



The Sizewell C Project

8.4 Planning Statement Appendix 8.4D Freight Management Facility Planning Statement

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APPENDIX 8.4D: FREIGHT MANAGEMENT FACILITY PLANNING STATEMENT

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1 Introduction

1.1.1 The nature of the Sizewell C Project, and the characteristics of the local area require a number of associated developments to form part of the Sizewell C Project in order to facilitate the construction of Sizewell C power station, and to mitigate potential environmental impacts associated with the Sizewell C Project.

1.1.2 The purpose of this **Planning Statement** (Doc Ref. 8.4) is to set out the case for a freight management facility at Seven Hills, which is one of the associated developments of the Sizewell C Project to which the application for development consent relates. This Planning Statement considers the site-specific planning issues relevant to the freight management facility at Seven Hills. Overarching planning merits/issues, such as the justification of the transport strategy as a whole, are considered within the **Planning Statement** for the main development site, the **Site Selection Report**, provided in **Appendix A** of this volume, which is appended to the **Planning Statement** (Doc Ref. 8.4), the **Transport Assessment** (Doc Ref. 8.5) and other documents accompanying the Development Consent Order (DCO) 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:** 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 freight management facility site at Seven Hills is located to the north of Levington and to the south of Bucklesham, and to the south-east of the A12/A14 junction near Ipswich (OS grid reference: TM239406), as seen in **Figure 1.1 of Volume 8, Chapter 1 of the Environmental Statement (ES)**. The proposed development is provided on the **Freight Management Facility Plans** (Doc Ref. 2.11).

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

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

2.1.4 The surrounding area is dominated by agricultural fields separated by hedgerows and pockets of woodland, with the closest residential property located 0.3 kilometres (km) to the south-east of the site. Seven Hills Crematorium is located further to the west of the site, and an intervening area of land, less than 0.2km west of the site, is allocated for a high quality business park in Policy Suffolk Coastal Local Plan 12.20A of the emerging Suffolk Coastal Local Plan Final Draft (January 2019) (Ref. 1.1).

2.1.5 The site is relatively open, and the topography of the site is generally flat with a very slight slope from west to east of up to 2-3 metres (m).

2.2 Planning and environmental designations

2.2.1 There are no statutory designations or listed buildings within, or immediately adjacent to, the site. The nearest heritage features include a bowl barrow located to the east of Levington Lane, and a Grade II listed building, known as Decoy Cottage, which is situated approximately 0.9km to the south-west of the site.

2.2.2 The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 670m to the south-west of the site at its closest point.

2.2.3 A locally designated landscape covers the valleys of Mill River and Kirton Brook, and their tributaries, to the north-east of the site, and is referred to as

a Special Landscape Area. It is approximately 1.2km from the site at its closest point.

2.2.4 The whole 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 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-western edge of the site is at a low to medium risk of surface water flooding.

2.2.5 The site is within the ‘Estate Sandlands’ Landscape Character Type (Ref. 1.2), as identified in the Suffolk Landscape Character Assessment. This is an area characterised by arable farmland, punctuated by rows of pine lines.

2.2.6 The site and the majority of the surrounding area are also situated within National Character Area 82 (NCA82) (Ref 1.3). NCA82 comprises low-lying, gently undulating farmland with areas of woodland, heath, and forest plantation.

2.2.7 The site does not lie within a neighbourhood plan area.

2.3 Planning history

2.3.1 There is no relevant planning history for this site.

3 Proposal

3.1.1 This section provides an overview of the proposed freight management facility and its proposed access.

3.1.2 The freight management facility would include:

- A parking area to accommodate approximately:
 - 150 HGVs including up to six covered HGV spaces for screen and search activities;
 - up to 12 car parking spaces for staff and visitors including up to one accessible space;
 - up to ten spaces for minibuses/vans;
 - up to four motorcycle parking spaces; and
 - cycle shelters for up to ten bicycles.
- Buildings and structures including:
 - 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; and
 - a smoking shelter.
- Three landscape bunds and additional planting.
- A ghost island junction on Felixstowe Road to allow right-turning traffic from the east to enter the site without blocking westbound traffic using Felixstowe Road.
- Other ancillary development, including signage, road markings, lighting, CCTV and utilities.
- External areas including roadways, footways, landscaping and drainage infrastructure.
- Up to four swales, including adjacent to the highway, and geo-cellular storage structures beneath two of the landscape bunds forming part of the sustainable drainage system (SuDS).access, including a ghost island.

3.1.3 The freight management facility would be operational for a minimum of seven and a half hours a day, for five days a week, to a maximum of 24 hours a day, seven days a week, during peak construction of the Sizewell C main development site.

3.1.4 Once the need for the facilities has ceased, the temporary buildings and structures would be removed in accordance with the relevant removal and reinstatement plans, which would consider the feasibility of re-using buildings, modules and materials. When the sites have been cleared, they would be returned to agricultural use.

3.1.5 **Chapter 2 of Volume 8 of the Environmental Statement (ES)** (Doc Ref. 6.9) sets out a more detailed description of development.

b) *Approach to plans*

3.1.6 The **Freight Management Facility Plans** consist of a set of plans and drawings which provide the parameters within which the Freight Management Facility will be advanced, as well as detailed plans for approval and illustrative plans for information.

3.1.7 The **Freight Management Facility Proposed Parameter Plan** is submitted for approval and will be secured by **Schedule 6** of the **Draft DCO** (Doc Ref. 3.1). The **Parameter Plan** identifies zones within which specific buildings, structures and works must be located. The **Parameter Plan** is consistent with the limits of deviation in **Article 4** of the **Draft DCO** and shown on the **Freight Management Facility Work Plan** (Work No. 13) and should be read alongside the parameter table (see **Table 2.1 at ES Volume 8, Chapter 2**) which provides maximum building dimensions within the zones shown on the **Parameter Plan**.

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

3.1.9 Several other plans within the **Freight Management Facility 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**. SZC Co. will be required to undertake works in accordance with these approved plans. These comprise:

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

- Freight Management Facility Removal and Reinstatement Plan.

- 3.1.10 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the Freight Management Facility must be carried out in general accordance with **Work Plan No. 13** (Freight Management Facility), the **Freight Management Facility Proposed Parameter Plan**, the plans as set out in Schedule 7 of the **Draft DCO** (Approved Plans) and the **Associated Development Design Principles**, save to the extent that alternative plans or details are submitted by the undertaker and approved by East Suffolk Council.
- 3.1.11 Any revised plans shall be in general accordance with the relevant sections of the **Associated Development Design Principles** and within the limits of deviation specified in the **Draft DCO**.
- 3.1.12 Illustrative plans are also included as part of the **Freight Management Facility Plans** which demonstrate how the development could be delivered in line with the **Parameter Plan** and the plans for approval listed above. The illustrative plans include a Drainage Plan, Proposed Lighting and CCTV Plan, Proposed Signage Plan, Cross Section Plan, Points of Connection Plan, and Utility 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 Proposed Covered Screen and Search Area. Requirements in the **Draft DCO** secure the submission and approval of the drainage and lighting proposals prior to commencement.

4 Policy context

4.1 National Policy Statements

4.1.1 The National Policy Statements for Energy (NPS EN-1) (Ref. 1.4) 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**.

4.1.2 As explained within the **Planning Statement**, the freight management facility is considered to be ‘associated development’ as it has a direct relationship with the principal development, and is proportionate to the nature and scale of the principal development. The provision of the freight management facility is to capture, and manage, HGV traffic at the A12/A14 junction at Ipswich, so that their movement towards the main development site can be managed through a Delivery Management System.

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 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.

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.”

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 goes on to say that the decision maker should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.

4.1.7 Paragraph 5.13.11 of NPS EN-1 states that the decision maker may attach requirements to a consent where there is likely to be substantial HGV traffic to “*control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements*”.

4.2 Other national and regional planning policies

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

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

4.2.3 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 Core Strategy and Development Management Polices (2013)**

- 4.2.4 The Core Strategy and Development Management Policies (Ref. 1.6) set out the vision and strategy for development in the area covering the former Suffolk Coastal District to 2027.
- 4.2.5 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.
- 4.2.6 The adopted Policies Map (2017) confirms that the proposed site of the freight management facility is located outside of a settlement boundary, and therefore is located within the countryside.
- 4.2.7 Core Strategy Policy SP29: countryside states that development 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).

b) **Emerging Suffolk Coastal Local Plan (Final Draft Plan) January 2019**

- 4.2.8 The emerging local plan (Ref. 1.1) contains a number of site-specific policies, including Policy SCLP12.20 for a business park at land at Felixstowe Road, a site at the Seven Hills junction of the A12 and A14, in close proximity to the 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.
- 4.2.9 Draft Policy Suffolk Coastal Local Plan 3.4: Major Proposals for Major Energy Infrastructure Projects states that proposals, and the need to mitigate against them, will be considered against policy requirements, including:

- appropriate road and highway measures are introduced (including diversion routes) for construction, operational, and commercial traffic to reduce the pressure on the local communities;
- the development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment;
- measures to ensure the successful decommissioning and restoration of the site, through appropriate landscaping, is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects; and
- cumulative impacts of projects are taken into account, and do not cause significant adverse impacts.

4.2.10 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 that local roads are not well suited to carrying the number, or type of vehicle movements that will be necessary to enable construction, and operation of major energy infrastructure projects.

4.2.11 Draft Policy Suffolk Coastal Local Plan 7.1: Sustainable Transport also states that proposals for new development that would have significant transport implications should be accompanied by a **Construction Worker Travel Plan** (Doc Ref. 8.8). This includes new large-scale employment sites, and developments that when considered cumulatively with other developments, are likely to have a severe impact on the local community or local road network. In consultation with the Highway Authority, the scale, location, and nature of development will be considered in determining how the transport impacts of development should be assessed. Non-residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed.

5 Principal planning issues

5.1 Introduction

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

5.2 The need for the freight management facility at Seven Hills

5.2.1 The need for the freight management facility is to mitigate the impacts of construction traffic on the local road network. The freight management facility would allow a controlled pattern of deliveries to the Sizewell C main development site with reduced movements during peak or sensitive hours on the network. The facility would provide ancillary buildings and structures where paperwork, and goods can be checked prior to delivery to the Sizewell C main development site, and a location where HGVs can be held and searched while they wait to enter the Sizewell C main development site. The facility would also provide a location where HGVs can be held in the event of an accident on the local road network which prevents access to the Sizewell C main development site.

5.2.2 SZC Co. have demonstrated through the locations options testing that the most appropriate location for the freight management facility is at Seven Hills. The proposed freight management facility is also not considered to have an adverse impact on the surrounding land use, on the character of the surrounding area and landscape, as both the careful site selection process and detailed mitigation strategy have endeavoured to minimise any environmental effects.

5.3 Location of the freight management facility

5.3.1 NPS EN-1 sets out that where transport mitigation is needed, demand management measures must be considered, including the controlling and routing of HGV movements to and from the site. The temporary increase in journeys on the highway network justifies specific mitigation to relieve potential problems at specific locations, including at Seven Hills. A robust assessment of the preferred route options has been undertaken, and the site’s location is compliant with the principles set out in NPS EN-1 to mitigate against potential transport impacts.

5.3.2 As detailed in **Chapter 3** of **Volume 8** of the **ES** and the **Site Selection Report** appended to the **Planning Statement**, potential sites were considered with regard to their proximity to the Port of Felixstowe, which is

anticipated to play a major role in the delivery of materials to the Sizewell C main development site. The freight management facility site location therefore needed to consider both HGVs arriving on the A14 from the east, as well as HGVs arriving on the A14 from the west. HGVs will also continue to make their journey to the main development site along the A12, and so the freight management facility needs to be located with close proximity to the A14 and A12. To accommodate for the facilities the freight management facility needs to be able to operate, a site of approximately 10 hectares (ha) was required.

- 5.3.3** The land considered in Options 1 (Orwell Lorry Park West), and 2 (Orwell Lorry Park East) at consultation, was considered to no longer be available for the timescales of the SZC Co. Sizewell C Project, as outline planning permission (local planning authority ref: DC/17/4257/OUT) was granted in June 2018 for employment development of both options. The initial Seven Hills Option 3 site was also no longer available having been allocated at Policy SCLP12.20A of the Final Draft Suffolk Coastal Local Plan. As such, two sites further along the A14, including a slightly smaller 9.9ha site at Seven Hills (Option 1 at Stage 3) and Innocence Farm (Option 2 at Stage 3) were then subsequently considered.
- 5.3.4** Detailed testing of the environmental, heritage, ecology and landscape considerations demonstrated that both of these sites would have similar impacts. However, noise impacts were more significant within the Option 2, Stage 3 site. Additionally, traffic flows through the use of the A14 junction were tested to find that Option 1, Stage 3 at Seven Hills would create less pressure on the A12/A14 junction. Further analysis identified that Option 2, Stage 3 would also result in HGVs taking a 9.5-mile detour, which would put pressure on the westbound diverge slip, creating unnecessary additional vehicle movements. Option 1, Stage 3 is also located to the east of the Orwell Crossing, and so would allow the freight management facility to continue to operate in the event of a bridge closure.
- 5.3.5** Option 2, Stage 3 forms part of a wider proposed 67ha allocation within Policy SCLP12.35 of the emerging Suffolk Coastal Local Plan for port related businesses, including HGV parking. The policy states that the Option 2, Stage 3 site could, in exceptional circumstances, be used to assist in the delivery of nationally significant infrastructure projects.
- 5.3.6** Two further options at Sproughton and Stowmarket were suggested by local authorities, but these have been disregarded due to their distance from the Port of Felixstowe and their traffic impacts. The option at Sproughton would have required HGVs arriving from the east to cross the Orwell Crossing twice (to visit the freight management facility and then join the A12 towards the Sizewell C main development site), involving a 20-mile detour. As such, Option 3 (Sproughton) would have put additional pressure on the Orwell

Crossing and, should the crossing be closed, the HGVs would not have been able to be held anywhere off of the road network.

5.3.7 Furthermore, outline planning consent for an enterprise park comprising 90,000 square metres (sqm) of employment floorspace, retail uses and a hotel (local planning authority ref: 17/05687) was granted by Babergh and Mid Suffolk District Councils in December 2018. This consented scheme encompassed the potential site at Sproughton and did not include space specifically for HGV parking. It should also be noted that a number of pre-commencement conditions have been submitted by the developer and approved by the local planning authority indicating that the consent is coming forward and is unavailable for a freight management facility site.

5.3.8 The Stowmarket option would have been circa 45 miles from the Sizewell C main development site and would have been a 60-minute drive via the A14 and A12 in uncongested conditions. This would have been too far from the site to provide operational efficiency, and too far from the A14/A12 junction to effectively manage HGV movements on the local road network.

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, 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 public rights of way (PRoWs), National Trails and other rights of access to land are important recreational facilities. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other PRoWs. Where this is not the case the decision maker should consider what appropriate mitigation requirements might be attached to any grant of development consent. The mitigation measures with regard to local amenity are set out below.

5.4.3 It is anticipated that the freight management facility would be operational for a minimum of seven and a half hours a day, five days per week, to a maximum of 24 hours per day, seven days a week at the height of the Sizewell C Project construction. The distance between the site and any noise sensitive receptors (over 300m) is such that no primary noise and vibration mitigation measures are considered to be necessary. Tertiary mitigation in

the form of the good practice outline within the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) will control construction noise.

- 5.4.4 The distance between the site boundary, and the closest noise sensitive receptors (1 and 2 Keepers Cottages) is approximately 350m. Initial testing showed that there was no possibility of an adverse effect. Additionally, 1 and 2 Keepers Cottages are approximately 100m from the A14 dual carriageway, where noise from existing road traffic is likely to be substantial. Therefore, the proposed development is in accordance with Policy Suffolk Coastal Local Plan 11.2: Residential Amenity, which states that development must not cause an unacceptable loss of amenity to neighbouring or future occupiers of development in the vicinity, including through noise and disturbance impacts.
- 5.4.5 The assessment of any likely impacts from construction dust has been carried out at **Chapter 5 of Volume 8 of the ES**. There is a risk of proposed construction activities giving rise to changes in dust deposition rates and concentrations of particulate matter in the air. Tertiary mitigation in the form of the good practice outlined within the **CoCP** (Doc Ref. 8.11) will control construction dust. These changes can be managed through locating dust and particulate generating uses, such as the site access, any concrete batching plant and (if required) mobile crushing and screening plant, as far as practicable from receptors.
- 5.4.6 The roads likely to be affected by traffic emissions from the proposed development include the A12, A14, and A1156 as there would be an increase in HGV vehicles on these roads. However, this impact is not considered to be significant. The low baseline concentrations indicate that there would unlikely be significant adverse air quality effects at receptors, including residential properties during operation of the freight management facility. The embedded mitigation in the proposal therefore accords with Policy SCLP11.2: Residential Amenity, and also with Paragraph 5.6.4 of EN-1 which states that the aim should be to keep amenity impacts to a minimum and at a level that is acceptable.
- 5.4.7 The site does not contain any PRow, cycle routes, outside recreational facilities, access land, or public open space, although 22 PRows were identified nearby. From some PRows, the proposed development would not be visible due to distance, topography, and existing woodland/hedgerow screening. Where PRows have the potential to be impacted upon, impacts on these would be managed through landscape bunds incorporated into the design of the proposed development, alongside perimeter planting, shorter lamp columns, and a best practice approach to minimising light spill. Structures and buildings would be designed to create an unimposing appearance that harmonises with the surroundings, with buildings screened as far as possible.

5.5 Biodiversity and ecology

5.5.1 NPS EN-1 recognises the need to protect the most important biodiversity and geological conservation interests, but also that nationally significant low carbon energy infrastructure development may include benefits that 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. There are no statutory or non-statutory sites that lie within 500m of the site boundary, and as such there will be no impacts or land take from these sites. The mitigation measures for each of the requirements is addressed in **Chapter 7, Volume 8** of the **ES**, and the findings of any relevant studies are outlined in that chapter.

5.5.2 The site comprises mostly of intensively managed arable fields of a type widespread in Suffolk, with no notable plant species identified. One species-rich hedgerow was identified on the site’s boundary, and all of the hedgerows on-site are considered to be of local importance. The site is considered to be of low habitat potential for invertebrates, amphibians or reptiles. Some trees within the site have been identified to have bat roosting potential, but all apart from one with low potential and one with medium potential are to be retained. Some ground nesting and farmland birds could be present on-site.

5.5.3 In order to mitigate the impacts of the development, and protect the existing habitats and species, mitigation including the retention of species-rich hedgerows, badger fencing, planting, a 10m landscaped buffer zone, sustainable urban drainage systems (SuDs), and environmentally sensitive construction lighting. The full list of mitigation measures is set out in **Chapter 7, Volume 8** of the **ES**. This approach is in accordance with Policy Suffolk Coastal Local Plan 10.1: Biodiversity and Geodiversity, which states that development will be supported where it can be demonstrated that it positively contributes towards biodiversity. This mitigation approach is also in accordance with NPS EN-1, and opportunities to conserve and enhance the existing biodiversity interests have been taken.

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 comprises largely Grade 3a and 3b agricultural land, with one small area of Grade 1, and a small area of non-agricultural land. The returning of the site to agricultural land following the decommissioning of the freight management 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. This is in accordance with paragraph 5.10.8 of EN-1 and Draft Policy Suffolk Coastal Local Plan 10.3: Environmental Quality, which state that applicants should identify any effects, and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed.

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 site does not lie within any groundwater Source Protection Zones. A raised balancing pool to manage drainage from the A12 is located immediately adjacent to the site, and a second balancing pond is located within the A12/A14. The site is located within Flood Zone 1.

5.7.3 Alongside NPS EN-1 seeking appropriate mitigation, Policy Suffolk Coastal Local Plan 9.5: Flood Risk requires sites to exhibit the three main principles of flood risk, in that they should be safe, resilient, and not increase flood risk elsewhere. In order for any flooding risk to be mitigated for, surface water run-off would be contained within the site through the use of swales and underground infiltration tanks. SuDS would be implemented for the operational phase of the freight management facility to allow surface water run-off to infiltrate into the ground, with a swale constructed across the northern boundary, and part of the eastern boundary to ensure that surface water run-off to be contained within the site. Foul sewage is to be treated on-site, before being channelled into the SuDS infrastructure. This is confirmed in **Chapter 12, Volume 8** of the **ES**.

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 primarily flat, agricultural land and consists of two small arable fields separated by an intermittent low hedgerow with occasional semi-mature hedgerow trees, running north-east to south-west through the centre of the site. The northern, eastern and western boundaries of the site are defined by similar intermittent field boundary hedgerows with occasional trees. Large areas of woodland are also present to the west of the site along with major road and rail routes, including the A12, the A14 and the Ipswich to Felixstowe railway line. There are no landscape features within the site except for hedgerows along existing field boundaries, and through the centre of the site, and the vegetation on the Felixstowe Road.

5.8.3 Visibility is likely to be contained due to the contained nature of the surrounding area, but the development's containment will further be improved through the retention of existing boundary vegetation and the provision of new boundary planting, grassed bunding, and/or fencing, alongside grassed areas, tree, and shrub planting. This approach is compliant with Policy Suffolk Coastal Local Plan 10.4: Landscape Character, which expects development proposals to demonstrate that their location, scale, form, design, and materials, will protect and enhance the special qualities and features of the area. The enclosed nature of the site also contributes to only a localised effect on immediate landscape character during the construction of the site which are not considered to be significant.

5.8.4 The Suffolk Coasts and Heaths AONB at its closest point lies 500m to the west of the site. Field survey work has confirmed that there would be no views of the proposed development from the AONB, and no potential for effects on the special qualities of the AONB, as detailed in **Chapter 6, Volume 8** of the **ES**.

5.9 Socio-economics

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**. Given the nature of the construction work, it is not possible to separate out the socio-economic impacts of the works associated with the freight management facility 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** (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**. 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 There are no designated heritage assets within the site, but there are three Scheduled Monuments within 500m of the site boundary. These are elements of a larger round barrow cemetery, which extends up to 1km to the west of the site boundary on Levington Heath. There is the potential for further evidence of prehistoric activity within the site, as the desk-based assessment has confirmed in **Volume 8, Chapter 9** of the **ES**. The site is considered to have low potential for records from the Romano-British period, the early medieval period, the medieval period and the post-medieval and modern periods.
- 5.10.4 Detailed design will seek to mitigate perceptual change, including the retention of existing boundary vegetation, a 10m landscaped buffer zone to the north, east and west boundaries, three landscaped bunds to be included within the site alongside additional planting. The construction of the proposed development would result in the complete removal, or disturbance of, surviving archaeological remains within the site given the intrusive nature of the works in relation to the ground on-site, but not all of these features are readily visible above ground, and do not contribute to the landscape context. No further effects are anticipated during the operational or reinstatement phases of development.
- 5.10.5 A suitable mitigation strategy and written scheme of investigation would be agreed with Suffolk County Council Archaeological Service, provided in the **CoCP** (Doc Ref. 8.11), which would set out specific mitigation proposals for this site, as detailed in **Volume 8, Chapter 9** of the **ES** (Doc Ref. 6.9).
- 5.10.6 There would be no changes to the setting of the closest listed building, the Grade II listed Decoy Cottage, as its setting is that of parkland and woodland, and is not to be altered as part of the proposed development.

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 size 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 freight management facility is in compliance with draft Policy SCLP7.1: Sustainable Transport, which states that development will be supported where it reduces conflict between users of the transport network, including pedestrians, cyclists, users of mobility vehicles and drivers, and does not reduce road safety.
- 5.11.3 The site is located to the south of the A14, close to the Seven Hills junction with the A12 and the A1156, which are all important roads that serve the region of Lowestoft, Felixstowe and Ipswich. The average daily weekday flow on the A14 west of Seven Hills is 59,000 vehicles, predicted to rise to 69,550 without Sizewell C construction traffic, as assessed in 2015. The site is located adjacent to the A12/A14 junction and its proposed access from Felixstowe Road (A1156) means that construction traffic can benefit from proximity to the trunk roads without causing noticeable disruption to traffic flow along them. The site's location close to the A14 means that construction materials would be able to reach the site using high-capacity roads which already handle HGVs.
- 5.11.4 Some short-term disruption to traffic flow including diversion could be experienced during the construction of the site access on Felixstowe Road, which is lightly used as most through traffic uses the A14. The impact of this construction activity on traffic flow would not be significant.
- 5.11.5 The key intention of the freight management facility is to manage the flow of HGV traffic to the Sizewell C construction site during the freight management facility's operational phase of development. It provides the ability to flexibly time HGV movements to reduce the impact of Sizewell C traffic on existing peak time traffic. It also encourages HGV drivers to use the trunk road network rather than seeking shortcuts along secondary routes. It also importantly provides a means of mitigation in the event of disruption on the A12 or local Sizewell C access roads. During disruption, provision of a freight management facility would allow HGVs to park in a safe, and suitable location, which does not impede existing road traffic until disruption clears. This is compliant with part g) of Draft Policy SCLP7.1, which seeks to ensure that the cumulative impact of new development will not create severe impacts on the existing travel network.
- 5.11.6 The volume of vehicles using the freight management facility would be low compared to the existing volumes using the A14, even at night. The operation of the freight management facility is considered to have a negligible impact on through traffic flow. There would be minor adverse effects on traffic delay during the removal of the freight management facility and its restoration. Such effects would be similar to the effects arising during the construction phase.

5.12 Noise and vibration

5.12.1 No significant noise and vibration effects are expected from the construction and removal and reinstatement of the freight management facility. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11). Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.

5.12.2 Similarly, no significant effects are expected as a result of the operation of the freight management facility. As part of the detailed design of the facility, mechanical plant items will be specified to achieve target noise levels that are below the significant noise effect level.

5.13 Planning balance

5.13.1 The proposed development is required to support the construction of the Sizewell C Project. This **Planning Statement** relates to this proposed facility, and sets out the need for the development and the consideration of its impacts. A freight management facility would allow for the management of HGVs travelling towards the Sizewell C main development site, and the mitigation of their impacts on the local road network.

5.13.2 It has been demonstrated that the role of the freight management facility 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 freight management facility, and to demonstrate that the facility has had regard to its site-specific planning issues. These considerations are covered in earlier sections of this **Planning Statement**.

5.13.3 A combination of public consultation feedback and options testing has determined that Seven Hills is the most appropriate location for the freight management facility 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** within this **Planning Statement**, and further design considerations have been assessed in both this **Planning Statement** and in **Chapter 3 of Volume 8 of the ES** (Doc Ref. 6.9).

5.13.4 A full description of the proposed mitigation measures is provided within **Chapters 4-12 of Volume 8 of the ES** (Doc Ref. 6.9), addressing all potential impacts of the proposed freight management facility to limit them where possible and to mitigate them if practical.

5.13.5 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 adverse impacts are fully considered in **Chapters 4-12 of Volume 8 of the ES** (Doc Ref. 6.9), but are summarised as follows:

- Negligible to minor adverse residual impacts on the nearest noise receptors;
- moderate adverse residual impacts on landscape character;
- minor adverse residual impacts on the heritage landscape and heritage assets in the form of archaeological remains;
- minor adverse residual impacts on ecology given the extent of natural habitats in and around the site;
- minor to major-moderate adverse residual impacts on the amenity of the nearby PRowS;
- minor adverse residual impacts due to a reduction in the rate/volume of water discharging to ground but the proposed SuDS would provide minor beneficial impacts on groundwater conditions and private water supplies.;
- minor adverse impacts on the transport network during the construction phase;
- minor adverse impacts on soils and land use, due to the long-term but temporary loss of agricultural land; and
- negligible impacts on flooding and air quality.

5.13.6 The site selection process has enabled impacts to be fully considered, with the site that is considered to have the least amount of impacts on the local area proposed. When the considerations above are taken into account, it is considered that any localised negative impacts caused by the freight management facility can be outweighed by the positive approach to HGV movements towards the Sizewell C construction site that the facility is enabling.

6 Conclusion

- 6.1.1 NPS EN-1 and NPS EN-6 together form the primary basis for deciding DCO applications for nuclear NSIPs. It demonstrates that when assessed against these policies and material considerations, including local planning policy, the freight management facility 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 freight management facility at Seven Hills is a fundamental part of SZC Co.'s delivery of the Sizewell C Project, and would minimise travel impacts, and enable the careful management of construction traffic where possible. The proposed freight management facility has been shown to be the most suitable option through a process of local consultation and assessment of impacts.
- 6.1.3 Whilst the Sizewell C Project as a whole will, in common with any national infrastructure project, result in some adverse effects to the environment and local community, the main **Planning Statement** (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 freight management facility at Seven Hills 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 freight management facility itself enables SZC Co. to be able to coordinate the movement of HGVs towards the main construction site, alleviating the impact on local roads. The location of the freight management facility allows for materials to be brought to Felixstowe port by sea, reducing highways impacts elsewhere. The presence of a freight management facility also allows for the parking of HGVs in any event that they are unable to access the main development site. The freight management facility has been located to minimise amenity impacts on local residents, and has also been located outside of sensitive landscape designations to reduce any visual impacts.

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- 1.6 Suffolk Coastal District Council (2013). Suffolk Coastal District Local Plan Core Strategy and Development Management Policies. (Online). Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/SCDC-Local-Plan-July-2013.pdf> (Accessed January 2020)