



The Sizewell C Project

8.4 Planning Statement Appendix 8.4B Northern Park and Ride Planning Statement

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APPENDIX 8.4B: NORTHERN PARK AND RIDE PLANNING STATEMENT

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None provided.

1 Introduction

1.1 Overview

1.1.1 The nature of the Sizewell C Project requires a number of associated developments to facilitate the construction of the new nuclear power station, Sizewell C, and to mitigate potential environmental impacts associated with the Sizewell C Project.

1.1.2 Two park and ride facilities are proposed along to A12, one to the north and one to the south of the main development site. This statement sets out the case for the northern park and ride at Darsham, and considers the site-specific planning issues relevant to this associated development. Overarching planning merits/issues, such as the justification of the transport strategy as a whole, are considered within the **Planning Statement** (Doc Ref. 8.4) for the Sizewell C main development site, the **Site Selection Report** which is appended to the **Planning Statement**, the **Transport Assessment** (Doc Ref. 8.5), and other documents accompanying the application for development consent.

1.2 Planning statement structure

1.2.1 The remainder of this statement is structured as follows:

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

2 Site and surroundings

2.1 Site location

2.1.1 The site is approximately 27.9 hectares (ha) in size, and is located to the west of the village of Darsham and the A12, to east of the East Suffolk railway line, and to the north of Darsham railway station (Ordnance Survey (OS) grid reference: TM404697), as seen in **Figure 1.1** of **Volume 3, Chapter 1** of the **Environmental Statement (ES)** (Doc Ref. 6.4). The site is approximately 6 kilometres (km) to the north-west of the Sizewell C main development site. The site predominately comprises agricultural land, and also includes highway land on the eastern side of the site along the A12.

2.1.2 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 of the site.

2.1.3 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.

2.1.4 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.

2.1.5 The proposed development, including the development site boundary, is provided on the **Northern Park and Ride Plans** (Doc Ref. 2.6).

2.2 Planning and environmental designations

2.2.1 The site is not allocated for a specific use within the Suffolk Coastal Local Plan (Ref. 1.1).

2.2.2 There are no designated heritage assets within the site boundary. The nearest heritage assets to the site are the Grade II listed Oak Hall, which lies

60 metres (m) to the north of the site boundary, and the Grade II listed Old Hall, which lies 550m to the east of the site boundary.

- 2.2.3** The site is within Flood Zone 1, and therefore has a low risk of flooding from tidal or fluvial sources. Risk associated groundwater, sewer and reservoir flooding at the site are also considered to be low. The Environment Agency’s long-term flood risk mapping (Ref. 1.2) shows the majority of the site is also at a very low risk of flooding from surface water. However, a 0.3ha strip of land along the south-western edge of the site and the north-eastern tip of the site are at high risk of surface water flooding.
- 2.2.4** The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 4km to the south-west of the site.
- 2.2.5** In terms of ecological designations, Dew’s Ponds, a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), is located 1.7km to the north-west of the site and Minsmere to Walberswick Heaths and Marshes, a SAC, Special Protection Area (SPA), Ramsar site, and SSSI, is 3.2km to the east. Potton Hall Fields SSSI is 4.1km to the east.
- 2.2.6** The site is within the ‘ancient estate claylands’ landscape character type, as identified in the Suffolk Landscape Character Assessment (Ref. 1.3). This is an ancient wooded landscaper of arable farms, associated with low lying valley floors and undulating glacial plateaus.
- 2.2.7** The site is characteristic of National Character Area 83 (NCA83): South Norfolk and High Suffolk Claylands. NCA83 covers a large area of central East Anglia, and is predominately flat clay plateau incised by numerous small-scale wooded river valleys.

2.3 Planning history

- 2.3.1** There is no relevant planning history on the site.
- 2.3.2** Adjacent to the site on the eastern side of the A12, a planning application for the erection of an 82 bedroom hotel, car parking and associated works was granted in May 2014 (DC/14/0420/OUT), and applications have been submitted in relation to reserved matters and to discharge conditions. This would be located to the east of the site, on land between Station Garage and Railway Cottage. Construction of the hotel has not yet begun.

3 Proposal

3.1 Overview

3.1.1 This section provides an overview of the proposed park and ride facility and its proposed access.

3.1.2 The northern park and ride at Darsham 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 10 spaces for minibuses/vans/buses.
- Up to 80 motorcycle parking spaces.
- Cycle shelters for up to 20 bicycles.
- Bus terminus area, including shelters.
- 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.
- A smoking shelter.
- Two landscape bunds and additional planting.
- Up to three infiltration basins, an existing pond and nine swales forming part of the Sustainable Drainage System (SuDS).
- A temporary three arm roundabout on the A12, situated approximately 125 metres (m) to the north of the existing Willow Marsh Lane junction, to access the site.
- Realignment of the A12 via the temporary roundabout.
- A section of Willow Marsh Lane will be closed for vehicular traffic from the A12 but retained for use by non-motorised users and as a private vehicular access for White House Farm. A dropped kerb would be provided where Willow Marsh Lane meets the A12 to facilitate access for cycles and pedestrians only.

- An access road will run from the new roundabout through the centre of the site to the car parking areas and proposed buildings.
- Provision of a separate agricultural track, on the west side of the proposed roundabout, north of Willow Marsh Lane.
- Diversion of a 11 kilovolt (kV) UK Power Networks overhead power line including undergrounding of the line.
- Other ancillary development, including signage, road markings, CCTV and utilities.
- External areas including roadways, footways, landscaping, and drainage infrastructure.

3.1.3 This proposed park and ride at Darsham would be used during the construction phase of the Sizewell C power station to transport and manage the flow of some of the construction workforce and visitors to and from the Sizewell C main development site. The construction of the Sizewell C Project would be between 9 and 12 years. The proposed park and ride at Darsham would mainly attract traffic travelling on the A12 from the north.

3.1.4 It is anticipated that construction of the proposed northern park and ride development would take place over a period of approximately 12 to 18 months.

3.1.5 It is anticipated that the park and ride would operate seven days a week between the hours of 05:00 and 01:00.

3.1.6 Following construction of the Sizewell C power station, the proposed northern park and ride would be removed and the land reinstated to agricultural use.

3.1.7 **Chapter 2 of Volume 3** of the **ES** (Doc Ref. 6.4) sets out a more detailed description of development.

a) **Approach to plans**

3.1.8 The **Northern Park and Ride Plans** (Doc Ref. 2.6) consist of a set of plans and drawings which provide the parameters within which the park and ride development will be advanced, as well as detailed plans for approval and illustrative plans for information.

3.1.9 As part of the **Northern Park and Ride Plans** (Doc Ref. 2.6), the Northern Park and Ride Proposed Parameter Plan is submitted for approval and will be secured by Schedule 6 of the **Draft Development Consent Order (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 Plans** (Doc Ref. 2.3) and should be read alongside the parameter table - see **Table 2.1** in **Volume 3, Chapter 2** of the **ES** (Doc Ref. 6.4), which provides maximum building dimensions within the zones shown on the **Parameter Plan**.

- 3.1.10 The Parameter Plan has informed the assessment presented in **Volume 3** of the **ES** (Doc Ref. 6.4) and the flexibility being sought is consistent with the findings of the **ES**.
- 3.1.11 Several plans within the **Northern Park and Ride Plans** (Doc Ref. 2.6) set are also submitted for approval as part of this application for development consent and will be secured by Schedule 7 of the **Draft DCO** (Doc Ref. 3.1). SZC Co. will 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.
- 3.1.12 The DCO Requirements (Schedule 2 of the **Draft DCO**) (Doc Ref. 3.1) ensure that the northern park and ride development must be carried out in general accordance with **Work Plan No. 9** (Northern park and ride), the **Northern Park and Ride Proposed Parameter Plan**, the plans as set out in Schedule 7 of the **Draft DCO** (Approved Plans) and the relevant **Associated Development Design Principles** (Doc Ref. 8.3), save to the extent that alternative plans or details are submitted by the undertaker and approved by East Suffolk Council (ESC).
- 3.1.13 Any revised plans shall be in general accordance with the relevant sections of the **Associated Development Design Principles** (Doc Ref. 8.3) and within the limits of deviation specified in the **Draft DCO** (Doc Ref. 3.1).
- 3.1.14 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, security booth, smoking shelter, cycle shelter, and bus shelter.

Requirements in the **Draft DCO** (Doc Ref. 3.1) secure the submission and approval of the drainage and lighting proposals prior to commencement.

4 Policy context

4.1 National Policy Statements

4.1.1 The National Policy Statements for Energy (NPS EN-1) (Ref. 1.4) and Nuclear Power Generation (NPS EN-6) (Ref. 1.5) provide the primary policy context against which decisions on new nuclear power stations (and any associated development) should be made. The status of the NPS is referred to in **Chapter 3** of the **Planning Statement** (Doc Ref. 8.4).

4.1.2 As explained within **Chapter 6** of the **Planning Statement** (Doc Ref. 8.4), the northern park and ride is considered to be an ‘associated development’ as it has a direct relationship with the principal development, and is proportionate to the nature of and scale of the principal development. The provision of the park and ride is to capture southbound construction worker traffic on the A12, and subsequently reduce the amount of additional traffic generated by the movement of the construction workforce.

4.1.3 Paragraph 5.13.4 of NPS EN-1 states that where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.

4.1.4 Paragraph 5.13.6 of NPS EN-1 states that a new energy nationally significant infrastructure project (NSIP) may give rise to substantial impacts on the surrounding transport infrastructure and the decision maker should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the decision maker should consider requirements to mitigate adverse impacts on transport networks arising from the development. Paragraph 5.13.6 also states that applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts.

4.1.5 Paragraph 5.13.7 of NPS EN-1 states that

“Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate

transport impacts identified in the NATA/WebTAG transport assessment, with attribution of costs calculated in accordance with the Department for Transport’s guidance, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.” (Ref. 1.4)

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

4.2 Other national and local planning policies

4.2.1 NPS EN-1 and NPS EN-6 together form the primary basis for deciding DCO applications for nuclear NSIPs. Paragraph 4.1.5 of NPS EN-1 states that other matters which the decision maker may consider both “*important and relevant*” to its decision-making include development plan documents or other documents in the local development framework, such as the National Planning Policy Framework (NPPF) (2019) (Ref. 1.6) and other local policy documents. Paragraph 4.1.5 of NPS EN-1 then explains that, in the event of a conflict between local policy and an NPS, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure.

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

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

4.2.4 The strategies of the local plan may be considered important and relevant, but where these relate to generic issues, such as the protection of the environment, the relevant policy tests are those set out in the NPS. The

following sets out those policies that are considered relevant to the proposed development.

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

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

“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.” (Ref. 1.6).

4.2.6 The NPPF contains policies and guidance that may be considered relevant to the proposed park and ride development in particular. It also promotes low carbon energy and its associated infrastructure.

4.2.7 Section 14 of the NPPF concerns climate change, flooding and coastal change. It states in paragraph 148 that the transition to a low carbon future should be supported, including renewable and low carbon energy and associated infrastructure.

4.2.8 Paragraph 150 of the NPPF sets out that *“new development should be planned for in ways that... can help reduce greenhouse gas emissions...”* (Ref. 1.6).

4.2.9 In plan-making terms, paragraph 151 of the NPPF states that suitable areas for low carbon energy sources and supporting infrastructure should be identified to help secure their development. Such supporting infrastructure would include development associated with the transport and movement of the construction workforce.

4.2.10 Section 9 of the NPPF promotes the delivery of development that incorporates sustainable transport solutions. Relevant to the associated development transport-related proposals, the NPPF states in paragraph 102 that:

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

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

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

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

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

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

The NPPF adds in paragraph 108 c) that it should be ensured that “any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.” (Ref. 1.6).

4.2.11 In addition, paragraph 98 of the NPPF encourages planning decisions to protect and enhance public rights of way and access.

4.2.12 This requirement is supported by paragraph 111 of the NPPF, which requires *“all development that will generate significant amounts of movements should... provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”* (Ref. 1.6).

4.2.13 In terms of site location, layout and operational use, paragraph 127 of the NPPF requires planning decisions to ensure that development proposals make effective use of landscaping to ensure that the visual impact of the proposed development is mitigated and the development is visually attractive. Clause (e) of this paragraph also requires the layout of the

proposed development to optimise the potential of the site for its proposed purpose.

4.2.14 Section 15 of the NPPF deals with conserving and enhancing the natural environment. Paragraph 170 says that planning decisions should minimise impacts on and provide net gains for biodiversity.

4.2.15 Section 16 of the NPPF relates to the importance of conserving and enhancing the historic environment. Paragraph 189 of this section gives specific advice for applicants and requires them to describe “*the significance of any heritage assets affected, including any contribution made by their setting.*” (Ref. 1.6).

b) [The Core Strategy and Development Management Polices \(2013\)](#)

4.2.16 The Suffolk Coastal District Local Plan Core Strategy and Development Management Policies (2013) (Ref. 1.1) set out the vision and strategy for development in the area covering the former Suffolk Coastal District to 2027.

4.2.17 The Core Strategy states that Sizewell has been formally identified to accommodate additional nuclear provision, and that it has a role to play within the larger Low Carbon Energy Corridor within the district. Any potential opportunities associated with new nuclear provision should be developed further.

4.2.18 Strategic Policy SP10 recognises the importance of the A12 as a valuable artery running north to south through the district, and subject to conformity with other elements of the strategy, the Council supports the provision of improvements to the A12.

4.2.19 Strategic Policy SP11 seeks to maximise opportunities for local journeys within the local and strategic road networks serving the district, to support East Suffolk Council’s strategic economic role both within the sub-region and nationally, to maintain quality of life and contribute to reducing the impact of carbon dioxide on climate change.

4.2.20 Strategic Policy SP13 – Nuclear Energy identifies the local issues that any further nuclear energy development in the District will need to address. These include but are not limited to:

- construction management;
- transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail

and sea for access all having regard to such factors as residential amenity; and

- the off-site need for associated land, notably during construction.

4.2.21 Strategic Policy SP18 supports the provision of new infrastructure in order to service, and deliver, new development at the required phase of the development.

4.2.22 The adopted Policies Map (2017) (Ref. 1.7) confirms that the site of the proposed northern park and ride is located outside of a settlement boundary, and therefore is located within the countryside.

4.2.23 Core Strategy Policy SP29 states that development within the countryside will be limited to that of which necessity requires it to be located there, and accords with other relevant policies within the Core Strategy, or would otherwise accord with special circumstances outlined in paragraph 55 of the National Planning Policy Framework (2012) (Ref. 1.8).

c) [Emerging Suffolk Coastal Local Plan \(Final Draft Plan\) \(January 2019\)](#)

4.2.24 The Emerging Suffolk Coastal Local Plan (Final Draft Plan) (Ref. 1.9) contains a number of site specific policies, including for sites relevant to some of the Sizewell C Project's associated development sites, such as within Darsham, the four villages and in the vicinity of SZC Co.'s proposed freight management facility. As a matter of principle, however, the emerging plan recognises that the development of major infrastructure projects such as at the Port of Felixstowe or Sizewell C will generate a requirement for supporting land and that the local plan should seek to provide land to meet the needs of such main economic activities.

4.2.25 Draft Policy SCLP3.4: Major proposals for major energy infrastructure projects states that proposals and the need to mitigate against them will be considered against policy requirements, including:

- appropriate road and highway measures are introduced (including diversion routes) for construction, operational, and commercial traffic to reduce the pressure on the local communities;
- the development and associated infrastructure proposals are to deliver positive outcomes for the local community, and surrounding environment; and
- measures to ensure the successful removal and reinstatement of the site through appropriate landscaping is delivered to minimise and

mitigate the environmental and social harm caused during operational stages of projects.

4.2.26 Table 3.6 of the Local Plan makes reference to the identified issues relevant to the consideration of energy infrastructure proposals, including the impact on the transport network. It identifies the need for park and ride facilities to be created, which are to accommodate the construction workforce. Table 3.6 also which acknowledges the need for new park and ride facilities to support major energy infrastructure proposals.

4.2.27 The site of the proposed northern park and ride lies outside of any settlement boundaries and is therefore located within the countryside. Policy SCLP3.3: Settlement Boundaries states:

“Settlement Boundaries are defined on the Policies Map and apply to Major Centres, Market Towns, Large Villages and Small Villages. Land which is outside of Settlement Boundaries in the Local Plan and Neighbourhood Plans is defined as Countryside.

New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.

New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.”

4.2.28 The policy pre-ambles for Draft Policy SCLP12.48: Land to the south of Darsham railway station, however, acknowledges the potential use of the land north of the railway station at paragraph 12.520, stating that the site is being promoted by SZC Co. as a possible site for a park and ride facility associated with the proposed Sizewell C power station. The site is also noted as being considered suitable for employment development, and depending on future need to support the development of Sizewell C, development for employment uses will be supported.

4.2.29 Draft Policy SCLP9.6: SuDS states that developments should use SuDS to drain surface water. Non-residential development on sites of 1 hectare or more will be required to utilise SuDS, unless demonstrated to be inappropriate. SuDS should:

- be integrated into the landscaping scheme and green infrastructure provision of the development;
- contribute to the design quality of the scheme; and

- deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as source protection zones.

4.2.30 Draft Policy SCLP10.4: Landscape Character ensures that proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018) (Ref. 1.3), the Settlement Sensitivity Assessment (2018) (Ref. 1.10), or successor and updated landscape evidence. Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:

- the special qualities and features of the area;
- the visual relationship and environment around settlements and their landscape settings;
- distinctive landscape elements, including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;
- visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
- the growing network of green infrastructure supporting health, wellbeing and social interaction.

4.2.31 Draft Policy SCLP10.4 also states that proposals should include measures that enable a scheme to be well integrated into the landscape, and enhance connectivity to the surrounding green infrastructure and Public Rights of Way (PRoW) network. Proposals for development should protect, and enhance, the tranquillity and dark skies across the district. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland, and river valley landscape character.

4.2.32 Draft Policy SCLP11.7: Archaeology, states that an archaeological assessment proportionate to the potential, and significance of remains, must be included with any planning application affecting areas of known, or suspected, archaeological importance to ensure that provision is made for the preservation of important archaeological remains. Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of the archive is more appropriate.

5 Principal planning issues

5.1 Introduction

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

5.2 The need for the park and ride at Darsham

5.2.1 NPS EN-1 at 5.13.1 acknowledges 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. NPS EN-1 also requires the consideration and mitigation of transport impacts, through which the need for a park and ride to accommodate the construction workforce has developed.

5.2.2 In accordance with NPPF paragraph 102, the transport issues arising from the Sizewell C Project have been considered from the earliest stages of the development proposals and the possible need to provide improvements to local infrastructure has been closely considered. A **Transport Assessment** (Doc Ref. 8.5) has been conducted to assess the cumulative effects of the Sizewell C Project and to gauge the need for the provision of local transport infrastructure and to identify appropriate mitigation measures.

5.2.3 As set out in the **Transport Assessment** (Doc Ref. 8.5), the need for the park and ride has arisen from the traffic generation anticipated to arise from the construction of Sizewell C. It finds that local roads in their current state would be insufficient in accommodating the increased traffic flows expected during the construction phase of the Project. Following advice within paragraph 5.13.6 of NPS EN-1 and NPPF paragraph 110 (clause c) measures have been sought to mitigate these impacts and make the proposed development acceptable.

5.2.4 The northern park and ride at Darsham is one of two park and ride facilities intended to play an important role in reducing the amount of additional traffic generated through the capturing of the construction workforce on local roads and through local villages such as Yoxford, Middleton Moor and Theberton.

5.2.5 In accordance with paragraph 5.13.8 of NPS EN-1, demand management measures have been considered and are set out in the **Transport Assessment** (Doc Ref. 8.5) to mitigate as far as possible the impacts of the

Sizewell C Project upon the transport infrastructure before assessing the need for further physical infrastructure. These are detailed in **Section 3** of the **Construction Worker Travel Plan** (Doc Ref. 8.8), which will be secured through the Section 106 Agreement (see **Appendix J**), and include measures to optimise existing bus timetables, introduce a car share scheme and effectively communicate the **Construction Worker Travel Plan** (Doc Ref. 8.8) to all construction workers. The proposed northern park and ride is an additional demand measure necessary to properly mitigate the transport impacts of the Sizewell C Project on the A12 and on local roads.

5.2.6 The need for a park and ride facility is identified in Table 3.6 of the Final Draft Suffolk Coastal Local Plan (Ref. 1.9), which acknowledges the need for new park and ride facilities to support major energy infrastructure proposals, and also states that local roads are not well suited to carrying the number, or type of vehicle movements that will be necessary to enable construction. The principle of a new park and ride facility at this site is discussed at Paragraph 12.520 of the local plan for this purpose and as such, proposals are therefore compliant with the emerging Local Plan (Ref. 1.9).

5.2.7 SZC Co. have demonstrated through the location options testing that the most appropriate location for the northern park and ride is at Darsham. This is compliant with the draft policy in this regard and also in that the proposed park and ride would not have an adverse impact on the surrounding land use, on the character of the surrounding area and landscape nor harm the natural or historic environment, as both the careful site selection process and detailed mitigation strategy have endeavoured to minimise any environmental effects.

5.3 The location of the park and ride

5.3.1 NPS EN-1 sets out that where transport mitigation is needed, demand management measures must be considered, as 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. The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives.

5.3.2 Two park and rides were considered necessary in order to accommodate for the construction workforce traffic, with the other being located at Wickham Market further south on the A12 strategic road.

5.3.3 The key analysis found within the **Transport Assessment** (Doc Ref. 8.5) and in the **Site Selection Report** appended to this **Planning Statement**

(Doc Ref. 8.4) demonstrates that the proposed park and rides are in the most appropriate locations for intercepting traffic from construction workers on the A12. The park and rides are located to the west of the Sizewell C main development site, and the northern park and ride is proposed in this location to capture both southbound traffic on the A12, as well as construction workforce traffic from locations west of the site. The site's location adjacent to the A12 would maximise transportation of the construction workforce by bus to the Sizewell C main development site, reducing car trips on the local highway network. This will help maximise the potential use and benefit of the park and ride and help reduce the carbon production associated with the Sizewell C Project, in accordance with paragraph 150 of the NPPF. Its location close to Darsham railway station means that the park and ride would also benefit from existing public transport access.

- 5.3.4** The site's location is compliant with the principles set out in draft Policy SCLP3.4 and Table 3.6 of the emerging Suffolk Coastal Local Plan (Ref. 1.9) which notes the need for additional park and ride facilities to support the development of major energy infrastructure, and paragraph 12.520 which notes the need for additional park and ride facilities at Darsham to support the development of major energy infrastructure. The site's location at Darsham is also compliant with Draft Policy SCLP3.3, paragraph 5.7.9 of NPS EN-1 and NPPF paragraph 158 in that it has been sequentially tested.
- 5.3.5** The necessity of locating the park and ride close to the A12 influenced the options testing process. The favoured location is outside the settlement boundary of Yoxford which lies to the south, although the proposed park and ride does lie close to the 'Small Village' of Darsham (as designated by Policy SCLP3.2: Settlement Hierarchy). Whilst the development of the park and ride is outside of the settlement boundary, it is considered preferable to the other locations as it was identified as the most appropriate location by respondents in the consultation process, and is considered to have the least impact on nearby residential properties.
- 5.3.6** The northern park and ride facility would be a temporary facility. Once the need for the facility has ceased following the completion of construction of Sizewell C, the buildings and associated infrastructure would be removed in accordance with removal and reinstatement plans, and the land returned to agricultural use. The impact on the open countryside in the long term is therefore limited.

- 5.4 Local amenity (including noise and vibration, air quality and health and wellbeing)
- 5.4.1 NPS EN-1 sets out that infrastructure developments can have a negative impact on air quality and emissions and on noise and vibration. NPS EN-6 states that there may be associated local impacts from nuclear development in terms of significant noise, vibration or air quality, but that there may be local impacts of this nature from transport. With appropriate mitigation, the subsequent effect of these is unlikely to be significant.
- 5.4.2 Paragraph 5.10.24 of NPS EN-1 states that PRowS, National Trails and other rights of access to land are important recreational facilities. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other PRowS. Where this is not the case the decision maker should consider what appropriate mitigation requirements might be attached to any grant of development consent. The mitigation measures with regard to local amenity are set out below.
- 5.4.3 It is anticipated that the park and ride facility would be operational seven days a week between 05:00 and 01:00. In accordance with paragraph 5.11.5 of NPS EN-1, baseline noise surveys have been carried out which have determined that the A12 is the principal source of noise in the area. The formation of a 3m high landscape bund early in the construction process will allow for a 5dB sound reduction for residential receptors in the area south of Willow Marsh Lane, to the east of the landscape bund and to the west of the A12 during construction, operation, and the removal and reinstatement of the site. No significant vibration effects are expected. Tertiary mitigation in the form of the good practice outlined within the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) will control construction noise.
- 5.4.4 Following guidance within paragraph 180 (c) of the NPPF, any required temporary construction and operational lighting arrangements would be designed to minimise spill to any nearby residential properties. Tertiary mitigation in the form of the good practice outlined within the **CoCP** (Doc Ref. 8.11) will control construction lighting. This is also in compliance with Draft Policy SCLP11.2: Residential Amenity, which seeks to preserve residential amenity through ensuring that developments have regard to light spillage, and also Draft Policy SCLP10.4: Landscape Character, which seeks to ensure that proposals protect and enhance the tranquillity and dark skies across the district.
- 5.4.5 Some footpaths (E-584/010/0, E-216/002/0) and an on-road Sustrans link to a National Cycle Route 1, as well as a local linking cycle route to the National

Cycle Network, all have views in to the site and, as such, would be affected by the proposals. Mitigation will be sought through the retention of existing boundary vegetation wherever possible, the introduction of new planting and/or fencing to provide screening, and the use of a 3m landscape bund to provide screening (as per paragraph 110 (c) of the NPPF) and noise mitigation. Further measures to minimise noise and changes to air quality are found in **Chapters 4 and 5 of Volume 3 of the ES** respectively.

5.4.6 The human receptors in close proximity to the proposed northern park and ride at Darsham are Moate Hall, Darsham Cottage and White House Farm, located on the A12 adjacent to the proposed site boundary. There are no sites of nature conservation interest (international, European and nationally designated) within 350m of the site.

5.4.7 In accordance with Section 5.6 of NPS EN-1, dust and air quality impacts have been considered for this proposed development. The site lies outside of any air quality management areas. Existing dust levels are also low given the arable nature of the existing land use. In order to mitigate any potential air quality impacts during the construction phase, and as outlined within the **CoCP** (Doc Ref. 8.11), pollution-generating uses such as access, concrete batching, and other plant, will be located as far as practicable from residential receptors. No significant air quality effects are predicted during the construction or removal and reinstatement of the northern park and ride at Darsham.

5.4.8 During operation, there is the potential for increases in pollutant concentrations along the local road network, particularly the A12 and Willow Marsh Lane, and this has been subject to a detailed considerations of the impacts as part of **Chapter 5 of Volume 3 of the ES**. As baseline concentrations are low, it is considered that any residual effects on air quality would not be significant.

5.5 Biodiversity and nature conservation

5.5.1 The need to protect and where possible enhance biodiversity and nature conservation has been considered from early stages of the planning process in accordance with paragraphs 5.3.3 and 5.3.4 of NPS EN-1 and paragraph 170 of the NPPF.

5.5.2 NPS EN-1 recognises the need to protect the most important biodiversity and geological conservation interests, but also that the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity interests and that these benefits may outweigh harm to these interests. Paragraph 5.3.4 in EN-1 states that the applicant should

show how the proposals have taken advantage of opportunities to conserve and enhance biodiversity interests (and refers to the Government's biodiversity strategy, 'Working with the grain of nature', at paragraph 5.3.5). NPS EN-6 identifies potential cumulative ecological effects in relation to nuclear development at sites in the east of England. These requirements are set out further in **Chapter 7, Volume 3** of the **ES** (Doc Ref. 6.4).

- 5.5.3** Paragraph 3.9.4 of NPS EN-6 requires that baseline studies discern how nationally and internationally important habitats might be affected by the proposal. There are three statutory designated sites of nature conservation within 5 km of the proposed park and ride, and six non-statutory sites are also present within 2 km of the site boundary. However, given their distance from the site no direct or indirect impacts are predicted, and these have been scoped out of any further assessment. There are not considered to be any significant adverse residual effects on ecology or ornithology. This is compliant with national policy set out in NPS-EN1, which states at paragraph 5.3.7 that development should avoid significant harm to biodiversity and geological conservation interests, and also in accordance with paragraph 3.4.3 of EN-6 which identifies that Nuclear proposals may have impacts on biodiversity and geological conservation, and with paragraph 3.9.4 stating that baseline studies on nationally and internationally important habitats and species should be undertaken as a result of the development. This is also in accordance with Draft Policy SCLP10.1: Biodiversity and Geodiversity which seeks to ensure that development avoids any significant adverse harm to existing habitats.
- 5.5.4** The site's current use as agricultural land means that no plant species of conservation interest were recorded within the proposed site. The existing pond within the site is known to support a small population of great crested newt, and there are records of other great crested newt populations nearby. As a result, in accordance with the **Associated Development Design Principles** (Doc Ref. 8.3), protection measures such as newt fencing would be placed around locations that are necessary as so to restrict the movement of newts around the site. This eliminates any need to move newts away from the site, and ensures minimal disruption to existing habitat, meaning that the proposal avoids any significant adverse effects to protected species.
- 5.5.5** Existing natural features are intended to be retained during the construction and operation of the northern park and ride, in accordance with the **Associated Development Design Principles** (Doc Ref. 8.3). Little Nursery woodland would be retained in its entirety, with a buffer distance of 20m between the woodland and the proposed park and ride facility, as confirmed in **Chapter 7, Volume 3** of the **ES** (Doc Ref. 6.4). Except for the loss of one small section to provide the site access, boundary hedgerows would be

retained, minimising direct loss of hedgerow habitat and its associated species.

5.5.6 The operational park and ride facilities on-site would be bounded by a 1.8m high security fence, in accordance with the **Associated Development Design Principles** (Doc Ref. 8.3). This security fence would prevent personnel using the proposed development from accessing the surrounding habitats. This would have the added benefit of reducing disturbance, habitat damage and littering within Little Nursery Wood which is adjacent to the site. The security fence would also be sufficient to prevent access by badgers.

5.5.7 The careful design of lighting controlled by the **Associated Development Design Principles** (Doc Ref. 8.3) will also minimise the light spill to surrounding habitats, lowering any impact on nocturnal species such as bats. Close-boarded fencing would be erected along the internal side of the perimeter security fence alongside Little Nursery woodland for the duration of the development.

5.5.8 Overall the environmental effects of the northern park and ride at Darsham are not considered to be significant, and are therefore compliant with the aims of both national and local policy for the retention and protection of ecological features within the site.

5.6 Soils and geology

5.6.1 Sites of regional and local geological interest should be given due consideration by the decision maker, though given the need for new infrastructure, these designations should not be used in themselves to refuse development consent (EN-1 paragraph 5.3.13).

5.6.2 The site is considered to be Agricultural Land Classification grade 3, with some grade 2 land in the southernmost part of the site. **Chapter 10 of Volume 3** of the **ES** (Doc Ref. 6.4) states that 21.8ha of the site comprises of best and most versatile land (Grade 3a). The returning of the site to agricultural land following the decommissioning of the park and ride facility will be made possible through the sustainable re-use of the soil resource, which will be undertaken in line with the **CoCP** (Doc Ref. 8.11) and an outline **Soil Management Plan** as provided in **Volume 2** of the **ES** (Doc Ref. 6.3). These measures will ensure the appropriate storage of soil, protection from erosion, and quality assurance.

5.6.3 All agricultural land taken temporarily would be reinstated to agricultural use once the site is no longer required to support the construction of the Sizewell C main development site. This is in accordance with paragraph 5.10.8 of NPS EN-1 and Draft Policy SCLP10.3: Environmental Quality which states that

applicants should identify any effects and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed. The effects on land holdings are considered to occur during the construction phase and would last until the completion of the removal and reinstatement phase, when the land would be returned to agricultural use.

5.7 Surface water, groundwater and flood risk

5.7.1 NPS EN-1 identifies flood risk as a generic impact and states that infrastructure development can have adverse effects on the water environment, including groundwater, inland surface water, transitional waters and coastal waters. Section 5.7 of NPS EN-1 requires applicants to submit an FRA for energy projects located in Flood Zones 2 and 3. Flood risk is also identified as a Nuclear Impact in EN-6.

5.7.2 There is one pond located within the site and a small watercourse is located to the south-west with the River Yox to the south-east. The geology of the site is identified as Crag (marine deposits), which is considered to have variable permeability. The land slopes gradually to the south and west of the site and lies within Flood Zone 1, and therefore there is no need to undertake the sequential test or exceptions test set out in Draft Policy SCLP9.5. Two areas within the site are identified by the Environment Agency to at high risk from surface water flooding, including a strip of land at the western edge of the site and an area in the north-eastern corner of the site where the proposed access road would meet the A12.

5.7.3 It is envisaged that construction drainage would be contained within the site through the implementation of temporary SuDS early during construction. Construction drainage would be contained within the site, with infiltration to ground. A low bund to be constructed to achieve this with an external toe drain to intercept off-site run-off that may otherwise be impeded by the presence of the proposed bund.

5.7.4 During the operational phase, it is likely that infiltration to the ground would be viable, and SuDS would be implemented to provide a natural approach to managing drainage. The main car parks would have permeable surfaces and the use of infiltration ponds, including in the north-east corner of the site where surface water flood risk is currently high, would help mitigate any negative impacts. Water falling onto impermeable surfaces such as access roads would be channelled into the SuDS infrastructure, in accordance with Draft Policy SCLP9.6. The provision of SuDS infrastructure is in accordance with Draft Policy SCLP7.2: Parking Proposals and Standards, which seeks to ensure the incorporation of SuDS in car parking proposals. All proposed

parking areas and ancillary buildings have been located outside the area at risk of flooding from surface water.

5.8 Landscape and visual impacts

5.8.1 NPS EN-1 acknowledges that the landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects inter alia on landscape and visual amenity. It should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs. However, paragraph 1.7.2 of EN-1 acknowledges that the impacts on landscape and visual amenity in particular will sometimes be hard to mitigate.

5.8.2 The site is relatively open and there are views across the site from individual properties in close proximity, as well as adjoining roads and footpaths. However, views of the site from the wider landscape are relatively contained by local variations in landform, woodland and vegetation. There would be localised effects on the landscape during construction, operation, and removal and reinstatement but given the localised extent and temporary duration of these effects, they are not considered to be significant.

5.8.3 Given the distance of the Suffolk Coast and Heaths AONB from the site, and the relatively limited extent of visual effects, the proposals are not considered to have an impact on the AONB. This is also compliant with paragraph 3.4.3 of EN-6, which requires applicants to consider the landscape and visual impacts of proposed Nuclear development. At paragraph 3.10.3 of EN-6 Sizewell is identified to have potential long-term impacts on visual amenity given its proximity to the Suffolk Coast and Heaths AONB, but given the low-lying nature and inland location of the proposed park and ride facility, it is not considered to have significant visual impacts.

5.8.4 In line with Draft Policy SCLP10.4 the proposals will not have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathlands and other very sensitive landscapes. The proposed landscaping will enable the scheme to be well integrated into the existing landscape. Mitigation measures such as the retention of woodland and hedgerows, and the use of appropriate exterior lighting, are also compliant with Draft Policy SCLP10.4: Landscape Character, which seeks to ensure that developments are sympathetic to landscape features and that they protect and enhance the tranquillity and dark skies across the district.

5.8.5 **Appendix 6B of Volume 3** of the **ES** (Doc Ref. 6.4) considers the effects of the lighting elements of the proposed development on the Ancient Estate Claylands. The assessment indicates that the effects of lighting on this Landscape Character Type would be of high-medium magnitude, resulting in a moderate (not significant) effect and would be adverse given the relative lack of existing artificial lighting in the vicinity of the northern part of the site. The mitigation approach set out above also seeks to meet the policy tests set out in NPS EN-1, in that projects should aim to minimise harm to the landscape and that where possible, reasonable mitigation should be provided to reduce the impacts of the proposed development.

5.9 Socio-economic considerations

5.9.1 Paragraph 5.12.6 of EN-1 states that the decision maker should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the decision maker considers to be both relevant and important to its decision. Paragraph 5.12.8 of EN-1 states that the decision maker should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.

5.9.2 The socio-economic impacts of the Sizewell C Project are identified in **Chapter 9, Volume 2** of the **ES** (Doc Ref. 6.4). Given the nature of the construction work, it is not possible to separate out the socio-economic impacts of the works associated with the northern park and ride from the wider Sizewell C Project impacts.

5.9.3 Much of the core socio-economic mitigation sought for the proposed development includes measures to secure local recruitment set out in the **Employment, Skills and Education Strategy** which is provided in **Annex A** to the **Economic Statement** (Doc Ref. 8.9). The Hinkley Point C Worker Code of Conduct is provided for reference in **Appendix 1.A.1** of the **Community Safety Management Plan (CSMP)** (Doc Ref. 8.16) to offer guidance for the governance of worker behaviour, and a **Supply Chain Strategy** is provided in **Annex B** to the **Economic Statement** (Doc Ref. 8.9). To address the potential impact on tourism and local accommodation, the **Accommodation Strategy** (Doc Ref. 8.10) includes a Housing Fund to mitigate against pressures on availability of accommodation. There will also be a Community Fund to mitigate against localised community impacts, detailed in the **Community Impact Report** (Doc Ref. 5.13). There are also physical mitigation measures sought at the main development site, including the construction of an accommodation campus and temporary caravan

accommodation. It is considered that the socio-economic impacts of the proposed development are therefore mitigated against where possible, and that the mitigation measures adhere to the requirements set out in NPS EN-1.

5.10 Archaeological and heritage impacts

5.10.1 NPS EN-1 identifies the historic environment as a generic impact, and sets out that any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development. Paragraph 1.7.2 of EN-1 states that the development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on cultural heritage. Paragraph 5.8.1 of EN-1 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment. When considering the impacts of proposed development, the particular nature of the significance of the heritage assets should be considered.

5.10.2 NPS EN-1 states that there should be a presumption in favour of the conservation of designated heritage assets, and the more significant the designated heritage asset, the greater the presumption in favour of its conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.

5.10.3 Investigative studies of the site suggest that buried archaeological remains of pre-modern origin are likely to be encountered within the site. There is the potential for prehistoric or Romano-British remains to be present within the site, though the nature of any such remains would be explored through further archaeological investigation as part of the written scheme of investigation in compliance with Draft Policy SCLP11.7, which states the need for an archaeological assessment proportionate to the potential and significance of remains. It is not anticipated that there would be significant medieval, post-medieval, or modern remains present within the site although some historic field boundaries and ditches are thought to be potentially present. It is likely that these remains have been disturbed by the agricultural use of the site and the construction of the A12, the railway and Darsham railway station.

5.10.4 There are no designated assets within the site boundary. The desk-based assessment, as seen in **Appendix 9B, Chapter 9 of Volume 3 of the ES** (Doc Ref. 6.4), details the potential for as yet unrecorded heritage assets to

be present within the site boundary, but these would be explored through a further agreed written scheme of archaeological investigations which has been produced for the Sizewell C Project and is seen in **Chapter 9 of Volume 3** of the **ES** (Doc Ref. 6.4). Change to setting arising from the proposed northern park and ride facility could give loss of or harm to heritage significance, but detailed design will seek to minimise perceptual change.

5.10.5 Any disturbance of archaeological remains would occur (and be effectively mitigated) through the construction phase of the park and ride. No direct effects on heritage assets are anticipated during the operation of the proposed park and ride site. Listed buildings within the wider area are not thought to be affected by the proposed park and ride facility. Any impacts on the nearby non-designated parkland at Cockfield Hall would not be affected by the proposal. Heritage and archaeological impacts are fully explored in **Chapter 9 of Volume 3** of the **ES** (Doc Ref. 6.4).

5.11 Traffic and transport

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

5.11.2 The principle of the proposed park and ride is in compliance with Draft Policy SCLP7.1: Sustainable Transport, which states that development proposals should encourage people to travel using non-car modes to access employment. The detailed traffic considerations that are also required as part of this policy are set out in turn below.

5.11.3 The site is located on the western side of the A12, a single carriageway road with a speed limit of 40 miles per hour. The A12 carried approximately 14,000 vehicles per day in 2015 when assessed. The site also lies immediately to the north of Darsham level crossing, which closes on average twice an hour. The access point into the site has been moved further north than initially proposed following Stage 2 consultation feedback, and the access onto the A12 being in the form of a new roundabout reduces queueing times, and offers improved pedestrian crossing opportunities which is in compliance with Draft Policy SCLP7.1: Sustainable Transport. The additional slight diversion of a cycle route close to the site is also in compliance with part c) of the same policy, which seeks to ensure the integration of development into the existing cycle network and the safe design and layout of new routes.

- 5.11.4 The roundabout intended to provide access to the site is to be constructed early in the construction phase. Most of the construction activity would not impact on A12 traffic but when the tie-ins to the A12 are being built there would be some temporary traffic measures put in place. This is likely to be traffic signal-controlled shuttle working, which would impose some delays on A12 traffic during this period. Some short-term road closures and diversions may also be necessary, resulting in an increase in vehicles using the A144 and its junction within the A12. This additional traffic volume would be very small, and the effects of this are considered to be insignificant. The approach of constructing the roundabout first enables smoother traffic management and is therefore in accordance with part e) of Draft Policy SCLP7.1.
- 5.11.5 Any construction parking for the contractor would be provided within the site, and worker's vehicles would be prevented from parking along the A12 or in Willow Marsh Lane, nearby car parks or lay-bys. The contractor would also encourage workers to arrive by rail where possible. The construction phase would generate HGV movements and at the peak period of its construction this would be approximately 21 HGVs and 60 construction workers per day.
- 5.11.6 During the operational period of the park and ride, the A12 traffic volume would increase to approximately 16,000 vehicle movements per day, accounting for increased traffic movements and Sizewell C construction traffic. As set out in the **Transport Assessment** (Doc Ref. 8.5), there are not considered to be any significant adverse transport and traffic effects especially given that the park and ride will enable the removal of a significant number of Sizewell C construction worker cars off the wider highway network. At the peak construction year, traffic is understood to add 2,350 vehicles per day, or an increased traffic flow of 13-15% to the highway network. Modelling shows that the local highway network would continue to operate satisfactorily, which is compliant with part g) of Draft Policy SCLP7.1: Sustainable Transport which seeks to support development whose cumulative impact would not create severe impacts on the existing transport network. The positive effects of the park and ride, including the removal of a significant number of vehicles from the wider highway network, are considered to outweigh an increase in traffic along the short section of the A12 between Yoxford and Darsham.
- 5.11.7 The proposal is also in accordance with Draft Policy SCLP7.2: Parking Proposals and Standards as the park and ride is proposing the provision of safe, secure and convenient off-street car parking for the construction workforce in order to minimise congestion caused, to promote the use of sustainable transport modes, and to reduce conflict between road users.

5.12 Planning Balance

- 5.12.1 The proposed development is required to support the construction of the Sizewell C main development site. This statement relates to the northern park and ride at Darsham and sets out the need for the development and the consideration of the impacts of a new park and ride facility. A new park and ride would allow for the capturing of wider workforce traffic from the north and west of the Sizewell development, reducing the impact of workers commuting to site on the local road network.
- 5.12.2 It has been demonstrated that the role of the park and ride forms a core part of the construction management and implementation of the Sizewell C Project. It is necessary to assess the location and form of the proposed park and ride, and to demonstrate that the facility has had regard to its site-specific planning issues, and these considerations are covered in earlier sections of this statement.
- 5.12.3 A combination of public consultation feedback and options testing has determined that Darsham is the most appropriate location for the northern park and ride site. The suitability of this site has then been tested to demonstrate that there are no other preferable options. This is further detailed in the Site Selection Report, appended to the **Planning Statement** (Doc Ref. 8.4) and further design considerations have been assessed in both this statement and **Volume 3** of the **ES** (Doc Ref. 6.4).
- 5.12.4 A full description of the proposed mitigation measures is provided within **Chapters 4-12** of **Volume 3** of the **ES** (Doc Ref. 6.4), addressing all potential impacts of the proposed park and ride to limit them where possible and to mitigate them if practical.
- 5.12.5 It is acknowledged that any development of this scale will result in some form of residual impacts, even after site-specific mitigation measures are implemented. Where residual impacts remain however they can still be considered acceptable taking into account the overall benefits of the development. The identified residual adverse impacts are fully considered in **Chapters 4-12** of **Volume 3** of the **ES** (Doc Ref. 6.4) but are summarised as follows:
- minor impacts on heritage assets;
 - minor impacts on cycle routes and visibility into the site from these routes;

- minor impacts on land use, given the temporary nature of the site's proposed use;
- negligible impacts on the transport network close to the site;
- 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;
- major-moderate impacts on landscape character;
- minor adverse impacts on ecology;
- moderate adverse impacts on archaeological remains within the site;
- major adverse impacts on soils due to the loss of agricultural land;
- minor adverse impacts on land quality; and
- minor adverse impacts on groundwater.

5.12.6 When the considerations above are taken into account, it is considered that any minor localised adverse impacts on the proposed park and ride site can be outweighed by the positive approach to construction workforce traffic management that the proposed park and ride facility is enabling.

6 Conclusion

- 6.1.1 This appendix considers the relevant national and local planning policies within the overarching context of NPS EN-1 and EN-6 in relation to the Sizewell C Project associated development at Darsham for a park and ride facility. It demonstrates that when assessed against these policies and material considerations, including local planning policy, the park and ride benefits from strong policy support, and that its principles are acceptable in land use planning terms.
- 6.1.2 It has been established that a park and ride facility at Darsham is a fundamental part of SZC Co.'s delivery of the Sizewell C Project, and would minimise transport impacts and maximise opportunities to travel by sustainable modes of transport where possible. The proposed Darsham park and ride has been shown to be the most appropriate option through a process of local consultation and assessment of impacts.
- 6.1.3 Whilst the Sizewell C Project as a whole would, in common with any national infrastructure project, result in some adverse effects to the environment and local community, the main **Planning Statement** (Doc Ref. 8.4) states that these (considered individually or collectively) will not outweigh the important nationally significant benefits of the provision of new safe, and secure, low-carbon energy infrastructure alongside local benefits such as job creation, investment in the local economy, and the provision of skills for the local workforce. The proposed park and ride at Darsham therefore forms part of a project that has the potential to create a significant positive legacy for both Suffolk and the UK.
- 6.1.4 The northern park and ride at Darsham itself offers a range of local benefits, including the capturing of construction workforce traffic and the subsequent relieving of congestion on local roads and on the A12. The location of the park and ride has been selected to maximise the use of travel by sustainable modes and is of a size that is able to operate flexibility and accommodate for fluctuations in workforce movement and size.

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