east of Parkgate Farm and Stratford Plantation, and re-join the A12 also via a new four-arm roundabout to the east of Farnham at the A12 and A1094 Friday Street junction.



- 6.7.21 The two village bypass would be constructed in the early years and would form a new permanent section of the A12. The existing section of the A12 through the villages would be retained.
- 6.7.22 Where possible, Public Rights of Way (PRoW) would be retained on their existing alignments. However, several PRoW would require a diversion to ensure connectivity across the route of the bypass. These are described in **Chapter 2 of Volume 5 of the ES**.
- 6.7.23 The two village bypass would include:
- a 2.4km single carriageway road;
  - provision of a four arm roundabout at the western end of the road, east of Parkgate Farm and Stratford Plantation to connect the road to the A12 and Tinker Brook;
  - a single span overbridge for all traffic, 7.5m in height above ground level to the road surface (+/- 1m) to allow a crossing over the River Alde;
  - provision of flood compensation areas to the north and south of the bypass, largely to the west of the River Alde, if required;
  - provision of a staggered junction between Nuttery Belt and Pond Wood to maintain access on both sides of the route of the proposed two village bypass;
  - Farnham Hall, a non-motorised user overbridge, over the two village bypass road, would be provided and two PRoW diverted to maintain connectivity across the route; and
  - provision of a four-arm roundabout at the eastern end of the road, to replace the existing junction of the A12, with the A1094 (Friday Street).
- 6.7.24 With regard to the flood compensation land associated with the two village bypass, SZC Co.'s position is that this area of land is not required to mitigate or compensate for the effects of the Sizewell C Project as shown in the Two Village Bypass Flood Risk Assessment and that therefore such land is not required for the development of Sizewell C. It is nevertheless being put forward as part of the Sizewell C DCO Application in case the Secretary of State disagrees with this position and takes the view that it is in fact required.

6.7.25 If the Secretary of State agrees with SZC Co. that such land is not required for flood compensation then we would expect the Secretary of State to grant the DCO in a form which does not authorise any powers over such land, including powers of compulsory purchase.

**Plate 6.7: Two Village Bypass masterplan**



6.7.26 A full description of the two village bypass is set out in **Volume 5** of the **ES**.

**d) Sizewell Link Road**

6.7.27 The Sizewell link road would comprise a new, permanent, 6.8km single carriageway road, with a design speed of 50mph, which begins at the A12 south of Yoxford, bypasses Middleton Moor and Theberton before joining the B1122. The Sizewell link road would allow construction traffic to avoid the B1122 through Middleton Moor and Theberton.

6.7.28 The Sizewell link road would be constructed in the early years and once Sizewell C is operational, the road would be open to general traffic and would be used by SZC Co. during the construction phase of the Sizewell C main

development site to transport construction workers travelling by car, buses from the northern park and ride facility (who would only use the Sizewell link road east of the Middleton Moor link) and southern park and ride facility, and goods vehicles (both light and heavy) delivering freight to the Sizewell C main development site.

6.7.29 Where possible, PRow would be retained on their existing alignments. However, several PRow would require a diversion to ensure connectivity across the route of the bypass. These are described in **Chapter 2 of Volume 6** of the **ES**.

6.7.30 The Sizewell link road would include:

- a 6.8km single carriageway road;
- a new three arm roundabout on the A12, located approximately 180m north of The Red House Farm;
- a single span bridge, approximately 50m in length, to enable the proposed road to cross over the East Suffolk line;
- a ghost island junction and a new link road (referred to as the ‘Middleton Moor link’), from the proposed route of the Sizewell link road;
- Fordley Road would be realigned on the south side of the proposed route of the Sizewell link road so northbound traffic could join the new road;
- provision of a staggered crossroads ghost island junction to give access to Trust Farm located to the south and to the existing B1122 to the north;
- provision of an access road from the south side of the route of the proposed Sizewell link road to Hawthorn Cottages, and realignment of Hawthorn Road for approximately 150m to meet the proposed route of the Sizewell link road. Hawthorn Road would be stopped up on the north side of the proposed route of the Sizewell link road;
- two crossings of an unnamed watercourse, which would be culverted beneath the route of the proposed Sizewell link road;
- a new ghost island junction would be formed with an extension of the B1125 and reconfiguration of the existing B1122 to form suitable new junction;

- a new priority junction on the west side of the Sizewell link road at Pretty Road;
- a new single span overbridge would carry non-motorised users only (pedestrians, cyclists, equestrians) over Pretty Road;
- a new junction to Moat Road would be provided to maintain access to the existing properties including Theberton Grange and Moat House; and
- a new junction to provide access to Theberton to the north, where approximately 500m of the B1122 would be realigned, with the route of the Sizewell link road joining the southern section of the B1122.

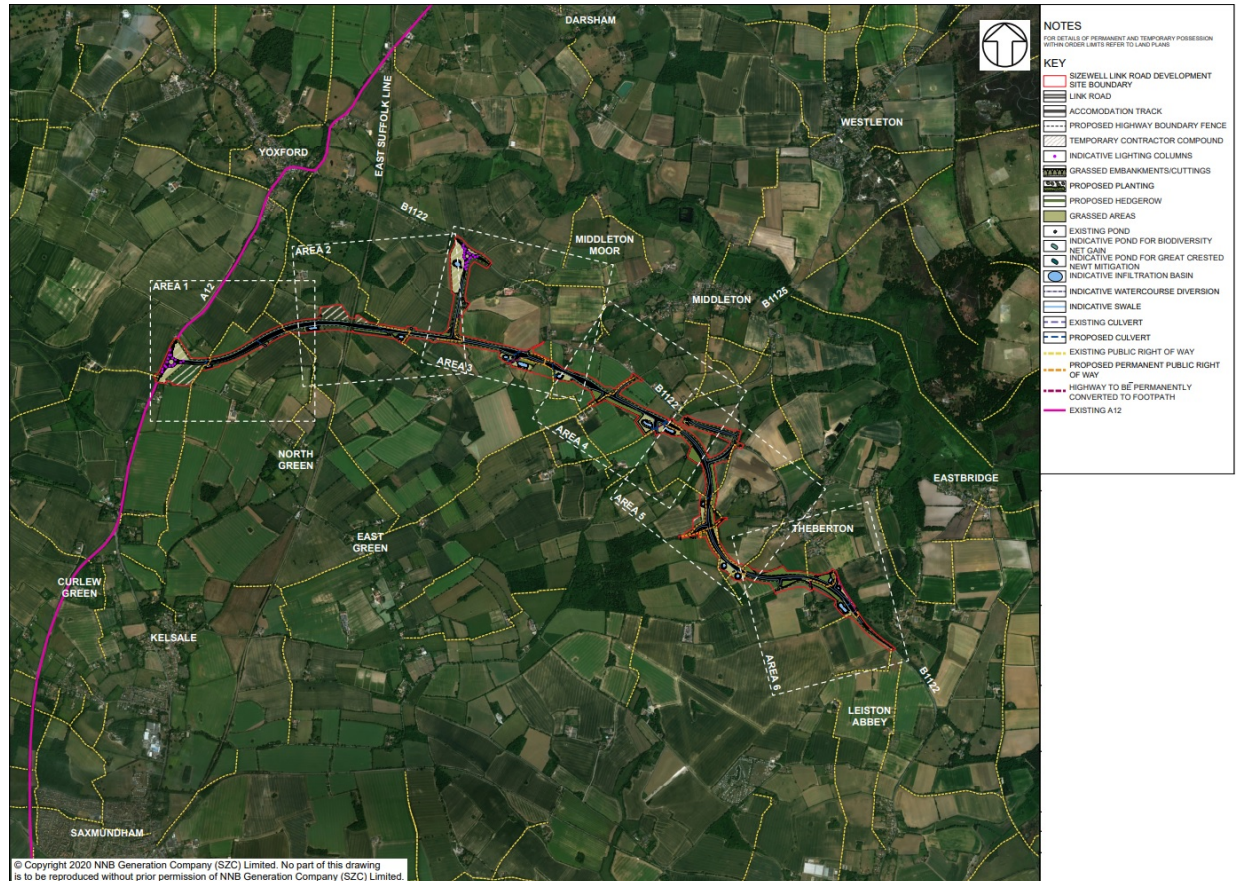
6.7.31 SZC Co.'s initial transport assessments predicted that the B1122 would be the main route for construction traffic travelling to the main development site. The rationale for the Sizewell link road is to respond to concerns expressed through consultation and to relieve the B1122 from the anticipated construction traffic associated with the main development site and consequently, reduce traffic passing through Theberton and Middleton Moor. The link road would also substantially reduce traffic flow through Yoxford, by removing the need for traffic from the south to access the B1122 from the A12 at Yoxford.

6.7.32 Having identified the benefits of diverting traffic from the B1122 through the **Transport Assessment** (Doc Ref. 8.5), SZC Co. commenced a site selection exercise to identify potentially suitable locations. A key operational pre-requisite for the route was that it needed to be as short as is practical from the A12, whilst observing environmental constraints, in order to reduce journey times compared with the use of the B1122 to make it an attractive option for motorists to use.

6.7.33 Details of the site selection exercise are set out at **Appendix A** of this **Statement**. The outcome was a 6.8km single carriageway road, with a design speed of 50mph, beginning at the A12 south of Yoxford, bypassing Middleton Moor and Theberton before joining the B1122 to the west of the main development site. The site comprises approximately 123.5 ha of primarily agricultural land, as well as highway land.

6.7.34 A full description of the link road is set out within **Volume 6** of the **ES**.

Plate 6.8: Sizewell Link Road masterplan



e) Yoxford and Other Highway Improvements

6.7.35 A number of permanent highway improvements are proposed for the local highway network in order to limit the potential transport effects on the local highway network. These would be constructed in the early years and would support the construction of Sizewell C.

6.7.36 The proposed off-site highway improvement works seek to address safety concerns and are explained fully in **Chapter 11** of the **Transport Assessment** (Doc. Ref. 8.5). They comprise the following:

- A12 and B1122 east of Yoxford: Provision of a new roundabout at the junction.
- A1094/B1069 junction south of Knodishall: Improvements of visibility splays and provision of signage and road markings.

- A12/A144 junction south of Bramfield: Provision of central reservation island and waiting area.
- A12/B1119 junction at Saxmundham: Improvements of visibility splays, alteration of the B1119 at the junction with the A12, and provision of signage and road markings.

6.7.37 All of the proposed highways improvement works listed above would form part of the permanent development and would be retained following the construction of the main development site.

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

#### A12/B1122 Yoxford Roundabout

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

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

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

#### A1094 and B1069 junction south of Knodishall

6.7.42 The proposed improvements to the A1094 and B1069 junction involve vegetation maintenance to improve visibility for vehicles exiting the B1069, and the provision of signage and road markings. The proposal includes a speed limit reduction to 40mph with additional signage to increase driver awareness prior to the junction.

#### A12 and A144 junction south of Bramfield

6.7.43 The proposed improvements to the A12 and A144 junction comprise the provision of a physical central reservation island and waiting area on the A12,

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

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

#### A12/B1119 junction at Saxmundham

- 6.7.45 The proposed improvements include vegetation maintenance to improve the visibility from the B1119, and the provision of altered and additional road signage to increase driver awareness of the junction.
- 6.7.46 New road markings would also be provided to clarify the priority within the central reserve and allow right-turning vehicles from the B1119 to negotiate the junction in two manoeuvres.

#### f) Rail

- 6.7.47 The rail proposals for have been designed to allow for the maximum practical freight movements by rail, reducing the number of HGVs on the local roads and mitigating the potential impacts of the Sizewell C Project. A temporary rail extension, referred to as the ‘green rail route’, has been proposed which would provide a new rail route from the Saxmundham to Leiston branch line to the main development site. In addition, infrastructure upgrades (including track replacement) and changes to level crossings would be required to the Saxmundham to Leiston branch line to accommodate the additional freight trains once the green rail route is operational.
- 6.7.48 These rail improvements are explained in more detail in **Chapter 2** of **Volume 9** of the **ES** but a summary of each proposal can be found below.

#### Green rail route

- 6.7.49 The green rail route would be a temporary 4.5km rail extension from the existing Saxmundham to Leiston branch line, running from west to east to the TCA. Following the completion of the construction of the Sizewell C Project, the green rail route, including the track bed and level crossings, would be removed and returned to its original topography.
- 6.7.50 The green rail route can be considered in three main parts as follows:
- Saxmundham Road to Buckleswood Road.

- Buckleswood Road to B1122 (Abbey Road).
- B1122 (Abbey Road) to Sizewell C power station site. This section is reported in **Volume 2** of the **ES** concerning the main development site.

6.7.51 The proposed green rail route works also comprise:

- Saxmundham Road to Buckleswood Road;
- automated level crossing on Buckleswood Road;
- diversion of footpath E-363/003/0;
- automated level crossing where the rail extension crosses the B1122 (Abbey Road);
- diversion of Footpath E-363/006/0;
- diversion of Footpath E-363/010/0;
- permanent relocation of the B1122 (Abbey Road) and Lover's Lane junction;
- SuDS to include swales alongside the track with the potential for a larger infiltration pond at low points or adjacent to the cuttings, if required; and
- landscaping including the provision of landscape bunds, grassed areas and other areas of proposed planting.

#### Removal and reinstatement

6.7.52 Following the completion of the construction of the Sizewell C Project, the green rail route, including the track bed and level crossings, would be removed and returned to its original topography.

6.7.53 Any highway that has been diverted or stopped up as a requirement of the proposed development would be reinstated and the level crossings removed. The relocated junction of the B1122 and Lover's Lane would remain in place.



### Saxmundham to Leiston branch line upgrades

6.7.54 The existing Saxmundham to Leiston branch line track requires upgrades to accommodate the required number of freight movements by rail for the Sizewell C Project. The proposed improvement works comprise:

- track replacement on the Saxmundham to Leiston branch line; and
- upgrade works to eight level crossings on the branch line.

6.7.55 All of the rail infrastructure upgrades to the Saxmundham to Leiston branch line would be retained following completion of the construction of Sizewell C.

### *Track replacement on the Saxmundham to Leiston branch line*

6.7.56 The proposed track replacement on the Saxmundham to Leiston branch line comprises the renewal of the entire length of track using new ballast and flat bottom continuously welded rail on concrete sleepers. The proposed upgrades would ensure that the existing track would meet Network Rail standards for freight transport.

6.7.57 Trains bringing materials for the construction of Sizewell C would travel along the East Suffolk line as far as Saxmundham, and then along the branch line towards Leiston.

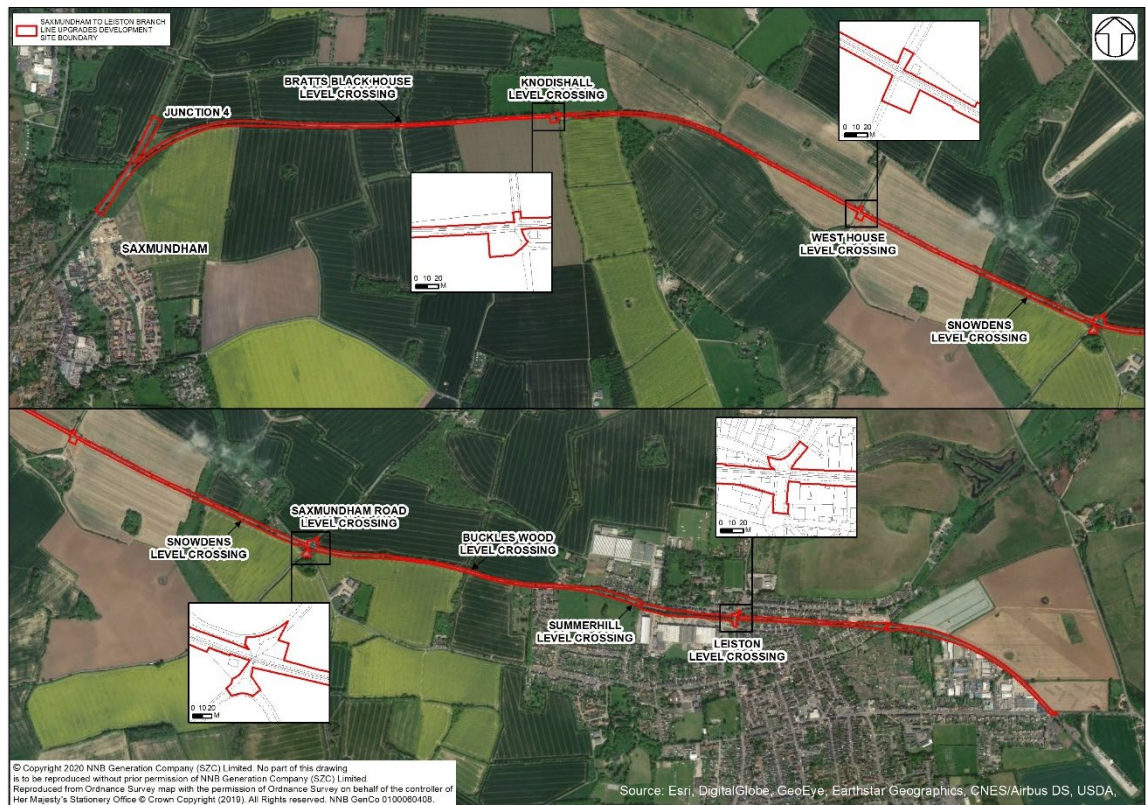
### *Upgrade works to the level crossings*

6.7.58 Upgrades would also be required on eight operational level crossings on the Saxmundham to Leiston branch line between the Saxmundham junction and Sizewell Halt. This is to enable safe use of the Saxmundham to Leiston branch line for freight deliveries as part of the construction of the Sizewell C main development site. The location of the level crossings is shown on **Plate 6.9**, and they are located at:

- Bratts Black House.
- Knodishall.
- West House.
- Snowdens.
- Saxmundham Road.

- Buckles Wood.
- Summerhill.
- Leiston.

**Plate 6.9: Level crossing upgrades**



- 6.7.59 The level crossing upgrades would minimise the need for barriers to be closed and reopened manually, enabling them to reopen to traffic soon after a train has safely passed.
- 6.7.60 All of the proposed upgrade works would ensure that the level crossings remain in use and that there is no need to close or divert any PRow whilst the branch line is in operation.
- 6.7.61 The level crossings at Bratts Black House, Snowdens, Buckle’s Wood and Summerhill would be upgraded to Miniature Stop Light (MSL) crossings. This involves a red/green light located on both sides of the track and operated by approaching trains. The light indicates if it is safe for a pedestrian to cross the railway.

- 6.7.62 The level crossings at Knodishall, West House and Saxmundham Road would be upgraded to Automatic Barrier Crossing Locally Monitored (ABCL). ABCLs have wig-wag-type signals and half barriers locally monitored by train crew or other staff to check that they are working, and they are activated by approaching trains.
- 6.7.63 The Leiston and Sizewell crossings would be upgraded to Train crew Operated Barriers with assistance (TOB). At TOBs the train is forced to stop short of the crossing and the train crew operate it from a local control unit or plunger. Correct operation of the crossing and permission to pass over it is indicated to the driver by a flashing signal.
- 6.7.64 The more substantial upgrades (greater than MSLs) have additional land within the Order Limits to facilitate temporary satellite compounds during construction. All the proposed level crossing upgrades would be permanent improvements to the branch line.

## 7 Planning Assessment – Benefits and Assessment Principles

### 7.1 Introduction

7.1.1 This section provides an analysis of the Sizewell C Project against the relevant NPSs and national and local policies so far as they are “relevant and important” for the determination of the Sizewell C DCO application.

7.1.2 As explained in **Section 3** of this **Planning Statement**, NPS EN-1 and NPS EN-6 provide the primary policy basis for deciding the Sizewell C DCO application. The NPSs set out assessment principles and identify ‘Generic Impacts’, ‘Nuclear Impacts’, ‘Flags for Local Consideration’ and other issues raised during the SSA consultation. While these are not exhaustive, they provide the primary basis for identifying the matters that should be taken into consideration in determining the DCO application.

7.1.3 The overarching context for an analysis against policy is the urgent need for nuclear power set out in the NPSs and which remains up to date, as explained in **Section 3** of this **Planning Statement**. That context is important and relevant and significant weight attaches to it given its national importance and the emphasis given to it in the NPSs and subsequently by the Government.

7.1.4 It is also relevant and important to consider the full range of benefits that would arise from the construction and operation of the Sizewell C Project. The mitigation and funding benefits referred to further below are secured through the draft DCO requirements and the obligations in the **draft Section 106 Heads of Terms**, provided in **Appendix J** of this **Statement**.

### 7.2 Benefits of the Sizewell C Project

7.2.1 NPS EN-1 (paragraph 4.1.4) provides that the decision maker should take into account environmental, social and economic impacts, at national, regional and local levels. The Sizewell C Project would provide benefits at each of these scales, from the contribution to the delivery of nuclear power generation at the national scale though to significant regional and local social and economic benefits. Potential adverse impacts of the Sizewell C Project would, however, primarily arise at a local level.

7.2.2 This section of the **Planning Statement** sets out these benefits, with reference to the draft planning obligation **Heads of Terms**, provided in **Appendix J** of this **Statement** and the **Mitigation Route Map** (Doc Ref 8.12).

a) **An Urgent Need for Nuclear Power**

- 7.2.3 Nuclear power generation is a low carbon, proven technology, which is anticipated to play an increasingly important role as we move to diversify and decarbonise our sources of electricity.
- 7.2.4 The principle of the need for new nuclear power stations, and confirmation that this need is urgent, is established in NPS EN1 and NPS EN-6. There is no relevant change of circumstances which would cause anything other than significant weight to be given to government policy in NPS EN-1 and EN-6 in relation to the need for new nuclear power generation.
- 7.2.5 For the UK to meet its energy and climate change objectives, the Government believes there is an urgent need for new electricity generation infrastructure, including new nuclear power.
- 7.2.6 This urgency has been made even greater with the declaration of a climate emergency by Government and the tightening of legally binding targets to reduce UK carbon emissions to net zero by 2050. If this target is to be achieved, then the inclusion of new nuclear power stations to support the uptake of renewable energy and other low and zero carbon energy sources is critical in the journey towards decarbonising the grid and moving away from a reliance on fossil fuels.
- 7.2.7 The electricity supply sector is a significant contributor to UK greenhouse gases (GHGs). The Committee on Climate Change’s report ‘Net Zero – the UK’s Contribution to stopping Global Warming’ (Ref. 1.70) recognises that the decarbonisation of the grid is an essential part of the Zero-Carbon Strategy, requiring a quadrupling of the supply of low carbon energy by 2050 in order to meet a fully decarbonised electricity supply.
- 7.2.8 The 2017 Ministerial Statement is also clear that the statements concerning need for nuclear power continue to be relevant for projects which will deploy after 2025.
- 7.2.9 Whilst there are inherent carbon reduction benefits during the operation phase of the Sizewell C power station, as with any large infrastructure project, the construction phase would give rise to emissions of GHGs. It is estimated that over the course of the nine to twelve-year construction period, approximately 5.7 million tonnes of CO<sub>2</sub>e would be emitted.
- 7.2.10 However, the GHG assessment of construction emissions has demonstrated that construction emissions for Sizewell C will not exceed 1% of the total five year UK carbon budget period in which they arise. As such, the construction of Sizewell C will not have a significant impact on the UK meeting its five

carbon budgets through to 2032 (when the Sizewell C Project is expected to be fully operational).

7.2.11 It is also relevant to note that estimated CO<sub>2</sub> emitted during the construction period is small in comparison to the savings that would be achieved once the power station becomes operational. Indeed, based on current grid intensity, the operation of the Sizewell C power station would displace the equivalent construction emissions within the first six years of operation.

7.2.12 The longer term, low carbon operational benefits of nuclear power far outweigh the short term impacts of its construction. Over the 60 year operational life of the Sizewell C Project, lifecycle GHG emissions are estimated to equate to 4.5g CO<sub>2</sub>e/kWh. This compares favourably against lifecycle emissions of fossil fuel electricity generation and is comparable with other low carbon fuel sources such as onshore and offshore wind for example:

- Natural gas 340 gCO<sub>2</sub>e/kWh.
- Solar photovoltaic 40-85 gCO<sub>2</sub>e/kWh.
- Offshore wind 7-24 gCO<sub>2</sub>e/kWh.
- Onshore wind 7-20 gCO<sub>2</sub>e/kWh.

7.2.13 When complete, the Sizewell C Project would be capable of generating enough electricity to supply approximately six million (or about 20%) of homes in the UK each year. The SZC Project would also achieve substantial GHG savings compared with likely alternative forms of energy generation and make a significant contribution to meeting UK climate change targets. This contribution of low carbon energy should be given considerable weight.

#### b) Economic Benefits

7.2.14 As set out within the **Economic Statement** (Doc Ref 8.9), a significant level of economic benefit can be expected as a result of such a large infrastructure project, during both construction and operational phases.

7.2.15 The construction phase would provide a fixed-term boost to the local economy. However, at nine to twelve years, this would be a sustained and relatively long-term boost – especially in the context of the peripatetic nature of construction projects – and would help to transform the economy and the employment prospects of local residents.

- 7.2.16 The estimated total cost of the Sizewell C Project is £20bn and it could support just over 40,000 person-years of construction employment and provide a major boost to local and regional businesses.
- 7.2.17 The peak of the construction phase is estimated to require 7,900 workers plus 600 additional jobs in the operation of associated development sites during the construction period. Of this total, it is estimated that around 2,000 home-based workers would be employed on the main development site at peak, which would deliver major beneficial changes to employment in the area.
- 7.2.18 The home-based jobs would range across occupations and skill levels and:
- equate to around 1% of all employment in Suffolk; and
  - compare to total unemployment of 12,400 in Suffolk (those unemployed but economically active – Annual Population Survey 2018/19).
- 7.2.19 This suggests that the increase in employment would be **significant** and make a material difference, particularly for those looking for work, but would not be beyond the capacity of the normal turnover in the labour market.
- 7.2.20 The development of the Sizewell C Project would also create extensive supply chain opportunities, building on the model set by the first in a planned fleet of new nuclear power stations in the UK – Hinkley Point C.
- 7.2.21 Construction contracts and sub-contracts, and particularly non-construction packages, would have a much stronger local and regional element, with a substantial proportion of construction value retained in the local economy through wages to home-based workers and expenditure by non-home-based workers.
- 7.2.22 In respect of Hinkley Point C<sup>9</sup>, EDF Energy and the Department for Business, Energy & Industrial Strategy (BEIS) have documented that:
- Over £650m had (at July 2018) been spent in the south west (including South Wales).

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<sup>9</sup> BEIS (July 2018) Hinkley Point C Wider Benefits Realisation Plan

- In addition to the £650m of expenditure, contracts have been entered into for a further £700m. This brings a total of commitments, including spend (as at July 2018), to over £1.5bn.
- There is a target for £200m regional supply chain spend per year during the construction period.

7.2.23 At Sizewell C, if total spending on the regional supply chain is as currently predicted at Hinkley Point C to date (i.e. £1.5bn), that would represent 7.5% of the total estimated project cost (£20bn).

7.2.24 The operational phase would provide a long-term boost to the economy. The operational phase is expected to support approximately 700 employees directly employed by SZC Co. and a further approximately 200 as contractors. This would provide a major, long-term boost to the local economy. The approximately 900 jobs at Sizewell C equate to just under 1% of all the jobs in East Suffolk District and 0.3% of the jobs in Suffolk.

7.2.25 This would significantly boost wages in the area by £44.5m per year (assuming the approximately 900 workers earn the 2018 median earnings for the ‘production of electricity’ sector).

7.2.26 There would also be an extra c.1,000 workers required during maintenance and refuelling outages, which would last for up to two months and occur approximately every 18 months for each reactor. The 1,000 additional workforce would be likely to have multiplier expenditure and employment impacts, proportionately more akin to those for un-accompanied non-home-based construction workers.

### c) Infrastructure Improvements

7.2.27 In addition to the delivery of the nuclear power station, which has significant benefits in providing long term, sustainable infrastructure for the benefit of the UK as a whole, the Sizewell C Project would also result in local and regional infrastructure benefits through the delivery of the upgrades to a series of transport infrastructure.

7.2.28 The two village bypass itself has the potential to create a significant positive legacy for Suffolk. It offers a range of local benefits including a reduction in traffic noise and traffic-related emissions to the residents of Stratford St Andrew and Farnham. It also is considered to improve the setting of heritage assets within the village of Farnham. The two village bypass also offers benefit to road users and is sufficiently short to be considered as a viable alternative to the A12 and the notorious ‘Farnham bend’.



- 7.2.29 The Sizewell link road itself offers a range of local benefits in addition to the safe movement of traffic towards the main development site during the construction stage. It is anticipated that the existing B1122 would be downgraded by SCC to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the existing B1122 would experience much lower traffic volumes and could become more popular among cyclists.
- 7.2.30 A new off-road diversionary route for Bridleway 19 would also provide a pedestrian and cycle route from Leiston and LEEIE to the main development site, thereby offering a car-free alternative for workers to travel between these locations. The Bridleway 19 diversionary route would remain in place post-construction, providing additional facilities for workers to walk or cycle to the site as well as for use by the public at large.
- 7.2.31 SZC Co. has also assessed a series of potential road safety improvement schemes which address existing accident issues at junctions on the local highway network. These provide a package of recommended improvements to be delivered by SZC Co. or funded by SZC Co. as part of Suffolk Highways' ongoing road safety programme. Additionally, there are a number of enhancements to facilities for pedestrians, cyclists and equestrians which would benefit existing users as well as new ones. The package of road safety improvements put forward in this **Transport Assessment** (Doc Ref 8.5) would not only benefit the proposed Sizewell C Project but would also provide a lasting legacy to residents of the surrounding towns and villages.
- 7.2.32 The sports facilities which would be provided at Leiston would be retained following the construction period as a permanent benefit for the community.

#### d) Education, Jobs and Skills

- 7.2.33 The economic effects of the Sizewell C Project on skills, employment, and labour market and supply chain are substantial and beneficial in terms of the creation of new jobs, effects on unemployment and economic inactivity, generation of business activity in the supply chain, and indirect and induced benefits of earnings and spending of workers.
- 7.2.34 SZC Co. has worked closely with stakeholders in the region to develop a strategy with a range of measures that combine to create an environment in which education, skills and workforce development can flourish, to the benefit of both the Sizewell C Project and the region.
- 7.2.35 The **Employment, Skills and Education Strategy** is included as **Appendix A** to the **Economic Statement** (Doc Ref 8.9). It sets out a strategic approach centred around four strategic priorities:

- Creating economic benefit and improving social mobility by:
  - Leaving a legacy;
  - Addressing key Government and regional policy priorities; and
  - Linking employment, skills and education to complementary activities for developing the supply chain, provided in **Appendix B** to the **Economic Statement** (Doc Ref 8.9) – **Supply Chain Strategy**.
- Minimising workforce & project risk caused by a lack of availability, capability, capacity or competence in the UK or regional skills base.
- Setting realistic DCO commitments and leveraging significant additional value.
- Where appropriate, integrating strategic activity between Sizewell C and Hinkley Point C – and in the future Bradwell B - by leveraging the full benefit of ‘fleet effect’ for skills and workforce.

7.2.36 The **Employment, Skills and Education Strategy** sets out how learning from Hinkley Point C has helped provide more clarity about Sizewell C, and sets out a ‘prospectus’ of required roles and qualifications for Sizewell C in the future by phase of construction and type of role.

7.2.37 The implementation of the **Employment, Skills and Education Strategy** and **Supply Chain Strategy** will be secured by obligations in a Section 106 Agreement (see draft **Section 106 Heads of Terms**, provided in **Appendix J** of this **Statement**).

#### e) Tourism

7.2.38 SZC Co. recognises that there may be potential for the tourist economy to be adversely affected as a result of the Sizewell C Project, in some locations and under some conditions.

7.2.39 As such, SZC Co. has proposed a Tourism Fund – the provision, governance, scale and application of which will be secured by a Section 106 Agreement, provided in **Appendix J** of this **Statement** - which could be used to deliver initiatives such as:

- Marketing and promotion activities for the Suffolk Coast and specific attractions and events within it, which can demonstrate a strong return on investment.
- Supporting local projects including capital and revenue investment.
- Undertaking future visitor surveys.
- Providing information about public transport and travel.
- Supporting existing tourist information centres.
- Responding to effects on particularly sensitive attractions/locations within the AONB.
- Developing or supporting a Tourism Strategy/Action Plan.

7.2.40 The existing Sizewell B visitor centre would be replaced with a permanent, modern educational facility for visitors, including school groups. It is proposed that the new visitor centre would be located at the north-east of the Coronation Wood Development Area, adjacent to the proposed Sizewell B training centre. It is anticipated that the proposed visitor centre would include exhibition spaces, an auditorium, media centre, viewing area, classrooms and offices.

7.2.41 The visitor centre would be accessible by the general public with exhibition space and modern educational elements providing capacity for school groups. Its role would be to provide information to the general public and school groups about aspects including: the process for generating electricity, the benefits of low-carbon energy and sustainability more generally, and the new technology's role in the future of nuclear power in the UK. It would also illustrate the contribution of Sizewell C to carbon reduction and its role as part of the Suffolk Energy Coast and demonstrate the importance of the surrounding AONB.

#### f) Health and Well-being

7.2.42 When operational, the new power station would help to bring a stable supply of low-carbon electricity to the UK. This has direct and indirect effects on health and well-being. A stable power supply helps health and social care services to operate, jobs and economic activity to continue, and technology to function. Low-carbon energy generation can also help to reduce climate

change and its many adverse effects on physical and mental health and well-being.

7.2.43 The **significant** employment during both construction and operation would deliver health and well-being benefits, as working improves mental and physical health. The Sizewell C Project would benefit working people, their dependants and the wider economy. This investment is also an opportunity to improve the health and well-being of people living in the area, for example by reducing levels of deprivation.

g) **Housing Fund**

7.2.44 SZC Co. considers that direct investment in existing housing projects may enable them to deliver more social housing which would ease potential displacement impacts at the bottom of the market. SZC Co. would provide support for housing in the local area by the establishment of a Housing Fund to address potential adverse effects on local accommodation markets and sectors.

7.2.45 The Housing Fund would be secured via the Section 106 Agreement, provided in **Appendix J** of this **Statement**, and would assist ESC to:

- pre-empt and mitigate against any potential adverse effects on the local housing market arising from the temporary inflow of construction workers and their demand for accommodation;
- boost the supply of accommodation, including affordable housing, in the local area; and
- provide support for the provision of housing services to local residents who need access.

7.2.46 SZC Co. has been discussing a range of possible initiatives with ESC to reach consensus on the type of targeted initiatives that would be most effective in avoiding or mitigating the specific potential adverse impacts of the Sizewell C Project.

7.2.47 A number of initiatives are set out in **Table 7.1** of the **Accommodation Strategy** (Doc Ref 8.10), as options that could draw on the Housing Fund. These include measures to stimulate new/improved supply in the private rental sector and social rented stock, bring empty homes back into beneficial use, 'grant replacement' for existing/pipeline development schemes and support schemes to enable access to the private rental sector.

7.2.48 Indicatively, measures which could be considered to develop supply in the housing market are estimated to provide around 1,000 extra bedspaces including legacy or permanent provision together with the creation of additional lettings from within the existing affordable stock facilitated both by moves into the intermediate or affordable rent sector and the freeing up of under-occupied properties.

#### h) Summary

7.2.49 The **significant** contribution that the Sizewell C Project would make to meeting the urgent national need for nuclear energy should be given considerable weight.

7.2.50 The Sizewell C Project would also deliver other significant regional and local benefits that should be taken into consideration by the decision maker, including job creation and economic benefits during both construction and operational phases, as well as a number of other long term legacy benefits.

### 7.3 Assessment Principles

7.3.1 This section of the **Planning Statement** addresses the various assessment principles at part 4 of NPS EN-1. These comprise general policies in accordance with which applications relating to energy infrastructure are to be decided, that do not relate only to the need for energy infrastructure or to particular physical impacts of its construction or operation (paragraph 4.1.1). The assessment principles are:

- General points, including financial and technical viability.
- Environmental Statement.
- Habitats and Species Regulations.
- Alternatives.
- Criteria for “good design” for energy infrastructure.
- Consideration of Combined Heat and Power (CHP).
- Carbon Capture and Storage and Carbon Capture Readiness.
- Climate change adaptation.

- Grid connection.
- Pollution control and other environmental regulatory regimes.
- Safety.
- Hazardous substances.
- Health.
- Common law nuisance and statutory nuisance.
- Security considerations.

7.3.2 Carbon Capture and Storage and Carbon Capture Readiness is not relevant to nuclear power station NSIP applications. All of the other matters are addressed in the remainder of this section.

a) **General Points, including Financial and Technical Viability (NPS EN-1)**

7.3.3 Section 4.1 of NPS EN-1 establishes the “*presumption in favour of granting consent to applications for energy NSIPs*”. This applies unless “*any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.*”

7.3.4 Section 4.1 also states that:

*"In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of Government interventions."*

7.3.5 Importantly, it goes on to state that where:

*"...the financial viability and technical feasibility of the proposal has been properly assessed by the applicant it is unlikely to be of relevance in IPC decision making..."*

7.3.6 SZC Co.’s design for the power station has passed the GDA process undertaken by the Office for Nuclear Regulation and the Environment Agency. It is therefore technically feasible.

- 7.3.7 The financial standing of the company intending to develop and operate a nuclear power station is considered by the Office for Nuclear Regulation in its process for issuing a Nuclear Site Licence. This matter has, therefore, already been considered by the relevant regulatory body.
- 7.3.8 The applicant has submitted a **Funding Statement** (Doc Ref. 4.2) that explains how the Sizewell C Project would be funded.
- 7.3.9 SZC Co. has undertaken careful analysis to satisfy itself of the viability of the Sizewell C Project and the **Funding Statement** (Doc Ref. 4.2) confirms that the Sizewell C Project would not be prevented due to difficulties in sourcing and securing the necessary funding, including the cost of acquiring any land, interests in land and rights over land and the payment of compensation.
- 7.3.10 Based on the **Funding Statement** (Doc Ref. 4.2), the decision maker can be satisfied of the projects viability and that there is a reasonable prospect of the requisite funds for the acquisition becoming available, in accordance with Section 4.1 of NPS EN-1.

b) **Environmental Statement (NPS EN-1)**

- 7.3.11 Section 4.2 of NPS EN-1 states that:
- "All proposals for projects that are subject to the European EIA Directive must be accompanied by an ES describing the aspects of the environment likely to be significantly affected by the project."*
- 7.3.12 Schedule 1 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572) (as amended) lists developments for which an EIA is mandatory. Nuclear power stations are listed as Schedule 1 development, and consequently EIA is required for the Sizewell C Project.
- 7.3.13 The terrestrial elements of the Sizewell C Project have been assessed against the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the marine elements (i.e. the marine licensable activities) have been assessed against the Marine Works (Environmental Impact Assessment) Regulations 2007), together referred to as the 'EIA Regulations'. Further information on the requirements and the procedures established by these regulations is provided in **Volume 1, Chapter 6 (EIA Methodology)** of the **Environmental Statement**.
- 7.3.14 Section 4.2 of NPS EN-1 sets out the matters that an ES should cover, including *"the environmental, social and economic effects arising from*

*preconstruction, construction operation and decommissioning of the project” (paragraph 4.2.3).*

- 7.3.15 When considering the proposal, the decision maker should satisfy themselves that *“likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed”* (paragraph 4.2.4).
- 7.3.16 Paragraph 4.2.5 in NPS EN-1 states that when considering cumulative effects, the ES should provide information on how the proposal would combine and interact with other development. Paragraphs 4.2.7 to 4.2.9 require that where some details are still to be finalised, the ES should set out what the maximum extent of the proposed development may be to ensure that the impacts of the Sizewell C Project as it may be constructed have been properly assessed.
- 7.3.17 The submitted **Environmental Statement** presents the assessment of likely environmental effects that may occur as a result of the proposed Sizewell C Project, including the construction and operational phases of the Sizewell C nuclear power station and the associated developments, including the removal and reinstatement phase of the temporary associated developments and temporary construction areas. The assessment of operations for Sizewell C also includes the assessment of commissioning as well as re-fuelling and maintenance outages. A qualitative assessment of the decommissioning of the Sizewell C nuclear power station is also provided within the ES, although a separate application for decommissioning would need to be submitted at the end of generation and a new ES prepared under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended) (Ref. 1.52).
- 7.3.18 The scope of the EIA reported in the ES has been informed by Scoping Opinions provided by the Planning Inspectorate. SZC Co. submitted an EIA Scoping Report (Ref. 1.53) to the Planning Inspectorate in April 2014, alongside a written request for a Scoping Opinion in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. The Secretary of State considered the EIA Scoping Report and, after consulting the prescribed bodies, set out what information should be included in the **Environmental Statement**. The Scoping Opinion issued in June 2014 identified that consultees were satisfied that the proposed approach to the EIA was generally suitable and reflected the discussions with stakeholders.
- 7.3.19 In May 2019, SZC Co. submitted a new EIA Scoping Report (Ref. 1.54) to the Planning Inspectorate, as the proposed development had evolved



substantially, particularly with regards to the temporary and permanent off-site associated development sites. Furthermore, new Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 had come into force transposing the 2014 EIA Directive into UK law. The 2019 EIA Scoping Report built largely on the 2014 Scoping Report and Scoping Opinion. These are included in **Appendix 6A, Volume 1** of the **Environmental Statement**.

7.3.20 A new Scoping Opinion was published by the Planning Inspectorate in July 2019, provided in **Appendix 6B, Volume 1** of the **ES**. The **ES** has been based on the most recent scoping opinion adopted, whilst also taking into account the 2014 Scoping Opinion in the preparation. Further refinement of the methodologies for the topic assessments has been undertaken in consultation with key consultees.

7.3.21 The methodology and assessment process, including the approach in relation to the ‘Rochdale Envelope’, as introduced in Section 3.2 of this **Planning Statement**, are set out in detail in **Volume 1, Chapter 6 (EIA Methodology)** of the **ES**, which complies with the requirements of Section 4.2 of NPS EN-1.

7.3.22 SZC Co has, therefore, complied with the requirements of section 4.2 of NPS EN-1.

**c) Habitats and Species Regulations (NPS EN-1)**

7.3.23 Section 4.3 of NPS EN-1 requires the decision maker to:

*"consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects."*

7.3.24 This obligation arose from the Conservation of Habitats and Species Regulations 2010 (Ref 1.55) and is maintained in its 2017 successor. It is also a requirement of the Conservation of Offshore Marine Habitats and Species Regulations 2017 (Ref 1.56). The applicant is therefore required to provide information to allow a Habitats Regulations Assessment (HRA) to be undertaken by the “*competent authorities*” in support of its DCO and environmental permit applications. In this case the competent authorities are the Secretary of State for BEIS (for the DCO) and the Environment Agency (for the environmental permits).

7.3.25 SZC Co. has therefore provided a **Shadow Habitats Regulations Assessment Report** (Doc Ref. 5.10) that provides all the information required by the competent authorities to discharge their responsibilities.

7.3.26 The report outlines the consultation undertaken on the HRA approach through discussions with key stakeholders (including the Planning Inspectorate, Natural England, the Major Infrastructure and Environment Unit, ESC and the MMO).

7.3.27 The provision of this report satisfies the requirements of NPS EN-1 section 4.3 and, in accordance with the requirements of paragraph 4.3.1 of NPS EN-1, the report provides information that the competent authorities will use to carry out the Appropriate Assessment.

d) **Alternatives (NPS EN-1 and NPS EN-6)**

7.3.28 Section 4.4 of NPS EN-1 explains that there is no general requirement arising from the NPS to consider alternatives or to establish whether the proposed project represents the best option. However, there is a legal requirement to report in the ES on the main alternatives the applicant has studied and, in some circumstances, there are specific legislative requirements for the decision maker to consider alternatives, notably under the Habitats Directive. These should also be identified in the ES by the applicant.

7.3.29 Paragraph 4.4.3 of NPS EN-1 states that, given the level and urgency of need for new energy infrastructure, the decision maker should, subject to any relevant legal requirements (e.g. under the Habitats Directive) which indicate otherwise, be guided by specified principles when deciding what weight should be given to alternatives. These principles include that the consideration of alternatives should be carried out in a proportionate manner and whether there is a reasonable prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development.

7.3.30 Importantly, paragraph 4.4.3 states that where (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the decision maker should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.

7.3.31 Paragraph 4.4.3 also states that if the decision maker “concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the... decision”.

- 7.3.32 Paragraph 4.4.3 also states that the decision maker should also be guided by the principle that *"alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the...decision"*.
- 7.3.33 NPS EN-6 clarifies how alternatives should be considered in the context of applications for nuclear power stations. Section 2.5 reiterates the Government's view that there is an urgent need for new nuclear power stations and advises that the decision maker *"should be guided by whether there is a realistic prospect of the proposed alternative being able to generate a comparable amount of low carbon electricity on a comparable timescale"* (paragraph 2.5.2). It also states that *"subject to any contrary legal requirements, the [decision maker] should judge an application on a listed site on its own merits and a comparison with any other listed site is unlikely to be important to its decision"* (paragraph 2.5.5).
- 7.3.34 Section 2.4 outlines how alternatives were considered through the nomination process that led to the confirmation in NPS EN-6 of the eight sites for new nuclear power stations. Paragraph 2.4.3 states that as a result of the Strategic Siting Assessment and the Alternative Sites Study carried out for NPS EN-6, the Government does not believe that there are any alternatives to the listed sites that are potentially suitable for the deployment of new nuclear power stations in England and Wales before the end of 2025. Paragraph 2.4.4 goes on to state that given the very limited number of sites identified as potentially suitable for the deployment of new nuclear power stations before the end of 2025, the Government considers that all eight are required to be listed in NPS EN-6. There is nothing in the consultation on the new NPS or the Government's July 2018 response to it which suggests that the Government's position on this has changed.
- 7.3.35 Elements of the Sizewell C Project have been determined through other processes, policy or legislation and, therefore, SZC Co. has not considered any alternatives in this regard. In particular, the proposed siting of Sizewell C is set out in NPS EN-6 and decisions relating to the reactor design were completed through the UK Generic Design Assessment (GDA) process.
- 7.3.36 However, appropriate strategic options are proposed by SZC Co. for the accommodation of the accommodation workforce and movement of people and freight, when considered against alternative strategies. These strategies have identified the need for, and set the scope for, required associated development to support the construction of Sizewell C.

- 7.3.37 An assessment of site-specific alternatives for each element of the proposals, including a consideration of alternative design solutions for the different components of the main development site, and the location and design of each of the required associated developments, has also been undertaken. This site selection and design evolution process has ensured that the associated development is delivered in the right place and performs its function.
- 7.3.38 Appropriate alternatives have been considered for the components which comprise the main development sites and suitable options have been included within scheme development, having regard to operational requirements, the planning policy context, consideration of the site constraints and development constraints and the outcomes of the environmental assessment process to avoid likely significant environmental effects where possible and, where this is not possible, to mitigate and manage any remaining effects.
- 7.3.39 The **Site Selection Report** found in **Appendix A** to this **Statement**, sets out SZC Co.'s approach to site selection, and its consideration of alternatives for the proposals - from initial conception, through the various consultation stages, to the final proposals included within the DCO application.
- 7.3.40 The **Site Selection Report** is complemented by the alternatives chapters contained within the **ES**, these can be found in **Chapter 6 of Volume 2** and **Chapter 3 of Volumes 3 – 9**, which draw on the report to specifically address the requirements of the EIA Regulations. The **Environmental Statement** chapters focus on the comparative potential environmental effects of the alternatives studied by SZC Co., which are explained in the **Site Selection Report**.
- e) [Criteria for “Good Design” for Energy Infrastructure \(NPS EN-1 and NPS EN-6\)](#)
- 7.3.41 Section 4.5 of NPS EN-1 explains that good design is multi-faceted, encompassing not only visual appearance but also the functionality of the proposal, its fitness for purpose and its sustainability. These matters are considered to be equally important. NPS EN-6 adds with regard to nuclear NSIPs that substantial weight should be given to the safety and security of the power station and the control of its impacts. NPS EN-1 requires good aesthetic design “*as far as possible*” but acknowledges that “*the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.*”
- 7.3.42 Paragraph 4.5.2 of NPS EN-1 says that “*good design is also a means by which many policy objectives in the NPS can be met, for example the impact*

*sections show how good design, in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise”.*

- 7.3.43 NPS EN-1 acknowledges that the nature of energy infrastructure development will often limit the extent to which it can enhance the quality of an area. It advises, at paragraph 4.5.3, however, that *“whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area”.*
- 7.3.44 NPS EN-1 goes on to require that energy infrastructure proposals *“are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be.”* Applicants are required to *“demonstrate in their application documents how the design process was conducted and how the proposed design evolved.”*
- 7.3.45 Applicants are encouraged to make use of independent professional advice on design, such as a design review by the Design Council.
- 7.3.46 NPS EN-6, in specifically applying the principles of good design to nuclear power stations, sets out the need to ensure the safety and security of the power station and the need to control the impacts of its operations. These *“must be given substantial weight given the importance of these factors to the operation of a nuclear power station”* (paragraph 2.8.1).
- 7.3.47 SZC Co. has engaged in design-specific pre-application consultation with the local authorities and key stakeholders. This has included design reviews by the Design Council CABE undertaken in March 2014 and November 2019. The Design Council CABE noted that *“the extension of the Sizewell Nuclear Facility to create Sizewell C is a significant intervention in a sensitive and remarkable landscape. Extensive steps are being taken by the project team to carefully integrate the Sizewell C site into its historic, coastal setting. Overall, we think the proposal is being approached with great care and attention across architecture, engineering, landscape design and ecology”* This is provided at **Appendix B of Main Development Site Design and Access Statement** (Doc Ref. 8.1).
- 7.3.48 The **Main Development Site Design and Access Statement** (Doc Ref. 8.1) provides details of the proposed design, including the key issues of visual appearance, functionality, fitness for purpose and sustainability. It also

addresses the evolution of the design, as does the **Consultation Report** (Doc Ref. 5.1).

f) **Consideration of Combined Heat and Power (CHP) (NPS EN-1 and NPS EN-6)**

7.3.49 Section 4.7 of NPS EN-1 and section 2.9 of NPS EN-6 relate to the consideration of CHP. NPS EN-1 explains the principle behind CHP:

*"CHP is the generation of usable heat and electricity in a single process. A CHP station may either supply steam direct to customers or capture waste heat for low-pressure steam, hot water or space heating purposes after it has been used to drive electricity generating turbines. The heat can also be used to drive absorption chillers, thereby providing cooling"*

7.3.50 CHP can significantly reduce carbon emissions by making efficient use of heat that is generated by power stations that would otherwise be lost through emission to the environment. It is of most benefit when the source of the heat is located close to the need, for example industrial uses or homes. NPS EN-6 acknowledges that:

*"the economic viability of CHP opportunities...may be more limited for new nuclear power stations because the application of a demographic criterion for new nuclear power stations can result in stations being located away from major population centres and industrial heat demand."*

7.3.51 NPS EN-1 requires consideration of the potential for CHP to be included in the design. If the proposal does not include CHP the applicant is required to:

- explain why CHP is not economically or practically feasible for example if there is a more energy efficient means of satisfying a nearby domestic heat demand;
- provide details of any potential future heat requirements in the area that the station could meet; and
- detail the provisions in the proposed scheme for ensuring any potential heat demand in the future can be exploited.

7.3.52 A **CHP Feasibility Study** (Doc Ref. 8.15) has been prepared by SZC Co.. A detailed study was previously commissioned by SZC Co. to evaluate the

practical feasibility and economic viability for inclusion of CHP at the Hinkley Point C project in Somerset. This study was included within the Hinkley Point C application for development consent, where it was concluded that CHP would be impractical and uneconomic. Similar to the findings for Hinkley Point C and indeed any thermal generating station, operating Sizewell C as a CHP plant is technically feasible. Notwithstanding this, various constraints exist which mean that such a solution is not practical nor currently expected to be commercially viable.

7.3.53 The CHP Feasibility Study draws from the in depth findings at Hinkley Point C, and other CHP assessments produced for thermal generating stations, and addresses the technical justifications in NPS EN-1 paragraph 4.6.8. Key findings include:

- The Sizewell C main development site is located within a relatively remote location, over 30 km from the nearest city of Ipswich. Guidance suggests that a distance of 15 km may be viable for decentralised energy.
- The settlements that do currently exist within a 15 km radius of the site have relatively limited heat demands. The Government's CHP Heat Map has identified that the surrounding heat demands are significantly lower for Sizewell than for a similar area surrounding Hinkley Point.
- According to the CHP Development Map, there are no large heat load sites identified within the 15 km search area. These are defined as sites with a point heat demand of greater than 5 MWth. which could act as potential anchor load for heat network development.
- The principal existing demand is from the domestic sector, which would be space heating, mainly of existing properties, both residential and commercial. These are generally expected to be individual houses, rather than larger estates and blocks of flats. The heat demand within the domestic sector is only high for around 4 months during the winter and very low for 4 months during summer months (winter / summer seasonal variation). This means that the cost of the system has to be borne by relatively small heat sales. The infrastructure cost is very high compared to the heat supplied.
- It is envisaged that any decentralised heat network supplied by Sizewell C would take many years to complete and require a very large investment in administration and development costs as well as the plant. The high capital cost would then need to be financed over a very long period. Thus,

there is considerable capital outlay, with no return until the Sizewell C Project is commissioned.

- The viability of the Sizewell C Project would be dependent on the number of connections made. As the predominant heat demand is for existing residential users, this cannot be accurately predicted. Thus, there would always be a substantial commercial risk which will compound the difficulty in obtaining funding.
- As with Hinkley Point C, it would be reasonable to expect that any CHP scheme would have relatively poor performance in abating carbon dioxide, principally because the use of the heat would reduce the output of the nuclear power station requiring replacement of the power from fossil fuelled sources.

7.3.54 For the above reasons it is concluded that using the power station as a source of energy for CHP would not be economically viable or practical for Sizewell C. This conclusion is consistent with NPS EN-6 paragraph 2.9.3.

7.3.55 Consideration could be given in the future to potential opportunities to form an ‘energy hub’, which could employ innovative solutions to reuse waste heat released during the energy generation process as a potential source of useful energy, for example to make low carbon hydrogen, in cryo-storage or in absorption chillers for data centres which require continuous power and cooling.

#### g) Climate Change Adaptation (NPS EN-1 and NPS EN-6)

7.3.56 Section 4.8 of NPS EN-1 advises that the effects of climate change need to be taken into account when developing and consenting energy infrastructure. It notes that, *“If new energy infrastructure is not sufficiently resilient against the possible impacts of climate change it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS”*. Part 3 of NPS EN-1 addresses the need for new energy infrastructure, including nuclear power stations, and is summarised at **Section 3.2** of this **Statement**.

7.3.57 Climate change must be considered in terms of an NSIP’s location, its design, construction, operation and (where necessary) its decommissioning. Appropriate mitigation or adaptation measures must be identified, based on the latest projections of climate change, and the decision maker must be satisfied that critical infrastructure will not be seriously affected by more radical changes to the climate than those forecast.



- 7.3.58 NPS EN-6 acknowledges that nuclear power stations' need for cooling water means they are likely to be developed in coastal or estuarine areas (as all of the potential sites identified in NPS EN-6 are). This means they could be at greater risk of flooding than inland sites. Applicants are therefore required to consider adaptation measures that take account of the effects of climate change, including:
- coastal erosion and increased likelihood of storm surge and rising sea levels;
  - effects of higher temperatures; and
  - increased risk of drought, which could lead to a lack of available process water.
- 7.3.59 NPS EN-6 also confirms that the effect of climate change will have been considered through the GDA process and subsequent site licencing and environmental permitting. Following the principles set out in NPS EN-6 section 2.7 – that the DCO process should not duplicate the consideration of matters that fall within the remit of the Nuclear Regulators – the decision maker for the DCO application can assume that these matters have been properly addressed.
- 7.3.60 **Volume 2, Chapter 26** of the **ES** (Doc Ref. 6.3) presents an assessment of climate related impacts and explains how climate change has been considered with regard to design resilience and the effects of climate change on the Sizewell C Project. The ES chapter also provides the outputs of a climate change risk assessment undertaken using UK Climate Projections 2018 (UKCP18).
- 7.3.61 The Sizewell C Project has been developed with climate change in mind and incorporates mitigation measures embedded in the design. This includes elevation of the main platform to take it out of the area of flood risk up to a level of 7.3m Above Ordnance Datum (AOD) and the creation of new coastal flood defences up to 10.2m AOD with adaptive design to potentially raise the defence up to 14.2m AOD.
- 7.3.62 The overall design is set out in the **Main Development Site Design and Access Statement** (Doc Ref. 8.1), which includes details of the sea defences. These are also addressed in **Volume 2, Chapter 20** of the **ES**, related to coastal geomorphology and hydrodynamics.
- 7.3.63 SZC Co. has, therefore, complied with the requirements of Section 4.8 of NPS EN-1.

h) Grid Connection (NPS EN-1)

- 7.3.64 Section 4.9 of NPS EN-1 confirms that it is the responsibility of the applicant to “ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated.” A clear preference is expressed for infrastructure related to grid connections to be included within the application for new generating stations. Failing that, separate applications can be made, provided that they have been developed in an “integrated way” with the DCO application, though the decision on one application would not fetter subsequent decisions on related projects.
- 7.3.65 This DCO application includes infrastructure required to connect the new power station to the National Grid. A new 400kV substation is proposed along with connections lines and pylons. Details of this element of the proposals can be found in **Section 3.3** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1).
- 7.3.66 National Grid and SZC Co. have entered into contractual arrangements which provide for connection of Sizewell C to the National Electricity Transmission System. These contractual arrangements set out in principle the works that would need to be carried out to provide the grid connection and enable the National Electricity Transmission System to accommodate the output from Sizewell C.
- 7.3.67 The contractual arrangements divide responsibility for designing and building the grid connection between National Grid and SZC Co.. Under the arrangements, National Grid is responsible for designing and building most of the connection and reinforcement works, with SZC Co. having responsibility for the connection between Sizewell C and the National Grid substation. These contractual arrangements provide the contractual basis for, and clearly establish as a principle, the connection of Sizewell C to the National Electricity Transmission System.
- 7.3.68 The **Grid Connection Statement** (Doc Ref. 7.1) provides further details.
- 7.3.69 SZC Co. has, therefore, complied with the requirements of section 4.9 of NPS EN-1.

i) Pollution Control and other Environmental Regulatory Regimes (NPS EN-1)

- 7.3.70 Section 4.10 of NPS EN-1 advises on the extent to which the planning system needs to consider the issue of pollution, which is the subject of separate regulatory regimes:

*"Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality and the marine environment, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes."*

*"In considering an application for development consent, the IPC should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves."*

- 7.3.71 Again, the NPS is consistent; where other regulatory controls exist the planning decision maker can assume that those controls have been properly applied. The planning system should not seek to duplicate those controls. Its role is limited to ensuring that the cumulative effects of existing sources of pollution and the new development would not make that development unacceptable.
- 7.3.72 The **Schedule of Other Consents Licences Agreements** (Doc Ref 5.11) identifies the other consents, licences and agreements that are required to allow the construction, operation and maintenance of the Sizewell C Project. This includes, amongst other things, Prior Consent(s) pursuant to Section 61 of the Control of Pollution Act 1974 (Ref. 1.57).
- 7.3.73 The proposed development's effect on air quality, water quality, land quality, the marine environment and the effect of noise and vibration is assessed in various parts of the **ES**. Air quality is assessed at **Volume 2, Chapter 12** of the **ES**. Water quality is assessed at **Volume 2, Chapters 19** and **21** of the **ES**. Land quality is assessed at **Volume 2, Chapter 17** of the **ES**. The effect on the marine environment is assessed at **Volume 2, Chapters 21** and **22** of the **ES**. Noise and vibration are addressed at **Volume 2, Chapter 11** of the **ES**.
- 7.3.74 Paragraph 4.10.8 of EN-1 notes that the decision maker should not refuse consent on the basis of pollution impacts unless it has good reason to believe that any relevant necessary operational pollution control permits or licences, or other consents, will not subsequently be granted.
- 7.3.75 The consents, licences and agreements identified in the **Schedule of Other Consents Licences Agreements** (Doc Ref. 5.11) have either already been obtained or would be sought separately from the DCO. SZC Co. sees no impediment to obtaining any of these consents, licences or agreements and is not aware of any reason why these consents should not be forthcoming.

7.3.76 SZC Co. has, therefore, complied with the requirements of section 4.10 of NPS EN-1.

j) **Safety (NPS EN-1)**

7.3.77 Section 4.11 of NPS EN-1 requires the decision maker to be satisfied that the required safety assessments have been done to the satisfaction of the Competent Authority. The Competent Authority for safety matters is the Health and Safety Executive which acts jointly with other agencies in certain regulatory areas. The Control of Major Accident Hazards Regulations 2015 (Ref. 1.58) (NPS EN-1 refers to the now-revoked 1999 Regulations) are jointly enforced by the Health and Safety Executive and the Environment Agency. The Competent Authority for nuclear establishments includes the Office for Nuclear Regulation (ONR). The ONR also has responsibility for non-nuclear safety at nuclear establishments.

7.3.78 The proposed Sizewell C power station would comprise two UK European Pressurised Reactor (UK EPR™) units. 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 (ONR and Environment Agency).

7.3.79 As explained in **Section 3.4** and **3.5** of the **Main Development Site Design and Access Statement** (Doc Ref. 8.1), the GDA process allows the ONR and Environment Agency to assess the safety, security and environmental implications of new reactor designs. Assessment at the design stage enables identification of any potential issues so that they can be addressed by the requesting party (the company who has submitted a design for assessment) before commitments are made to construct the reactors.

7.3.80 The design of the power station, buildings and systems subject to the GDA process are required to meet the highest standards of public and environmental protection and withstand a range of defined natural and human hazards, to ensure protection over the lifetime of the power station.

7.3.81 Through the GDA process, SZC Co. submitted detailed information on the design of the UK EPR™. A rigorous and structured examination was undertaken to facilitate the involvement of the public who were able to view and comment on design information.

7.3.82 In December 2012, the ONR issued a Design Acceptance Confirmation (Ref. 1.59) and the Environment Agency issued a Statement of Design Acceptability (Ref. 1.60) for the UK EPR™ design, which concluded the GDA process.

- 7.3.83 The design of the Hinkley Point C power station, which is under construction, is the reference plant design for the UK EPR™, and Sizewell C has drawn on the learning and experience of this construction project. The learning and experience from Hinkley Point C power station construction process has led to enhanced safety, contractibility and operational effectiveness.
- 7.3.84 **Volume 2, Chapter 27** of the **ES** presents an assessment of the risk of major accidents and disasters that have the potential to arise during the construction and operation of the Sizewell C Project.
- k) **Hazardous Substances (NPS EN-1) and Radioactive Waste Management (NPS EN-6)**
- 7.3.85 Section 4.12 of NPS EN-1 confirms that, *“All establishments wishing to hold stocks of certain hazardous substances above a threshold need Hazardous Substances consent.”* Section 2.11 of NPS EN-6 addresses the issue of radioactive waste management. This confirms that the Government is satisfied that *“effective arrangements exist for the management and disposal of the wastes produced by new nuclear power stations.”* Details on these arrangements are set out at Volume II Annex B of NPS EN-6. In particular, the Government is satisfied that:
- geological disposal of higher activity radioactive waste, including waste from new nuclear power stations, is technically achievable;
  - a suitable site can be identified for the geological disposal of higher activity radioactive waste; and
  - safe, secure and environmentally acceptable interim storage arrangements will be available until a geological disposal facility can accept the waste.
- 7.3.86 Section 2.11 also confirms that nuclear power stations will produce other, non-radioactive wastes. Similar to radioactive waste, the Government is satisfied that arrangements exist for effective management and disposal of these wastes.
- 7.3.87 In accordance with section 2.7 of NPS EN-6, section 2.11 confirms that the decision maker for a DCO application need not consider the issue of whether effective management and disposal arrangements exist for waste (radioactive and non-radioactive) produced by nuclear power stations.
- 7.3.88 Detail on the Sizewell C Project’s arrangements for spent radioactive fuel waste can be found in **Volume 2, Chapter 7** of the **ES**.

## I) Health (NPS EN-1)

- 7.3.89 NPS EN-1 states at paragraph 4.13.1 that energy production has the potential to impact on the health and well-being of the population, and that whilst *“access to energy is clearly beneficial to society and to our health as a whole...the production, distribution and use of energy may have negative impacts on some people’s health”*. It states that where the Sizewell C Project has an effect on human beings (e.g. as a result of increased traffic, air pollution, dust, noise, access to public services etc.), the ES should assess these effects identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts (paragraphs 4.13.2 – 4.13.4, NPS EN-1).
- 7.3.90 Having identified these issues NPS EN-1 acknowledges that many of these effects will be subject to separate regulation. It states that *“it is unlikely that health concerns will either constitute a reason to refused [sic] consents or require specific mitigation under the Planning Act 2008.”* The main consideration for the decision maker on a DCO application with regard to health is in the setting of requirements.
- 7.3.91 Potential health impacts of an NSIP are not included within the Generic Impacts for consideration. Human health and wellbeing are however identified as a Nuclear Impacts in NPS EN-6. The guidance at section 3.12 advises that:
- “The operation of a new nuclear power station is unlikely to be associated with significant noise, vibration or air quality impacts (although there may be local impacts from transport and associated activities during construction; and if cooling towers are required, particularly forced draught towers, the potential noise impact may be greater). With appropriate mitigation, the subsequent effect of these potential impacts on human health is unlikely to be significant” (paragraph 3.12.3, NPS EN-6).
  - “In common with other major industrial processes, the construction, operation and decommissioning of new nuclear power stations could affect health care provision” (paragraph 3.12.5, NPS EN-6).
  - “The Nuclear AoS also identified that there could be positive effects for health and well-being resulting from the positive socio-economic benefits of new nuclear power stations” (paragraph 3.12.6, NPS EN-6).
- 7.3.92 With regard to the risk of adverse effects resulting from exposure to radiation for workers, the decision maker should act on the basis that the public and

the environment will be adequately mitigated because of the need to satisfy the strict legislative and regulatory regime (paragraph 3.12.11, NPS EN-6).

- 7.3.93 With specific regard to Sizewell C, Annex C of NPS EN-6 (paragraph C.8.109) states that it is possible that the presence of a nuclear power station may lead to increased stress levels in certain individuals. Overall, the AoS finds that likely enhancement in employment, community wealth, housing stock and other associated neighbourhood infrastructure should improve community well-being and health generally.
- 7.3.94 **Volume 2, Chapter 28** of the **ES** (Doc Ref 6.3) presents an assessment of construction and operational activities which have the potential to impact on health and wellbeing. Due to the multidisciplinary factors that could affect health, the assessment of health and wellbeing draws from and builds upon data and outputs from a wide range of supporting assessments, including Socio-economics, Transport, Noise and Vibration, Air Quality, Amenity and Recreation, Geology and Land Quality, Groundwater and Surface Water, and Radiological Assessment. The assessment of health and wellbeing has also been informed by data presented in the **Health Technical Note 1: Sizewell Occupational Health Care Service Description**, provided in **Appendix 28A**, **Health Technical Note 2: Sizewell Health Residual Health Care Forecast**, provided in **Appendix 28B** and the **Health Baseline (community profile)**, provided in **Appendix 28C**, all of which can be found in the **ES**.
- 7.3.95 The scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process.
- 7.3.96 The Sizewell C Health Working Group (SHWG) was established to agree the methodology of the assessment and further address public health concerns. Membership currently includes SCC, ESC, Public Health Suffolk, Suffolk NHS, Suffolk, Ipswich, East Suffolk and Great Yarmouth and Waveney Clinical Commissioning Groups (CCGs)). This has provided a collaborative platform to explore, discuss, and iteratively inform the health and wellbeing assessment undertaken, while informing the development of features and initiatives relevant to supporting local health needs, objectives and priorities.
- 7.3.97 The on-site occupational health provision will form a planning commitment and constitutes secondary mitigation relevant to health and wellbeing, to manage and reduce the impact on local healthcare capacity. Additional mitigation in the form of an appropriate healthcare planning contribution has been allowed for in the **draft Heads of Terms**, provided in **Appendix J** of this **Statement**, and will be provided to address the residual referrals

forecasted for non-home-based workers, and the health care requirement of net additional dependants.

m) **Common Law Nuisance and Statutory Nuisance (NPS EN-1)**

7.3.98 Section 4.14 of NPS EN-1 states that it *“is very important that, at the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the 1990 Act and how they may be mitigated or limited are considered...so that appropriate requirements can be included in any subsequent order granting development consent”*. The paragraph then cross refers to the Generic Impact policy relating to dust, odour, artificial light etc. (section 5.6) and noise and vibration (section 5.11) of NPS EN-1.

7.3.99 The DCO application is accompanied by a **Statement of Statutory Nuisances** (Doc Ref. 5.12) which details the possible sources of statutory nuisances and how they may be mitigated or limited.

n) **Security Considerations (NPS EN-1)**

7.3.100 Section 4.15 of NPS EN-1 confirms that the Government’s policy is to *“ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development”*. The agencies involved in the security of national infrastructure include the Centre for the Protection of National Infrastructure and, in the case of nuclear establishments, the Office for Nuclear Regulation, being the security regulator for the UK’s civil nuclear industry. Overall responsibility for energy infrastructure security lies with BEIS.

7.3.101 Because responsibility lies with these bodies the decision maker for a nuclear power station DCO application *“need not consider the details of security measures in its examination”*.

7.3.102 The security arrangements at the main site must be approved by the Office for Nuclear Regulation, and must include physical security protection features such as fencing CCTV, access controls and intruder alarms, as well as a security presence. As set out in the **Main Development Site Design and Access Statement** (Doc Ref. 8.1), the Generic Design Principles include site management, security and access principles. These establish a framework for security measures to be implemented in accordance with SZC Co.’s standards and the Office for Nuclear Regulation’s requirements.

o) **Summary**

7.3.103 Given the level and urgency of need for nuclear energy, paragraph 4.1.2 of NPS EN-1 states that the decision maker should *“start with a presumption in*



*favour of granting consent to applications for energy NSIPs*”. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. Whilst the NPS no longer has effect for projects which will not operate by the end of 2025, the existence of that presumption within the NPS demonstrates the importance which the Government attaches to the need for new nuclear power and the importance of that need within the decision making process.

- 7.3.104 As demonstrated in **Section 7.2** of this **Planning Statement**, the Sizewell C Project would make a substantial contribution towards meeting the urgent national need for nuclear energy. The **significant** regional and local benefits should also be taken into consideration by the decision maker, including job creation and economic benefits during both construction and operational phases, as well as a number of other long-term legacy benefits.
- 7.3.105 These contributions and benefits should be given considerable weight in the balance of the decision.
- 7.3.106 Furthermore, as demonstrated in this Section, the Sizewell C Project complies with each of the Assessment Principles set out in sections 4.2 – 4.15 of NPS EN-1.
- 7.3.107 This **Planning Statement** turns to assess the Sizewell C Project against the ‘generic impacts’ relevant to all energy NSIPs which are set out in Section 5 of NPS EN-1 and the ‘nuclear impacts’ described in NPS EN-6.

## 8 Planning Assessment – Main Development Site

### 8.1 Introduction

8.1.1 This section provides an assessment of the main development site proposals described in **Section 5** of this Planning Statement against the policy context set out in **Section 3**. This addresses the generic and nuclear impacts described in NPS EN-1 and NPS EN-6. These are:

- Air Quality and Emissions (NPS EN-1).
- Biodiversity and Geological Conservation (NPS EN-1 and NPS EN-6).
- Coastal Change (NPS EN-1 and NPS EN-6).
- Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation (NPS EN-1).
- Flood Risk (NPS EN-1 and NPS EN-6).
- Historic Environment (NPS EN-1).
- Landscape and Visual (NPS EN-1 and NPS EN-6).
- Land Use, Including Open Space, Green Infrastructure and Green Belt (NPS EN-1).
- Noise and Vibration (NPS EN-1).
- Socio-economics (NPS EN-1 and NPS EN-6).
- Traffic and Transport (NPS EN-1).
- Waste Management (NPS EN-1).
- Water Quality and Resources (NPS EN-1 and NPS EN-6).

8.1.2 Further Issues (NPS EN-6), including:

- Proximity to civil aircraft movements;

- Access to transmission networks;
- Impact on significant infrastructure and resources; and
- Size of site to accommodate construction and decommissioning.

8.1.3 All relevant environmental, social and economic benefits and adverse impacts for each topic listed above have been assessed and are reported on in the application documents. Primary, secondary and/or tertiary mitigation has been identified where required and is presented comprehensively in the **Mitigation Route Map** (Doc Ref 8.12).

## 8.2 Air Quality and Emissions (NPS EN-1)

### a) Policy Context

8.2.1 Air quality and emissions are identified as Generic Impacts at Section 5.2 of NPS EN-1.

8.2.2 **Volume 1, Appendix 6H** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance of relevance to the assessment of the potential air quality impacts associated with the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

### i. NPS EN-1

8.2.3 NPS EN-1 advises that infrastructure development can have adverse effects on air quality (paragraph 5.2.1). Paragraph 5.2.2 of NPS EN-1 recognises that CO<sub>2</sub> emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided. However, paragraph 5.2.2, NPS EN-1 confirms that:

*“Government has determined that CO<sub>2</sub> emissions are not reasons to prohibit the consenting of projects which use these technologies or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the Carbon Capture Readiness and, for coal, Carbon Capture and Storage requirements)”.*

8.2.4 Paragraph 5.2.3 notes that a particular effect of air emissions from some energy infrastructure may be eutrophication. Paragraph 5.2.4 notes that exhaust stack heights would be determined by statutory requirements and is not a matter for the decision maker in terms of air quality.

8.2.5 Where a project is likely to have adverse effects on air quality, paragraph 5.2.6 requires that an assessment of the impacts of the proposed project should be undertaken as part of the ES and paragraph 5.2.7 identifies the air quality and emission requirements that should be assessed.

8.2.6 Paragraph 5.2.9 of NPS EN-1 states that the decision-maker should:

*"generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits."*

8.2.7 Where a project is likely to lead to a breach of national air quality limits, paragraph 5.2.9 of EN-1 provides that the applicant should work with the relevant local authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to noncompliance with a statutory limit the decision maker should refuse consent (paragraph 5.2.10).

8.2.8 Paragraph 5.2.11 of EN-1 advises that the decision maker should consider *"whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application"*. Paragraph 5.2.13 notes that mitigation measures identified in section 5.13 of EN-1 will help mitigate the effects of air emissions from transport.

8.2.9 Paragraph 4.13.5 of EN-1 states that generally, those aspects of energy infrastructure which are most likely have a significantly detrimental impact on health are subject to separate regulation (for example, for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refuse consents or require specific mitigation.

8.2.10 Finally, paragraph 3.12.3 of EN-6 recognises that the operation of a new nuclear power station is unlikely to be associated with significant air quality impacts, although there may be local impacts from transport and associated activities during construction.

#### ii. Other Relevant National and Local Policy

8.2.11 At a national level, paragraph 181 of the NPPF states that: *"Planning policies and decisions should sustain and contribute towards compliance with*

*relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas... Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*

- 8.2.12 At a local level, Suffolk Coastal Local Plan includes Strategic Policy SP13 which, in respect of air quality effects from additional nuclear power stations at Sizewell, requires the consideration of ecological impacts on nearby designated sites, construction management and transport issues having regard to such factors as residential amenity.
- 8.2.13 The Suffolk Coastal Local Plan also highlights the designation of several Air Quality Management Areas (AQMAs) within the district and the need to ensure that new development does not result in additional AQMAs being declared.
- 8.2.14 AQMAs have been declared for three locations within the administrative area of ESC, one in Stratford St Andrew and one in Woodbridge, both for the potential for exceedance of the annual mean nitrogen dioxide air quality objective at several properties on the A12 and in Woodbridge centre, and a third in Felixstowe which was revoked in 2016.

#### b) Assessment

- 8.2.15 This section demonstrates how the Sizewell C power station accords with national and local policy in relation to air quality and emissions. Emissions from traffic and ecological impacts (including any potential eutrophication impacts) are considered in separate sections below.
- 8.2.16 In accordance with the requirements of paragraphs 5.2.6 and 5.2.7 in EN-1, **Volume 2, Chapter 12 (Air Quality)** of the **ES** (Doc Ref. 6.3) presents the assessment of air quality effects arising from the construction and operation of the Sizewell C power station at the main development site. The assessment has been informed by technical assessments, including a **Construction Dust Assessment**, provided in **Appendix 12A**, a **Transport Emissions Assessment**, provided in **Appendix 12B** and a **Combustion Activities Assessment**, provided in **Appendix 12C**, all respectively provided in the **ES**; as well as by ongoing consultation and engagement with statutory consultees. A summary of consultation relating to the air quality assessment is provided in **Volume 1, Appendix 6H** of the **ES**.
- 8.2.17 In the first instance, it is worth considering that the policy of deployment of nuclear power stations is part of a wider policy of achieving zero carbon emissions nationally by 2050 (EN-1 paragraph 3.3.15).

- 8.2.18 As set out within the **Sustainability Statement** (Doc Ref 8.13), nuclear power is a low carbon technology. On a lifecycle basis GHG emissions from the Sizewell C power station over the 60-year design life would equate to between 9-10 gCO<sub>2</sub>e/kWh. This compares favourably with other fossil fuel electricity generation and is comparable with alternative low carbon fuel sources such as wind:
- Natural gas 340 gCO<sub>2</sub>e/kWh.
  - Solar photovoltaic 40-85 gCO<sub>2</sub>e/kWh.
  - Offshore wind 7-24 gCO<sub>2</sub>e/kWh.
  - Onshore wind 7-20 gCO<sub>2</sub>e/kWh.
- 8.2.19 Nuclear power is able to provide a reliable source of electrical energy and is generally advantageous to wind and solar energy in providing a stable base load to support the National Grid. The proposals for the Sizewell C Project would be for two UK EPR™ units, generating 1,670MW (net) of low carbon electricity per unit. The electrical output would provide a low carbon source for over 20% of the UK's homes and, based on current grid intensity, offset approximately 7 million tonnes of CO<sub>2</sub> per annum by displacing the existing mix of more carbon intensive electricity from the National Grid. The development of the Sizewell C power station would therefore play a **significant** role in the UK's transition to a low carbon economy.
- 8.2.20 Whilst the Sizewell C power station would play a key role in decarbonising the energy supply sector, it would be a **significant** contributor to emissions during construction. It is estimated that approximately 2.9 million tonnes CO<sub>2</sub>e would arise from the construction activities over a 9 to 12-year period, principally associated with material use and the transportation of materials and people.
- 8.2.21 Whilst the construction phase would involve substantial quantities of materials, many of which have high embodied energy, these are being used to construct infrastructure, which would have a significant operational design life. Indeed, the generation of low carbon electricity once the power station is commissioned would displace the equivalent construction emissions in as little as 10 months of operation. Notwithstanding this, recognising the urgent need to tackle climate change, measures must be taken to reduce construction emissions where possible. Whilst the Sizewell C Project is therefore considered to support the objective overall, an opportunity has been identified to further drive forward improvements beyond the regulatory

minimums to design, construct and operate the proposed nuclear power station and associated development as efficiently as possible. This opportunity is to be further explored through the implementation of the Sizewell C Sustainability Strategy set out in Chapter 4 of the **Sustainability Statement** (Ref. 8.13).

8.2.22 Whilst recognising the overarching long-term benefits of carbon reduction, it is still important that consideration is given to mitigating, where possible, the emissions and potential air quality impacts associated with the construction and operation of the Sizewell C power station.

8.2.23 As detailed in **Volume 2, Chapter 12** of the **ES**, a number of primary mitigation measures have been identified through the iterative EIA process and have been incorporated into the design and construction planning of the proposed development. These include:

- Use of two off-site park and ride facilities to reduce construction worker traffic to site, as well as the use of an accommodation campus to further reduce travel to site, which would help reduce transport related emissions.
- Use of an offsite freight management facility.
- Diesel generator stack heights are set as high as could be achieved under the design envelope for the power station and emissions of nitrogen oxides controlled through primary means.
- Minimising freight movements on roads through the provision of the beach landing facility, Saxmundham to Leiston branch line upgrades, the rail siding at LEEIE, and the green rail route.

8.2.24 The **Sizewell C Code of Construction Practice (CoCP) Part B: Main Development Site** (Doc Ref. 8.11) also sets out air quality and dust mitigation measures which would manage and control the construction activities at the main development site.

8.2.25 As acknowledged at paragraph 4.13.5 of EN-1, the aspects of the proposed development which are most likely have a significantly detrimental impact on health are subject to separate regulations – primarily the Environmental Protection Act 1990 (Ref. 1.61), and the Clean Air Act 1993 (Ref. 1.62).

8.2.26 Where batching cement plant or mobile crushing plant is employed at sufficient scale to require an Environmental Permit to be in place for the facility, dust and particulate emissions to air will be regulated by the local

authority under the Environmental Permitting Regulations 2016 (Part B Activities) (Ref. 1.63) and controlled in accordance with an Environmental Permit to be issued for such operation.

8.2.27 Combustion emissions to air from stationary generators, where employed during the construction of the proposed development, and from the Sizewell C operational plant, such as the emergency power generation plant (diesel generators), will be regulated by the Environment Agency under the Environmental Permitting Regulations 2016 and controlled in accordance with an Environmental Permit to be issued for such operation.

8.2.28 Following these measures, the assessment concludes that the only potential source of significant air pollution would arise from construction dust. Secondary mitigation measures would be applied, including regular site inspections, logging of complaints, dust and particulate monitoring and reviewing of weather conditions ahead of works to determine the need for further mitigation. With these measures in place, no residual effects are anticipated.

8.2.29 Therefore, as the proposals would not lead to a breach in national air quality limits at construction, operation or decommissioning, they are in accordance with paragraph 5.2.10 of NPS EN-1. Adverse effects on air quality are **not significant** and therefore paragraph 5.2.9 of EN-1 does not apply because there would be no “substantial changes in air quality levels”.

#### i. Air Quality Impacts from Transport

8.2.30 **Volume 2, Appendix 12B** of the **ES** (Transport Emissions Assessment) describes the air quality impacts from all transport modes associated with the Sizewell C Project as a whole, including road traffic and rail operational emissions, and is referenced within the relevant volumes of the ES for the assessment of air quality effects. Whilst the traffic movements set out in **Appendix 12B, Volume 2** of the **ES**, are associated with the wider Sizewell C Project, **Volume 2, Chapter 12 (Air Quality)** of the **ES** is focused only on those within the main development site study area, with air quality effects on receptors within the study areas of the associated developments considered within **Chapter 5 of Volumes 3 to 9** of the **ES**.

8.2.31 A number of the primary mitigation measures identified above specifically target traffic emissions, including:

- Use of two off-site park and ride facilities, an accommodation campus and caravan park to reduce travel to site, reduced car parking and



public rights of way improvements, which would help reduce transport related emissions.

- Use of an off-site freight management facility, which would help manage freight arrivals and reduce on-site queuing and engine idling.
- Minimising freight movements on roads through the provision of the beach landing facility, Saxmundham to Leiston branch line upgrades, the rail siding at LEEIE, and the green rail route.

8.2.32 In addition, during construction, a **Construction Workforce Travel Plan**, and a **Construction Traffic Management Plan**, including a delivery management system, would be implemented to reduce and manage the effects of traffic generated by the proposed development. The implementation of both the Construction Workforce Travel Plan and Construction Traffic Management Plan will be secured through an obligation in a Section 106 Agreement, provided in **draft Section 106 Heads of Terms**, provided in **Appendix J** of this **Statement**.

8.2.33 As a result of the mitigation measures, the air quality effects on human health resulting from traffic associated with the construction and operation of the Sizewell C Project are not predicted to be significant. Therefore paragraph 5.2.9 of EN-1 does not apply as there would be no “substantial changes in air quality levels”.

### 8.3 Biodiversity and Geological Conservation (NPS EN-1 and NPS EN-6)

#### a) Policy Context

8.3.1 Biodiversity and geological conservation are identified as both Generic Impacts in EN-1 and Nuclear Impacts in EN-6.

8.3.2 This section deals only with biodiversity, with geological conservation addressed separately under consideration of soils and geology.

8.3.3 **Volume 1, Appendix 6J** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance of relevance to the assessment of the potential terrestrial ecology and ornithology impacts associated with the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

i. NPS EN-1

8.3.4 Paragraph 5.3.3 of EN-1 requires an ES to clearly set out: “...any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity”.

8.3.5 Paragraph 5.3.4 in EN-1 states that the applicant should show how the proposals have taken advantage of opportunities to conserve and enhance biodiversity interests (and refers to the Government’s biodiversity strategy ‘Working with the grain of nature’ at paragraph 5.3.5).

8.3.6 Paragraph 5.3.6 (and 5.3.15) recognise that the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and that these may outweigh harm to these interests.

8.3.7 Paragraph 5.3.7 of NPS EN-1 states, in relation to biodiversity and geological conservation, that:

*“As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives where significant harm cannot be avoided, then appropriate compensation measures should be sought”.*

8.3.8 The policy therefore aims to achieve avoidance of significant harm (including through mitigation) in the first instance but supports seeking appropriate compensation measures where significant harm cannot be avoided.

8.3.9 Paragraph 5.3.8 of NPS EN-1 requires the decision maker to attach appropriate weight to designated sites, protected species, habitats and to biodiversity within the wider environment.

8.3.10 Paragraph 5.3.11 in EN-1 relates to SSSIs, of which there are two that are close to and relevant to Sizewell C: the Sizewell Marshes SSSI and the Minsmere to Walberswick Heaths and Marshes SSSI. Paragraph 5.3.11 states:

*“Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally*

*be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The decision maker should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest".*

- 8.3.11 Sites of regional and local geological interest should be given due consideration by the decision maker, though given the need for new infrastructure, these designations should not be used in themselves to refuse development consent (EN-1 paragraph 5.3.13).
- 8.3.12 Paragraph 5.3.15 notes that development proposals provide many opportunities for building in beneficial biodiversity features as part of good design.
- 8.3.13 Paragraph 5.3.17 states that other species and habitats have been identified as being of principal importance for the conservation of biodiversity and thereby requiring conservation action. The decision maker should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The decision maker should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context, the decision maker should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.
- 8.3.14 Finally, under consideration of the air quality and emissions Generic Impacts, paragraph 5.2.3 of EN-1 notes that a particular effect of air emissions from some energy infrastructure may be eutrophication.

ii. [NPS EN-6 \(2011\)](#)

- 8.3.15 There is no additional general policy relating to SSSIs in the main body of NPS EN-6, though the Site Assessment for Sizewell at C.8 acknowledges the inclusion of part of the Sizewell Marshes SSSI within the nominated site and proximity of other SSSIs. Paragraph C.8.60 specifically notes that some

responses to the Government’s consultation questioned how direct land take could be mitigated.

8.3.16 Paragraph C.8.61 noted that the AoS identified that there could be potential significant effects at Sizewell Marshes SSSI, Minsmere Walberswick Heaths and Marshes SSSI, Leiston-Aldeburgh SSSI and Alde Ore Estuary SSSI.

8.3.17 Paragraph C.8.62 then notes that, as the site boundary indicates land take from Sizewell Marshes SSSI, the AoS concluded that construction and development are likely to lead to direct loss and fragmentation within Sizewell Marshes SSSI, and that:

*“developers could avoid or minimise losses and disturbance to protected species through careful site layout, design, routing, location of the development, associated infrastructure, and construction management and timings. The AoS finds that there is potential for habitat creation within the wider area in order to replace lost “wet meadows” habitats of the Sizewell Marshes SSSI, but also finds that it may not be possible to fully compensate for losses of this habitat. The applicant will need to develop an ecological mitigation and management plan to minimise the impacts”.*

8.3.18 Paragraph C.8.63 notes that the AoS identified the potential for the mitigation of biodiversity effects on sites of UK-wide conservation importance (Sizewell Marshes SSSI), including the creation of replacement habitat, and that developers *“could avoid or minimise losses and disturbance to protected species through careful site layout, design, routing, location of the development, associated infrastructure, and construction management and timings”*. It also notes that the AoS found that there is potential for habitat creation within the wider area in order to replace lost wet meadows habitats in the Sizewell Marshes SSSI – though that it may not be possible to fully compensate for the loss of habitat.

8.3.19 The assessment at C.8.64 – C.8.65 concludes that:

*“C.8.64 The Government notes that AoS has identified potential impacts on nationally designated sites of ecological importance which it considers of strategic significance. Given the scope for mitigation of biodiversity effects identified in the AoS for sites of national importance it is reasonable to conclude that it may be possible to avoid or mitigate impacts to an extent. However, the AoS has highlighted that the site includes land take from Sizewell Marshes SSSI that could lead to direct impacts.*

*C.8.65 The Government has carefully considered whether this site meets this criterion given the direct impact on Sizewell Marshes SSSI. However, given the need to ensure sufficient sites are available for development to meet the Government’s energy policy objectives (as described in Part 2 of this NPS), the Government believes that it does. In view of the need for sites and the limited number of potentially suitable sites, the Government does not think the issues in relation to this criterion are sufficient to justify not including the site in this NPS. The Government has also noted that there will be further assessment of any proposal for the site at project level and that EN-1 sets out detailed consideration that must be given to issues related to nationally designated sites, should an application for development consent come forward”.*

- 8.3.20 In summary, NPS EN-6 concluded that the need for direct land take at Sizewell Marshes SSSI was not sufficient to justify excluding the site from the NPS, and that it is reasonable to conclude that it may be possible to avoid or mitigate impacts to an extent through the provision of replacement habitat.

iii. [Other Relevant National and Local Policy](#)

- 8.3.21 Paragraph 175 (b) of the NPPF states that:

*“...development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSI”;*

- 8.3.22 This wording is similar, but not identical, to paragraph 5.3.11 of NPS EN-1, which specifically refers to the “need” for the development.

- 8.3.23 Section (a) of paragraph 175 sets out the mitigation hierarchy principles which state that:

*“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.*

8.3.24 Again, this is similar to paragraph 5.3.7 of NPS EN-1 (though the latter does not include the term “last resort”).

8.3.25 With regard to local planning policy, Policy DM27 (Biodiversity and Geodiversity) of the adopted SCDC Core Strategy and Development Management Policies (July 2013) is relevant, which states:

*“All development proposals should: (a) protect the biodiversity and geodiversity value of land and buildings and minimise fragmentation of habitats; (b) maximise opportunities for restoration, enhancement and connection of natural habitats; and (c) incorporate beneficial biodiversity conservation features where appropriate.*

*Development proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species will not be permitted unless: (i) prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development; or (ii) with regard to internationally designated sites that the exceptional requirements of Reg. 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) relating to the absence of alternative solutions and Imperative Reasons of Overriding Public Interest have been met.*

*Improved site management and increased public access to sites will be encouraged where appropriate”.*

8.3.26 The Suffolk Final Draft Local Plan 2019 recognises at paragraph 10.17 that:

*“Compensatory areas have been provided at Sizewell Nuclear Power plants to mitigate the effects of development on SSSIs. In the interests of ensuring the continued conservation of mitigation measures such as SANGs and compensatory areas, considerable weight should be afforded to the conservation of such measures where they are included as part of large scale development proposals”*

**b) Assessment**

8.3.27 In accordance with the requirements of paragraph 5.3.3 of EN-1, **Volume 2, Chapter 14 (Terrestrial Ecology)** and **Chapter 22 (Marine Ecology)** of the **ES** (Doc Ref. 6.3) presents the assessment of the terrestrial ecology and ornithology and the marine ecology effects arising from the construction and operation of the proposed development at the main development site.

8.3.28 Also, in accordance with paragraphs 5.2.3 and 5.2.7 of EN-1 (i.e. potential eutrophication impacts) the **Plants and Habitats Synthesis Report**, provided in **Appendix 14B1** of this **Statement**, provides a detailed assessment of the air quality and changing water levels effects that the proposed development would have on the terrestrial habitats. The **Shadow Habitat Regulations Assessment** considers internationally designated nature conservation sites.

**i. Terrestrial Ecology**

8.3.29 **Chapter 14** of **Volume 2** of the **ES** identifies all relevant terrestrial ecological receptors with the potential to be affected by the construction and operation of the Sizewell C power station and fully assesses these, recommending mitigation and compensation where appropriate.

8.3.30 The identified and assessed internationally, nationally and locally designated sites of ecological or geological conservation importance comprise:

- Three Special Protection Areas (SPA): Outer Thames Estuary; Minsmere to Walberswick; and the Sandlings.
- Three Special Areas of Conservation (SAC): Minsmere to Walberswick Heaths and Marshes; Alde-Ore and Butley Estuaries; and Orfordness to Shingle Street.
- Two Ramsar sites: Minsmere to Walberswick and Alde-Ore; and Butley Estuary.
- Eight Sites of Special Scientific Interest (SSSI): The Alde-Ore Estuary; Blaxhall Heath; Leiston to Aldeburgh; Minsmere to Walberswick Heaths and Marshes; Sandlings Forest; Sizewell Marshes; Snape Warren; and Tunstall Common.
- Four County Wildlife Sites (CWS): Sizewell Levels and Associated Areas; Suffolk Shingle Beaches; Sizewell Rigs; and Leiston Common.

8.3.31 Legally protected species which have been identified and assessed include bats, Natterjack Toad, water vole, badger and reptiles.

8.3.32 Mitigation measures have been designed to conserve and, wherever practicable, enhance biodiversity (in accordance with paragraph 5.3.4 of EN-1). The design of the main development site has been carefully planned to reduce effects on ecology, as much as reasonably practicable. The amount of habitat lost has been minimised, where possible, and replacement habitats are proposed on-site and off-site. Measures have been embedded within design to minimise construction disturbance, effects on groundwater, surface water and air quality and to maintain the coastal frontage of Sizewell C. Specific primary mitigation includes:

- The establishment of new reedbed and ditches at Aldhurst Farm (completed in 2016) has provided replacement for the land take of these habitats within Sizewell Marshes SSSI. The replacement habitats have established successfully, and mobile aquatic plant and invertebrate species would colonise over time from the adjacent areas of the Sizewell Marshes SSSI. These new habitats also provide nesting and foraging habitat for bird and bat species as well as suitable habitat for water vole. Committing to the early creation of enhanced habitats at Aldhurst Farm can be regarded as best practice.
- The Rights of Way and Access Strategy for the EDF Energy Estate, provided in **Appendix 15I of Chapter 15 of Volume 2 of the ES**, would be developed to minimise the displacement of people away from the proposed development area and to nearby European sites to minimise disturbance to ground-nesting bird species and trampling of vegetation. In addition, the strategy outlines a monitoring programme for recreational displacement and identifies local mitigation measures, to be agreed with local land managers, which could be introduced to further reduce recreational disturbance.
- Permanent foraging habitat for marsh harrier has been established and enhanced within the northern part of the EDF Energy Estate, in advance of construction, to mitigate any potential disturbance effects which might discourage marsh harriers from foraging over parts of the Minsmere South Levels and Sizewell Marshes SSSI.
- Boundary treatments are included within the construction masterplan to minimise noise, lighting and visual disturbance to adjacent designated sites or valuable habitats. Boundary treatments would also limit the extent of air borne dust pollution.



- Lighting strategies are proposed with dark corridors to respect bat foraging areas.
  - A SSSI crossing has been designed to be an embankment and culvert, with the culvert of sufficient dimensions to leave the bank and channel of the Leiston Drain intact. The culvert would be of sufficient size to facilitate the passage of fish, bats, otter and water vole through the structure, and a ledge would be installed to enable passage by otter (complete with fencing to guide otter to the SSSI crossing), if deemed required following detailed design and flood assessments. Appropriate lighting and noise protection measures would be deployed to ensure the culvert is viable for use by bats.
- 8.3.33 This is only a selection of the proposed mitigation measures. A full summary of the ecological mitigation is set out at Section 14.12 of **Chapter 14** of **Volume 2** of the **ES**.
- 8.3.34 In addition, a series of specific strategies and management plans would be secured by the DCO Requirements, provided in **Schedule 2** of the **draft DCO** (Doc Ref. 3.1) and implemented to conserve and, wherever practicable, enhance biodiversity. These include:
- **Sizewell C Code of Construction Practice Part B: Main Development Site (CoCP)** (Doc Ref. 8.11).
  - **Outline Landscape and Ecology Management Plan (oLEMP)** (Doc Ref. 8.2).
  - **Outline Dust Management Plan**, provided in **Appendix 12A** of **Volume 2** of the **ES** (Doc Ref. 6.3).
  - **Natterjack Toad Mitigation Strategy**, provided in **Appendix 14C7A** of **Volume 2** of the **ES** (Doc Ref. 6.3).
  - **Bat Mitigation Strategy**, provided in **Appendix 14C1** of **Volume 2** of the **ES** (Doc Ref. 6.3).
  - **Reptile Mitigation Strategy**, provided in **Appendix 14C2** of **Volume 2** of the **ES** (Doc Ref. 6.3).
  - **Badger Mitigation Strategy**, provided in **Appendix 14C3** of **Volume 2** of the **ES** (Doc Ref. 6.3).

- **Water Vole Mitigation Strategy**, provided in **Appendix 14C6A** of **Volume 2** of the **ES** (Doc Ref. 6.3).
- 8.3.35 Finally, an additional, temporary, off-site area which could be improved to provide further marsh harrier foraging during construction is also proposed west of Westleton. SZC Co. believes this additional area is not required to mitigate or compensate for the effects of the Sizewell C Project on marsh harriers. The area at Westleton is nevertheless being put forward as part of the DCO application in case the Secretary of State disagrees with this position and takes the view that it is in fact required. If the Secretary of State agrees with SZC Co. that such land is not required then we would expect the Secretary of State to grant the DCO in a form which does not authorise any powers over such land, including powers of compulsory purchase.
- 8.3.36 Following the mitigation summarised above, the majority of the effects arising from the construction phase of the main development site for plants and habitats are considered to be **not significant**. However, the **ES** does identify significant adverse effects on Deptford Pink (a nationally scarce plant species) due to direct land take and barbastelle and on Natterer's bats due to habitat fragmentation during construction.
- 8.3.37 No other significant adverse effects on other protected species (invertebrate assemblages, eel, natterjack toad, birds, other bat species and terrestrial mammals) have been identified for the construction phase.
- 8.3.38 Following construction, areas temporarily used would be reinstated in accordance with the **Outline Landscape and Ecology Management Plan** (Doc Ref. 8.2). Existing arable land on the Sizewell estate would be converted to Suffolk Sandlings acid grassland habitats with additional areas of scrub and woodland plantings. This landscape-scale habitat creation would replace existing intensively managed arable farmland with habitats of greater biodiversity value and would increase habitat connectivity particularly for bats. The **Outline Landscape and Ecology Management Plan** (Doc Ref. 8.2) also includes long-term management prescriptions and a monitoring programme for habitats created ensuring that these areas deliver the habitats proposed. This restoration would deliver biodiversity gain and is considered to provide a long-term significant beneficial effect, specifically for invertebrate assemblages of sandy habitats and reptiles due to the additional habitat provided.
- 8.3.39 Therefore, taking into account the overall planning balance set out in **Section 11** of this **Planning Statement** and with particular regard to the measures set out above it can be concluded that the benefits of the development

outweigh the harm and the Sizewell C power station is in accordance with paragraphs 5.3.11, 5.3.14, 5.3.15, 5.3.17 and 5.3.18 of EN-1.

ii. **Eutrophication Impacts**

8.3.40 As set out above, EN-1 notes that a particular effect of air emissions from some energy infrastructure may be eutrophication, which is the excessive enrichment of nutrients in the environment. Eutrophication from air pollution results mainly from emissions of NO<sub>x</sub> and ammonia. Eutrophication can affect plant growth and functioning, altering the competitive balance of species and thereby damaging biodiversity.

8.3.41 The **Plants and Habitats Synthesis Report**, provided in **Volume 2, Appendix 14B1** of the **ES**, provides a detailed assessment of the air quality effects the proposed development would have on the terrestrial habitats. This report is provided in **Annex 14A3.3** of **Appendix 14A3 – Plants and Habitats** of the **ES** and has been used to support the terrestrial ecological assessment.

8.3.42 The air quality dispersal modelling work presented in the **Plants and Habitats Synthesis Report** indicates that the likely zone of influence for potential air quality effects is limited, with the majority of emissions and deposition occurring within 1km radius of the point of source. Therefore, any potential air quality effects would be restricted to the Minsmere European Site, Minsmere to Walberswick Heaths and Marshes SSSI and Sizewell Marshes SSSI.

8.3.43 Following the mitigation measures set out in the section above, including the implementation of the **CoCP** (Doc Ref. 8.11) and **Outline Dust Management Plan**, the **ES** does not identify any significant air quality effects on the terrestrial habitats.

iii. **Marine Ecology**

8.3.44 **Chapter 22** of **Volume 2** of the **ES** identifies all relevant marine ecological receptors with the potential to be affected by the construction and operation of the Sizewell C power station and fully assesses these, recommending mitigation and compensation where appropriate.

8.3.45 Following consultation feedback on the EIA Scoping Report (SZC Co, 2014), the receptor groups which make marine ecological assessment comprise plankton, benthic ecology, fish ecology, marine mammals and fisheries.

8.3.46 Mitigation measures have been designed to conserve and, wherever practicable, enhance marine ecology (in accordance with paragraph 5.3.4 of

EN-1) and, having regard to paragraph 5.3.18 of EN-1, mitigation measures are integral to the design and through the implementation of specific strategies and management plans. This includes a **Lighting Strategy for Construction and Operational Sites**, provided in **Appendix 2C of Volume 2** of the **ES** (Doc Ref. 6.3) which aims to minimise light spill into the marine environment.

8.3.47 Marine temperature changes due to thermal discharges have been mitigated by locating intake headworks 3km offshore in deep water to allow initial mixing and minimise intersection with the coastline. Also, two fish recovery and return systems would be constructed, one for each reactor and would minimise impacts on impinged fish and invertebrates.

8.3.48 **Chapter 22 of Volume 2** of the **ES** (Doc Ref. 6.3) concludes that there would be no significant effects upon any of the receptor groups.

## 8.4 Coastal Change (NPS EN-1 and NPS EN-6)

### a) Policy Context

8.4.1 Coastal change is identified as both a Generic Impact in section 5.5 of EN-1 and a Nuclear Impact in EN-6.

8.4.2 **Volume 1, Appendix 6P** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant effects of the Sizewell C Project on coastal geomorphology and hydrodynamics. The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.4.3 Paragraph 4.1.6 of EN-1 confirms that the Marine and Coastal Access Act 2009 (MCAA) provides for the preparation of a Marine Policy Statement (MPS) and a number of marine plans. It states that the decision maker must have regard to the MPS and applicable marine plans in taking any decision which relates to the exercise of any function capable of affecting the whole or any part of the United Kingdom marine area. In the event of a conflict between any of these marine planning documents and an NPS, paragraph 4.1.6 of EN-1 confirms that the NPS prevails for purposes of decision making given the national significance of the infrastructure.

8.4.4 Paragraph 5.5.7 of EN-1 states that applicants should assess the impact of the proposed project on coastal processes and geomorphology, including by taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant must demonstrate

how the impacts will be managed to minimise adverse impacts on other parts of the coast.

- 8.4.5 Paragraph 5.5.10 of EN-1 states that the decision maker should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the Sizewell C Project's operational life and any decommissioning period.
- 8.4.6 Paragraph 5.5.12 of EN-1 states that the decision maker should ensure that applicants have restoration plans for areas of foreshore disturbed by direct works and will undertake pre- and post- construction coastal monitoring with defined triggers for intervention and restoration.
- 8.4.7 Paragraph 5.5.17 of EN-1 confirms that applicants should propose appropriate mitigation measures to address adverse physical changes to the coast in consultation with stakeholders. Where this is not the case, the decision maker should consider what appropriate mitigation requirements might be attached to any grant of development consent.

ii. **NPS EN-6**

- 8.4.8 EN-6 states at paragraph 2.10.3 that the **ES** should take into account how the proposal will take account of the projected impacts of climate change in accordance with section 4.8 of EN-1, which includes climate change adaptation.
- 8.4.9 Paragraph 3.9.3 of EN-6 states that in carrying out an assessment in accordance with section 5.3 of EN-1, applicants should also consider the effects of the construction of a new nuclear power station on the groundwater regime and its effects on terrestrial/coastal habitats.
- 8.4.10 Paragraph 3.8.3 of EN-6 states that applicants should assess the site's ongoing natural ecological, coastal and geomorphic processes and that this will include identifying impacts on coastal processes, intertidal deposition and soil development processes that maintain terrestrial/coastal and/or marine habitats.
- 8.4.11 Coastal erosion at the Sizewell C main development site was taken into account in the NPS site selection process and there is no expectation within NPS EN-6 that coastal erosion would be a threat to the viability of the Sizewell C Project. Annex C refers to advice from the Environment Agency:

*“The Environment Agency has advised that, based on the current understanding of coastal erosion in this area there is no technical reason that would prevent the site being*

*protected/mitigated from the effects of coastal erosion, although there are potential difficulties."*

8.4.12 Those potential difficulties include:

- a lack of sizeable quantities of sediment moving along the shoreline (that might replenish material lost through erosion);
- the possible need to upgrade existing sand and shingle flood defences, to cover the full lifespan of the Sizewell C Project; and
- the possible loss of the Minsmere Sluice during the lifespan of the Sizewell C Project and the consequences for the protection of the coastline from erosion.

8.4.13 Although recognising these difficulties, the Site Assessment in NPS EN-6 states that:

*"Based on the advice above [from the Environment Agency] it is reasonable to conclude that a nuclear power station at the site could be protected against coastal erosion, including the effects of climate change, for the lifetime of the site."*

### iii. Other Relevant National and Local Policy

8.4.14 The UK Marine Policy Statement is the framework for preparing Marine Plans and sets out the environmental, social and economic considerations for decisions affecting the marine environment. The relevant section of the Policy Statement (Section 2.6.8, pertaining to coastal change and flooding) indicates that any development which may affect areas at high risk and probability of coastal change should not be considered unless the impacts upon it can be managed. Developers should also seek to minimise or mitigate changes in geomorphology and coastal process (including sediment movement).

#### b) Assessment

8.4.15 This section demonstrates how the main development site accords with national and local policy in relation to coastal change.

8.4.16 In accordance with the requirements of paragraph 5.5.7 of EN-1, **Volume 2, Chapter 20 (Coastal Geomorphology and Hydrodynamics)** of the **ES** (Doc Ref. 6.3) presents the assessment of the coastal geomorphology and

hydrodynamics effects arising from the construction and operation of the proposed Sizewell C nuclear power station at the main development site. The assessment has been informed by **Sizewell Coastal Geomorphology and Hydrodynamics Synthesis for Environmental Impact Assessment**, provided in **Appendix 20A** of **Volume 2** of the **ES**; as well as, by ongoing consultation and engagement with statutory consultees.

- 8.4.17 In accordance with paragraph 3.9.3 of EN-6, the effects of the construction of a new nuclear power station on the groundwater regime and its effects on terrestrial/coastal habitats are considered in **Sections 8.14** and **8.3** of this **Planning Statement**.
- 8.4.18 To facilitate engagement with statutory stakeholders on the marine assessments, the Sizewell Marine Technical Forum (MTF) was established in 2014 and full details of the consultation undertaken as part of the MTF in relation to the coastal geomorphology and hydrodynamics assessment are provided at **Volume 1, Appendix 6P** of the **ES**.
- 8.4.19 In accordance with paragraph 5.5.7 of EN-1 and paragraph 2.10.3 of EN-6, **Chapter 20** of **Volume 2** of the **ES** takes account of potential impacts from climate change and the assessment of the marine components of the Sizewell C Proposals includes:
- hard and soft coastal defence features;
  - beach landing facility;
  - offshore cooling water intakes and outfall heads;
  - nearshore fish recovery and return outfalls; and a
  - nearshore combined drainage outfall.
- 8.4.20 The design of the proposed Sizewell C nuclear power station at the main development site includes a series of mitigation measures, and these are described in **Volume 2** of the **ES**. These include the location and design of the hard and soft coastal defence features, the use of a small number of slender piles for the beach landing facility, the use of shallow draft vessels and a plough dredger to minimise dredging and retain sediment in the system and the use of subterranean tunnels connecting the outfalls to the Sizewell C power station.

- 8.4.21 As a result of the mitigation measures no significant effects for coastal geomorphology and hydrodynamics are predicted from the construction and operation of the proposed Sizewell C nuclear power station at the main development site.
- 8.4.22 In accordance with paragraph 5.5.12 of EN-1, in **Chapter 20** of **Volume 2** of the **ES** a series of monitoring specifications are proposed for coastal geomorphology receptors, with details on the recommended monitoring techniques, frequency and extent.
- 8.4.23 Is it considered that the proposed Sizewell C nuclear power station would be resilient to coastal erosion and deposition, taking account of climate change. On this basis, the proposal accords with paragraph 5.5.10 of EN-1.
- 8.5 Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation (NPS EN-1)**
- a) **Policy Context**
- 8.5.1 Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation are identified as a Generic Impact in section 5.6 of EN-1.
- i. **NPS EN-1**
- 8.5.2 Paragraph 4.13.2 and 4.13.3 of EN-1 state that the **ES** should assess effects on human beings for each element of the project, identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The direct impacts on health may include increased air pollution, dust, odour, noise and increases in pests.
- 8.5.3 Paragraph 5.6.3 states that for energy NSIPs some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum.
- 8.5.4 Paragraph 5.6.4 of EN-1 advises that applicants should “...*assess the potential for insect infestation and emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the Environmental Statement*”
- 8.5.5 Paragraph 5.6.7 of EN-1 states that the decision maker should be satisfied that an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out and that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts.



8.5.6 Paragraph 5.6.9 of EN-1 states that where the decision maker believes it is appropriate, they may consider attaching requirements to the development consent, in order to secure certain mitigation measures. Paragraph 5.6.10 notes that this could include schemes of management and mitigation.

b) **Assessment**

8.5.7 **Volume 2, Chapter 28 (Health and Wellbeing)** of the **ES** (Doc Ref. 6.3) presents the assessment of the health and wellbeing effects arising from the construction and operation of the proposed Sizewell C nuclear power station at the main development site. **Volume 2, Chapter 13 (Landscape and Visual)** of the **ES**, provides a detailed assessment of the landscape and visual effects, including the appraisal of impacts from artificial light at night, **Volume 2, Chapter 11 (Noise and vibration)** of the **ES**, provides a detailed assessment of the noise effects, and **Volume 2, Chapter 12 (Air Quality)** of the **ES**, presents the assessment of air quality effects arising from the construction and operation of the Sizewell C power station at the main development site.

8.5.8 In addition, the DCO application is accompanied by a **Statement of Statutory Nuisances** (Doc Ref. 5.12) which details the possible sources of statutory nuisances and how they may be mitigated or limited.

8.5.9 The **Statement of Statutory Nuisances** (Doc Ref. 5.12) provides a summary of the assessment of whether the Sizewell C Project engages one or more of “statutory nuisances” set out in section 79(1) of the Environmental Protection Act 1990 (EPA). The list of “statutory nuisances” in the EPA are similar to the potential Generic Impacts listed at paragraph 4.13.2 and 4.13.3 of EN-1 and includes noise, artificial light, smoke, fumes or gases, dust, steam, smell or other effluvia or insects emanating from relevant premises.

8.5.10 An assessment of noise effects on health is set out separately in **Section 8.10** of this **Planning Statement** and is not repeated here.

8.5.11 The **Statement of Statutory Nuisances** (Doc Ref. 5.12) assessment draws upon the **ES**, including any relevant mitigation measures, whether embedded within the design of the power station or secured through requirements or obligations, or other means within the DCO. Proposed mitigation measures are detailed in the **CoCP** (Doc Ref. 8.11) and the **Mitigation Routemap** (Doc Ref. 8.12).

8.5.12 The **Statement of Statutory Nuisances** (Doc Ref. 5.12) explains that smoke is not expected to be generated during any phase of the proposed development. As set out in the **CoCP** (Doc Ref. 8.11), no burning of waste or

bonfires will be permitted on any of the sites during construction or the removal and reinstatement of the proposed development.

- 8.5.13 Also, the potential for insect infestation has been scoped out of the assessment. Again, the Sizewell C Project sites would be managed in accordance with the **CoCP** (Doc Ref. 8.11), and other relevant management plans, to ensure that the development does not attract and result in insects emanating from premises. For example, no materials that could attract insects would be stored on-site, and food waste from the construction compounds or accommodation campus would be managed in accordance with the **Waste Management Strategy** (Doc Ref. 6.2) prior to being removed off-site.
- 8.5.14 With regards to air quality, dust and odour, the operational Sizewell C nuclear power station would include two UK EPRs supported by up to twelve backup diesel generators. An Environmental Permit will be sought<sup>10</sup> for the operation of the Combustion Activity (referred to as the “Combustion Activity Permit”). An assessment of potential impacts on air quality from emissions from the diesel generators has been undertaken in support of the DCO application and the application for the Combustion Activity Permit and is provided in **Appendix 12C** of **Volume 2** of the **ES**.
- 8.5.15 The modelling of emissions of identified pollutants (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) from the diesel generators predicts there to be no exceedances of air quality standards at human health receptors for both short- and long-term effects. In addition, there are negligible emissions of deposited dust that could give rise to nuisance. Emissions of pollutants that could occur from the nuclear auxiliary stack have also been considered and assessed. The level of emissions has been identified to be insignificant and will therefore not give rise to any nuisance including releases of odour.
- 8.5.16 With regards to artificial lighting, during construction of the proposed development, temporary artificial lighting would be required to provide illumination for construction activities providing a safe working environment in the absence of natural light, allowing workers and site traffic to safely undertake various construction-related tasks and to provide security lighting.
- 8.5.17 The assessment is supported by a **Night-time Landscape and Visual Appraisal**, provided in **Appendix 13B** of **Volume 2** of the **ES**, and measures to minimise impacts are set out in the **Lighting Management Plan (LMP)**, provided in **Appendix 2B** of **Volume 2** of the **ES** (Doc Ref. 6.3). The LMP

<sup>10</sup> Under Schedule 1, Part 2, Chapter 1, Section 1.1, Part A(1)(a) of the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

includes objectives to target lighting where it is required; avoid all unnecessary illumination (such as illumination of construction company logos); and minimise upward lighting and light spill to neighbouring areas. A range of mitigation measures are available to address the potential impact from the construction phase lighting. These range from equipment choice, use of site topography and competent design and site management. In addition to the physical equipment, lighting will be placed such that it makes use of the existing and proposed topography such as:

- Keep mounting heights lower than fences and bunding, where possible.
- Position equipment so it is not visible to sensitive observers by using natural screening.

8.5.18 Installed lighting would be periodically inspected during construction. This would help to maintain the levels of lighting in accordance with current best practice and standards whilst controlling and minimising the potential impact from lighting as far as practicable. If there is an issue with the management of lighting, the **CoCP** (Doc Ref. 8.11) sets out measures for community liaison, including the management of queries and complaints.

8.5.19 On this basis, all reasonable steps have been taken to minimise potential impacts of dust, odour, artificial light, smoke, steam or insect infestation, through implementation of the **CoCP** (Doc Ref. 8.11), and other relevant management plans. As acknowledged at paragraph 5.6.3 of EN-1, some impact on amenity for local communities are unavoidable, however, mitigation is proposed to keep any impacts to a minimum. It is therefore considered that the proposed development is in accordance with paragraphs 5.6.3 and 5.6.7 of EN-1.

## 8.6 Flood Risk (NPS EN-1 and NPS EN-6)

### a) Policy Context

8.6.1 Flood risk is identified as both a Generic Impact in EN-1 and a Nuclear Impact in EN-6.

8.6.2 **Volume 1, Appendix 6O** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance of relevance to the assessment of the potential groundwater and surface water impacts associated with the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

i. NPS EN-1

8.6.3 NPS EN-1 section 5.7 requires applicants to submit a flood risk assessment (FRA) if their proposal lies within Flood Zones 2 or 3 or is more than one hectare in size and located in Flood Zone 1. The aim of planning policy with regard to flood risk is stated to be:

*"...to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk."*

8.6.4 Section 5.7 sets out the minimum requirements for FRAs. Decision makers are required to be satisfied that, where relevant:

- the application is supported by an appropriate FRA;
- the Sequential Test has been applied as part of site selection;
- a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;
- the proposal is in line with any relevant national and local flood risk management strategy;
- priority has been given to the use of SuDS;
- in flood risk areas the Sizewell C Project is appropriately flood resilient and resistant;
- including safe access and escape routes where required; and
- residual risk can be safely managed over the lifetime of the development.

8.6.5 NPS EN-1 states that the decision maker should not consent development in Flood Zone 2 unless it is satisfied that the sequential test requirements have been met. It should not consent development in Flood Zone 3 unless it is satisfied that the Sequential and Exception Test requirements have been met.

8.6.6 The Sequential Test gives preference to sites at lower risk of flooding. The Exception Test applies to projects that cannot be located in areas other than Flood Zone 3 or alternative sites at lower risk of flooding that are

inappropriate for other reasons (for example being located in an AONB or SSSI). NPS EN-1 confirms the requirements for passing the Exception Test:

*“All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed:*

- it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk;*
- the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and*
- a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall”.*

8.6.7 NPS EN-1 requires that the sequential approach should be applied at the site selection stage and at the site level (in terms of layout and design) with more vulnerable uses located on parts of the site at lower probability of flooding.

ii. NPS EN-6

8.6.8 Section 3.6 of NPS EN-6 acknowledges that nuclear power stations need access to cooling water and so need to be located in coastal or estuarine areas. This makes them more likely to be at risk of flooding without appropriate mitigation measures. The Government has decided to identify the sites listed in section 4.1 of NPS EN-6 as potentially suitable for new nuclear power stations:

*“...in spite of some being located in higher flood risk zones, noting that the independent Nuclear Regulators have advised that they have the potential to be protected from flood risk throughout their lifetime, and because of the lack of alternative sites and the need for new nuclear development. As a result, the second limb of the Exception Test does not apply to new nuclear development.”*

8.6.9 NPS EN-6 confirms that the Sequential Test has been applied by the Government as part of the SSA process. Nuclear power stations promoted on any of the listed sites are therefore excluded from the need to apply the Test (and the second limb of the Exception Test). The Sequential Approach still applies at site level and so an FRA is still required.

b) **Assessment**

8.6.10 This section demonstrates how the main development site accords with the relevant national policy in relation to flood risk.

8.6.11 In accordance with the requirements of section 5.7 of EN-1, the **Main Development Site Flood Risk Assessment** (Doc Ref. 5.2) (FRA) is provided and presents an assessment of existing flood risk from all sources of flooding to the proposed main development site of the Sizewell C power station. The **Flood Risk Assessment** (Doc Ref. 5.2) also describes future flood risk to the site, taking account of climate change, and considers possible changes in flood risk to off-site receptors as a result of the proposed development. It also presents mechanisms for managing residual risk.

8.6.12 Sections of the main development site are located in Flood Zones 1, 2 and 3, and therefore there is a risk of flooding from tidal or fluvial sources. Risks associated with groundwater, sewer and reservoir flooding at the site are also considered to be at risk. The Environment Agency's long-term flood risk mapping shows that the sections of the site are also at risk of flooding from surface water.

8.6.13 In the first instance, it is relevant to recognise that flood risk has already been assessed in principle for this site through the SSA process. Although the site lies partially within Flood Zone 3, the Government considers it to be an acceptable location in principle for a nuclear power station (NPS EN-6 paragraph C.8.19):

*"The Government believes that the fact that a site, or in this case, part of a site is in Flood Zone 3 should not necessarily preclude it from the NPS if the independent regulator has advised that the site can be potentially protected. At Sizewell the Environment Agency and the ONR have advised that the site can potentially be protected from flood risk, including the effects of climate change, throughout its lifetime."*

8.6.14 In making its assessment, the Government took into account advice from the Environment Agency that:

*"It is reasonable to conclude that any new nuclear power station on the site could potentially be protected against flood risk throughout its lifetime, including the potential effects of climate change, storm surge and tsunami and considering possible countermeasures" (paragraph C.8.31).*

8.6.15 The Sizewell C power station design incorporates measures to mitigate flood risk. The principal measures are:

- Elevation of the main platform to take it out of the area of flood risk, up to a level of 7.3m Above Ordnance Datum (AOD).
- New coastal flood defences up to 10.2m AOD with adaptive design to potentially raise the defence up to 14.2m AOD.
- Construction of the SSSI crossing at 7.3m AOD and retention of the haul road embankment as coastal defence, with adaptive design to potentially raise the defence up to 10.5m AOD should this be required.
- The creation of three surface water drainage catchments around the main platform.
- Permeant and temporary sewage treatment plant and foul water drainage network to address sewer flooding risks.
- Where possible, use of permeable surfaces to minimise surface water run-off.
- Long term monitoring and management of water levels through an updated Water Levels Management Plan, which is secured by draft DCO requirements relating to the Drainage Strategy.

8.6.16 The **FRA** addresses the requirements of NPS EN-1 and NPS EN-6. It concludes that:

- The main platform and SSSI crossing are in an existing area of high coastal, breach and fluvial flood risk but are at low risk of surface water, sewer and reservoir flood. The groundwater flood risk is nominal for above ground works. The deep excavation works have a low risk of groundwater flooding during construction due to the presence of the cut-off wall and internal dewatering system.

- The embedded design and construction methods of the proposed main platform and SSSI crossing manages the risk of flooding from coastal, fluvial, groundwater, surface water and sewers. However, the residual risk of flooding from a breach of the shingle ridge during the early phases of construction is limited but present. Once the main sea defences are built in the later phases of construction, the coastal breach flood risk to the main platform and SSSI crossing area would be reduced to low.
- Overall the main platform and SSSI crossing areas are currently at a low level of flood risk. During the early part of the construction phase, there is a risk of coastal flooding to both the main platform and SSSI crossing areas while the new hard-coastal defence feature is still under construction. A flood emergency plan will be developed to manage this risk.
- The main platform and access via the SSSI crossing are designed for a safety case of a 1 in 10,000-year storm event and would remain dry during a 1 in 200-year and 1 in 1000-year event during the construction phase.
- The LEEIE is considered to be at low risk of flooding from surface water, groundwater, reservoirs, sewers, fluvial, coastal and a defence breach. However, the development of the site would marginally increase the localised risk of flooding from surface water and sewers. The embedded design approach for surface water and foul water provides suitable mitigation to maintain a low flood risk while the site is in use in the construction phase. At the end of the construction phase, the LEEIE site would be returned to its former use.
- At the end of the decommissioning phase, the fluvial flood risk would have increased in accordance with the climate change scenarios. However, both the main platform and the SSSI crossing would be operable during an extreme fluvial event. With the adaptive flood defences in place, the SSSI crossing would be safe for vehicles crossing the causeway until the end of the decommissioning phase.

8.6.17 The **FRA** includes tables that summarise the overall mitigated flood risk to the main development site during the construction, operational and decommissioning phases. These show low risk for all elements (the main platform, SSSI crossing, TCA and LEEIE) for all types of flooding during the operational phase. Some medium risks related to coastal and breach flooding exist for the main platform and SSSI crossing during the construction and decommissioning phases.



8.6.18 In summary, the embedded mitigation measures fundamentally alter the risk of flooding over the whole lifespan of the Sizewell C Project. As required by NPS EN-6, critical infrastructure has been located in the lowest flood risk areas of the site. It meets the NPS EN-1 requirement of being “*flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed of the lifetime of the development.*”

## 8.7 Historic Environment (NPS EN-1)

### a) Policy Context

8.7.1 The historic environment is identified as a Generic Impact in EN-1.

8.7.2 **Volume 1, Appendices 6L and 6S** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant terrestrial historic environment effects and the likely significant marine historic environment effects of the Sizewell C Project respectively. The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.7.3 Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on cultural heritage. Paragraph 5.8.1 of EN-1 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.

8.7.4 Elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called ‘heritage assets’ (paragraph 5.8.2). Some heritage assets have a level of significance that justify official designation (such as Scheduled Monuments, Listed Buildings and scheduled Monuments) (paragraph 5.8.3) and other non-designated heritage assets identified either through local listing or the decision maker’s judgement based on clear evidence that the asset has heritage significance (paragraph 5.8.6).

8.7.5 In terms of the applicant’s assessment, an **ES** is expected to provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset (paragraph 5.8.8).

Paragraph 5.8.9 confirms that where a proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

8.7.6 The decision maker should take into account the desirability of sustaining or where appropriate enhancing the significance of heritage assets, the contribution of their settings and the positive contributions they can make to sustainable communities and economic vitality (paragraph 5.8.13).

8.7.7 Paragraph 5.8.14 of EN-1 states that “there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be”. Paragraph 5.8.14 of EN-1 also states:

*“Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II\* listed buildings; grade I and II\* registered parks and gardens; and World Heritage Sites, should be wholly exceptional”.*

8.7.8 Paragraph 5.8.15 of EN-1 states that any harmful impacts on the significance of designated heritage assets should be “...weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss”. Where the application would lead to substantial harm or total loss of significance of a designated heritage asset the decision maker should “refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm”.

8.7.9 Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 states that when deciding an application which affects a listed building or its setting, the decision-maker must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

ii. NPS EN-6

8.7.10 Paragraph C.6.76 of EN-6 Annex C states that:

*“The Appraisal of Sustainability has also identified potential for adverse impacts on the setting of Scheduled Monuments, Conservation Areas and Listed Buildings in the area. These impacts could arise depending on the distance and sight lines from any potential new nuclear power station, and the mitigation that may be applied. The Appraisal of Sustainability identifies cultural heritage features in the area including the nearest scheduled monument of the original site of Leiston Abbey with a later chapel and pillbox which lies within approximately 2km of the site and the nearest Conservation Areas of Leiston and Thorpeness which are located within an approximate 3km distance of the site. There are no listed buildings within or directly adjacent to the site. However, the Appraisal of Sustainability identifies that there are around 90 Grade II listed buildings within an approximate 5km distance and there may be an effect on their settings.”*

- 8.7.11 The Appraisal of Sustainability also notes that there is potential for adverse physical impacts upon significant buried archaeology, however, the Appraisal of Sustainability found that these impacts may be mitigated to some degree by appropriate facility siting (paragraph C.8.77).
- 8.7.12 The Appraisal of Sustainability assessment acknowledges that visual impacts on the setting of cultural heritage features in the area and mitigation measures will need to be considered by the decision maker. However, at the stage that the Appraisal of Sustainability was produced, the potential effects were not felt sufficient to outweigh the need for new electricity generation, particularly given the need for further investigation and the scope for some mitigation that had been identified (paragraph C.8.84).

**b) Assessment**

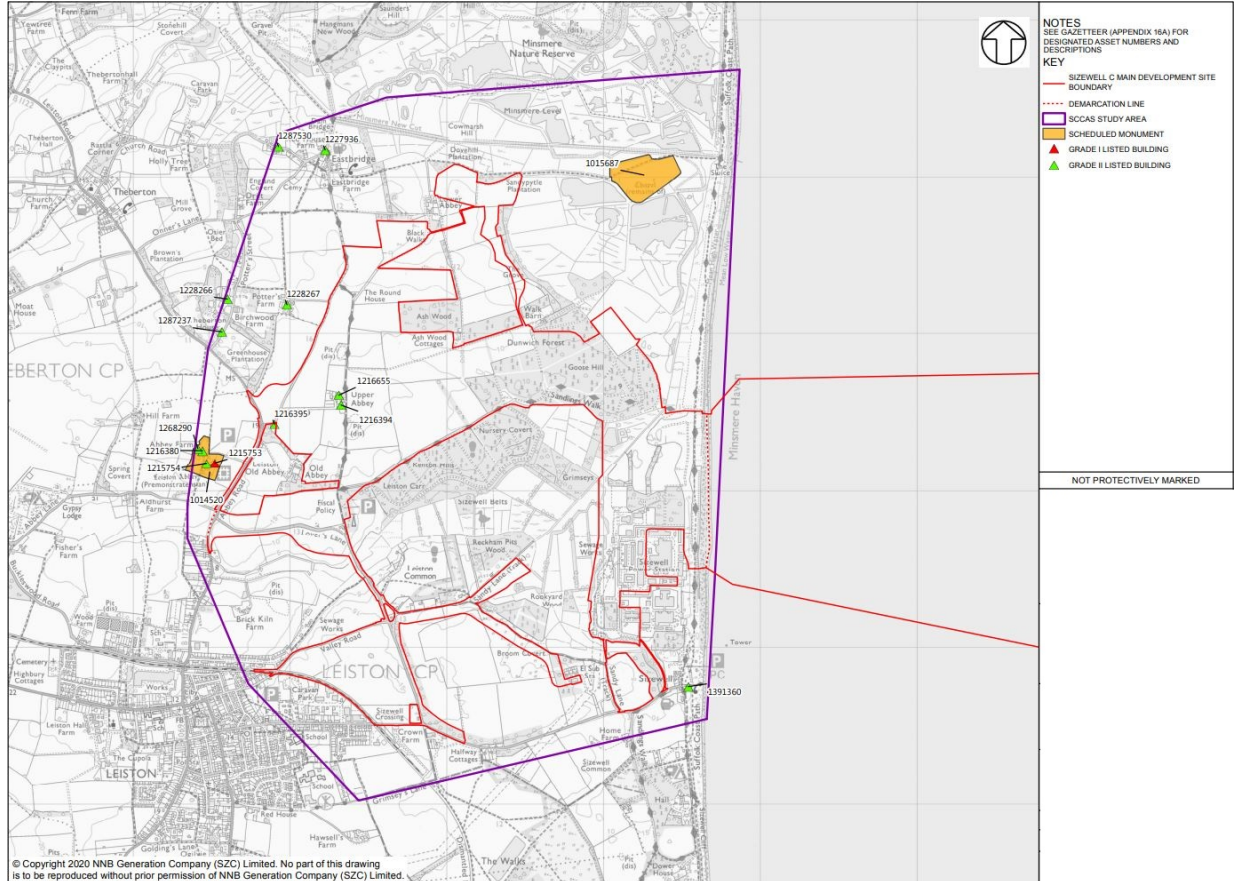
- 8.7.13 In accordance with the requirements of paragraph 5.8.8 of EN-1, **Volume 2, Chapter 16 (Terrestrial Historic Environment)** and **Chapter 23 (Marine Historic Environment)**, both of the **ES** (Doc Ref. 6.3) presents an assessment of the potential effects on the terrestrial and marine historic environment arising from the construction and operation of the main development site.
- 8.7.14 In addition, the **ES** assessment is supported by a series of technical appendices, including:

- **Appendix 16A, Volume 2** of the **ES**: Gazetteer of heritage assets based on a search of the Suffolk Historic Environment Record (HER) and National Heritage List for England undertaken in August 2018.
- **Appendix 16B, Volume 2** of the **ES**: Sizewell C Main Site Updated Historic Environment Desk-Based Assessment. September 2015.
- **Appendix 16C, Volume 2** of the **ES**: Geophysical Survey Reports.
- **Appendix 16D, Volume 2** of the **ES**: Evaluation Trenching Reports.
- **Appendix 16E, Volume 2** of the **ES**: Upper Abbey Farm Heritage Asset Assessment.
- **Appendix 16H, Volume 2** of the **ES**: Overarching Archaeological Written Scheme of Investigation (WSI).
- **Appendix 23A, Volume 2** of the **ES**: Sizewell C Offshore and Intertidal Historic Environment Desk-Based Assessment. September 2014.
- **Appendix 23B, Volume 2** of the **ES**: UK EPR™ Sizewell C: Marine Historic Environment: Geoarchaeological and palaeoenvironmental assessment of vibrocores recovered east of Sizewell.

8.7.15 In accordance with EN-1 paragraph 5.8.9, and as agreed with Historic England and the local authority Conservation Officer, relevant visualisations are supplied as **Figures 13.9** and **13.10** and at **Appendix 13A** of the **Landscape and Visual Impact Assessment** in **Volume 2, Chapter 13** of the **ES**.

8.7.16 The geographical extent of the terrestrial and marine historic study area has also been agreed with Historic England and the Suffolk County Council Archaeology Service. The extent of the study area is shown in **Plate 8.1** below.

Plate 8.1: Historic Environment Assessment Study Area



i. Terrestrial Historic Environment

8.7.17 A full list of the heritage assets identified within the study area is set out within the ES. The assessed effect of the proposed development upon these heritage assets in terms of construction is set out at **Table 16.5** and the effect of the operational phase is set out at **Table 16.6**, both located in **Volume 2, Chapter 16** of the **ES** (Doc Ref. 6.3). These tables also set out the mitigation measures in place and any residual effects.

8.7.18 In terms of mitigation, the design of the proposed Sizewell C nuclear power station at the main development site includes a series of mitigation measures. This includes seeking to retain and strengthen, where possible, hedgerows to the site boundary and the installation of planting, bunding, and acoustic fencing to screen views of the proposed development, and minimise visibility of, and noise from, the proposed construction works and development.

- 8.7.19 Also, detailed design and landscaping would seek to minimise perceptual change to setting, wherever practicable, for example, construction and operational site lighting would be designed to minimise light spill as in the **Lighting Management Plan**, provided in **Appendix 2B** of **Volume 2** of the **ES** (Doc Ref. 6.3). Generic measures to reduce noise and visibility of construction works of the proposed development, and to ensure that its composition in views from out with the site view remains coherent, are set out in the **LVIA** (section 13.5) and the **Main Development Site Design and Access Statement** (Doc Ref. 8.1).
- 8.7.20 In addition to the primary (embedded) mitigation, and in accordance with NSP EN-1, secondary mitigation is proposed to comprise the adoption of an agreed scheme of archaeological investigation, to ensure that the archaeological interest of any significant deposits, and features within the site, could be appropriately investigated, recorded and disseminated, preserving the archaeological interest of these remains.
- 8.7.21 To mitigate effects on known buried archaeology, an **Overarching Archaeological Written Scheme of Investigation** (WSI), provided in **Appendix 16H** of **Volume 2** of the **ES** (Doc Ref. 6.3)) has been produced. Individual site WSIs would be produced to supplement this and would be agreed with the local authority. These site-specific WSIs would also set out requirements for further investigation of areas that could not be surveyed pre-consent, to allow for the agreement of finalised mitigation proposals.
- 8.7.22 In general, mitigation through recording would be effective in retaining much of the archaeological interest of a heritage asset. However, to reflect the basic principle, acknowledged in NPS EN-1, that a retained record is not as valuable as archaeological interest retained in an asset which is actively conserved, this mitigation would serve as partial mitigation, thereby reducing the magnitude of any adverse effect. In all cases identified in the **ES** assessment, the proposed mitigation would be sufficient to ensure that no residual significant adverse effects would arise as a result of disturbance of archaeological remains.
- 8.7.23 Mitigation of harm arising through change to setting has primarily been achieved through the provision of primary mitigation which has been designed into the proposed Sizewell C nuclear power station at the main development site.
- 8.7.24 Funding would be made available through the **Section 106 Agreement** for localised enhancements to heritage assets at the two Leiston Abbey sites and enhancing the historic interest of the sites through improvements to visitor experience in order to complement the creation of an off-road link

between these sites. This mitigation would enhance the historic interests of these assets, addressing the effect presented by the construction and operation of the proposed development.

8.7.25 Works to ensure the conservation of the listed structures at Upper Abbey Farm would similarly provide a degree of mitigation for the change to setting arising in the construction phase and a lasting enhancement through operation.

8.7.26 Following the implementation of all primary and secondary mitigation, the assessment shows that three terrestrial heritage assets would suffer temporary but less than substantial harm through the construction phase only but no substantial harm to or total loss of significance:

- Leiston Abbey (first site) with later chapel and pillbox (SM 1015687).
- Cottage 450m west of Upper Abbey Farmhouse (LB 1216395).
- Historic landscape character.

8.7.27 For the operational phase, no heritage assets suffer a significant adverse effect after mitigation. The barn north of Upper Abbey Farmhouse (LB 1216655) would benefit from a moderate beneficial effect (**significant**) through enhancement to its setting within the farmyard.

8.7.28 The proposed development would not lead to substantial harm to or total loss of significance of any designated asset. The temporary residual adverse effect on the significance of the three assets listed above is classed as moderate, not major, and the harm is less than substantial. This harm is weighed against the public benefits, which include the need for the Sizewell C Project.

#### ii. Marine Historic Environment

8.7.29 **Volume 2, Chapter 23** of the **ES** assesses the potential for effects upon the marine historic environment. There are no designated heritage assets within the marine study area. The main sources of historic significance are likely to be archaeological remains and shipwrecks. However, these are likely to be of low to medium historic value.

8.7.30 Secondary mitigation in this case would comprise the adoption of a finds reporting protocol to permit the identification of any encountered material of archaeological interest within the Site to allow it to be appropriately

investigated, recorded and disseminated, preserving the archaeological interest of these remains.

8.7.31 The assessment concludes that any residual effects would not be significant.

## 8.8 Landscape and Visual (NPS EN-1 and NPS EN-6)

### a) Policy Context

8.8.1 Landscape and visual impacts are identified as Generic Impacts in EN-1 and Nuclear Impacts in EN-6.

8.8.2 **Volume 1, Appendix 6I** the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant landscape and visual effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.8.3 Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale required to meet the current and future need, is likely to have some negative effects inter alia on landscape and visual amenity. It should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs. However, paragraph 1.7.2 of EN-1 acknowledges that the impacts on landscape and visual amenity in particular will sometimes be hard to mitigate.

8.8.4 Paragraph 1.7.11 of EN-1 states that EN-1 already contains policies which severely limit the prospects for development of large-scale energy infrastructure in the most attractive landscapes and townscapes. Paragraph 1.7.11 of EN-1 continues to state that:

*“Tightening the development consent policies in EN-1 to make it harder for energy infrastructure to be consented which would have adverse landscape or townscape effects would be likely to make it significantly more difficult to gain consent for a range of large-scale energy infrastructure projects.”*

8.8.5 With regard to the criterion for ‘good design’ assessment principles, EN-1 states at paragraph 4.5.1 that:



*“Applying ‘good design’ to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area”.*

- 8.8.6 The existing nature of the local landscape, including the quality and value, needs to be considered when assessing the impact of the proposal on the landscape. However, NPS EN-1 (paragraph 5.9.8) acknowledges that:

*“Virtually all energy NSIPs will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”*

- 8.8.7 With regards to the assessment, EN-1 also clarifies at paragraph 5.9.5 that the landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant’s assessment should also take account of any relevant policies based on these assessments in local development documents in England.

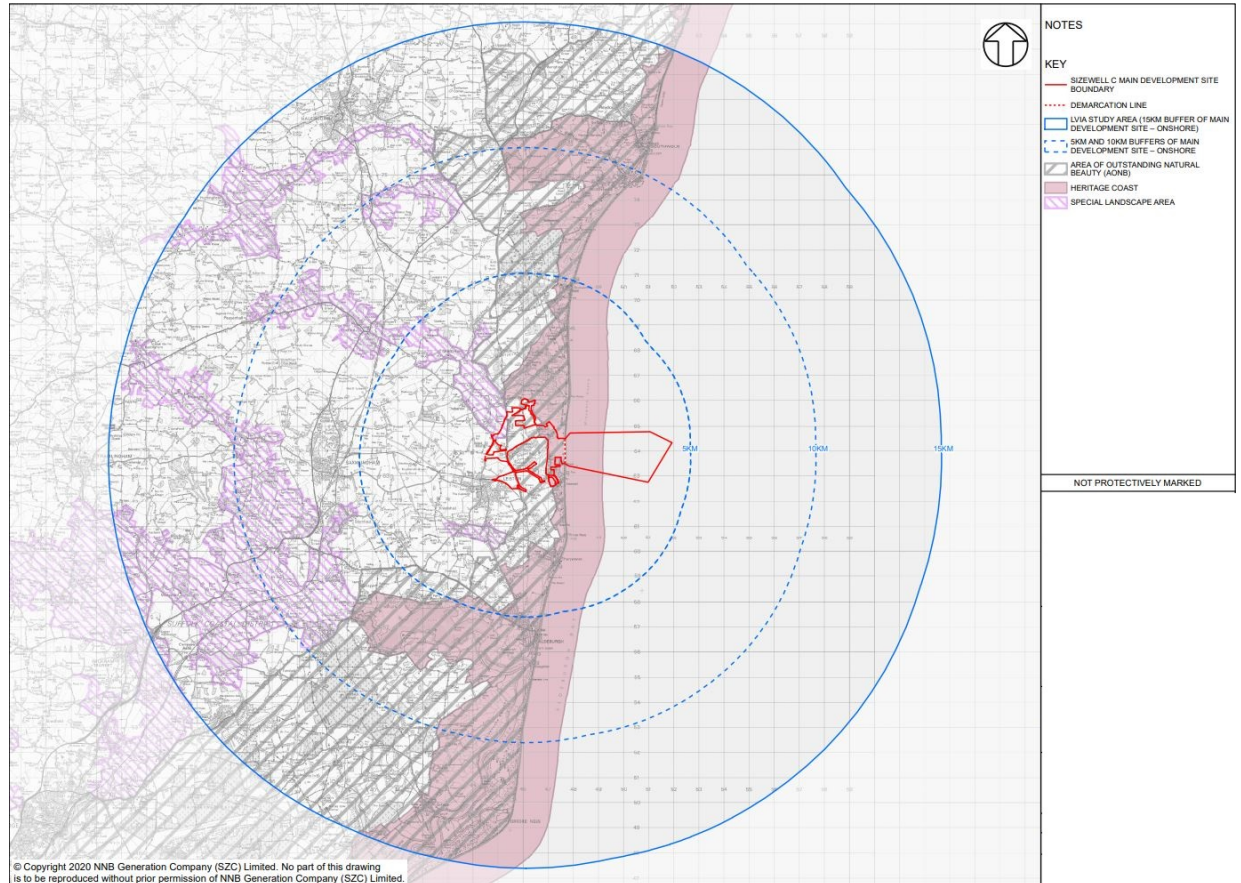
- 8.8.8 Paragraph 5.9.6 goes on to explain that the assessment should include the visibility and conspicuousness of the project during construction and operation and potential impacts on views and visual amenity. This should include effects on light pollution effects on local amenity and nature conservation.

- 8.8.9 NPS EN-1 also recognises the importance of nationally designated landscapes, such as National Parks, the Broads and AONBs, noting that they benefit from the *“highest status of protection”* (paragraph 5.9.9). The main development site lies largely within the Suffolk Coast and Heaths Area AONB with the remainder located within its setting, which is defined as:

*“... The area within which development and land management proposals, by virtue of their nature; size; scale; siting, materials or design can be considered to have*

*an impact, positive or negative, on the natural beauty and special qualities of the nationally designated landscape.”*

**Plate 8.2: Site Location Plan showing AONB**



8.8.10 Paragraph 5.9.10 in EN-1 confirms that the decision maker may grant development consent in nationally designated landscapes, such as AONBs, in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:

- the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in section 4.4 of EN-; and

- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

8.8.11 Paragraph 5.9.11 states that the decision maker should, “...ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary”.

ii. NPS EN-6

8.8.12 Paragraph 2.8.3 of EN-6 states that the decision maker should consider how good design can act to mitigate the impacts of new nuclear power stations, such as landscape and visual impacts.

8.8.13 Paragraphs 3.10.2 – 3.10.3 provide specific guidance in relation to the landscape and visual impacts associated with nuclear power generating stations.

*“The Nuclear AoS identified that the potentially suitable sites share the following landscape issues: the sites are generally in less populated areas that may have value for visual amenity and as landscape resources; they are coastal/estuarine sites; and the scale of the facilities means that the scope for visual mitigation is quite limited. In addition, because of the timescales involved, there is some uncertainty over future land uses once sites are decommissioned.*

*There is the potential for long-term effects on visual amenity, especially at Sellafield because of the proximity to the Lake District National Park, and at Sizewell, given the Suffolk Coast and Heaths AONB.”*

8.8.14 Paragraph 3.10.8 of EN-6 states that the decision maker “...should not expect the visual impacts associated with new nuclear power stations to be eliminated with mitigation. Indeed, the scope for visual mitigation will be quite limited. Mitigations should, however, be designed to reduce the visual intrusion of the project as far as reasonably practicable”.

8.8.15 Annex C (Site Assessment), Volume II of NPS EN-6 includes the assessment of why the Government has found sites as being potentially suitable for new nuclear power generating stations. This has considered the main potential environmental effects of the proposed sites, including landscape impact and consideration of impacts on the AONB. In relation to Sizewell C it notes that “there is the potential for some long lasting adverse direct and indirect effects

*on landscape character and visual impacts on the Suffolk Coast and Heaths AONB, with limited potential for mitigation” (paragraph C.8.73). The principle of development in the AONB is therefore already accepted, along with an acknowledgement that there would be some harm to the AONB.*

- 8.8.16 It is important to recognise that the Government included Sizewell as a potentially suitable site in NPS EN-6, fully aware of the fact that the project would have impacts on the AONB.

iii. **Other Relevant National and Local Policy**

- 8.8.17 Paragraphs 172 and 173 of the NPPF require great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs, which have the highest status of protection in relation to these issues and states that major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

- 8.8.18 With regard to local planning policy, Strategic Policy SP13 (Nuclear Energy) of the adopted SCDC Core Strategy and Development Management Policies (July 2013) states that, in respect of an additional nuclear power stations at Sizewell, the Council will consider the local issues that need to be adequately addressed, including the proposed layout and design and the landscape and visual character assessment.

- 8.8.19 Strategic Policy SP15 (Landscape and Townscape) states:

*“The policy of the Council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.”*

- 8.8.20 It adds:

*“In addition to the protected landscape of the AONB, the valleys and tributaries of the Rivers Alde, Blyth, Deben, Fynn, Hundred, Mill, Minsmere, Ore, Orwell and Yox, and the designated Parks and Gardens of Historic or Landscape Interest are considered to be particularly significant.*

*Many of the towns and villages in the district are of distinctive historical and architectural value, as well as landscape value and character, and the Council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas.”*

b) Assessment

8.8.21 **Volume 2, Chapter 13 (Landscape and Visual)** of the **ES** (Doc Ref. 6.3) presents an assessment of the landscape and visual effects arising from the construction and operation of the main development site.

8.8.22 In addition, the **ES** assessment is supported by a series of technical appendices, including:

- **Appendix 13A, Volume 2** of the **ES**: Illustrative viewpoints;
- **Appendix 13B, Volume 2** of the **ES**: Night-time appraisal;
- **Appendix 13C, Volume 2** of the **ES**: Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators;
- **Appendix 13D, Volume 2** of the **ES**: Special Landscape Areas Paper;
- **Appendix 13E, Volume 2** of the **ES**: Landscape and Visual Receptors judged to experience negligible effects.
- **Appendix 13F, Volume 2** of the **ES**: Non-significant landscape and visual effects;
- **Appendix 13G, Volume 2** of the **ES**: Off-site developments landscape and visual assessment; and
- **Appendix 13H, Volume 2** of the **ES**: Landscape and Visual Assessment Consultation report

8.8.23 The assessment of the potential landscape and visual impacts of the Sizewell C Project has been based upon the Guidelines for Landscape and Visual Impact Assessment (GLVIA) (Ref 1.64) and the scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. Full details of the consultation undertaken in relation to landscape and visual matters is provided within **Volume 2, Appendix 13H** of the **ES** (Doc Ref. 6.3).

8.8.24 In line with NPS EN-1, mitigation measures have aimed to minimise as far as practicable the extent of physical disturbance to the landscape and the visual prominence of activity and temporary buildings, structures, compounds and storage areas during the construction phase.

8.8.25 The approach taken has been to embed mitigation within the scheme as far as possible. A summary of the key measures that have been incorporated into the design of the proposed development during the construction stage is set out below:

- Configuring the physical extents of the main development site boundary to exclude and protect woodland and forested areas on rising landform that provides screening.
- Optimising the land required for construction and avoiding or minimising activity and use of land in visually sensitive locations where possible.
- Retaining, where possible, established vegetation.
- Landscaping early in the construction phase to provide localised screening of the construction works and to allow areas of new planting associated with the operational phase landscape masterplan to become established.
- Creating earth bunds and installing acoustic and temporary fencing to provide visual containment of construction areas.
- Selecting the causeway option for the SSSI crossing allows for the establishment of vegetation along its eastern edge that would be retained into the operational phase.

8.8.26 Further mitigation measures have then been proposed for the operational stage to minimise the visual prominence of the permanent elements of the operational power station, including buildings, structures, infrastructure and vehicles. A summary of the operational mitigation that has been embedded in the proposed development is summarised below:

- Any excess excavated material arising from the construction phase would be accommodated through localised ground raising in areas used during construction.
- New planting and landscaping would be designed to integrate with existing vegetation and early planting established in the construction phase.

- Vegetation within the EDF Energy Estate would be managed to enhance landscape character and maintain the long-term screening function of vegetation in views.
- The sea defences would screen views to activity and lower-lying buildings and structures adjacent to the main power station structures.
- The temporary road on the eastern side of the proposed SSSI crossing would be removed and additional native tree and shrub planting would be introduced.
- Prominent structures, notably the Turbine Halls and Operational Services Centre, located along the coast would be designed to respond to their sensitive landscape and visual context within the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast. Measures would include careful consideration of design detailing, materials, finishes and colours.
- Permanent structures inland from the coast, such as the training centre and emergency equipment store, would be designed to respond to their sensitive landscape context within or adjacent to the Suffolk Coast and Heaths AONB.

8.8.27 It is important that the potential impact on the AONB was understood by Government and recognised as necessary for the delivery of the power station, including Sizewell as a potentially appropriate site in NPS EN-6. This recognition provides the overarching context for the consideration of topic-specific policies.

8.8.28 Paragraph 5.9.9 of NPS EN-1 requires the conservation of the natural beauty of the landscape and countryside to be given substantial weight. NPS EN-6 accepts that projects including Sizewell C are expected to lead to long lasting impacts on AONBs which cannot be eliminated through mitigation. Paragraph 3.10.8 goes on to state that:

*“mitigation should, however, be designed to reduce the visual intrusion of the project as far as reasonably practicable”.*

8.8.29 Where adverse effects cannot be avoided, policy recognises that these can be legitimate where necessary and are to be weighed in the balance against the benefits of the application proposals.

- 8.8.30 Collectively, the measures described in this section and in **Chapter 13 of Volume 2** of the **ES** (Doc Ref. 6.3) represent the most that can practically be achieved to reduce the impact of what is a major infrastructure development in a rural location.
- 8.8.31 **Chapter 13 of Volume 2** of the **ES** (Doc Ref. 6.3) contains a careful analysis of the landscape character and visual effects of the Sizewell C Project, including on the natural beauty and special qualities of the AONB.
- 8.8.32 It is considered that there would be significant effects from construction on the natural beauty indicators and special qualities of the AONB over a limited extent of the designation. However, the overall integrity and resilience of the wider designated landscape would not be compromised and the wider countryside especially west of the construction area, would continue to support the AONB’s general countryside characteristics.
- 8.8.33 During the construction stage, the overall effect on the wider AONB would be medium-scale across a limited extent of the designation, leading to effects that are adverse but **not significant**.
- 8.8.34 During operation, significant adverse effects on the natural beauty indicators and special qualities of the AONB would occur over a limited extent of the designation. There would be some positive effects on the AONB from the proposed restoration and long-term management of the landscape.
- 8.8.35 Taking the above into consideration, the overall effect on the wider AONB would be small-scale across a limited extent of the designation, negligible magnitude, minimal (**not significant**) and adverse.
- 8.8.36 It is demonstrated in the ES that all reasonable opportunities to minimise the visual impact have been taken and the requirements of NPS EN-1 section 5.9 and NPS EN-6 section 3.10 have been satisfied.
- 8.8.37 In specific regard to paragraph 5.9.10 of NPS EN-1, the need for the development and the potential impact upon the local economy is outlined at **Sections 3 and 7.2** of this **Statement** and within the **Economic Statement** (Doc Ref. 8.9). As assessment of the cost of developing elsewhere outside the designated area or meeting the need for it in some other way is provided at the **Site Selection Report**, provided in **Appendix A** of this **Statement** and **Volume 2, Chapter 6** (Alternatives) of the **ES** (Doc Ref 6.3). Finally, the detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated is assessed throughout the **ES** and, where necessary, mitigated through the application of appropriate Requirements, provided in **Schedule 2** of the **Draft DCO** (Doc Ref. 3.1).



8.8.38 It is considered that the requirements of paragraph 5.9.10 of NPS EN-1 have been satisfied.

## 8.9 Land Use, Including Open Space, Green Infrastructure and Green Belt (NPS EN-1)

### a) Policy Context

8.9.1 Potential land use impacts are identified as Generic Impacts in EN-1.

8.9.2 The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.9.3 Paragraph 5.10.1 of EN-1 recognises that energy infrastructure projects will have a direct effect on the existing use of proposed sites and may have indirect effects on the uses, or planned uses, of land in the vicinity for other types of development. This may have particular effects on open space including green infrastructure, given the likely location of energy infrastructure projects.

8.9.4 Paragraph 5.10.3 recognises that although the re-use of previously developed land for new development can make a major contribution to sustainable development, it may not be possible for many forms of energy infrastructure.

8.9.5 With regards to mitigation, paragraph 5.10.19 states:

*“Although in the case of much energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some at least of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project.”*

8.9.6 Paragraph 5.10.20 seeks to ensure that, where green infrastructure is affected, the decision maker should consider imposing requirements to ensure the connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to new coastal access routes.

8.9.7 Finally, paragraph 5.10.24 states that PRowS, National Trails and other rights of access to land are important recreational facilities. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other PRowS. Where this is not the case the decision maker should consider what appropriate mitigation requirements might be attached to any grant of development consent.

b) **Assessment**

8.9.8 **Volume 2, Chapter 15 (Amenity and Recreation)** of the **ES** (Doc Ref. 6.3) presents an assessment of the amenity and recreation effects arising from the construction and operation of the Sizewell C power station at the main development site.

8.9.9 The amenity and recreation impact assessment set out at **Volume 2, Chapter 15** of the **ES** (Doc Ref. 6.3) considers the effects of the proposed development on users of PRow (Public Footpath, Bridleway, Restricted Byway, Byway open to All Traffic), permissive footpaths (also referred to as permissive paths), long distance walking routes, cycle routes and accessible open spaces such as (inter alia) open access land, common land, nature reserves, sports facilities and water bodies. In addition, **Sections 8.8** and **7.3(e)** of this **Planning Statement** seek to demonstrate how the proposal has sought to minimise impact upon the SSSI and AONB by minimising the land required and adopting good design principles and mitigation measures. These matters are equally relevant to the issue of land use.

8.9.10 The amenity and recreation impact assessment method and study areas for the Sizewell C Project have been consulted on and agreed between 2015 and 2019 as described in **Volume 1, Appendix 6K** of the **ES** (Doc Ref. 6.2). The final method and study areas were discussed at a meeting with SCC, Natural England, Suffolk Coast and Heaths Area of Outstanding Natural Beauty Partnership and the Suffolk Local Access Forum (including representatives from Ramblers Council for Suffolk) on 7 February 2019. SCDC was invited but could not attend, but were included in all correspondence and agreement. The final agreed methodology report (including study areas) was issued to SCC, ESC (formerly SCDC), Natural England, Suffolk Coast and Heaths AONB Partnership and SLAF on 24 June 2019. The onshore study area for the proposed development was agreed.

8.9.11 The offshore study area was agreed with consultees involved in offshore matters comprising Scottish Power, the Royal Yachting Association, the Cruising Association, Sizewell Residents Association and a commercial fisherman at a workshop on 3 April 2019.

8.9.12 The main uses of land in the vicinity of Sizewell C are recreation and nature conservation uses of the AONB and the SSSI.

8.9.13 The Sizewell C main development site is unused land, apart from the Sizewell B facilities which are proposed to be relocated. The TCA is in agricultural use and would be returned to that use at the end of the construction period.

8.9.14 Other uses of land include the Suffolk Coast Path, Sandlings Walk and England Coast Path. NPS EN-1 makes specific reference to the need for applicants to consider coastal recreation:

*“In considering the impact on maintaining coastal recreation sites and features, the IPC should expect applicants to have taken advantage of opportunities to maintain and enhance access to the coast. In doing so the IPC should consider the implications for development of the creation of a continuous signed and managed route around the coast, as provided for in the Marine and Coastal Access Act 2009.”*

8.9.15 The effects on the Suffolk Coast Path, Sandlings Walk and England Coast Path are assessed in the **ES**. As described within the **Rights of Way and Access Strategy**, provided in **Appendix 15A of Volume 2 of the ES** (Doc Ref 6.3), these paths would be diverted during the construction phase though they would revert to their current alignment at the operational phase, save for occasions when the beach landing facility is in operation. The assessment in the **ES** concludes that there would be significant adverse effects even after all stages of mitigation.

8.9.16 The need to divert the paths is unavoidable, but the diversion itself and the restoration of the paths to their current route after the construction period is complete amount to “*appropriate measures*” that address the adverse effects. This therefore satisfies the policy requirements of NPS EN-1.

8.9.17 The proposal would have a positive effect on the provision of sports and recreational facilities, through the delivery of enhanced facilities at the Alde Valley Academy, Leiston. These will include:

- one full-size 3G pitch, 400 millimetre pile, rubber crumb surface suitable for football, non-contact rugby and hockey; and
- two MUGAs suitable for basketball, netball, tennis and football.

- 8.9.18 These facilities would be delivered for the benefit of construction workers and local residents and retained as a long-term legacy benefit following the completion of the construction phase.
- 8.9.19 In addition, a new 4.5km long off-road combined bridleway, cycleway and footpath would be created from Sizewell Gap and King George’s Avenue to the location of the construction phase accommodation campus, which would be retained following construction. A further section of the route would be constructed from Valley Road and the LEEIE, which would also provide a new off-road connection to Leiston. This route would provide safe pedestrian, cycle and equestrian access for the public and for construction workers, taking people off roads and providing new and enhanced routes.
- 8.9.20 Other mitigation included within the proposals include the permanent improvement of Kenton Hills car park and provision of public access to specific areas within Aldhurst Farm habitat creation area for informal recreation. Furthermore, mitigation proposed to reduce effects on noise, air quality, visual amenity and transport would also reduce disturbance of recreational users.
- 8.9.21 Whilst steps have been taken to mitigate the power station’s impact on amenity and recreation uses, it remains inevitable that an infrastructure project of the scale proposed would have an effect on other local land uses particularly during its construction. This is accepted by NPS EN-1. The applicant is required to minimise these effects wherever possible and the decision-maker is required to weigh any residual effects in the balance against the benefits of the proposals. In this case, the benefits extend beyond the need for new nuclear energy generation and include legacy benefits such as enhanced sports and recreation facilities for the local community.

## 8.10 Noise and Vibration (NPS EN-1)

### a) Policy Context

- 8.10.1 Noise and vibration impacts are identified as Generic Impacts in EN-1.
- 8.10.2 **Volume 1, Appendix 6G** the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant noise and vibration effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

i. NPS EN-1

- 8.10.3 Paragraph 5.11.1 of EN-1 states that excessive noise can have wide ranging impacts on the quality of human life, health (for example owing to annoyance or sleep disturbance) and use and enjoyment of areas of value such as quiet places and areas with high landscape quality. Similar considerations apply to vibration, which can also cause damage to buildings.
- 8.10.4 Paragraph 5.11.2 states that noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity, which should be assessed by the decision maker in accordance with the 'biodiversity and geological conservation' section of EN-1 (see **Section 8.3** above).
- 8.10.5 NPS EN-1 requires assessment of noise and vibration as generic impacts of new energy infrastructure. Paragraph 5.11.8 states:
- "The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission."*
- 8.10.6 Paragraph 5.11.9 states that consent should not be granted unless the following aims are met:
- avoid significant adverse impacts on health and quality of life from noise;
  - mitigate and minimise other adverse impacts on health and quality of life from noise; and
  - where possible, contribute to improvements to health and quality of life through the effective management and control of noise.
- 8.10.7 Paragraph 5.11.11 states that the decision maker should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the Sizewell C Project application.
- 8.10.8 Paragraph 5.11.13 confirms that in certain situations, and only when all other forms of noise mitigation have been exhausted, it may be appropriate for the decision maker to consider requiring noise mitigation through improved sound insulation to dwellings.

## ii. NPS EN-6

- 8.10.9 With regards to human health and well-being (see **Section 7.4(I)** above), paragraph 3.12.3 of EN-6 states:

*“The operation of a new nuclear power station is unlikely to be associated with significant noise, vibration or air quality impacts (although there may be local impacts from transport and associated activities during construction; and if cooling towers are required, particularly forced draught towers, the potential noise impact may be greater). With appropriate mitigation, the subsequent effect of these potential impacts on human health is unlikely to be significant”.*

## b) Assessment

- 8.10.10 **Volume 2, Chapter 11 (Noise and Vibration)** of the **ES** (Doc Ref. 6.3) presents an assessment of the noise and vibration effects arising from the construction and operation of the Sizewell C power station at the main development site.
- 8.10.11 The potential health and wellbeing effects from changes in noise exposure are assessed in **Volume 2, Chapter 28 (Health and Wellbeing)** and the results of underwater noise assessment are reported in **Volume 2, Chapter 22 (Marine Ecology and Fisheries)**. Furthermore, the effects of noise on terrestrial ecology and ornithology are assessed in **Volume 2, Chapter 14 (Terrestrial Ecology and Ornithology)**, all of which are respectively provided in the **ES** (Doc Ref. 6.3).
- 8.10.12 Human noise sensitive receptors within the study area are shown in **Figure 11.1** and **Table 11.8** of **Volume 2, Chapter 11** of the **ES** (Doc Ref. 6.3). All human receptors identified around the site were included which have the potential to be affected by noise on account of their proximity to the proposed development. Areas potentially important for ecological receptors were also included.
- 8.10.13 In relation to noise from road traffic on the surrounding network, all road links where there was any theoretical potential for any adverse effect to occur have been examined. The study area extends to Lowestoft to the north, Ipswich to the south and the A140 to the west, including the A12, A14 and key routes envisaged to be used by Sizewell C Project traffic.
- 8.10.14 With regards to on-site mitigation, this has been included within the design of landscape bunds, acoustic screens or a combination to contain

construction noise as much as possible and minimise impact on noise-sensitive receptors (NSRs). In addition, the standard of good practice outlined in BS 5228-1 would be followed, as set out in the **CoCP** (Doc Ref 8.11). This would include (but would not be limited to):

- Selection of quiet plant and techniques in accordance with good practice in BS5228 for all construction, demolition and earth moving activities.
- Switching off equipment when not required.
- Use of reversing alarms that ensure proper warning whilst minimising noise impacts off site.
- Provision of training and instruction to construction site staff on methods and techniques of working to minimise off-site noise impacts.

8.10.15 During the initial phases of construction, significant noise effects are predicted at Abbey Cottages, Abbey Farm, Ash Wood, Ash Wood Cottage, Heath View, Keepers Cottage, Old Abbey Farm/care home, Plantation Cottages, Potters Farm, Round House, The Studio, Sizewell Sports and Social Club and properties along Abbey Road, King George's Avenue, and Lover's Lane/ Sandy Lane junction. However, these effects are limited to the initial site levelling and establishment phases and the final removal and reinstatement phases, with no significant effects predicted in the interim phases of construction. No significant vibration effects are predicted at any of the receptors during the construction of the main development site.

8.10.16 With overnight freight movements on the green rail route, significant noise effects are predicted at Ash Wood Cottage, Old Abbey Farm/care home, and Round House.

8.10.17 Where the SOAEL is expected to be exceeded, further mitigation is proposed to reduce noise levels, as set out within the **Noise Mitigation Scheme (Appendix 11H of Volume 2, Chapter 11** of the ES), the principal terms of which are appended to the Heads of Terms appended to this **Planning Statement (Appendix J)**. The measures set out in the **CoCP** (Doc Ref 8.11) will be implemented so that all reasonable steps are taken to mitigation and minimise adverse effects.

8.10.18 Construction traffic has been reduced as much as possible through the provision of park and ride facilities, rail infrastructure, the freight management facility and beach landing facility as part of the Sizewell C Project. Impacts of construction traffic will be managed in accordance with the **Construction**

**Traffic Management Plan** (Doc Ref. 8.7) and **Construction Worker Travel Plan** (Doc Ref. 8.8).

- 8.10.19 Notwithstanding these measures, significant adverse effects are expected at receptors along the B1122 between Yoxford and the B1125 junction in 2023, at receptors within 50m of the kerb on Lovers Lane in Leiston in 2023, and at receptors within 50m of the kerb on Kings Road in Leiston in 2028. A total of 12 no. properties have been identified as being likely to have noise levels that exceed the SOAEL. Where this is confirmed as part of a further assessment under the **Noise Mitigation Scheme (Appendix 11H of Volume 2, Chapter 11 of the ES (Doc Ref. 6.3))**, the provisions of that scheme will apply.
- 8.10.20 During operation of Sizewell C, no significant effects are expected from the operation of power station plant, including during periods where back-up generators are tested.
- 8.10.21 The **draft Heads of Terms (Appendix J)** explain that SZC Co. is committed to a **Noise Mitigation Scheme** to provide an offer of temporary rehousing where receptors are affected by short term peaks in construction noise and funding for noise insulation where longer term impacts are forecast to exceed trigger levels. More details can be found in **Volume 2, Chapter 11 (Noise and Vibration)** of the **ES (Doc Ref. 6.3)**.

## 8.11 Socio-economics (NPS EN-1 and NPS EN-6)

### a) Policy Context

- 8.11.1 Socio-economics is identified as a Generic Impact in EN-1 and a Nuclear Impact in EN-6.
- 8.11.2 **Volume 1, Appendix 6E** the **ES (Doc Ref. 6.2)** identifies and describes legislation, policy and guidance relevant to the assessment of likely significant socio-economic effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.
- i. **NPS EN-1**
- 8.11.3 NPS EN-1 paragraph 5.12.3 provides a (non-exhaustive) list of relevant socio-economic impacts, which includes:
- the creation of jobs and training opportunities;



- provision of additional local services and infrastructure improvements;
- effects on tourism;
- the effect of an influx of workers on local population dynamics, including infrastructure requirements and social cohesion; and
- cumulative effects should more than one NSIP be sought in the same area at the same time.

8.11.4 Paragraph 5.12.6 of EN-1 states that the decision maker should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the decision maker considers to be both relevant and important to its decision.

8.11.5 Paragraph 5.12.8 of EN-1 states that the decision maker should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.

ii. **NPS EN-6**

8.11.6 Paragraphs 3.11.3 and 3.11.4 require the applicant to identify at local and regional levels any socio-economic impacts associated with the construction, operation and decommissioning of a proposed new nuclear power station, and that an assessment should demonstrate that the applicant has taken account of, amongst other things, potential pressures on local and regional resources, demographic change and economic benefits.

8.11.7 The Strategic Siting Assessment at Annex C of EN-6 makes some comments on socio-economic effects and it is noted that some responses “*expressed concern on the effects of the construction and operation of the proposed power station in relation to the local community. Concerns included the effect of the influx of construction workers to the area, with particular reference to local traffic problems and social issues*” (paragraph C.8.118).

8.11.8 Paragraph C.8.19 states that:

*“The Appraisal of Sustainability report notes that potential development at the Sizewell site is appraised as having positive effects of regional economic significance on employment and community viability. The site Appraisal of Sustainability report notes that there may be negative short-*

*term effects, during the construction of any new power stations, if the development results in a local shortage of specialist construction labour. It also noted that the influx of a large number of workers could bring pressure on basic services, housing and traffic routes.”*

8.11.9 The NPS directs the decision maker to consider potential socio-economic effects of development when assessing development consent applications.

b) **Assessment**

8.11.10 **Volume 2, Chapter 9 (Socio-Economics)** of the **ES** presents an assessment of the socio-economic effects arising from the construction and operation of the Sizewell C power station at the main development site.

8.11.11 The scope of the assessment of potential socio-economic impacts has been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process.

8.11.12 A series of formal socio-economic working groups, incorporating representatives from ESC and SCC and SZC Co., were established from 2013. The working groups have considered the Sizewell C Project assumptions and methodology adopted for the assessment, the approach to assessing effects and identifying critical issues, and the development of analysis leading to mitigation. Membership of the working groups has expanded to include other relevant stakeholders, including but not limited to local tourism and skills/educational organisations, the emergency services, and the NHS as the assessment has progressed.

8.11.13 A series of technical notes were also prepared as part of this engagement and formal consultation process, and these are provided as appendices to **Chapter 9** of **Volume 2** of the **ES**:

- **Appendix 9A, Volume 2** of the **ES**: Technical Note 1: Workforce Profile.
- **Appendix 9B, Volume 2** of the **ES**: Technical Note 2: Demographic Benchmarks and Workforce Characteristics.
- **Appendix 9C, Volume 2** of the **ES**: Technical Note 3: Workforce Spatial Distribution.
- **Appendix 9D, Volume 2** of the **ES**: Technical Note 4: Accommodation Datasets and Assumptions.

- **Appendix 9E, Volume 2** of the **ES**: Technical Note 5: Sport and Leisure Audit and Estimated Demand.
  - **Appendix 9F, Volume 2** of the **ES**: Sizewell C: Suffolk Coast Visitors Survey.
- 8.11.14 In accordance with NPS EN-1 the scope of the socio-economic assessment considers construction and operational phase impacts, including labour market impacts, business and supply chain impacts, impacts on overall supply of homes and on the private rented sector (PRS), impacts on population dynamics and public services, and wider employment and economic impacts.
- 8.11.15 A number of mitigation measures have been embedded into the design of the proposed development. The ES assessment notes that these mitigation measures would require construction and implementation themselves and are identified in **Volume 2, Chapters 2 and 3** of the **ES**. The provision of the accommodation campus and the facilities within it, for example, during construction, provide embedded mitigation to reduce adverse effects on the local housing market and public service facilities during construction. The embedded mitigation in relation to traffic and transport, public access and recreation, landscape, air quality and noise also provide mitigation of socio-economic effects as they serve to remove or reduce effects on people, be they local residents or visitors.
- 8.11.16 Mitigation is also provided through additional documents which include implementation strategies and specific measures that set out the actions that would be undertaken. These include:
- **Accommodation Strategy** (Doc Ref. 8.10) including details of a Housing Fund.
  - **Community Safety Management Plan** (Doc Ref. 8.16).
  - **Economic Statement** (Doc Ref 8.9) including an **Employment, Skills and Education Strategy** (Doc Ref. 8.9A) and a **Supply Chain Strategy** (Doc Ref. 8.9B).
- 8.11.17 The **ES** assessment concludes that there are no significant adverse effects on any of the receptors or groups of receptors. In accordance with paragraph 5.12.8 of EN-1, the assessment also shows that there are some significant beneficial effects of the Sizewell C Project, notably:

- Employment opportunities for the local labour market, at both the construction and operational stages, including opportunities for upskilling and return/entry to work.
- Supply chain opportunities for local firms.
- Spending by construction and permanent workers in the local economy.
- Legacy benefits of provision of sports facilities in Leiston.

8.11.18 These benefits are summarised in **Section 7.2** above and set out within the **Economic Statement** (Doc Ref 8.9).

8.11.19 The project-wide assessment in the ES satisfies and is supported by the requirements of EN-1 and EN-6 to assess socio-economic considerations, including effects on jobs and training, local services, tourism and the influx of workers. The assessment of socio-economic effects within the ES complies with the requirements of paragraphs 5.12.2 and 5.12.3 of NPS EN-1, and the significant beneficial effects of the Sizewell C Project on the labour market and the local economy during construction and operation should be considered by the decision maker in considering paragraph 5.12.8 of NPS EN-1.

## 8.12 Traffic and Transport (NPS EN-1)

### a) Policy Context

8.12.1 Traffic and transport are identified as Generic Impacts in EN-1.

8.12.2 **Volume 1, Appendix 6F** the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant transport effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.12.3 Section 5.13 of NPS EN-1 sets out the Government’s policy on traffic and transport for energy NSIPs. Paragraph 5.13.2 states that “*the consideration and mitigation of transport impacts is an essential part of Government’s wider policy objectives for sustainable development.*”

8.12.4 Paragraph 5.13.1 states that “*the transport of materials, goods and personnel to and from a development during all project phases can have a variety of*

*impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion*". The text goes on to note that impacts may involve economic, social and environmental effects (including noise and emissions).

- 8.12.5 Paragraph 5.13.3 requires a Transport Assessment where a project is likely to have significant transport implications. Also, paragraph 5.13.4 confirms that, where appropriate, the applicant should prepare a Travel Plan including demand management measures to mitigate transport impacts.
- 8.12.6 With regard to decision making, paragraph 5.13.6 recognises that a new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and that the decision maker should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Paragraph 5.13.7 requires that these impacts are mitigated in order to "*...reduce the impact on transport infrastructure to acceptable levels...*", and that providing the applicant "*...is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts ... then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.*"
- 8.12.7 If mitigation is needed to reduce impacts to "*acceptable levels*", "*possible demand management measures must be considered, and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts*" (paragraph 5.13.8)
- 8.12.8 Finally, paragraph 5.13.10 advises that water-borne or rail transport is preferred over road transport at all stages of the Sizewell C Project, where cost-effective.

ii. **NPS EN-6**

- 8.12.9 Paragraph 3.15.2 of EN-6 advises that applications should demonstrate that the proposed development would not have an unacceptable adverse impact on significant infrastructure. It also clarifies that the decision maker should take into account any local authority impact report, advice from the relevant Nuclear Regulators and relevant policy in NPSs in assessing impacts on significant infrastructure and resources.
- 8.12.10 Paragraph 3.15.3 notes that there may be adverse effects during the construction and decommissioning phases on regional transport networks that may already be under stress.

- 8.12.11 The Strategic Siting Assessment at Annex C of EN-6 makes some comments on potential transport impacts and it is noted that some responses “*referred to existing traffic issues on the A12 and a requirement for a bypass at Stratford/Farnham. It was mentioned that in previous Sizewell developments that it was agreed that heavy traffic would not use the A1094. There was some concern about the route of the construction vehicles which it was felt may affect people who live locally. Some responses stated that use of a railway would be beneficial for transporting construction material, rather than using the local roads*” (paragraph C.8.122).
- 8.12.12 Paragraph C.8.123 acknowledges that “*development at the Sizewell site is assessed by the Appraisal of Sustainability as having the potential for some adverse impacts locally from additional traffic generated during construction and wider negative effects on regional road infrastructure.*”

b) **Assessment**

- 8.12.13 **Volume 2, Chapter 10 (Transport)** of the **ES** presents an assessment of the transport effects arising from the construction and operation of the power station and associated developments. The **Transport Strategy** (Doc Ref. 8.5) is also summarised at **Section 6.4** of this **Planning Statement**.
- 8.12.14 When considering the proposed Transport Strategy against the policy set out in NPS EN-1, the following is relevant:
- NPS EN-1’s preference for public transport is reflected in the new bus services from Ipswich, Lowestoft and Leiston.
  - NPS EN-1’s support for walking and cycling is reflected in the proposed improvements to existing highway land. These will connect the caravan accommodation site to the main construction site via a new footpath. Measures to encourage safe cycling are also proposed, and in the case of the Bridleway 19 diversion along Lover’s Lane, the B1122 and Eastbridge Road, are already delivered.
  - Marine options for freight were considered but rejected on environmental grounds, provided in **Site Selection Report of Appendix A** in this **Statement**. However, abnormal indivisible loads will be delivered by sea, using the beach landing facility.
  - The practical use of rail has been maximised. Greater use of rail was considered but involved the risk of significant delay to the programme. In the context of the “*urgent*” need for new nuclear power generating

capacity, provided in **Section 3.2** of this **Statement**, an integrated strategy involving road and rail was considered the most appropriate.

- 8.12.15 All non-road options for transporting freight and the workforce have therefore been considered and incorporated to the maximum extent practical. Having done so, NPS EN-1 is then permissive of additional “*new inland transport infrastructure to deal with remaining transport impacts.*” The associated development sites are *the “new inland transport infrastructure”* that would mitigate the remaining impacts.
- 8.12.16 NPS EN-1 recognises that a new energy NSIP can give rise to substantial impacts on the surrounding infrastructure, and that the decision maker should ensure that the applicant has sought to mitigate these impacts (paragraph 5.13.6). The **Transport Assessment** (Doc Ref. 8.5) and **ES** identify these impacts and propose mitigatory measures.
- 8.12.17 The **Transport Assessment** (Doc Ref. 8.5) has assessed the potential for substantial impacts on the surrounding transport infrastructure and proposed a range of mitigatory measures. These include:
- Using both rail and sea transport to reduce the number of deliveries being made by road.
  - Constructing two new roads to bypass the villages of Stratford St Andrew and Farnham (two village bypass) and link the A12 to the main development site (Sizewell link road), which would otherwise experience significant traffic impacts.
  - Implementing a park and ride and bus system in order to mitigate the impact of construction worker car trips on the highway network surrounding the main development site.
  - Using a freight management facility and other measures to control the movement of vehicles delivering materials to the main development site.
  - Designing the main development site and associated off-site developments in such a way as to encourage the use of sustainable travel modes, supported by the **Construction Worker Travel Plan** (Ref. 8.8).
  - Incorporating facilities for non-motorised users at the main development site and associated off-site developments.

- 8.12.18 The potential for significant transport impacts has been largely dealt with by way of embedded mitigation within the development proposals. In the remaining cases, discussions are ongoing with the relevant local authorities and other stakeholders in order to identify mitigatory measures towards which a funding contribution can be made.
- 8.12.19 As per NPS EN-1 paragraph 5.13.7, limited weight should be applied to any residual effects on the transport network. However, following the application of the mitigation measures set out in the **Transport Assessment**, the Sizewell C Project will have addressed its residual significant transport impacts as far as practicable.
- 8.12.20 On the basis of these commitments, development consent should not be withheld.

## 8.13 Waste Management (NPS EN-1)

### a) Policy Context

- 8.13.1 Waste Management is identified as a Generic Impact in Section 5.14 of EN-1.
- 8.13.2 **Volume 1, Appendix 6D** of the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant material resource use and conventional waste generation effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

### i. NPS EN-1

- 8.13.3 Section 5.14 of EN-1 deals with waste management, stating in paragraph 5.14.1 that Government policy is intended to protect human health and the environment by producing less waste and by using it as a resource where possible. Paragraph 5.14.2 states that waste management is implemented through the waste hierarchy.
- 8.13.4 Paragraph 5.14.4 of EN-1 recognises that “*all large infrastructure projects are likely to generate hazardous and non-hazardous waste*”. It requires applications to set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan.

### b) Assessment

- 8.13.5 This section demonstrates how the main development site accords with relevant policy in relation to conventional waste management.



- 8.13.6 **Volume 2, Chapter 8 (Conventional Waste and Material Resources)** of the **ES** (Doc Ref. 6.2) presents the assessment of the material resource use and conventional waste generation effects arising from the construction and operation of the Sizewell C power station at the main development site.
- 8.13.7 A **Conventional Waste Management Plan** (Doc Ref. 6.3) for the Sizewell C Project has also been produced and submitted with this DCO application. This plan addresses non-radioactive waste and does not relate to spent fuel or the decommissioning process (this will be the subject of a separate consent and waste strategy in advance of the commencement of decommissioning).
- 8.13.8 The scope of the **ES** assessment and **Conventional Waste Management Plan** has been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. On 13 June 2019 a joint consultation meeting was held at the Environment Agency office in Ipswich. The meeting was attended by the interested stakeholders and a presentation of the proposed **Conventional Waste Management Strategy** was given.
- 8.13.9 In accordance with paragraph 5.14.4 of EN-1, mitigation measures are proposed to ensure efficient use of material resources and reduction of waste arisings, and to reduce the potential impacts. These include:
- Materials would be delivered on an ‘as required’ basis to avoid damage or contamination and therefore limit the likelihood of waste.
  - Where site-won material is not available or suitable for re-use, secondary or recycled materials would be procured where available and practicable.
  - The design of the temporary roads would incorporate geogrid or lime stabilisation methods to reduce the amount of granular fill required.
  - All suitable excavated material would be re-used in the construction of the Sizewell C Project and in landscaping features to reduce the requirement to import materials for construction and reducing the need to remove surplus materials from site.
  - Temporary stockpiling of fill materials prior to incorporation in the Sizewell C Project would be avoided, where possible, to ensure double handling and damage is minimised. However, where required, materials would be stockpiled in accordance with best practice and managed appropriately to limit the likelihood of damage or contamination.

- Locally sourced materials and suppliers would be identified and used where practicable.
- Pre-cast elements would be used where practicable to ensure efficient use of materials and avoid the generation of waste arisings from cut-offs.

8.13.10 Also, in accordance with paragraph 5.14.2 of EN-1, the Sizewell C Project would apply the waste hierarchy to minimise disposal and maximise reuse and recycling. Opportunities for re-use and recycling of waste include (but are not limited to):

- Re-using excavated soils on-site in the landscaping features of the Sizewell C Project.
- Chipping green waste on-site for use in the landscaping for the Sizewell C Project.
- Composting of green waste.
- Recycling of inert material by crushing, blending and subsequent re-use, as an aggregate.
- Re-using waste on other nearby schemes.
- Re-using waste for uses with clear benefits to the environment, for example in the remodelling of agricultural land or in the restoration of nearby quarries or other excavation sites.

8.13.11 As a result of the mitigation measures and management plan, it is proposed for there to be no undue burden upon existing waste infrastructure as a result of the Sizewell C Project, which this strategy demonstrates through proposals to prevent and reduce waste production where possible. In addition, an analysis of Suffolk’s existing conventional waste facilities in **Chapter 8** of **Volume 2** of the **ES** shows there to be adequate capacity to deal with the various waste streams for which options on a regional level have been identified.

8.13.12 No significant adverse effects were identified for waste and it is considered that the requirements of NPS EN-1 have been met.

## 8.14 Water Quality and Resources (NPS EN-1 and NPS EN-6)

### a) Policy Context

8.14.1 Water quality and resources are identified as Generic Impacts in Section 5.15 of EN-1 and as Nuclear Impacts in Section 3.7 of EN-6.

8.14.2 **Volume 1, Appendix 60** the **ES** (Doc Ref. 6.2) identifies and describes legislation, policy and guidance relevant to the assessment of likely significant groundwater and surface water effects of the Sizewell C Project. The following is a summary of the national and local policy of relevance to the main development site assessment.

#### i. NPS EN-1

8.14.3 Paragraph 5.15.2 of EN-1 states that where a project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES.

8.14.4 Paragraph 5.15.9 states that the risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. Additionally, paragraph 5.15.10 confirms that the impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling.

8.14.5 Finally, EN-1 confirms that the decision maker should not refuse consent on the basis of pollution impacts unless it has good reason to believe that any relevant necessary operational pollution control permits, or licences or other consents will not subsequently be granted (paragraph 4.10.8).

#### ii. NPS EN-6

8.14.6 EN-6 states at paragraph 3.9.3 that applicants should consider the effects of the construction of a new power station on the groundwater regime and its effects on terrestrial/coastal habitats. Paragraph 3.9.6 states that potential mitigation measures could include variations to the building layout to avoid ecologically sensitive areas and on-site measures to protect habitats and species and to avoid or minimise pollution and the disturbance of wildlife.

8.14.7 Paragraph 3.7.6 of EN-6 states that in designing any direct cooling system the locations of the intake and outfall should be sited to avoid or minimise adverse impacts on legitimate commercial and recreational uses of the receiving waters, including their ecology. Paragraph 3.7.6 continues to state

that there should also be specific measures to minimise impact to fish and aquatic biota by entrainment or by excessive heat or biocidal chemicals from discharges to receiving waters.

- 8.14.8 Paragraph 3.7.8 states that contamination of water resources “...can be mitigated through the EIA process and managed through the possible implementation of Environmental Management Plans”.

b) **Assessment**

- 8.14.9 **Volume 2, Chapter 19 (Groundwater and Surface Water) and Chapter 21 (Marine Water Quality and Sediments)** of the **ES** (Doc Ref. 6.3) presents the assessment of the groundwater and surface water effects and the marine water quality and sediment effects arising from the construction and operation of the Sizewell C power station at the main development site respectively.

- 8.14.10 **Volume 2, Chapter 19** of the **ES** is also supported by the project-wide **Water Framework Directive Compliance Assessment** (Doc. Ref 8.14) which provides an assessment of whether the Sizewell C Project, and its components, are compliant with the Directive of the European Parliament and Council 2000/60/EC (Ref. 1.65) establishing a framework for community action in the field of water policy.

- 8.14.11 **Section 8.3** of this **Statement** also summarises the assessment of the marine ecology effects arising from the construction and operation of the Sizewell C power station at the main development site, as set out at **Volume 2, Chapter 22 (Marine Ecology)** of the **ES** (Doc Ref. 6.3).

i. **Groundwater Quality**

- 8.14.12 Detailed information on groundwater quality data available as part of historic groundwater sampling and ongoing baseline monitoring has been provided in the **Conceptual Model Report** and its Addendum in **Appendix 19B** and in **Appendix 18A** of **Volume 2** of the **ES**. The outcomes of these assessments are summarised in **Chapter 19** of **ES Volume 2** (Doc Ref. 6.3).

- 8.14.13 The construction phase and the removal and reinstatement of the temporary facilities would potentially introduce new sources of contamination to the site through spills or leaks of contaminants used during construction. Construction works, such as excavation and stockpiling, can pose a risk to groundwater receptors through leaching and run-off of contaminants. Intrusive activities and removal of low permeability material can pose a risk to groundwater by creating new contaminant pathways or mobilising existing contamination through exposure of contaminated soil or remobilisation of contaminants through soil disturbance.

- 8.14.14 The permanent realignment of the Sizewell Drain could lead to a change in groundwater flow patterns that could have an associated effect on the groundwater dependent ecological receptors (i.e. the Sizewell Marshes SSSI). To mitigate this, the realignment has been engineered to maintain a surface water level that would prevent alteration of the groundwater flow regime. A control structure to be installed at the northern end of the realigned Sizewell Drain has been incorporated into the design to manage water flow and prevent changes to groundwater. The **draft DCO** (Doc Ref. 3.1) requirements commit to the provision of the **Outline Drainage Strategy**, provided in **Volume 2 Appendix 2A** of the **ES** (Doc Ref. 6.3), which requires the detail of a monitoring and management regime to be put in place to ensure that ground water and surface water levels are appropriately managed.
- 8.14.15 Following the implementation of proposed mitigation, including ensuring that all site activities are carried out in accordance with the **Outline Drainage Strategy**, the **CoCP** (Doc Ref. 8.11), **Materials Management Strategy** (MMS) and **Waste Management Strategy** (WMS), no significant effects are anticipated.
- ii. **Surface Water Quality**
- 8.14.16 Surface water drainage in the study area comprises two, low energy, lowland river systems, the Leiston Drain and the Minsmere River, both of which discharge to the sea via the Minsmere Sluice. When river levels exceed sea levels, water flows from Minsmere Sluice to the sea. When sea levels exceed river levels, flow will cease, and water is stored upstream of the sluice.
- 8.14.17 Water levels in the Sizewell Marshes SSSI are controlled by a series of interconnecting drains, which ultimately discharge to the Leiston Drain. The Sizewell Drain, which runs through the western section of the main platform area, is a tributary of Leiston Drain and is the primary watercourse that drains the Sizewell Marshes SSSI.
- 8.14.18 Construction activity at the main development site has the potential to introduce new sources of contamination to the site or mobilise existing sources through the creation of new pathways. Construction activities could also impact upon surface water resources due to runoff from the construction site, changes to surface water flows and hydromorphology.
- 8.14.19 The **CoCP** (Doc Ref. 8.11) sets out proposed measures to be implemented by the construction contractors to protect groundwater and surface water. Overall, with these measures in place, no significant effects arising from contamination are anticipated on surface water resources during construction phase.

- 8.14.20 Construction activities would not lead to a change in the overall status of the water bodies; the proposed construction activities are therefore deemed compliant with the Water Framework Directive.
- 8.14.21 The permanent main site drainage systems have also been designed to minimise effects on groundwater and surface water receptors. The **Outline Drainage Strategy**, provided in **Volume 2, Appendix 2A** of the **ES**, has been developed and demonstrates how acceptable standards of drainage would continue to operate during the construction and operational periods of the power station. The Strategy includes the following measures to minimise effects on groundwater and surface water receptors:
- Rainfall falling onto the Sizewell C power station platform would be managed through an engineered drainage system. Forecourt separators would be provided at all locations where fuel handling takes place. Bypass separators would be provided for car parks within the temporary construction area and the LEEIE of a size greater than 800m<sup>2</sup> or with more than 50 spaces if the car park discharges via drains to a water body. Bypass separators are also required for other areas where there is a risk of oil/hydrocarbon contamination in surface water runoff. This water would be discharged to the sea with the cooling water.
  - At the western perimeter of the Sizewell C power station platform, a filter drain would be installed to capture surface water runoff and prevent direct discharge to Sizewell Drain. The realigned Sizewell Drain would remain during the operational phase.
  - The Sizewell C access road that passes over Goose Hill and is linked to the power station car park would drain to the north, diverting runoff away from the Sizewell Marshes SSSI. Its design would be compliant with the Design Manual for Roads and Bridges. Drainage would be provided to collect surface water runoff from the road and discharge to the north where it would outfall into a swale and infiltrate to ground.
- 8.14.22 The drainage strategy has been designed for the site to manage and control surface water run off rates through infiltration to ground and includes pollution prevention techniques that would be implemented through standard good practice and good design, the detail of which would be confirmed through a DCO requirement.
- 8.14.23 The proposed operational phase activities would not lead to a change in the overall status of the water bodies; the proposed operational phase activities are deemed compliant with the Water Framework Directive.

### iii. Marine Water Quality

- 8.14.24 The scope of the marine water quality assessment has been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process. As set out in the Coastal Change section above, the Sizewell C Marine Technical Forum (MTF) was established in March 2014 in order to facilitate engagement with statutory stakeholders on the marine assessments.
- 8.14.25 It is considered that the main development site has the potential to affect water quality and sediment in several statutory and non-statutory designated sites, including Alde-Ore Estuary SPA, Minsmere to Walberswick SPA and Ramsar site, Minsmere to Walberswick Heaths and Marshes SSSI, Outer Thames SPA and Southern North Sea SAC.
- 8.14.26 The potential for water quality issues associated with the proposed development to affect the Minsmere to Walberswick SPA, Ramsar site, Minsmere to Walberswick Heaths and Marshes SSSI, and the associated RSPB Minsmere reserve has also been identified.
- 8.14.27 In terms of mitigation, several mitigation measures have been identified through the iterative EIA process and are incorporated into the design and construction planning of the proposed development. These include:
- Soft-coastal defence feature (SCDF) made of landscaped beach grade sediments and constructed to 5m ODN elevation between the hard-coastal defence feature (HCDF) and the MHWS.
  - Any coatings or treatments applied to the beach landing facility or other infrastructure must be suitable for use in the marine environment in accordance with best environmental practice.
  - In accordance with the **CoCP** (Doc Ref. 8.11), a site Vessel Management Plan (VMP) would be provided and implemented to mitigate potential effects of vessel traffic at the site.
  - In accordance with paragraph 3.7.6 of EN-6, embedded mitigation measures implemented into the design of the intake and outfall headworks include locating the outfalls of the cooling water infrastructure east of the Sizewell-Dunwich Bank approximately 3km offshore, thereby allowing greater dilution of cooling water discharges and reducing potential intersections with the shore.

8.14.28 As a result of the mitigation measures, impact on marine water resources would be minimised and no significant adverse effects were identified. It is therefore considered that the requirements of NPS EN-1 and EN-6 have been met.

## 8.15 Further Issues (NPS EN-6)

### a) Proximity to Civil Aircraft Movements

8.15.1 The Sizewell C main development site is not located in or adjacent to a Public Safety Zone, a Safeguarded Area, or an Air Traffic Control Area of a major civil aerodrome.

8.15.2 The existing flight restriction zone over Sizewell prevents civil aircraft movements in the vicinity of the nominated site at an altitude of less than 2,000 foot. An exception is made for helicopters that have permission to land at Sizewell.

8.15.3 The prevailing air traffic control regime has been developed taking account of the flight restriction zone around the existing site.

### b) Access to Transmission Networks

8.15.4 This topic is addressed in the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) and the **Grid Connection Statement** (Doc Ref. 7.1), as well as at **Section 7.3(h)** of this **Planning Statement**.

### c) Impact on Significant Infrastructure and Resources

8.15.5 Section 3.15 of NPS EN-6 requires applicants to “*demonstrate that the proposed development would not have an unacceptable adverse impact on significant infrastructure.*” “*Significant infrastructure*” is stated to include:

- motorways, major highways (for example A roads);
- strategic rail network;
- gas transmission network;
- electricity transmission network;
- airports;



- ports; and
  - Groundwater Source Protection Zones and Drinking Water Protected Areas.
- 8.15.6 The NPS notes that there may be particular adverse effects during the construction and decommissioning phases on regional transport networks that may already be under stress.
- 8.15.7 The impact of the proposal on major highways, notably the A12, has been assessed in **Volume 2, Chapter 10** of the **ES**. The **Transport Strategy**, addressed at **section 6.4** of this **Planning Statement**, explains how pressure on the A12 would be relieved through a series of measures notably including the two park and ride facilities. The mitigation of impacts on the A12 would also ensure that there would be no significant impact on the operation of the port of Felixstowe.
- 8.15.8 Regarding the electricity transmission network, ultimate responsibility for this lies with National Grid who has entered into contractual agreements with SZC Co. for connecting the new power station to its network. As set out at within the **Main Development Site Design and Access Statement** (Doc Ref. 8.1) and the **Grid Connection Statement** (Doc Ref. 7.1), a new 400kV substation is proposed along with connections lines and pylons. The proposals would be sufficient to avoid a significant impact.
- 8.15.9 No significant effects are anticipated on the strategic rail network, gas transmission network, airports, ports or water protection designations (there are no Groundwater Source Protection Zones or Drinking Water Protected Areas within the site).

d) [Size of Site to Accommodate Construction and Decommissioning](#)

- 8.15.10 Section 3.16 of NPS EN-6 notes that:

*"Some activities associated with the proposed development may take place outside of the boundaries of the listed site (for example construction and decommissioning activities – see section 2.3 of this NPS). In considering an application for development consent IPC should assess all impacts of the proposed development that it considers relevant and important to the application in accordance with the Planning Act 2008, the policy set out in EN-1 and this NPS."*

- 8.15.11 Section 2.3 of NPS EN-6 states that,

*“The Government expects the key operational elements of the power station, and in particular the infrastructure that has the potential to directly cause a radiological hazard such as the reactor building (including the associated turbine hall), spent fuel and intermediate level waste stores, to be located within the boundary of the site that was assessed by the SSA. However, the Government recognises that flexibility is required to accommodate detailed local level considerations.”*

The size of the main development site is defined by the Order Limits and shown in the **Land Plans** (Doc Ref. 2.1). It is sufficient to accommodate construction activities and decommissioning activities are expected to require less land than construction and so the size of the site would be sufficient to accommodate these.

## 9 Planning Assessment – Associated Development Sites

9.1.1 Section 115(1) of the Act provides that development consent may be granted for development for which development consent is required or for associated development<sup>11</sup>. Associated development is defined within the same section to mean development which is associated with an NSIP and “*does not consist of or include the construction or extension of one or more dwellings*”. The former Department for Communities and Local Government *Guidance on associated development applications for major infrastructure projects* (Ref. 1.66) explains that it is for the Secretary of State to decide on a case by case basis whether or not development should be treated as associated development, having regard to a number of principles which include:

- associated development should either support the construction or operation of the principal development, or help address its impacts;
- associated development should not be an aim in itself but should be subordinate to the principal development;
- development should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development; and
- associated development should be proportionate to the nature and scale of the principal development.

9.1.2 Paragraph 6 of the guidance also states that associated development is expected, in most cases, to be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project, citing as an example (where consistent with the core principles above), a grid connection for a commercial power station.

9.1.3 Applying these principles to the Sizewell C Project, it is evident that none of the proposed associated development detailed in this **Planning Statement** is promoted as an aim in itself. Each associated development is proposed to support the development or operation of the power station or to help address its impacts. The associated development proposals carry substantial costs to SZC Co., and the majority would be removed and the land reinstated at the end of the construction period. Therefore, there is no

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<sup>11</sup> Or for “related housing development” which does not apply.

other benefit to be derived from the associated development for SZC Co. other than to serve the development of Sizewell C.

9.1.4 As with the main development site, the associated development sites have been assessed against the generic and nuclear impacts set out in NPS EN-1 and NPS EN-6 with the results set out in, **Volumes 3 – 9 of the Environmental Statement**. The same process of applying primary (embedded), tertiary and, if necessary, secondary mitigation has been used. This process leads either to the full mitigation of effects or residual effects that must be weighed in the planning balance. These are summarised in the individual **Planning Statements, Appendices 2-8**, for the associated development sites and collated in **Table 9.1**.

**Table 9.1: Summary of effects for associated development sites**

AD site.	Residual effects.
Northern park & ride (Darsham).	<ul style="list-style-type: none"> <li>● Minor impacts on heritage assets.</li> <li>● Minor impacts on cycle routes and visibility into the site from these routes.</li> <li>● Minor impacts on soils and land use, given the temporary nature of the site’s proposed use.</li> <li>● Negligible impacts on the transport network close to the site.</li> <li>● Potential for significant impacts on receptors close to the site from construction noise but given the noise-generating works would be short-term and temporary, the impacts would be not significant.</li> <li>● Major-moderate impacts on landscape character.</li> <li>● Minor adverse impacts on ecology.</li> <li>● Moderate adverse impacts on archaeological remains within the site.</li> <li>● Major adverse impacts on soils due to the loss of agricultural land through the project construction phase.</li> </ul>

AD site.	Residual effects.
	<ul style="list-style-type: none"> <li>● Minor adverse impacts on land quality.</li> <li>● Minor adverse impacts on groundwater.</li> </ul>
Southern park & ride (Wickham Market).	<ul style="list-style-type: none"> <li>● Minor impacts on heritage assets.</li> <li>● Minor impacts on soils and land use, given the temporary nature of the site’s proposed use.</li> <li>● Minor impacts on the transport network close to the site.</li> <li>● Minor adverse noise impacts.</li> <li>● Moderate adverse landscape impacts on users of footpaths near the site.</li> <li>● Minor adverse ecological impacts.</li> <li>● Minor adverse amenity impacts due to the proximity of footpaths to the site.</li> <li>● Minor adverse impacts on groundwater.</li> </ul>
Freight management facility.	<ul style="list-style-type: none"> <li>● Negligible to minor adverse residual impacts on the nearest noise receptors.</li> <li>● Moderate adverse residual impacts on landscape character.</li> <li>● Minor adverse residual impacts on the heritage landscape and heritage assets in the form of archaeological remains.</li> <li>● Minor adverse residual impacts on ecology given the extent of natural habitats in and around the site.</li> <li>● Minor to major-moderate adverse residual impacts on the amenity of the nearby PRowWs.</li> </ul>

AD site.	Residual effects.
	<ul style="list-style-type: none"> <li>● Minor adverse residual impacts due to a reduction in the rate/volume of water discharging to ground but the proposed SuDS would provide minor beneficial impacts on groundwater conditions and private water supplies.</li> <li>● Minor adverse impacts on the transport network during the construction phase.</li> <li>● Minor adverse impacts on soils and land use, due to the long-term but temporary loss of agricultural land.</li> <li>● Negligible impacts on flooding and air quality.</li> </ul>
Two village bypass.	<ul style="list-style-type: none"> <li>● Negligible and moderate beneficial impacts on air quality for some nearby residential properties.</li> <li>● No significant noise effects are expected during construction. Significant adverse and significant beneficial effects are expected during operation.</li> <li>● Moderate adverse impacts on some landscape character, major-moderate adverse impacts on some visual receptors.</li> <li>● Moderate impacts to some footpaths within the site.</li> <li>● Minor adverse impacts on archaeological remains within the site and to the setting of some heritage assets.</li> <li>● Minor and major adverse impacts on agricultural land.</li> <li>● Minor adverse and minor beneficial impacts on terrestrial ecology and ornithology.</li> <li>● Minor adverse and minor beneficial impacts on geology and land quality.</li> <li>● Minor adverse impacts on groundwater and surface water.</li> </ul>

AD site.	Residual effects.
Sizewell link road.	<ul style="list-style-type: none"> <li>● Major and moderate adverse residual noise impacts on nearby receptors.</li> <li>● Negligible air quality impacts.</li> <li>● Moderate adverse impacts on landscape character and major-moderate adverse impacts on visual receptors.</li> <li>● Minor adverse and minor beneficial impacts on ecology.</li> <li>● Moderate adverse impacts on footpaths within the site and minor impacts on footpaths close to the site.</li> <li>● Minor adverse impacts on heritage assets, historic landscape character and archaeological remains.</li> <li>● Major adverse impacts on agricultural land.</li> <li>● Minor adverse impacts on geology through soil erosion.</li> <li>● Minor adverse and minor beneficial impacts on groundwater.</li> </ul>
Yoxford roundabout and other highway improvements.	<ul style="list-style-type: none"> <li>● Moderate adverse residual noise impacts on nearby receptors.</li> <li>● Moderate to minimal adverse landscape character impacts.</li> <li>● Minor impacts on footpaths and PRowS close to the site.</li> <li>● Minor impacts on the setting of nearby heritage assets.</li> <li>● Moderate adverse impacts on agricultural land and soils, given the largely developed nature of the site and low amount of agricultural land loss.</li> </ul>

AD site.	Residual effects.
	<ul style="list-style-type: none"> <li>Minor adverse and minor beneficial impacts on groundwater conditions.</li> </ul>
Rail	<ul style="list-style-type: none"> <li>Major adverse residual noise impacts on nearby receptors.</li> <li>Minimal to moderate adverse impacts on landscape character.</li> <li>Moderate to major-moderate impacts on amenity users of nearby footpaths/PRoWs.</li> <li>Minor adverse impacts on ecology due to the proximity of habitats to the site.</li> <li>Minor adverse impacts on heritage assets within and close to the site.</li> <li>Minor adverse and minor beneficial impacts on soils and land use.</li> <li>Minor adverse and minor beneficial impacts on geology and land quality.</li> <li>Minor adverse and minor beneficial impacts on groundwater.</li> </ul>

9.1.5 Planning assessments of each associated development proposal can be found at **Appendices 2 – 8** of this **Statement** and these assessments consider any residual effects, both positive and negative, of the individual associated development sites as part of the planning balance against relevant national, regional (where appropriate) and local planning policies but, principally, the generic and nuclear impacts set out in NPS EN-1 and NPS EN-6.

9.1.6 The following sections provide a summary of the planning assessments for each of the associated development proposals. It is important to recognise that each site has been carefully selected to ensure its suitability in principle for the development proposed and that a very **significant** input into the site



selection process was the importance of limiting adverse environmental effects.

a) Northern Park and Ride (Darsham)

- 9.1.7 The northern park and ride at Darsham is one of two temporary park and ride facilities required to support the construction of Sizewell C through the capture of wider workforce traffic from the north and west of the A12. The need for the park and ride facility has been acknowledged in the emerging draft East Suffolk Local Plan Policy SCLP12.48 (paragraph 12.50), which states that the land to the north of Darsham railway station is being promoted by SZC Co. as a possible site for a park and ride facility.
- 9.1.8 There are anticipated to be some minor impacts, namely on nearby heritage assets outside of the site boundary, nearby cycle routes, land use, ecology, land quality and groundwater. Whilst there would be some residual adverse effects, steps would be taken to minimise these impacts on the affected receptors as much as possible, and any harm to such receptors would be temporary in nature. Many of these impacts would be alleviated through the provision of soil storage and appropriate landscaping onsite for the duration of the development, and impacts on amenity and land use are temporary in nature given the site's proposed use.
- 9.1.9 There are anticipated to be major impacts on soils due to the temporary change of use from agricultural use and major-moderate impacts on landscape character given the transition of the site from agricultural use to the proposed temporary park and ride. There are also considered to be moderate impacts on archaeological remains within the site.
- 9.1.10 No significant noise and vibration effects are expected from the construction and removal and reinstatement of the northern park and ride at Darsham. A range of mitigation measures will be implemented to secure this outcome, including the provision of landscape bunds in the first phase of construction that provide acoustic screening, and the adoption of good practice measures to minimise noise and vibration impacts, as set out in the **CoCP** (Doc Ref. 8.11). In addition, further acoustic screening and working methods will be considered by the contractor, such as limiting noisy construction activities on Saturday afternoons. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.
- 9.1.11 Similarly, no significant effects are expected as a result of the operation of the northern park and ride at Darsham. As part of the detailed design of the

facility, mechanical plant items will be specified to achieve target noise levels that are below the significant noise effect level.

- 9.1.12 However, these are to be mitigated as far as possible to accord with the NPSs and local planning policy. These impacts are unavoidable as the type of development onsite requires the removal of soils to enable the construction of the temporary park and ride facility, which would have negative impacts on any archaeological remains and on the quality of soils onsite.

**b) Southern Park and Ride (Wickham Market)**

- 9.1.13 The temporary southern park and ride at Wickham Market is required to support the construction of Sizewell C through the capture of wider workforce traffic from the south and west of the A12.
- 9.1.14 A large amount of the impacts of the southern park and ride have been assessed to be minor, including impacts on heritage assets, soils and land use given the temporary nature of the site's proposed use, impacts on the transport network, noise impacts, ecological impacts, groundwater impacts and other impacts on amenity.
- 9.1.15 There are anticipated to be fewer impacts on nearby receptors than with the northern park and ride given its relatively isolated location in comparison. There would be moderate impacts in terms of landscape on users of footpaths near to the site and their views. This is the only impact that is considered to be moderate, and is to be mitigated as far as possible to accord with the NPSs and local planning policy.
- 9.1.16 Potential traffic impacts in Wickham Market are proposed to be mitigated through local measures which have been discussed and agreed in principle with the parish council.
- 9.1.17 No significant noise and vibration effects are expected from the construction and removal and reinstatement of the southern park and ride at Wickham Market. A range of mitigation measures will be implemented to secure this outcome, including the provision of landscape bunds in the first phase of construction that provide acoustic screening, and the adoption of good practice measures to minimise noise and vibration impacts, as set out in the **CoCP** (Doc Ref. 8.11). In addition, further acoustic screening and working methods will be considered by the contractor, such as limiting noisy construction activities on Saturday afternoons. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.

9.1.18 Similarly, no significant effects are expected as a result of the operation of the southern park and ride at Wickham Market. As part of the detailed design of the facility, mechanical plant items will be specified to achieve target noise levels that are below the significant noise effect level.

c) **Freight Management Facility**

9.1.19 The temporary freight management facility is needed to mitigate the impacts of Sizewell C construction traffic. Whilst some impacts are expected from the construction and operation of the freight management facility, these are largely expected to be minor impacts further mitigated by the temporary use of the site. Minor impacts are expected on ecology, amenity, archaeological remains including a scheduled ancient monument within the site, and on groundwater contamination but these would be mitigated.

9.1.20 The freight management facility would have major adverse impacts on landscape from its visible construction activity, and moderate-slight adverse landscape impacts on nearby receptors during the construction phase. The development of the freight management facility would also have a moderate impact on agricultural and soils, but all effects are reduced by the temporary nature of the site's proposed use.

9.1.21 These are to be mitigated as far as possible to accord with the NPSs and local planning policy. These impacts are unavoidable – for instance, the type of development onsite requires the removal of soils to enable the construction of the freight management facility, which would have negative impacts on the quality of soils onsite.

9.1.22 Although there are some residual adverse effects that come with the construction of the temporary freight management facility that cannot be fully mitigated, none are of such magnitude that they outweigh the key benefit of the scheme – the delivery of new nuclear power generating capacity. The freight management facility plays a vital role in the co-ordination of freight and the moderation and management of traffic impacts on the road network within the vicinity of Sizewell C, and plays a key contingency role in HGV parking accommodation if any events require the temporary suspension of site deliveries.

9.1.23 No significant noise and vibration effects are expected from the construction and removal and reinstatement of the freight management facility. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11). Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any

noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.

- 9.1.24 Similarly, no significant effects are expected as a result of the operation of the freight management facility. As part of the detailed design of the facility, mechanical plant items will be specified to achieve target noise levels that are below the significant noise effect level.

d) Two Village Bypass

- 9.1.25 The A12 between Ipswich and Lowestoft would be the main route corridor for Sizewell C construction traffic on the highway network. Traffic modelling identified that whilst the majority of the A12 would not experience traffic concerns, consideration was given to specific areas along the A12 that are expected to experience a level of traffic impacts that would justify further mitigation, including where the road passes the villages of Farnham and Stratford St Andrews (discussed in this section), communities between the A12 and the entrance to the main development site such as Theberton.
- 9.1.26 There has been a long-standing concern from residents regarding the existing traffic levels through the four villages of Farnham, Stratford St. Andrew, Little Glemham and Marlesford. The road narrows, and has a tight bend at Farnham, which reduces capacity and creates a potential safety concern, particularly when two large vehicles are passing at once. The proposed Sizewell C Project would increase construction traffic levels along this section of the A12, and there are also potential impacts on residential amenity within the village of Farnham due to the increase in traffic flows and the proximity of traffic to the frontage of properties.
- 9.1.27 Having identified the need to mitigate the impacts of traffic travelling to, and from, the main development site on the section of the A12 in Farnham, further consideration was given to the potential options to alleviate traffic impacts.
- 9.1.28 The two village bypass has been proposed to avoid the adverse effects that would otherwise be associated with the addition of the construction traffic to the existing volume of traffic that would travel through Farnham and Stratford St Andrew.
- 9.1.29 The proposed alignment of the highway runs across land to the south of the existing A12. In a west to east direction, it would begin at the A12 to the west of Stratford St. Andrew via a new four-arm roundabout, east of Parkgate Farm and Stratford Plantation, and re-join the A12 also via a new four-arm roundabout to the east of Farnham at the A12 and A1094 Friday Street junction.

- 9.1.30 As set out in the **Site Selection Report**, provided in **Appendix A** of this **Statement**, the proposed location of two village bypass has been shown to be the most appropriate route through a process of consultation and assessment of alternatives.
- 9.1.31 The two village bypass would have moderate impacts on some landscape character, major-moderate adverse impacts on some visual receptors and moderate adverse impacts on agricultural land. These impacts would be permanent given the proposed nature of the development. Otherwise, the proposals would have a minor impact on air quality, archaeological remains, geology and groundwater.
- 9.1.32 It is acknowledged that any new highway development could result in some form of residual impacts, even after site-specific mitigation measures are implemented. Moderate adverse impacts on some landscape character, major-moderate adverse impacts on some visual receptors have been identified, as well as some moderate adverse impacts on agricultural land. Where residual impacts remain however, they are considered acceptable taking into account the overall benefits of the development. The identified adverse impacts are fully considered in **Chapters 4-12, Volume 5** of the **ES**.
- 9.1.33 During the peak construction year for the main development site in 2028 when the two village bypass is used for Sizewell C construction traffic, significant noise effects have been identified at: Parkgate Farm, Hill Farm, The Old Vicarage, Pond Barn Cottages, Farnham Hall, Farnham Hall Farmhouse, Mollet's Farm, Friday Street Farm, 51 Friday Street, Church Bungalow and Walk Barn Farm. During the busiest month in the peak construction year of 2028, further significant noise effects are expected at: Chapel Cottages, Rosehill Cottages and Mill Lane West.
- 9.1.34 Where these outcomes are confirmed as part of a further assessment under the **Noise Mitigation Scheme**, provided in **Appendix 11H** of **Volume 2, Chapter 11** of the **ES**, the provisions of that scheme will apply.
- 9.1.35 Noise levels at properties along the bypass are expected to reduce following the completion of the Sizewell C power station, as the bypass will no longer be used for Sizewell C construction traffic. However, significant noise effects are anticipated to remain in the long term at: Hill Farm, Pond Barn Cottages, Farnham Hall, Farnham Hall Farmhouse, and Walk Barn Farm.
- 9.1.36 SZC Co. will continue to seek measures to avoid or reduce these significant adverse effects. The **Noise Mitigation Scheme** will be made available for all properties, where the specified noise criteria are exceeded, this is provided in **Volume 2, Appendix 11H** of the **ES** (Doc Ref. 6.3). In doing so SZC Co.

will engage with stakeholders to further understand the affected receptors, their use and the benefit of the measures.

9.1.37 The two village bypass itself offers a range of local benefits including a reduction in traffic noise and traffic-related emissions to the residents of Stratford St Andrew and Farnham. It also is considered to improve the setting of heritage assets within the village of Farnham. The two village bypass would also make significant contributions to road capacity for the construction of the Sizewell C Project, and would reduce localised highway impacts in Farnham. The proposed alignment also offers benefit to road users and is sufficiently short enough to be considered as a viable alternative to the A12.

e) [Sizewell Link Road](#)

9.1.38 The Sizewell link road is a fundamental part of SZC Co.'s delivery of the Sizewell C Project and would minimise travel impacts and support the movement of construction traffic from the A12 to the main development site. The proposed Sizewell link road has been shown to be the most appropriate route through a process of local consultation and assessment of impacts.

9.1.39 During the peak construction year for the main development site in 2028 when the Sizewell link road is used for Sizewell C construction traffic, significant noise effects have been identified at the following receptors in both of the 2028 assessment scenarios: Fir Tree Farm, Buskie Farm, Fordley Hall, Trust Farm, Dovehouse Farm, Theberton Hall, Church Farm, Doughty Wylie Crescent, Theberton Grange, Theberton House, Oakfield House, Hawthorn Cottages, Rookery Farm, Keepers Cottage, Town Farm, Hawthorn Farm, Moat House, south of Theberton Grange, and Rose Farm.

9.1.40 Where these outcomes are confirmed as part of a further assessment under the **Noise Mitigation Scheme**, provided in **Appendix 11H** of **Volume 2, Chapter 11** of the **ES**, the provisions of that scheme will apply.

9.1.41 Noise levels at properties along the link road are expected to reduce following the completion of the Sizewell C power station, as the road will no longer be used for Sizewell C construction traffic. However, **significant** noise effects are anticipated to remain in the long term at: Fordley Hall, Trust Farm, Dovehouse Farm, Doughty Wylie Crescent, Theberton Grange, Oakfield House, Hawthorn Cottages and Moat House.

9.1.42 SZC Co. will continue to seek measures to avoid or reduce these significant adverse effects. The **Noise Mitigation Scheme** will be made available for all properties, where the specified noise criteria are exceeded, this is provided in **Volume 2, Appendix 11H** of the **ES** (Doc Ref. 6.3). In doing so SZC Co.

will engage with stakeholders to further understand the affected receptors, their use and the benefit of the measures.

9.1.43 The Sizewell link road itself offers a range of local benefits including the safe movement of construction traffic towards the main development site without placing additional pressure on existing local roads. The proposed development would also make significant contributions to road capacity for the construction of the Sizewell C Project, and would reduce the environmental impacts from noise and vibration that the settlements of Yoxford, Theberton and Middleton Moor would otherwise experience given the high levels of HGV movements per day during the peak construction period.

9.1.44 The permanent Sizewell link road forms part of a project that has the potential to create a significant positive legacy for both Suffolk, and the UK.

#### f) Yoxford Roundabout and Other Highway Improvements

9.1.45 Highways improvements including the construction of a new roundabout to the northeast of Yoxford would help mitigate expected highways impacts resulting from the increase in traffic from construction vehicles and otherwise in relation to the Sizewell C Project.

9.1.46 Minor impacts are expected on footpaths and PRowS close to the sites, along with minor impacts on the setting of some nearby heritage assets as hedgerows and roadside foliage is to be altered as part of the works. Minor impacts may also occur on groundwater conditions.

9.1.47 There are predicted to be significant noise impacts on nearby receptors as some of the roads are close to residential properties, but the benefits of improved visibility, highways safety and traffic flow (which would be permanent, legacy benefits) are considered to outweigh these impacts. Noise mitigation measures are set out in, and would be secured by, the **CoCP** (Doc Ref 8.11). Noise impacts would be mitigated during the construction phase so that significant adverse effects on health and quality of life would be avoided. However, there are no significant adverse effects expected during the operational phase and no mitigation is therefore proposed for the operational phase.

9.1.48 There may also be moderate impacts on agricultural land and soils, particularly at the Yoxford Roundabout site as land is to be acquired to facilitate roundabout construction, but given the largely developed nature of the sites as highways and the low amount of agricultural land loss, it is considered that this impact can be mitigated. There may be moderate to minimal landscape impacts caused by the highways works, but as foliage

replenishes these impacts would be dissipated as the road network already forms an existing part of the landscape character in the various works locations.

- 9.1.49 No significant noise and vibration effects are expected from the construction of Yoxford roundabout and the proposed A12/A144 junction improvement works south of Bramfield. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11). In addition, further acoustic screening and working methods will be considered by the contractor, such as limiting noisy construction activities on Saturday afternoons. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.
- 9.1.50 Once the Yoxford roundabout works are complete, the modelling of road traffic noise for the two 2028 scenarios (during a typical day and a busiest day of main development site construction) and the 2034 scenario (operation of Sizewell C power station) demonstrated that in all scenarios no significant noise and vibration effects are expected to occur.
- 9.1.51 No significant effects are expected from the operational use of the proposed A12/A144 junction improvement works south of Bramfield and this was screened-out from the assessment.

#### g) Rail

- 9.1.52 The rail improvements form a key part of the management of freight and deliveries to the Sizewell C main development site, and also contribute towards the reduction of HGV vehicles traversing the local road network.
- 9.1.53 The rail improvements are considered to have a minor impact on groundwater conditions that would be mitigated through SuDS, and minor impacts on ecology that would be mitigated through habitat retention.
- 9.1.54 There are also significant impacts on the amenity users of nearby footpaths and PRowS that would have to be diverted for the duration of the rail works due to some routes bisecting the green rail route.
- 9.1.55 The proximity of a scheduled ancient monument at Leiston Abbey to the green rail route means that there could be a significant impact on this heritage asset, however, these impacts would be mitigated through commitments in the Section 106 agreement to provide for enhancements to the visitor



experience. There are not expected to be significant impacts on the other listed buildings at the Abbey.

- 9.1.56 The transport noise impact would be limited by the implementation of the green rail route. The green rail route would significantly reduce HGV movements and, therefore, reduce the scale of the transport noise effects. The route itself has been chosen on the basis that it would give rise to the least amount of impact on nearby residential properties in Leiston out of the route options that have been considered.
- 9.1.57 No significant noise and vibration effects are expected from the construction and removal and reinstatement of the rail proposals. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11), and further acoustic screening and working methods will be considered by the contractor. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.
- 9.1.58 To limit the potential noise effects of night-time train movements, no rail movements are proposed through Leiston at night to limit noise and vibration from the use of the Saxmundham to Leiston branch line. Furthermore, the use of continuously-welded rail and speed restrictions will be implemented to further minimise the potential noise and vibration effects.
- 9.1.59 Despite the mitigation, the following significant noise effects have been identified from the operational use of the rail route extension and the use of the East Suffolk line and Saxmundham to Leiston branch line:
- The use of the Saxmundham to Leiston branch line during the early construction years is expected to lead to significant noise effects at night at Kelsale Covert and Westhouse Crossing Cottage.
  - The use of the rail extension route and the Saxmundham to Leiston branch line in later construction years is expected to lead to significant noise effects at night at Kelsale Covert, Westhouse Crossing Cottage, Crossing Cottage and Crossing East.
  - Along the East Suffolk line, significant noise effects are expected at night a number of properties. Assuming that train operating procedures at Saxmundham junction are amended to avoid trains having to stop to change points, the number of properties that may require noise insulation is estimated at between 5 and 10. Additionally, a number of

properties near to the East Suffolk line will experience groundbourne noise impacts.

- 9.1.60 SZC Co. will develop a **Rail Noise Mitigation Strategy** in consultation with Network Rail and the rail freight operator to establish a package of measures to be implemented to mitigate noise impacts on the Saxmundham to Leiston branch line and the East Suffolk line. Examples of the types of measures that will be considered as part that document include the use of quieter locomotives and the use of track support systems on the branch line to reduce vibration
- 9.1.61 There would be major adverse impacts to the quality of agricultural land, soils and geology as a result of the proposals, given the loss of 22ha of agricultural land. However, the soil for these would be stored in bunds close to and within the site to enable restoration of the site once the use is no longer required. All impacts are moderated by the temporary nature of the green rail route.
- 9.1.62 The rail works provide the benefit of permanent improvements to the Saxmundham to Leiston branch line in the form of track replacement and multiple level crossings upgrade work, improving safety and the quality of journeys in the local area. The rail improvement works play a fundamental part in the sustainable transport of construction goods to the Sizewell C main development site.
- 9.1.63 The combined rail works offer the benefits of alleviating the level of HGV movements otherwise required to supply the main development site with construction material. The localised negative impacts caused have been effectively reduced and mitigated, and would be outweighed by the positive benefits derived from the sustainable approach to freight management, as required by NPS EN-1.

#### h) Summary

- 9.1.64 The planning assessments of the associated development proposals demonstrate that, when assessed against relevant policies and material considerations, the associated development proposals benefit from strong in principle policy support as associated development which is necessary to enable nationally significant infrastructure to be constructed and operated efficiently and sustainably. Careful site selection and scheme design, informed by close local engagement and consultation, has led to a series of bespoke developments which are acceptable in land use planning terms.
- 9.1.65 As explained in other supporting documents, including the **ES** and the appended **Site Selection Report**, it is established that the associated development proposals are fundamental to the delivery of the Sizewell C

Project, and would bring significant benefits by minimising transport impacts and maximising opportunities for freight and construction personnel to travel by sustainable modes of transport where possible. The locations of the individual associated development proposals have been selected as they are considered to be the most appropriate options based on preliminary environmental assessment and through a process of consultation.

9.1.66 The Sizewell C Project as a whole would, in common with any national infrastructure project, result in adverse effects to the environment and local community, including some which are **significant**. However, it is considered that these impacts (considered individually or collectively) would not outweigh the important nationally significant benefits of the provision of new safe and secure, low-carbon energy infrastructure alongside local benefits such as job creation, investment in the local economy and the provision of skills for the local workforce.

9.1.67 Each of the appendices to this **Planning Statement** concludes that the benefit of the individual associated development outweighs its mitigated adverse effects. It is also necessary, however, to consider the contribution which each of the associated development sites makes to the Sizewell C Project as a whole. In particular, the following points are directly relevant:

- Each associated development proposal performs an essential function in mitigating greater impacts that would arise if the land was not developed. The absence of park and ride sites, for instance, would cause either extensive fly-parking across the travel-to-work area or the need for unsustainable and unsatisfactory car travel through urban and rural areas to the Sizewell C main development site, which would inevitably need to be expanded to provide a larger car park (itself in open countryside).
- Similar considerations apply to the road and rail schemes. Not only would they provide essential infrastructure for freight delivery and the construction workforce but they would provide relief on the existing road network, limiting the number of HGV movements and taking them out of the villages of Farnham and Middleton Moor, for instance. The two village bypass and Sizewell link road would also provide a legacy benefit, reducing vehicular movements on the A12.
- Without the associated development proposals, there would be no Sizewell C Project. The impacts of the development would be substantially greater and the operational need to regulate freight deliveries and the movement of construction workers to the Sizewell C main development site could not be satisfied.

- 9.1.68 In accordance with the NPS, the associated developments have been sited and designed to try to avoid significant adverse impacts on the environment and human health. Where impacts cannot be avoided, mitigation measures are proposed to minimise the effects and, where possible, contributions would be made through the S106.
- 9.1.69 Temporary significant noise impacts are predicted on nearby receptors during the construction phase for some of the proposed highway improvements. Noise mitigation measures would be secured by the **CoCP** (Doc Ref 8.11) and the enduring benefits of improved visibility, highways safety and traffic flow are considered to outweigh these impacts. Furthermore, there are no significant adverse effects expected during the operational phase.
- 9.1.70 The proposed associated developments form part of a project that has the potential to create a **significant** positive legacy for both Suffolk and the UK and the collective impact of the associated development sites would not outweigh the **significant** benefit of the Sizewell C Project.

## 10 Requirements, Obligations and Securing Mitigation

### 10.1 Introduction

10.1.1 This section outlines how the mitigation measures identified in the **ES** and other application documents and assessments would be secured and provided.

10.1.2 The approach to mitigation is set out in **Volume 1, Chapter 6 (Methodology)** of the **ES** (Doc Ref. 6.2). It is explained that mitigation measures are those measures that are envisaged to prevent, reduce and, where relevant, offset any potential significant adverse effects of the proposed development.

10.1.3 The technical topic chapters of the ES categorise mitigation under three main headings:

- Primary mitigation. This is often referred to as ‘embedded mitigation’ and includes modifications to the location or design of the development made during the pre-application phase that are an inherent part of the Sizewell C Project, become a fundamental part of the design for which consent is sought, and do not require additional action to be taken.
- Secondary mitigation. This is often referred to as ‘additional mitigation’ and includes actions that would require further activity in order to achieve the anticipated outcome. These are detailed in the ES topic chapters or defined plans. They would be imposed as part of the development consent requirements by the Secretary of State or as a planning obligation entered into by SZC Co., if not secured through a separate permit, licence or consent.
- Tertiary mitigation. This is imposed as a result of legislative requirements and/or standard sectoral practices. For example, applying emission controls to an industrial stack to meet the requirements of the Industrial Emissions Directive (Directive 2010/75/EU); or measures contained within the **CoCP** (Doc Ref. 8.11).

10.1.4 There are two primary methods of securing the various mitigation measures:

- The Requirements set out at **Schedule 2** of the **draft DCO** (Doc Ref. 3.1); and
- as planning obligations under section 106 of the Town and Country Planning Act 1990 – also known as a ‘development consent obligation’. A

**draft Heads of Terms**, provided in **Appendix J** of this **Statement**, is submitted with the application.

10.1.5 A **Mitigation Route Map** (Doc Ref. 8.12) is also submitted with the Sizewell C DCO application, which sets out all of the mitigation identified in the ES as well as other non-environmental mitigation proposed by SZC Co., together with the relevant securing mechanism. This document does not form part of the DCO itself but is submitted to assist the decision maker and interested parties in understanding how the mitigation relied on by SZC Co. is secured by either of the two primary methods set out above.

10.1.6 The draft requirements and development consent obligations are summarised separately below.

## 10.2 Requirements

10.2.1 As permitted by section 120(1) of the Act, **Schedule 2** of the **draft DCO** (Doc Ref. 3.1) sets out all of the Requirements that SZC Co. must comply with during the construction, operation and maintenance phases of the Sizewell C Project. The Requirements set out a bespoke set of controls for the development proposed and are explained in the **Explanatory Memorandum** (Doc. Ref. 3.2).

10.2.2 The Requirements would control the way in which the Sizewell C Project is brought forward, and the various types of mitigation would be delivered by:

- Requiring the authorised development to come forward in accordance with the approved details and parameters which place controls on the location of buildings, structures and works (i.e. they can only be located in a defined zone), as well as defining maximum and minimum dimensions (such as heights) for certain elements of the authorised development.
- Requiring construction, operation and maintenance to be undertaken in accordance with the specified documents, such as the **Code of Construction Practice** (Doc Ref. 8.11), or the **Lighting Management Plan**, provided in **Appendix 2B** of **Volume 2** of the **ES** (Doc Ref. 6.3).
- Controlling identified issues or works (e.g. time limit around commencement of the Sizewell C Project).

10.2.3 The Requirements identify the relevant discharging authority depending on the type and location of the works and the nature of the Requirement. Suffolk County Council are identified as the relevant planning authority for matters

relating to highways, with East Suffolk Council identified for the remaining requirements where a subsequent approval may be necessary for onshore works. The Marine Management Organisation is the discharging authority in respect of land seaward of the MHWS and the marine works.

### 10.3 Planning Obligations

10.3.1 A number of mitigation measures are to be secured through a planning obligation under section 106 of the Town and Country Planning Act 1990 in order to make the development acceptable in planning terms. These have been informed through discussions with stakeholders in focus groups and one-to-one sessions through the stakeholder engagement process.

10.3.2 The **draft Heads of Terms**, provided in **Appendix J** of this **Statement**, is included in the Application and sets out the obligations that SZC Co. considers appropriate in the context of the proposals presented in this Application, the impact assessments which have been carried out, and the discussions that have been undertaken with stakeholders prior to the submission of the application.

10.3.3 SZC Co. expects that the obligations will be secured in a bilateral agreement but if that is not possible then they will be secured by a unilateral undertaking.

10.3.4 The obligations that SZC Co. considers appropriate in the context of the Sizewell C Project are set out below.

10.3.5 Monitory sums for a number of the proposed funds and contribution levels haven't yet been defined. However, it is intended that these will be discussed further with the relevant statutory authorities as part of the process of agreeing Statements of Common Grounds in advance of the commencement of the examination.

#### a) Accommodation and Housing

10.3.6 As set out at Section 7.2 above, SZC Co. would make available a **Housing Fund** to assist ESC to:

- Pre-empt and mitigate against any potential adverse effects on the local housing market arising from the temporary inflow of construction workers and their demand for accommodation.
- Boost the supply of accommodation, including affordable housing, in the local area.

- Provide support for the provision of housing services to local residents who need access.
- 10.3.7 Part of the Housing Fund would be set aside to support the supply, capacity and resilience of the tourist accommodation sector and latent accommodation. Another part of the Housing Fund would be provided as a reactive contingency which ESC could draw upon to mitigate any potential effects of the construction workforce on homeless presentations.
- 10.3.8 The Section 106 Agreement will include the mechanisms, governance, and scale of the Housing Fund as well as the suite of management measures with the potential to be funded.
- 10.3.9 SZC Co. would establish an **Accommodation Management System** and undertake regular workforce surveys to monitor information related to the accommodation of the Sizewell C Project construction workforce and to provide information to workers, contractors and accommodation providers.
- 10.3.10 SZC Co. would establish a **Socio-economic Advisory Group** which would monitor accommodation and other information. The Section 106 Agreement will include the governance of the **Socio-economic Advisory Group**.

**b) Community Safety**

- 10.3.11 SZC Co. would establish a **Community Safety Working Group** which would have an ongoing role as a key stakeholder in relation to matters contained in the **Community Safety Management Plan (CSMP)** (Doc Ref. 8.16) by delivering objectives, monitoring impacts, addressing community safety issues and making recommendations. Through the Community Safety Working Group, SZC Co. would explore opportunities to work in partnership with local community safety stakeholders.
- 10.3.12 SZC Co. would implement measures set out in the **Community Safety Management Plan (CSMP)** (Doc Ref. 8.16) where relevant.
- 10.3.13 SZC Co. would contribute towards additional resourcing where necessary for Suffolk Constabulary, Suffolk Fire and Rescue, and the East of England Ambulance Trust. These contributions would include funding towards site familiarisation and ensuring an agreed level of support to the community is met.
- 10.3.14 SZC Co. would also provide financial contributions towards additional resourcing where necessary to third sector organisations involved in providing community safety services, such as the Royal National Lifeboat Institution and the Kent, Surrey & Sussex Air Ambulance Trust.



### c) Employment, Skills and Education

- 10.3.15 SZC would implement an **Employment, Skills and Education Strategy**, as provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9), which would secure a package of employment and skills measures to enable local people to enter or re-enter the labour market.
- 10.3.16 SZC Co. would fund a Regional Skills Coordinator post to provide a focal point of coordination and skills planning between project and providers.
- 10.3.17 SZC Co. would provide an **Asset Skills Enhancement and Capability Fund** to fund skills initiatives by delivering outreach services through partnerships with voluntary and community organisations in the region and by enhancing the skills and training provisions within the region’s existing further education and higher education sectors.
- 10.3.18 The Section 106 Agreement will include the governance, scale and application of the Asset Skills Enhancement and Capability Fund.
- 10.3.19 SZC Co. would establish a **Sizewell C Jobs Service** to maximise local employment whilst catering for regional and national recruitment for key sector and roles.
- 10.3.20 SZC Co. would establish a Bursary Scheme to support the creation of alternative employment pathways into the Sizewell C Project for people in rural Leiston, Lowestoft, Great Yarmouth and Ipswich that haven’t reached the required entry level requirements.

### d) Health

- 10.3.21 SZC Co. would make a residual Healthcare Planning Contribution to a Health Task and Finish Group which would be suitable to mitigate the effects of the additional population from non-home-based workers and their dependents on the local NHS Services for the time that such public funding takes to adjust.
- 10.3.22 SZC Co would provide Sizewell Health, an on-site, 24/7. comprehensive occupational health service, to workers on the construction of the Sizewell C Project. Sizewell Health would proactively manage the health of the workforce as well as treating and advising workers who have accidents or are taken ill at work.
- 10.3.23 A Sizewell C Health Working Group would be formed to monitor specific health metrics and allocate the Healthcare Planning Contribution

appropriately. SZC Co. would report on the effectiveness of Sizewell Health to the Sizewell C Health Working Group.

e) Heritage

- 10.3.24 SZC Co. would contribute to localised enhancements to the heritage assets at the two Leiston Abbey sites and enhancing the historic interest of these assets through visitor experience as well as enhancements to the heritage assets themselves.
- 10.3.25 SZC Co. will undertake repairs of the barn at Upper Abbey Farm and works within the wider farmyard during the construction period to make good historic elements of the structure and replace modern additions and repairs in order to conserve and enhance the historic significance of the asset and mitigate for the change to setting arising from the construction of the Sizewell C Project.

f) Implementation Plan

- 10.3.26 The assessment presented in the **Environmental Statement** has been undertaken against the indicative construction programme, which identifies the key phases and activities, which are detailed in the description of construction works set out in Volume 2, Chapter 3 and the construction chapters for each of the proposed off-site associated developments. The indicative construction programme provides a set of consistent assumptions against which the impacts of the Sizewell C Project can be assessed.
- 10.3.27 The indicative programme sets out that construction of the associated development sites would be undertaken early in the construction programme. There will be a period in the early years of construction of the main development when offsite associated developments are not available. This early year phase is necessary in order to allow the Sizewell C Project to proceed without delay. The Implementation Plan provides assurance that the associated development will be developed as soon as practicable. The early years' period has been assessed and lower HGV limits have been set for the period before the highway improvements are available for use. This ensures that the impacts during this initial stage are minimised.
- 10.3.28 The scale and complexity of the Sizewell C Project means there is the potential for variation in the construction programme. On a project of this scale and complexity, a number of factors could arise which would alter the dates or timescales indicatively shown in the programme. The potential implications of changes in timescales and the intensity of activity have been considered in the assessment of effects but, subject to these, the conclusions of the **ES** would not be significantly affected by variations in the construction

programme. Controls and limitations are proposed on the nature of construction activity, with the consequence that the principal effect of any changes to the construction assumptions would be a prolonged construction period (i.e. the effects which are identified and assessed in the **ES** would last for longer, but they would be effects of the same nature and impact).

- 10.3.29 Where duration is important to the significance of an effect, this is identified within the relevant topic chapters of the ES, along with the significance of any prolonged impact. In relation to the nature of the construction impacts, the principal effects of construction activity are regulated and limited by a series of requirements set out in Schedule 2 of the **Draft DCO** (Doc Ref. 3.1) and obligations set out in the **Draft S106 Heads of Terms** (Doc Ref. 8.04). These include a requirement obliging the construction activity to be undertaken in accordance with the **CoCP** (Doc Ref. 8.11), which includes construction management measures to limit impacts on noise and air quality. HGV movements are then also capped, as described within the **CTMP** (Doc Ref. 8.7). The sequencing of construction stage mitigation is secured by a requirement included in Schedule 2 of the **Draft DCO** (Doc Ref. 3.1) that requires the development to be constructed in general accordance with the Construction Method Statement.
- 10.3.30 The **Implementation Plan** has been produced to complement the controls set out above and explain the delivery of the key environmental mitigation measures, including the accommodation campus and highways improvements works, and the proposed sequence in which these mitigation measures would be delivered in accordance with the Requirements and/or S106 obligations.
- 10.3.31 A further obligation which would be included in the Section 106 Agreement would require the Undertaker to use reasonable endeavours to implement the key environmental mitigation measures set out in the Implementation Plan, in accordance with the timescales indicated in the Indicative Phasing Schedule. Further detail is provided in the **Implementation Plan**, provided in **Appendix I** of this **Statement**.
- 10.3.32 For these reasons, the principal construction impacts can be anticipated and assessed with confidence.

g) **Leisure**

- 10.3.33 SZC Co. would construct or provide a contribution to fund the construction of two multi-use games areas in Leiston. These sports facilities would be managed by ESC. The funding would include a contribution for the maintenance of the pitches and provision of a sinking fund during the

construction phase when the facilities would be used by the Sizewell C construction workforce.

- 10.3.34 SZC Co. would provide a public rights of way fund to enhance the existing rights of way network in the vicinity of the proposed development. This fund would be available to support physical improvements to the network as well as other measures such as legal upgrades or implementing a communication strategy.

**h) Monitoring (Workforce and Socio-economic Impacts)**

- 10.3.35 SZC Co. would undertake monitoring of the impacts of the Sizewell C Project on the local community, including workforce surveys and any other monitoring as may be agreed between SZC Co. and the Socio-economic Advisory Group.
- 10.3.36 A number of sub-groups, such as the Community Safety Working Group and Sizewell C Health Working Group, would be responsible for monitoring effects related to their area of expertise.

**i) Natural Environment**

- 10.3.37 SZC Co. would provide a **Sizewell C AONB Fund** to support measures to mitigate impacts in the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast by enhancing the landscape as well as addressing amenity and accessibility impacts.
- 10.3.38 Contingent funds would be committed to ensure the establishment of Fen Meadow habitat and to address recreational displacement impacts on protected sites.
- 10.3.39 SZC Co. would provide the temporary marsh harrier habitat improvement area, if required.

**j) Noise Mitigation Scheme**

- 10.3.40 SZC Co. would implement a **Noise Mitigation Scheme**. This Noise Mitigation Scheme would offer funding for noise insulation where specified noise criteria are met and for short term, temporary re-housing to enable local residents to avoid particular peaks in construction activity.
- 10.3.41 The Section 106 Agreement would include the eligibility criteria which will apply to the Noise Mitigation Strategy.

#### k) Property Price Support Scheme

10.3.42 SZC Co. has launched a Property Price Support Scheme for certain residential properties immediately adjacent to the proposed development sites. Where an eligible property within the scheme boundary sells at a value which has been reduced as a consequence of the construction of Sizewell C, SZC Co. will offer the owner the difference in value, as determined by a surveyor.

#### l) Public Services

10.3.43 SZC Co. would make available a Public Services Contingency Fund to SCC to mitigate any unexpected effects on statutory services, including school places and social care.

#### m) Resilience Funds

10.3.44 SZC Co. will provide a Pro Corda resilience fund to the Pro Corda Music School at Leiston Abbey. This resilience fund would be available to support the Pro Corda Music School in mitigating impacts and addressing risks of the Sizewell C Project, including noise impacts, such as through a bespoke noise assessment, and reducing the risk of perceived changes in visitor behaviour from materialising through, for example, provision of information and promotion of courses and events.

10.3.45 SZC Co. would provide a RSPB Minsmere resilience fund to mitigate significant impacts and address risks caused by the Sizewell C Project, for example such as increased use by workers or visitors and potential visitor displacement as a result of the Sizewell C Project.

10.3.46 SZC Co. would provide a National Trust Dunwich Heath and Coastguard Cottages resilience fund to mitigate for significant impacts and address risks caused by the Sizewell C Project, for example such as increased use by workers or visitors as a result of the Sizewell C Project.

#### n) Sizewell C Community Fund

10.3.47 SZC Co. would make available a Community Fund. SZC Co. proposes that the Community Fund would be administered on behalf of the community by the Suffolk community Foundation and that its purpose would be to fund local projects or activities supported by the community which would add to the quality of life in the local area.

10.3.48 The Community Fund would be available to be spent on measures which the community consider could enhance the quality of life in the local area. These

measures do not directly mitigate specific impacts identified by the environmental impact assessment carried out in relation to the Sizewell C Project, but they would collectively help to offset residual harm to local quality of life, so far as reasonably possible. The Section 106 Agreement will include the scale, scope and application of the Community Fund.

10.3.49 A detailed summary of the Community Fund is provided at **Section 10.5** below.

o) **Supply Chain**

10.3.50 SZC Co. would support local and regional supply chain engagement through the implementation of a **Supply Chain Strategy** as provided in **Appendix B** of the **Economic Statement** (Doc Ref. 8.9), to enable the region to capture economic benefits generated by the goods and services needed for the delivery of the Sizewell C Project.

10.3.51 SZC Co. would monitor and report on local and regional levels of engagement to inform ongoing reviews of the **Supply Chain Strategy**, provided in **Appendix B** of the **Economic Statement** (Doc Ref. 8.9).

p) **Tourism**

10.3.52 SZC Co. would make available a **Tourism Fund**. The Tourism Fund would be available to deliver initiatives such as:

- Development of or support for a Tourism strategy/action plan.
- Marketing and promotion activities for the Suffolk coast and specific attractions and events within it, which can demonstrate a strong return on investment.
- Supporting local projects including capital and revenue investment.
- Undertaking future visitor surveys.
- Providing information about public transport and travel.
- Supporting existing tourist information centres.
- Responding to effects on particularly sensitive attractions/locations within the AONB.

10.3.53 The Section 106 Agreement will include the governance, scale and application of the Tourism Fund.

q) Transport

10.3.54 SZC Co. would implement the **Construction Workforce Travel Plan (CWTP)** (Doc Ref. 8.8) and **Construction Transport Management Plan (CTMP)** (Doc Ref. 8.7) to manage and monitor the freight traffic and construction workforce movements during the construction of Sizewell C. In addition, SZC Co. would prepare and implement an Operational Travel Plan to manage and monitor movements to the Sizewell C main development site during operation.

10.3.55 A **Transport Review Group (TRG)** would be established with members taken from the key transport stakeholders and SZC Co. The TRG would meet on a quarterly basis, unless the TRG decides to meet at a different frequency. The TRG would be able to delegate issues or functions to a sub-group if it decides to. The Section 106 Agreement will include the governance, scope and authority of the TRG.

10.3.56 SZC Co. would produce a monitoring report every six months from the commencement of construction to inform the TRG discussions and decisions, unless otherwise agreed by the TRG.

10.3.57 SZC Co. would submit proposals for the establishment of local transport and traffic groups to form key links between the TRG and the wider community. The proposals would include details of the formation, terms of reference, and membership of these local transport and traffic groups. SZC Co. will provide copies of the meetings of any local transport and traffic group to the TRG.

10.3.58 A **Transport Contingency Fund** would be made available to the TRG to be used if necessary for implementing further mitigation measures and remedial actions to address requirements in the CTMP.

10.3.59 SZC Co. would appoint a Transport Coordinator during construction of the Sizewell C Project. The Transport Coordinator would be responsible for the management, development and implementation of the **CWTP** (Doc Ref. 8.8), **TIMP** (Doc Ref. 8.6) and **CTMP** (Doc Ref. 8.7).

10.3.60 SZC Co. would appoint a Delivery Coordinator during construction of the Sizewell C Project. The Delivery Coordinator would be responsible for approving bookings for heavy goods vehicle deliveries in accordance with the **CTMP** (Doc Ref. 8.7).

- 10.3.61 SZC Co. would provide a Wickham Market transport contribution to fund pedestrian, cycle, and public realm improvements at Wickham Market to mitigate impacts on driver and passenger delay.
- 10.3.62 A contribution is also proposed towards traffic management, pedestrian and road safety measures in Leiston town centre.
- 10.3.63 SZC Co. would undertake a highways condition survey of the B1122 prior to commencement of construction and provide a B1122 maintenance fund which would be available for the maintenance of the B1122 prior to the completion of the Sizewell link road.
- 10.3.64 SZC Co. would implement or provide a contribution to fund B1078 transport safety measures, including at A140/B1078 Junction and at B1078/B1079 Junction.
- 10.3.65 SZC Co. would also commit monies to a **Cycle Connectivity Fund** to enhance sustainable travel options in the vicinity of the SZC Project.
- 10.3.66 SZC Co. would carry out an abnormal load route assessment prior to construction and submit a report setting out the estimated number of abnormal load deliveries by road and the preferred abnormal indivisible load routes to SCC and Highways England for approval. A copy of the report would also be sent to the Suffolk Constabulary.
- 10.3.67 SZC Co. would establish a traffic management and monitoring system prior to commencement of construction in order to monitor HGVs routing to the main development site. Details of this traffic management and monitoring system would be submitted to the SCC and Highways England for approval prior to commencement of construction.

## 10.4 Summary

- 10.4.1 This chapter has set out how the mitigation identified in the ES and other assessments would be secured and provided through the DCO Requirements and the use of planning obligations.
- 10.4.2 The DCO Requirements provide that SZC Co. would comply with a number of plans and strategies, which establish the framework for the construction, operation and maintenance of the Sizewell C Project, and would be certified by the Secretary of State upon grant of the DCO.
- 10.4.3 In addition to the approved plans and strategies, SZC Co. has identified additional commitments in other strategies that will be secured through planning obligations, as summarised in this section.



10.4.4 The **Mitigation Route Map** (Doc Ref. 8.12) sets out all of the mitigation identified in the ES as well as other non-environmental mitigation proposed by SZC Co., together with its securing mechanism.

## 10.5 Community Fund

10.5.1 As set out above, a Community Fund is proposed as part of the DCO **Section 106** obligations. SZC Co. proposes that the Community Fund would be administered on behalf of the community by the Suffolk Community Foundation and that its purpose would be to fund local projects or activities supported by the community which would add to the quality of life in the local area.

10.5.2 SZC Co.'s purpose in proposing the Community Fund is as follows:

- SZC Co. recognises that the construction of Sizewell C over an extended period would have a wide range of effects in the local area, including negative effects.
- As far as practicable, SZC Co.'s environmental and other assessments have sought to identify the significant impacts of the proposal, in response to which a number of commitments and obligations are proposed to limit, mitigate and off-set those effects. Where direct or in-direct effects can be identified, mitigation has been tailored to address those effects.
- Nevertheless, even with that mitigation in place, SZC Co. recognises that there would be other intangible impacts on the general quality of life locally from the presence of such a major construction project, bringing such significant change to the local area.
- Those intangible impacts are hard to define but SZC Co. does not dispute that there would be residual effects on the quality of life locally. For example, whilst many people react differently to changes in circumstances, it is likely that some people in the local area would sense or recognise a change in their local area through the extended period of construction activity, which may affect the way they feel about the quality of life experienced by them and by their communities. Residents of communities such as Eastbridge, Theberton, or Leiston are likely to be relevant in this context.
- Where those matters arise from standard headings in the assessments submitted with the DCO application, they are addressed in the application as best they can be. However, quality of life can be affected by other wide-

ranging considerations. For example, the Government’s ‘Measures of National Wellbeing Dashboard’ (Ref. 1.67) lists a number of potentially relevant measures, including:

- sense of safety / feeling safe;
  - access to the natural environment;
  - belonging to a neighbourhood;
  - anxiety; and
  - happiness.
- Potentially, the prolonged construction of Sizewell C with its attendant increased levels of traffic, activity and non-local construction workers could affect the way in which some people locally measure their quality of life in these less tangible and measurable terms.
  - Because of the intangible nature of those effects, a fund which seeks to provide compensatory enhancements to the local quality of life appears to be a fair, reasonable and proportionate response, consistent with SZC Co.’s vision to limit the effects of Sizewell C on local communities as far as is reasonably practical.

10.5.3 The Community Fund would be available to be spent on measures which the community consider could enhance the quality of life in the local area. A similar fund related to Hinkley Point C, for example, is being used to fund a wide range of measures such as the repair of community facilities, the sponsorship of community activities or the running of community events. These measures do not directly mitigate specific impacts identified by the environmental impact assessment carried out in relation to the Hinkley Point C proposals, but they do collectively help to offset residual harm to local quality of life, so far as reasonably possible.

10.5.4 The size of the Community Fund and the detailed arrangements for its administration are not yet finalised but SZC Co. will seek to agree the size of the fund with key stakeholders. The intention, however, is that the Fund would be sized having regard to SZC Co.’s understanding of the nature and scale of residual impacts which may arise in the local area once all other mitigation and compensation commitments are taken into account.

10.5.5 SZC Co. is aware that there has been recent case law in relation to whether or not funds of this general type can be material planning considerations and that care has to be taken in considering what weight if any might be attached to a community fund by the decision maker. In this case, SZC Co. does

consider the proposed Community Fund to be a material planning consideration to be taken into account, principally because:

- it relates directly to the character and use of the land – in this case the use of the land over an extended period to construct Sizewell C;
- SZC Co. recognises that such activity can give rise to effects on community quality of life and wellbeing which cannot be directly mitigated but which are, nevertheless, material in planning terms;
- the terms of the Fund will be closely prescribed so that it may only be spent on measures which are judged (i.e. by the community) to be likely to enhance local quality of life and community wellbeing; and
- therefore, the Fund should help to address (by way of compensation) the residual effects in a way that fairly and reasonably relates to the proposed development.

10.5.6 If the decision maker does conclude that the Community Fund is a material consideration in this case, SZC Co. recognises that it is entirely a matter for the decision maker to determine what weight if any may be attached to it. Even if no weight is to be attached, however, SZC Co. is committed to offer the Community Fund because it considers it to be a fair and reasonable response to the effects of the construction of the Sizewell C Project locally.

10.5.7 As mentioned, a similar Community Fund was offered as part of the Hinkley Point C DCO proposals and committed to within the Section 106 Obligations. That fund was considered by the Examining Authority (the ExA) in that case and there are three references to it within the ExA's report to the Secretary of State (Ref 1.68), as follows:

- Under the heading 'General Mitigation for the Parish of Stogursey', the ExA stated:

*"There is no doubt in our minds that the host parish of Stogursey would be on the 'front line' in terms of the effects stemming from the proposal. In addition to the specific mitigation measures discussed above, Schedule 2 of the s106 Agreement contains a provision for a Community Fund of £12.8m to be set up to provide funding for works to mitigate 'the intangible and residual impacts of the project on the communities in the area of benefit (which includes the parish of Stogursey) through schemes measures and*

*projects which promote the economic, social or environmental well being of those communities and enhance their quality of life.”*

- The ExA also recognised that there could be a range of impacts arising from the construction of the Sizewell C Project on the town of Bridgwater (paragraphs 4.359-4.364) and, in their report, the ExA added a footnote to those paragraphs to explain:

*“The wider issue of intangible and residual impacts occurring in the area affected by the proposal is recognised by the Section 106 obligation to set up a “Community Fund” to mitigate such impacts through schemes, measures and projects which promote the economic, social or environmental well-being of the effected communities. The sum committed to by the Section 106 Agreement totals £12.8 million. As we understand it, the funding would be available for schemes, measures and projects within Bridgwater as well as elsewhere in Somerset (subject of course to more specific funding not also being available to mitigate the impact in question)”.*

- In response to concerns expressed at the examination that the fund was “derisory” or that the arrangements for it to be administered by a 12-member panel would be inappropriate, the ExA stated: “*We do not consider the size of the proposed Community Fund, or the proposed machinery for its administration, to be inadequate*” (paragraph 8.201).

10.5.8 In reaching its overall conclusions on the acceptability of the application at Hinkley Point C, however, no explicit reference was made to the Community Fund.

10.5.9 Whilst that was the position at Hinkley Point C, it will be for the ExA and the Secretary of State in this case to determine the weight if any to be attached to the Community Fund for the Sizewell C Project.



## 11 Planning Balance and Conclusions

- 11.1.1 NPS EN-1 and NPS EN-6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025. Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025. The Government Response (July 2018) confirms that *“sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered appropriate sites and retain strong Government support during the designation of the new NPS”*.
- 11.1.2 In accordance with the terms of the 2017 Ministerial Statement, significant weight should still be given to the policy in NPS EN-1 and EN-6 *“where there is no relevant change of circumstances.”* As explained in detail in **Section 3** of this **Statement**, there is no relevant change of circumstances which would cause anything other than significant weight to continue to be given to government policy in NPS EN-1 and EN-6.
- 11.1.3 The principle of the need for new nuclear power stations, and that this need is urgent, is firmly established in NPS EN-1 and NPS EN-6. In accordance NPS EN-1, substantial weight should be given to the contribution which projects would make towards satisfying this need. In addition, the UK Government have concluded that Sizewell C is potentially suitable for the deployment of a new nuclear power station.
- 11.1.4 It is considered that, on this basis, the Sizewell C DCO application for the Sizewell C Project benefits from up to date, authoritative policy support, even though the NPSs do not strictly ‘have effect’. Not only does national policy establish an urgent need for new, low carbon energy generation, it specifically identifies Sizewell C as potentially suitable to meet that need. The Ministerial Statement confirms the strength of the Government’s continued support.
- 11.1.5 The development of Sizewell C is in the national interest and national policy requires that substantial weight is to be given to the need for its development. Alternative energy sources and alternative sites were considered by Government in developing national policy and do not need to be considered again in the determination of this application.
- 11.1.6 Given the level and urgency of need, paragraph 4.1.2 of NPS EN-1 states that the decision maker should *“start with a presumption in favour of granting consent to applications for energy NSIPs”*. Whilst the policy presumption does not formally have effect where the decision falls to be made under

Section 105 of Act, it nevertheless constitutes an important and relevant consideration weighing in favour of granting development consent because it reflects the Government's underlying assessments of need, impacts and alternatives, all of which remain directly relevant to the application.

- 11.1.7 In accordance with paragraph 4.1.3 of NPS EN-1, in making a determination of the DCO application, the decision maker should take into account:
- the potential benefits, including in addition to its contribution to meeting the need for energy, its contribution to job creation and any long term or wider benefits; and
  - the potential adverse impacts, including any long term and cumulative adverse impacts as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 11.1.8 **Sections 7, 8 and 9** of this **Planning Statement** consider relevant national and local planning policies within the overarching context of NPS EN-1 and NPS EN-6. They demonstrate that, when assessed against these relevant policies and material considerations, the Sizewell C Project benefits from strong policy support and is acceptable in land use planning terms.
- 11.1.9 The contribution that the Sizewell C Project would make to meet the national need for low carbon, secure and reliable energy is substantial and should be given considerable weight. When operational, the new power station would help to bring a stable supply of low-carbon electricity to the UK.
- 11.1.10 To enhance the overarching national benefit of delivering a new power station, SZC Co. has worked closely with stakeholders in the region to develop economic strategies with a range of measures that combine to create an environment in which education, skills and workforce development can flourish, to the benefit of both the Sizewell C Project and the region.
- 11.1.11 The total value of the Sizewell C Project is estimated at £20bn. It is anticipated that, if similar activities and local supply chain recruitment are achieved at Sizewell C as Hinkley Point C, there could be a local retention of in excess of £1.5bn over the construction period, equivalent to an average of £125m per year.
- 11.1.12 The construction stage would lead to a boost to the local economy, equating to £2.5bn over the course of the construction and supporting over 40,000 person-years of construction employment. Total for wages over the construction process could be around £2.6bn and, at the peak of construction, a third of employment (2,600 roles) are expected to be filled by

existing local residents. If proportions are similar to Sizewell B, up to 480 of these roles would be filled by people who were formerly unemployed or previously inactive workers.

- 11.1.13 The operational phase would provide a long-term boost to the economy. The operational phase is expected to boost GDP by around £225m per year and support approximately 900 permanent jobs with associated wages of £44.5m per year, and an additional approximately 1,000 workers during maintenance and refuelling outages, which would last for up to two months and occur approximately every 18 months for each reactor. Further, multiplier effects across the UK for nuclear power suggests an additional local indirect employment of around 60% of direct employment, representing a further 360 jobs as an indirect result of the Sizewell C Project.
- 11.1.14 SZC Co. would also provide support for housing in the local area by the establishment of a Housing Fund to address potential adverse effects on local accommodation markets and sectors.
- 11.1.15 In addition to the delivery of the power station, which is of national significance, the Sizewell C Project would result in separate local and regional infrastructure benefits through the delivery of the upgrades to the Saxmundham to Leiston branch rail line, the two village bypass, the Sizewell link road and a series of road safety improvement schemes which would address existing accident issues at junctions on the local highway network. A series of enhancements to facilities for pedestrians, cyclists and equestrians are also proposed to benefit existing users as well as new ones. The infrastructure investment and package of road safety improvements put forward would not only benefit the proposed Sizewell C Project but would also provide a lasting legacy to residents of the surrounding towns and villages.
- 11.1.16 SZC Co. is committed to take all reasonable steps to limit the adverse environmental effects of the Sizewell C Project. Mitigation and good practice measures are proposed in order to avoid, reduce or compensate for adverse impacts wherever possible.
- 11.1.17 The development of Sizewell C Project and delivery of necessary mitigation would be controlled through:
- Identifying parameters within which certain works can be located and constructed.



- Requiring construction and operation to be undertaken in accordance with plans and strategies which set out commitments identified in the **Environmental Statement** and other assessments.
- Other controls secured through the development consent.
- Planning obligations, which require SZC Co. to provide either a financial contribution towards the provision of mitigation or to secure the provision of certain services or works.

11.1.18 Even with mitigation in place the Sizewell C Project is, however, likely to result in some residual adverse effects, as would be expected with any nationally significant infrastructure and as anticipated in the NPSs. These effects do not outweigh the significant local, regional and national benefits.

11.1.19 This **Planning Statement** provides an assessment of these potential adverse effects for the Sizewell C Project. This analysis follows the assessment principles and generic and nuclear considerations in NPS EN-1 and NPS EN-6, and national and local policy where relevant. It demonstrates that the proposed development would not cause any potential adverse effects that, considered individually, cumulatively or as a whole, are so severe that the decision maker should refuse the application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies.

11.1.20 It is therefore concluded that the benefits of the scheme, particularly the delivery of new nuclear power generating capacity, are overwhelmingly greater than the residual adverse effects. There is a clear and compelling case in favour of the DCO being made.

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