

The Sizewell C Project

8.4 Planning Statement Appendix 8.4C Southern Park and Ride Planning Statement

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APPENDIX 8.4C: SOUTHERN PARK AND RIDE PLANNING STATEMENT



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Figures

None provided.

Annexes

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1 Introduction

1.1 Overview

- 1.1.1 The nature of the Sizewell C Project, and the characteristics of the local area, require a number of associated developments to facilitate the construction of Sizewell C Power Station, and to mitigate potential environmental impacts associated with the Sizewell C Project.
- 1.1.2 Two park and ride facilities are proposed, one to the north and one to the south of the Sizewell C main development site. The purpose of this Planning Statement is to set out the case for a southern park and ride at Wickham Market, which is one of the associated developments of the Sizewell C Project to which the application for Development Consent relates.
- 1.1.3 This section of the Planning Statement considers the site specific planning issues relevant to a southern park and ride at Wickham Market. 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 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 Development Consent Order application.

1.2 Planning Statement Structure

- 1.2.1 The remainder of this **Planning Statement** is set out as follows:
 - section 2: Site and surroundings describes the site location, the planning and environmental designations that apply to it and its planning history;
 - section 3: Proposal provides a description of development, design specifics, layout, and construction programme;
 - section 4: Policy Context provides a summary of site-specific planning policies;
 - section 5: Principal planning issues provides an assessment of the site against relevant policy; and
 - section 6: Conclusion summarises how the project complies with relevant policy and weighs its benefits against its harm in the context of the overall scheme.



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2 Site and surroundings

2.1 Site Location

- The site is located to the north of Lower Hacheston, and to the north-east of Wickham Market (OS grid reference: TM316572), as seen in **Figure 1.1** of **Chapter 1**, **Volume 4** of the **Environmental Statement (ES)** (Doc Ref. 6.5). The site comprises approximately 26 hectares (ha), of which 18 ha is Grade 3 arable land. The remaining part of the site comprises the A12 to the south, and a section of the B1078 between Fiveways roundabout and Station Road.
- 2.1.2 The park and ride facility comprises the main body of the site and is defined as such: the eastern and western boundary of the park and ride facility follows the existing field boundaries. The northern boundary cuts horizontally from south-west to north-east across a field, and the southern boundary of the park and ride aligns with the northern edge of the A12 embankment and northbound slip road. The remainder of the site boundary extends east and west following the route of the A12 and B1078, incorporating the junctions between the two roads, to allow for highway improvements.
- 2.1.3 Four wooded copses lie along the outer edges of the site along the eastern, northern and western boundaries, including Wonder Grove and Whin Belt.
- 2.1.4 The surrounding area is dominated by agricultural fields separated by hedgerows, and a number of small settlements, including:
 - Marlesford approximately 1.3 kilometres (km) northeast to settlement centre;
 - Wickham Market approximately 2 km south-west to settlement centre; and
 - Lower Hacheston approximately 650 metres (m) south to settlement centre.
- 2.1.5 The closest residential properties include Ash View, located at the eastern end of Main Road (B1078) (approximately 270m west of the site), Bottle and Glass Cottages (approximately 200m south) on the opposite side of the A12, and other properties in Lower Hacheston and Hacheston to the south and north respectively.
- 2.1.6 The topography of the site is largely flat but slopes gradually towards the south.



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2.2 Planning and Environmental Designations

- 2.2.1 The site is not allocated for a specific use within the Suffolk Coastal District Local Plan Core Strategy and Development Management Policies (2013) (Ref. 1.1). It is located within the countryside (area outside settlements). The site lies outside of the Wickham Market Neighbourhood Plan area, which was approved on 12 January 2016 (Ref. 1.2). The Wickham Market Neighbourhood Plan has not yet been approved.
- 2.2.2 There are no statutory designations or listed buildings within, or immediately adjacent to, the site. The nearest designated heritage assets are the two grade II listed buildings known as Ash Cottage and 36 Ash Road (both approximately 500m south), and the grade II listed building known as Rookery Farm (approximately 650m north-west).
- 2.2.3 The whole site is within Flood Zone 1, and therefore has a low risk of flooding from tidal or fluvial sources. Risk associated with groundwater, sewer, and reservoir flooding at the site is also considered to be low. The Environment Agency's long-term flood risk mapping shows the majority of the site is also at a very low risk of flooding from surface water. However, a small strip of land along the north-eastern corner of the site and a small strip along the south-western corner of the site adjacent to the A12, are at risk of medium to high surface water flooding.
- 2.2.4 A locally designated landscape, the River Deben Special Landscape Area, is within proximity to the site and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) lies 4.5 kilometres (km) to the southeast of the site.

2.3 Planning History

2.3.1 There is no relevant planning history for this site itself; however, an application was submitted on land adjoining the north-east corner of the site. The application (LPA Ref: DC/14/3016/FUL) sought permission for the continued use of the land to run radio-controlled cars on the two existing tracks. The application was approved on 26 February 2015.

3 Proposal

- 3.1.1 This section provides an overview of the proposed park and ride facility and its proposed access.
- 3.1.1 The southern park and ride facility at Wickham Market would comprise:

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- Car parking areas for up to 1,250 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.
- A postal consolidation building at the western part of the site to handle and process deliveries for the Sizewell C main development site. All mail and courier packages would be checked, sorted and consolidated before being delivered to the main development site. Outgoing mail would be collected from the Sizewell C main development site for postal or courier services to collect from the postal consolidation building.
- Two landscape bunds and additional planting.
- A proposed access point to the site from the existing slip road leading onto the A12.
- A temporary diversion of bridleway E-288/008/0 around the construction area for the proposed access road.
- Other ancillary development, including signage, road markings, CCTV and utilities.
- External areas including roadways, footways, landscaping and drainage infrastructure.
- Up to three infiltration ponds and up to seven swales forming part of the Sustainable Drainage System (SuDS).
- Protection of a medium pressure (below two bar) Cadent gas main.



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- A Traffic Incident Management Area (TIMA) at the north of the site to enable construction-related vehicles (including HGVs) to be held in the event of an incident within the Sizewell C main development site or external to the Sizewell C main development site on the local road network, removing them from the public road network while the incident is being resolved. The TIMA would only be used for the parking of heavy goods vehicles (HGVs) when required due to an incident. For the majority of the time, it would be unused with no HGVs parked in this area.
- 3.1.2 This proposed Southern park and ride development would be used by SZC Co. 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 construction site for up to ten years. The proposed development would mainly attract traffic travelling from the south on the A12.
- 3.1.3 It is anticipated that construction of the proposed development would last for approximately 12-18 months.
- 3.1.4 It is anticipated that the park and ride would be operated by SZC Co. seven days a week between the hours of 05:00 and 01:00.
- 3.1.5 Chapter 2 of Volume 4 of the Environmental Statement (ES) (Doc Ref. 6.5) sets out a more detailed description of development.
- 3.1.6 Following construction of the Sizewell C power station, the proposed development would be removed and reinstated to agricultural use.
 - a) Approach to plans
- 3.1.7 The **Southern Park and Ride Plans** provide the parameter plans within which the park and ride development will be advanced, as well as detailed plans for approval and illustrative plans for information.
- As part of the Southern Park and Ride Plans (Doc Ref. 2.7), the Southern 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 and shown on the Southern Park and Ride Work Plan (Work No. 10) and should be read alongside the parameter table (see Table 2.1 at ES Volume 4, Chapter 2) which provides maximum building dimensions within the zones shown on the Parameter Plan.



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- 3.1.9 The **Parameter Plan** has informed the assessment presented in the **ES Volume 4** (Doc Ref. 6.5) and the flexibility being sought is consistent with the findings of the **ES**.
- 3.1.10 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 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:
 - 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
- 3.1.11 The DCO Requirements (Schedule 2 of the Draft DCO (Doc Ref. 3.1)) ensure that the Southern Park and Ride development must be carried out in accordance with Work Plan No. 10 (Southern park and ride), the Southern 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.
- 3.1.12 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).
- 3.1.13 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, postal consolidation building, 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.



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4 Policy context

4.1 National Policy Statements

- 4.1.1 The National Policy Statements for Energy (NPS EN-1) (Ref. 1.3) and Nuclear Power Generation (NPS EN-6) (Ref. 1.4) provide the policy context against which decisions on new nuclear power stations (and any associated development) should be made. The status of the NPS is referred to in **Chapter 3** of the **Planning Statement**.
- 4.1.2 As explained within **Chapter 6** of the **Planning Statement**, the southern park and ride is considered to be 'associated development' as it has a direct relationship with the principal development (Sizewell C main development site) and is proportionate to the nature of and scale of the principal development. The provision of the park and ride is to capture northbound 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 the 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 the 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 the 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,



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then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure." (Ref. 1.3).

- 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.
- 4.1.7 Paragraph 5.13.11 of the NPS EN-1 states that the decision maker may attach requirements to a consent where there is likely to be substantial HGV traffic that:

"control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;

make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and

ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force".

- 4.1.8 This is of relevance to the proposed TIMA at the southern park and ride.
- 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. The Secretary of State may consider other documents alongside the NPSs, including the National Planning Policy Framework (NPPF) 2019 (Ref 1.5), and other local documents as important and relevant.
- 4.2.2 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



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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.

- 4.2.1 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.
- 4.2.2 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.
- 4.2.3 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)
- 4.2.4 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. 1.5).

4.2.5 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.



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- 4.2.6 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.
- 4.2.7 Paragraph 150 of the NPPF sets out that "new development should be planned for in ways that... can help reduce greenhouse gas emissions..." (Ref. 1.5).
- 4.2.8 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.
- 4.2.9 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." (Ref. 1.5).



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- 4.2.10 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.
- 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. 1.5).
- 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. 1.5).
 - b) The Core Strategy and Development Management Policies (2013)
- 4.2.16 The Suffolk Coastal District Local Plan Core Strategy and Development Management Policies (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.



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- 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. 1.6) confirms that the site of the proposed southern 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. 1.7).
 - c) Emerging Suffolk Coastal Local Plan (Final Draft Plan) January 2019
- 4.2.24 The Emerging Suffolk Coastal Local Plan (Final Draft Plan) (Ref. 1.8) contains a number of site specific policies, including for sites relevant to some of the Sizewell C Project's associated development sites, such as 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



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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 Suffolk Coastal Local Plan (SCLP) 3.4: Major proposals for major energy infrastructure projects states that proposals and the need to mitigate against them will be considered against policy requirements, including:
 - appropriate road and highway measures are introduced (including diversion routes) for construction, operational, and commercial traffic to reduce the pressure on the local communities;
 - 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 SCLP 3.3: 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."



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- 4.2.28 The policy pre-amble for Draft Policy SCLP 12.48: 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 SCLP 9.6: 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 SCLP 10.4: 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. 1.9), 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.



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- 4.2.31 Draft Policy SCLP 10.4 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 SCLP 11.7: 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

- Having regard to the 'Generic Impacts' and 'flags for local consideration' identified with the NPS EN-1 and EN-6, and relevant guidance for development within the NPPF, the purpose of this subsection is to analyse the site-specific planning considerations that emerge from the planning policy background.
- 5.2 The need for the park and ride at Wickham Market
- 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.
- 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.



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- 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.
- The southern park and ride at Wickham Market is one of two park and ride facilities intended to play an important role in reducing the amount of additional traffic generated by the construction workforce on local roads, and through local settlements such as Saxmundham, Church Common, and Leiston.
- 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** to all construction workers. The proposed southern 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.
- The need for a park and ride facility is identified in Table 3.6 of the Final Draft Suffolk Coastal Local Plan, 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.
- 5.2.7 SZC Co. have demonstrated through the location options testing that the most appropriate location for the southern park and ride is at Wickham Market. This is compliant with the draft policy in this regard, and also in that the proposed park and ride will 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.



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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 Darsham further north 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 southern park and ride is proposed in this location to capture both northbound 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 the Fiveways roundabout means that the park and ride will also benefit from existing local 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. 1.8) which notes the need for additional park and ride facilities to support the development of major energy infrastructure. The site's location at Wickham Market 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 Hacheston which lies to the north, although the proposed park and ride does lie close to the 'Large Village' of Wickham Market (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



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- appropriate location by respondents in the consultation process, and is considered to have the least impact on nearby residential properties.
- 5.3.6 The southern park and ride would be a temporary facility. Once the need for the facility has ceased following the completion of construction, the buildings, and associated infrastructure, would be removed in accordance with a removal and restoration plan, 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)
- 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, and 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.
- 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 provide limited sound reduction for local receptors 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



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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-387/008/0, E-288/016/0 and E-288/017/0), and a bridleway (E-288/008/0), partially run along the site boundary, or run close to the site. Following guidance within paragraph 98 of the NPPF, these footpaths have been protected. These footpaths and some other transport routes including the A12, and the B1116, close to the site will have views into the site. 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 the **Chapters 4** and **5** of **Volume 4** of the **ES** (Doc Ref. 6.5) respectively.
- The human receptors in close proximity to the proposed southern park and ride are Ivy House Farm, Ash View (Lower Hacheston), Bottle and Glass Cottages, and Rookery Farm (Hacheston). There are no sites of nature conservation interest (international, European and nationally designated) within 350m of the site.
- 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, as outlined in the CoCP, any pollution-generating uses such as access, concrete batching, and other plant will be located as far as practicable from receptors. No significant air quality effects are predicted during the construction or removal and reinstatement of the southern park and ride at Wickham Market.
- During the operational phase of the park and ride, junction improvements are proposed to widen the junction of the B1078 and Valley Road, and to provide an entirely new T-junction at the junction of Easton Road and the B1116. These road improvements should serve to alleviate any congestion that could have been caused by the proposed development, therefore reducing the potential for an increase in emissions, in accordance with paragraph 5.13.6 of NPS EN-1 and paragraph 150 of the NPPF. This approach has been subject to detailed consideration of its impacts as part of **Chapter 5** of **Volume 4** of the **ES** (Doc Ref. 6.5). As baseline concentrations are low, it is considered that any residual effects would not be significant.



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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 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 no statutory designated sites of nature conservation within 5 km of the proposed park and ride. Six non-statutory sites are also present within 2 km of the site boundary, and these have been scoped out of any further assessment given their distance from the site. 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 adverse harm to existing habitats.
- 5.5.3 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 proposed site has been assessed and does not appear to support any reptilian populations. The site does contain two species-rich hedgerows, alongside existing woodland thought to provide opportunities for bat roosting. Existing natural features are intended to be retained during the construction and operation of the southern park and ride, in accordance with the **Associated Development Design Principles** (Doc Ref. 8.3). This ensures that the proposal avoids any adverse impacts to protected species.
- 5.5.4 Except for the loss of one small section to provide the site access, all boundary hedgerows would be retained, minimising direct loss of hedgerow habitat and its associated species. A buffer of 10m between the woodland, and the development would be maintained. The existing pond is also to be retained. Overall the proposal is considered to have a minor adverse impact on existing arboriculture within the site, but no adverse impacts on established woodland.



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- 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 the neighbouring woodland blocks, including Whin Belt and Wonder Grove.
- 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 the woodland areas to the west for the duration of the development. The design of the temporary construction lighting will also minimise the light spill to surrounding habitats, lowering any impact on nocturnal species such as bats.
- 5.5.7 Overall the environmental impacts of the proposal 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 qualities 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).
- Chapter 10, Volume 4 of the ES (Doc Ref. 6.5) states that 5.4 ha of the site compromises of best and most versatile land with an Agricultural Land Classification of Grade 3a. The remainder of the site would be a mix of Grade 3b (7.9 ha) and Grade 4 (4.2 ha). 8.9 ha would be highway land. The reinstatement of the site to agricultural land following the removal 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, Appendix 17C 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 EN-1 and Draft Policy SCLP10.3: Environmental Quality which state that



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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 The proposed development is located on the watershed between the River Deben and the River Ore. There is one pond within the site and two ponds adjacent to the site boundary to the north-west of the site. The site is located within a groundwater Nitrate Vulnerable Zone.
- 5.7.3 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. The majority of the site is identified to be at 'very low' surface water flood risk, with several localised areas having a 'low' to 'high' risk as identified by the Environment Agency. There is a stretch of the A12 within the site which is also identified as having a 'high' risk of surface water flooding as it passes under the B1078. There is a reservoir approximately 300m southeast of the site. The Environment Agency's 'flood risk from reservoirs' map confirms the site would not be affected if this reservoir were to breach.
- 5.7.4 It is envisaged that construction drainage would be contained within the site through the implementation of temporary SuDS early during construction. Construction drainage to be contained within the site, with infiltration to ground. A low bund would 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.
- 5.7.5 During operation, 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



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would be channelled into the SuDS infrastructure and as such, would be 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 sustainable drainage systems 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.
- 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. The site's open nature will not lead to settlement coalescences and therefore adheres to the requirements set out in Draft Policy SCLP10.5: Settlement Coalescence, which seeks to resist against reductions in openness and coalescence.
- 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 landscape impacts.



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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 planting 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.

5.9 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.
- The socio-economic impacts of the Sizewell C Project are identified in **Chapter 9** of **Volume 2** of the **ES** (Doc Ref. 6.3). Given the nature of the construction work, it is not possible to separate out the socio-economic impacts of the works associated with the southern park and ride from the wider Sizewell C Project impacts.
- Much of the core socio-economic mitigation sought for the proposed 5.9.3 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



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proposed development are therefore mitigated against where possible, and that the mitigation measures adhere to the requirements set out in NPS EN1.

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.
- Investigative studies of the site suggest that buried archaeological remains of Late Iron Age and Romano-British activity close to the site. There is the potential for Romano-British and 17th century remains to be present within the site, though the nature of any such remains will be explored through further archaeological investigation in compliance with Draft Policy SCLP11.7, which states the need for an archaeological assessment proportionate to the potential and significance of remains. Hedges which could be considered important under the Hedgerow Regulations 1997 (Ref. 1.11) comprise the hedgerow along the site boundary to the east, and the hedgerow around the small enclosure in the south-west corner of the site. These are best considered as heritage assets of low significance for historic and aesthetic interest resulting from their contribution to historic landscape character.
- There are no designated assets within the site boundary. The desk-based assessment, provided in **Volume 4**, **Appendix 9B** of the **ES** (Doc Ref. 6.5), noted the potential for as yet unrecorded heritage assets to be present within the site boundary. These will be explored through a further agreed written



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scheme of archaeological investigations, which has been produced for the Sizewell C Project as provided in **Volume 4**, **Chapter 9** of the **ES** (Doc Ref. 6.5). Change to setting arising from the proposed 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 The location of the proposed development was moved to the north and east to avoid the most sensitive parts of the former Romano-British settlement. Any disturbance of archaeological remains will 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. Heritage and archaeological impacts are fully explored in the **Chapter 9** of **Volume 4** of the **ES** (Doc Ref. 6.5).

5.11 Traffic and transport

- 5.11.1 Paragraph 5.13.3 of EN-1 states that where a project is likely to have significant transport implications, the application's ES should include a transport assessment. Given the nature of the associated development and the anticipated impact of the Sizewell C Project on local roads, a **Transport Assessment** (Doc Ref. 8.5) has been undertaken in compliance with this requirement.
- 5.11.2 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.
- The site is located on the north-western side of the A12, a single carriageway road with a speed limit of 40 miles per hour. The A12, the B1078 and the B1116 carried approximately 24,550, 3,650 and 6,650 vehicles per day respectively when assessed in 2015. The site also lies to the east and northeast of the B1116 and B1078 road junction. None of the junctions in the area exhibit any consistent levels of congestion, and the roads operate well within capacity. The access point into the site is proposed to be built off the existing north bound slip road onto the A12. The slight diversion of a cycle route close to the site and the temporary PRoW diversions during the construction, operation and removal and reinstatement of the proposed development would be in compliance with Draft Policy SCLP7.1: Sustainable Transport, which seeks to ensure the integration of development into the existing cycle and PRoW network and the safe design and layout of new routes.



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- 5.11.4 The intended 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. The approach of constructing the access 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. 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 siting of the southern park and ride close to the A12/B1078 junction could lead to negative traffic effects in and around Wickham Market. This could be exacerbated by local on-street parking, reducing road widths. For this reason, SZC Co. will 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 by directing traffic to use the A12 rather than reassign to less suitable routes, such as the B1078 through Wickham Market. This contribution will be secured through the Section 106 Agreement. This is referred to in the Section 106 Heads of Terms, appended to the Planning **Statement**. This mitigation is compliant with part g) of Draft Policy SCLP7.1: Sustainable Transport which seeks to support development whose cumulative impact will 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 section of the A12 and on local roads in this area.
- 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 To support the construction of the Sizewell C main development site, two park and ride facilities are required. This **Planning Statement** relates to the southern park and ride at Wickham Market, and sets out the need for the



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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 south and west of the Sizewell C Project, reducing the impact of workers commuting to site on the local road network.

- 5.12.2 SZC Co. have 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 **Planning Statement**.
- A combination of public consultation feedback and options testing has determined that Wickham Market is the most appropriate location for the southern 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**, and further design considerations have been assessed in both this Planning Statement and in **Chapter 3** of **Volume 4** of the **ES** (Doc Ref. 6.5).
- 5.12.4 A full description of the proposed mitigation measures is provided within **Chapters 4-12** of **Volume 4** of the **ES**, 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 4** of the **ES**, but are summarised as follows:
 - minor impacts on heritage assets;
 - minor impacts on land use, given the temporary nature of the site's proposed use;
 - minor impacts on the transport network close to the site;
 - minor adverse noise impacts;
 - moderate adverse landscape impacts on users of footpaths near the site;
 - minor adverse ecological impacts;



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- minor adverse amenity impacts due to the proximity of footpaths to the site; and
- minor adverse impacts on groundwater.
- When the considerations above are taken into account, it is considered that any minor localised negative 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 Wickham Market 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 Wickham Market is a fundamental part of SZC Co.'s delivery of the Sizewell C Project, and would minimise travel impacts and maximise opportunities to travel by sustainable modes of transport where possible. The proposed Wickham Market park and ride has been shown to be the most appropriate option through a process of local consultation and assessment of impacts.
- 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 Wickham Market 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 southern park and ride at Wickham Market 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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