



The Sizewell C Project

8.4 Planning Statement Appendix 8.4E Two Village Bypass Planning Statement

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APPENDIX 8.4E: TWO VILLAGE BYPASS PLANNING STATEMENT

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1 Introduction

1.1 The Planning Statement

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 the new nuclear power station, Sizewell C, 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 the two village bypass (the proposed development), which is one of the associated developments of the Sizewell C Project to which the application for development consent relates. This statement considers the site-specific planning issues relevant to the proposed development. 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 appended to this **Planning Statement**, the **Transport Assessment** (Doc Ref. 8.5) and other documents accompanying the application for development consent as seen in the **Navigation Document** (Doc Ref. 1.3).

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 two village bypass 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 proposed route would be approximately 2.4 kilometres (km) in length and would be located to the south and east of the villages of Farnham and Stratford St Andrew (see the Existing Site Plan in **Book 2** which shows the site boundary). The route would depart the A12 to the east of Stratford St Andrew and re-join the A12 to the east of Farnham at the A12/A1094 Friday Street junction.

2.1.2 The site predominately comprises grade 2 to grade 4 agricultural land (very good to poor) and hedgerows. The River Alde also flows through the site from north to south.

2.1.3 There are two main settlements which sit to the west of the proposed route, Stratford St Andrew and Farnham. There are also a number of dispersed farmsteads along the route, with the closest residential properties being at Friday Street Farm to the north-east; Mollett's Farm to the north-west; Farnham Hall, Pond Barn Cottages and Hill Farm to the south of Farnham; and Parkgate Farm and properties along the A12 at the western end of the route.

2.2 Planning and environmental designations

2.2.1 There are no designated heritage assets within the site boundary. There are fifteen listed buildings within close proximity to the site, of which two are grade II* listed, the Church of St Mary (LB 1230211), Farnham, and the Church of St Andrew (LB 1231407), Stratford St Andrew. All other listed buildings within proximity are listed at grade II, and primarily comprise houses and shops either side of the A12 in Farnham and Stratford. Farnham Manor (LB 1230210) is located to the south-east of Farnham village. A small section of the Glemham Hall Registered Park and Garden (grade II) is located within the site boundary, with the remainder outside of the site adjoining the western edge of the site. The grade II listed Benhallstock Cottages (LB 1377115) are located adjacent to the A12 to the south of Benhall Park.

2.2.2 The majority of the site, including the two construction compound options, is located in Flood Zone 1, where fluvial flood risk is low. A small section of the bypass, where it would cross the River Alde, would be located in Flood Zones 2 and 3b, where fluvial flood risk is between a medium to high probability. Where the bypass crosses the River Alde there is a risk of surface water flooding, varying from low to high, however, the majority of the site has a very low surface water flood risk.

- 2.2.3 At a national level, the site and much of the study area is situated within National Character Area 82: South Coast and Heaths (Ref. 1.1). National Character Area 82 comprises low-lying gently undulating farmland with areas of woodland, heath and forest plantation. The valley of the River Alde is typical of the transition between this character area and the adjacent National Character Area 83: South Norfolk and High Suffolk Claylands to the west. National Character Area 83 is a predominantly flat clay plateau incised by numerous small-scale wooded river valleys.
- 2.2.4 At a local level, the site is predominantly located in the ‘rolling estate Sandlands’ landscape character type as identified in the Suffolk County Landscape Character (Ref 1.2). The valley of the River Alde is characterised as the ‘valley meadowlands’ landscape character type assessment.
- 2.2.5 The western end of the route falls within the locally designated River Alde Valley Special Landscape Area.
- 2.2.6 The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) is located approximately 2.5km to the south-east of the eastern end of the proposed route.
- 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 any of the land within the site boundary. On land immediately adjacent to the site, to the east of Farnham Hall, an application (LPA ref: DC/17/0818/CLP) was submitted for a 2 metre (m) high wall. The application was approved on 17 August 2017.
- 2.3.2 An application (LPA ref: DC/18/0322/FUL) was also submitted on land adjacent to Pond Barn Cottages, immediately to the east of the route, for an 80,000 cubic metre reservoir covering an area of approximately 3.5 hectares (ha). The application was approved on 25 June 2018.

3 Proposal

3.1.1 The proposed two village bypass would run from the A12 to the west of Stratford St. Andrew and re-join the A12 to the east of Farnham.

3.1.2 The proposed development would comprise:

- a 2.4km single carriageway, with a design speed of 60 miles per hour (97km per hour) and 7.3m wide with 1m hardstrips and 2.5m wide verges;
- a new four arm roundabout near Parkgate Farm;
- a crossing of the River Alde via an overbridge. The overbridge would be 60m in length and have two concrete intermediary piers. The bridge would be 7.5m in height above ground level to the road surface;
- a single span bridge for public rights of way (PRoW) to cross the bypass;
- an accommodation track from Pond Barn Cottages, alongside the bypass to Farnham Hall Farm House;
- a new four arm roundabout where the bypass meets the A1094;
- infiltration basins for drainage;
- environmental mitigation, including screen planting and landscape bunds;
- flood compensation areas, (if required)¹;

¹ The conclusion of the Two Village Bypass FRA (Doc Ref. 5.5) and Volume 5, Chapter 12 of the Environmental Statement (Book 6) is that the flood compensation areas are not necessary to mitigate the impacts of the proposed development. In response to consultation the Environment Agency has stated that written consent from the landowner must be obtained for the increased flood depth, hazard and velocity that would be experienced in localised areas. SZC Co. will continue to engage with the land owner with the view to reaching such an agreement. However, as this agreement has not been obtained at the time of submission of the application, the proposed development includes areas within the site to the north of the proposed bridge that could provide flood compensation. It is not considered that this flood compensation land is required for the proposed development. It is nevertheless being put forward as part of the DCO application in case the Secretary of State disagrees with this position and takes the view that it is in fact required.

- diversion and realignment of footpaths; and
 - associated signage, crossings, junctions, services, lighting and fencing.
- 3.1.3 It is expected that construction work for the proposed development would take up to 24 months to complete, during the early years of construction of the Sizewell C Project.
- 3.1.4 Once operational, the two village bypass would form a new permanent section of the A12 and would become part of the adopted highway network.
- 3.1.5 **Chapter 2, Volume 5** of the **Environmental Statement (ES)** sets out a more detailed description of development.
- a) [Approach to plans](#)
- 3.1.6 The parameters within which the two village bypass will be constructed, operated and maintained are shown on the relevant **Work Plans** (Work No. 11A, 11B and 11C). These are included within the **Work Plans** (Doc Ref. 2.3) set of drawings and not the **Two Village Bypass Plans** (Doc Ref. 2.8) set.
- 3.1.7 The Draft DCO states that the two village bypass will be constructed, operated and maintained anywhere within the area as shown on the **Work Plans No. 11A, 11B and 11C**, which include lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.
- 3.1.8 These parameters have informed the assessment presented in the **ES Volume 5** and the flexibility being sought is consistent with the findings of the **ES**.
- 3.1.9 There are several plans within the **Two Village Bypass Plans** set which provided additional detail and are submitted for approval as part of this application for development consent. These plans will be secured by **Schedule 7** of the **draft DCO** and SZC Co. will be required to undertake works in accordance with these approved plans. These comprise:
- Two Village Bypass Proposed General Arrangement and Profiles
 - Two Village Bypass Site Clearance Plan
 - Two Village Bypass Proposed Landscape Masterplan and Finished Levels

- Two Village Bypass A12/A1094 Eastern Roundabout Proposed General Arrangement
- Two Village Bypass A12/A1094 Eastern Roundabout Proposed Profiles
- Two Village Bypass A12 Western Roundabout Proposed General Arrangement
- Two Village Bypass A12 Western Roundabout Proposed Profiles
- Two Village Bypass Proposed Staggered Junction Plan and Profiles
- River Alde Road Bridge Proposed General Arrangement
- Foxburrow Wood Footbridge Proposed General Arrangement and Elevation

3.1.10 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the two village bypass development must be carried out in accordance with **Work Plan Nos. 11A, 11B and 11C**, the plans as set out in **Schedule 7** of the **Draft DCO** (Approved Plans) and the relevant **Associated Development Design Principles**, save to the extent that alternative plans or details are submitted by the undertaker and approved by Suffolk County 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 submitted as part of the **Two Village Bypass Plans** which provided further illustrative details and demonstrate how the development could be delivered in line with the **Work Plans** and the plans for approval listed above. The illustrative plans include Cross Sections, Drainage Plans, Proposed Street Lighting Plans and Existing Utilities Drawings. 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. 1.3) and Nuclear Power Generation (NPS EN-6) (Ref 1.4) provide the primary policy

context against which decisions on new nuclear power stations (and any associated development) should be made. The status of the NPS is referred to in **Chapter 3** of the **Planning Statement** (Doc Ref 8.4).

4.1.2 As explained within **Chapter 6** of the **Planning Statement** (Doc Ref. 8.4), the proposed development is considered to be ‘associated development’ as it has a direct relationship with the principal development (Sizewell C), and is proportionate to the nature of and scale of the principal development.

4.1.3 Paragraph 5.13.6 of NPS EN-1 (Ref 1.3) 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.

4.1.4 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.”

4.1.5 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.

4.1.6 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 heavy goods vehicles (HGVs) 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 local planning policies

4.2.1 NPS EN-1 and NPS EN-6 together form the primary basis for deciding development consent order (DCO) applications for nuclear NSIPs. Paragraph 4.1.5 of NPS EN-1 states that other matters which the decision maker may consider both “*important and relevant*” to its decision-making include development plan documents or other documents in the local development framework, such as the National Planning Policy Framework (NPPF) (2019) (Ref 1.9) and other local policy documents. Paragraph 4.1.5 of NPS EN-1 then explains that, in the event of a conflict between local policy and an NPS, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure.

4.2.2 Under Section 105 (2)(a) of the Planning Act 2008 (Ref 1.5) the decision maker is also required to have regard to a local impact report produced by the relevant local authorities. Local authorities can determine the content of their own local impact reports, and this may include reference to development plan documents. This is likely to be particularly relevant to planning policy designations, which are not replicated in the NPSs.

4.2.3 The host local planning authority is 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.

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

a) The National Planning Policy Framework (NPPF) (2019)

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

"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may

include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.” (Ref. 1.9).

- 4.2.6 The NPPF contains policies and guidance that may be considered relevant to the proposed park and ride development in particular. It also promotes low carbon energy and its associated infrastructure.
- 4.2.7 Section 14 of the NPPF concerns climate change, flooding and coastal change. It states in paragraph 148 that the transition to a low carbon future should be supported, including renewable and low carbon energy and associated infrastructure.
- 4.2.8 Paragraph 150 of the NPPF sets out that “*new development should be planned for in ways that... can help reduce greenhouse gas emissions...*” (Ref. 1.9).
- 4.2.9 In plan-making terms, paragraph 151 of the NPPF states that suitable areas for low carbon energy sources and supporting infrastructure should be identified to help secure their development. Such supporting infrastructure would include development associated with the transport and movement of the construction workforce.
- 4.2.10 Section 9 of the NPPF promotes the delivery of development that incorporates sustainable transport solutions. Relevant to the associated development transport-related proposals, the NPPF states in paragraph 102 that:

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

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

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

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

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

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

The NPPF adds in paragraph 108 c) that it should be ensured that “any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.” (Ref. 1.9).

- 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. 1.9).
- 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. 1.9).

b) **The Core Strategy and Development Management Polices (2013)**

- 4.2.16 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.
- 4.2.17 Strategic Policy SP10 of the Core Strategy and Development Management Policies (Ref 1.6) 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.
- 4.2.18 Strategic Policy SP11 of the Core Strategy and Development Management Policies (Ref 1.6) seeks to maximise opportunities for local journeys within the local and strategic road networks serving the district, to support the 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.
- 4.2.19 Strategic Policy SP18 supports the provision of new infrastructure in order to service and deliver new development at the required phase of the development.

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

- 4.2.20 The emerging local plan (Ref 1.7) contains a number of site specific policies, including for sites relevant to some of the Sizewell C Project's associated development sites, such as at Darsham, the four villages or the vicinity of SZC Co's proposed freight management facility. The emerging local plan also acknowledges the proposed improvements to the A12 in the vicinity of the site at the villages of Farnham and Stratford St Andrew (paragraph 1.30). 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.
- 4.2.21 There are no additional policies that are considered relevant to the two village bypass.
- 4.2.22 Draft Policy Suffolk Coastal Local Plan (SCLP) 3.4: Proposals for major energy infrastructure projects (Ref 1.7) states proposals and the need to mitigate against them will be considered against policy requirements, including:

- requirement for robust assessment of the potential impacts of the Suffolk Coast and Heaths AONB;
- appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities; and
- the development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment.

4.2.23 Table 3.6 in the draft SCLP (Ref 1.7) refers to the identified issues relevant to the consideration of energy infrastructure proposals, including the impact on the transport network. Specifically, it recognises 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.

4.2.24 Policy SCLP3.5 emphasises the need for developers to consider the infrastructure requirements needed to support and service the proposed development. All development will be expected to contribute towards infrastructure provision to meet the needs generated.

5 Principal planning issues

5.1 Introduction

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

5.2 The need for the two village bypass

5.2.1 The rationale for proposed development is to assist in accommodating the anticipated traffic associated with the Sizewell C Project, and reduce traffic flows on the A12 through Stratford St. Andrew and Farnham.

5.2.2 As set out in the Site Selection Report that accompanies this **Planning Statement**, there is a long standing public concern regarding the existing perceived traffic levels along the A12 and through the four villages of Farnham, Stratford St. Andrew, Little Glemham and Marlesford.

- 5.2.3 Traffic modelling indicates that the construction traffic associated with the Sizewell C Project through Stratford St Andrew and Farnham would justify the construction of a two village bypass to relieve Stratford St. Andrew and Farnham of HGV and worker transport movements. The main concern on the A12 is the tight bend in Farnham that would be subject to highway safety concerns and congestion should HGVs travel through the village.
- 5.2.4 Analysis suggested that congestion was only likely within Farnham due to the narrowing of the road at the Farnham bend. Therefore, SZC Co. concluded that the impact of Sizewell C traffic would not be sufficient to justify a bypass of all four villages.
- 5.2.5 The proposed development would be open for the public to use as well and would continue to relieve the A12 post-construction when vehicle movements continue.
- 5.2.6 Policy SCLP2.2 emphasises the importance of strategic infrastructure priorities, particularly the timely delivery of highways improvements (A12 and A14). Paragraph 2.15 of the Local Plan states that the provision of new and improved infrastructure is essential to ensure that the growth planned across the area is sustainable. As such, proposals are therefore compliant with the Local Plan.
- 5.2.7 It is anticipated that up to 60 HGVs would arrive per day during the construction period. This combined with existing traffic would put pressure on the known pinch-points on the A12 through Farnham, where there are locally perceived highway safety concerns. This combined with the impact on amenity in Farnham due to the scale of traffic flows on the A12 and the immediate proximity of traffic to properties brought about the consideration of other means to accommodate construction traffic.
- 5.2.8 Once operational, the proposed development would remove all Sizewell C HGV related traffic and a significant amount of existing traffic from the villages of Farnham and Stratford St. Andrew, providing a legacy benefit to the area.
- 5.2.9 Existing traffic on the A12 in this location is approximately 18,900 vehicles daily. Once the two village bypass is operational, during the peak construction period of the Sizewell C Project, the existing road through Stratford St. Andrew and Farnham is predicted to be used by 250 vehicle movements per day, representing a 99% reduction in traffic through Stratford St. Andrew and Farnham, including during peak hours (98% reduction between 07:00-09:00 and 99% reduction between 16:00-18:00 on a typical day).

- 5.2.10 During peak construction period of the Sizewell C Project it is anticipated that approximately 22,200 vehicle movements per day would use the two village bypass. Of these movements, it is estimated that there would be 1,550 vehicle movements per day from all Sizewell C-related traffic (including workers, light goods vehicles, HGVs, buses, etc) on the two village bypass, with the remainder being vehicle movements by the general public. On the busiest day, the Sizewell C-related traffic flow is estimated to be 1,850 vehicles.
- 5.2.11 On a typical day during the peak construction period of Sizewell C, this would include an estimated 1,430 HGV movements and 250 bus movements respectively. On the busiest day, the number of HGV movements would increase to an estimated 1,720; the bus movements would remain at 250 on the two village bypass.
- 5.2.12 Once the Sizewell C main development site has been completed, it is anticipated that, on a typical day, approximately 22,450 vehicles (of which 200 would be Sizewell C related) would use the two village bypass, including 920 HGV movements.
- 5.2.13 This offers highway safety improvements to the residents of the two villages.

5.3 The location of the proposed two village bypass

- 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 Farnham.
- 5.3.2 Several options were considered by SZC Co, including traffic control options through Farnham, a road widening scheme through Farnham, a single Farnham village bypass and the provision of a four village bypass, but SZC Co did not consider these to be a proportionate response to the highways issues and so were not considered acceptable to mitigate Sizewell C construction traffic. A four village bypass option had historically been considered by Suffolk County Council to relieve congestion, but a report issued in 2006 (Four Villages Study) (Ref. 1.8) stated that it was not considered to be acceptable against the tests set by planning policies at that time. See the Site Selection Report that accompanies this **Planning Statement** for further details.
- 5.3.3 The narrow bend in Farnham is recognised to be the most significant existing issue on the four villages stretch of the A12, particularly when

multiple large vehicles are passing in each direction at once. The location of the works are informed by the previous work carried out by Suffolk County Council, and facilitate the shortest bypass route possible whilst also observing environmental constraints. This is in order to reduce journey times compared with the use of the existing A12 route, ensuring that it is the preferable option for road users.

- 5.3.4 Strategic Policy SP29 of the Core Strategy states that development in the countryside will be limited to that which of necessity must be located there. As outlined below, a robust assessment of the preferred route options has been undertaken, and the site's location is compliant with the principles set out in Policy SP29, and draft Policy SCLP3.3, and also due to other policies in the draft Local Plan (SCLP 2.2 and 3.1) indicating acceptability of development. The description of alternatives considered and the evolution of design can be found at **Chapter 3, Volume 5** of the **ES**.

5.4 Traffic and transport

- 5.4.1 Paragraph 5.13.3 of NPS EN-1 states that where a project is likely to have significant transport implications, the application's **ES** should include a transport assessment. Given the nature of the associated development and the anticipated impact of the Sizewell Project on local roads, a **Transport Assessment** has been undertaken in compliance with this requirement. **Chapter 10, Volume 10** of the **ES** also assesses the transport effects arising from the construction of the Sizewell C Project. The proposed route of the two village bypass would comprise a single carriageway, running to the south of the A12 in an east-west direction approximately 2.4km in length. It begins to the west of Stratford St Andrew via a new four-arm roundabout, and re-joins the A12 via new four-arm roundabout to the east of Farnham to the east of the A12/A1094 junction. The proposed development is intended to reduce impacts on the villages of Farnham and Stratford St Andrew whilst also providing a road that is able to support the level of construction traffic that the Sizewell C Project will create. The creation of a two village bypass also has the local benefit of resolving perceived highway safety issues through Farnham. SZC Co's intention is that the two village bypass would be adopted as public highway to form the new A12, permanently alleviating traffic concerns in Farnham and Stratford St Andrew.

- 5.4.2 The **Transport Assessment** (Doc Ref. 8.5) fully details traffic impacts for the proposed development. Construction of a new bypass would limit adverse traffic impact during construction as traffic flow along the existing A12 would be largely unaffected, except when work is taking place to link the existing A12 with the roundabouts at both ends of the bypass. Short term traffic management may be needed in these locations when this work

is taking place. A new pedestrian bridge will connect sections of existing footpaths either side of the two villages bypass, thereby avoiding the need for users of these footpaths to cross the new road at grade.

- 5.4.3 The proposed design of the two village bypass seeks to reach an acceptable compromise between the positive and negative environmental impacts, which are detailed in **Volume 5** of the **ES** and summarised in this **Planning Statement**. Where the bypass crosses existing local roads, these would be connected to the bypass with a new junction. This would minimise the accessibility disruption arising from the new road.

5.5 Heritage impacts

- 5.5.1 **Chapter 9, Volume 5** of the **ES** concludes that there will be minor adverse effects on archaeological heritage assets within the site and on geoarchaeological or paleoenvironmental deposits within the site, following mitigation. There will either be minor adverse or no effects on nearby designated heritage assets. The introduction of a bypass and the resulting reduction in traffic is expected to bring a moderate positive effect during the operational phase to those designated heritage assets close to the existing A12, and no effect on other designated heritage assets in proximity to the site. There is considered to be a minor adverse effect on historic landscape character. No negative significant residual effects are predicted during the construction or operational phases.

- 5.5.2 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.

- 5.5.3 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. **Chapter 9, Volume 5** of the **ES** sets out the significance of

assets within 750m of the site and confirms that no significant adverse effects are anticipated.

5.6 Surface water, groundwater and flood risk

5.6.1 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 a Flood Risk Assessment for energy projects located in Flood Zones 2 and 3. Flood risk is also identified as a nuclear impact in EN-6.

5.6.2 Most of the site is located in Flood Zone 1, and therefore has a low risk of flooding from fluvial sources. Risks associated with groundwater, sewer and reservoir flooding at the site are also considered to be low. The Environment Agency's long-term flood risk mapping shows that the majority of the site is also at very low risk of flooding from surface water.

5.6.3 A small section of the site along the south-west edge of the site is at medium to high risk of flooding (within Flood Zones 2 and 3). However, the topography associated with the River Alde floodplain plays a key role in limiting the extent of flooding in the area, and the elevation of the proposed route above the flood area is considered to keep the risk of fluvial flooding to a low risk. A two village bypass Flood Risk Assessment has been submitted as part of the application for development consent which addresses flood mitigation, and is therefore compliant with NPS EN-1.

5.6.4 **Chapter 12, Volume 5** of the **ES** confirms that the water draining from road infrastructure will pass through appropriate drainage, including sustainable drainage systems. Further, it has been found that once sustainable drainage systems infrastructure is operational, there will be no effect from surface water run off during construction phase.

5.6.5 No significant adverse effects on groundwater and surface water are expected during the construction or operational phase.

5.7 Biodiversity and nature conservation

5.7.1 NPS EN-1 recognises the need to protect the most important biodiversity and geological conservation interests, but also that the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity interests and that these benefits may outweigh harm to these interests. Paragraph 5.3.4 in EN-1 states that the applicant should show how the proposals have taken advantage of opportunities to conserve and enhance biodiversity interests (and refers to the

Government's biodiversity strategy 'Working with the grain of nature' at paragraph 5.3.5). NPS EN-6 identifies potential cumulative ecological effects in relation to nuclear development at sites in the east of England. These requirements are set out further in **Chapter 7, Volume 5** of the **ES**.

5.7.2 In line with Draft Policy SCLP10.1 of the emerging Suffolk Coastal Local Plan (2019) the proposed development has sought to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, and as a last resort compensates for losses that cannot be avoided or mitigated for. During the construction phase of the works, some habitat loss, habitat fragmentation, incidental mortality of species, and other disturbance effects could occur.

5.7.3 Primary and tertiary mitigation that has been incorporated into the design in order to protect the existing habitats and species is included in the **ES, Chapter 7, Volume 5** of the **ES, Chapter 7** of **Volume 5** of the **ES** confirms that there are negligible and minor adverse effects on biodiversity but that mitigation is to be sought through the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) and through site-specific measures including planting and the introduction of buffer distances. These measures will help contribute towards the aim of biodiversity net gain that is set out in NPS EN-1 and is therefore compliant with policy requirements. No significant residual effects are anticipated on terrestrial ecology or ornithology during construction or operation.

5.8 Human health and well-being

5.8.1 NPS EN-1 sets out that infrastructure developments can have a negative impact on air quality and emissions and on noise and vibration. NPS EN-6 states that there may be associated local impacts from nuclear development in terms of significant noise, vibration or air quality, but that there may be local impacts of this nature from transport. With appropriate mitigation, no significant effects are likely.

5.8.2 Paragraph 5.10.24 of NPS EN-1 states that PRoWs, National Trails and other rights of access to land are important recreational facilities. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other PRoWs. Where this is not the case the decision maker should consider what appropriate mitigation requirements might be attached to any grant of development consent. The mitigation measures with regard to local amenity are set out below.

5.8.3 The assessment of amenity as seen in **Chapter 6, Volume 5** of the **ES**, considers the effects on the experiences of users of amenity and recreation

resources caused by physical changes to resources, changes to the experience people have due to either perceptual or actual changes to views, noise, air quality of traffic movements and the changes to the experience people have when using recreational resources due to increases in the number of people using them.

- 5.8.4 The magnitude of the effects is entered into a matrix with the sensitivity of the receptor in order to classify the effects. The magnitude rating is determined in relation to scale, duration and extent of the impact. Some primary mitigation measures have been included in the description of the development and these are outlined below but can be referenced in full at **Chapter 8, Volume 5** of the **ES**.
- 5.8.5 Air quality primary mitigation measures include the site access being located as far as practicable from receptors, potentially dusty loads to be covered in transit, and mobile crushing, and screening plant located as far as practicable from receptors. **Chapter 5, Volume 5** of the **ES** confirms that the anticipated air quality effects during the construction and operational phases are negligible. The reduction in traffic movements along this section of the A12 once the two village bypass is in operation will have a positive impact on the air quality of the area including on the Stratford St Andrew air quality management area and a subsequent positive impact on residential amenity.
- 5.8.6 Noise and vibration mitigation has been incorporated into the design of the proposed development, as set out at **Chapter 4, Volume 5** of the **ES**. Additional mitigation to protect residential amenity will be secured through the **CoCP** and includes measures such as screening and the minimising of noisy activities between specified times. The reduction in traffic movements along the stretch of the A12 at Stratford St Andrew and Farnham will bring a positive effect to local residents in terms of noise impacts.
- 5.8.7 Primary mitigation in relation to landscape and visual amenity include the retention and planting of existing woodland and hedgerows where possible, helping to screen and filter views to the development from footpaths.
- 5.8.8 There are a number of PRowS which would be subject to permanent diversion during both construction and operational phase of the proposed development, resulting in routes becoming less direct and with receptors experiencing adverse noise, dust and visual impacts where PRowS are aligned close to the road. However, the significant benefits to local residents brought by the reduction in traffic noise and movements and the improvement in air quality that come as a result of the proposed development are considered to outweigh the impacts on PRowS in the

vicinity of the site. Overall, the proposed mitigation measures are considered to be appropriate, and any negative impacts should be weighed against the amenity benefits provided to local residents of Stratford St Andrew and Farnham through the new bypass. The proposals are therefore compliant with the requirements set out in NPS EN-1 and EN-6.

5.9 Soils and geology

5.9.1 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).

5.9.2 **Chapter 10, Volume 5** of the **ES** states that approximately 50% of the site comprises land which falls into a BMV land category (i.e. grades 1, 2 and 3a). Grade 3a covers 25.1ha in total. The remaining areas of the site comprise grade 3b (19.5ha), grade 4 (0.60ha) and non-agricultural land (4.5ha). In addition, 3.1ha is un-surveyed. As part of the mitigation strategy, the site layout has been optimised to reduce the overall land take, through the realignment of various access tracks, livestock paths and the provision of an overbridge. Soil will also sustainably be re-used in line with the **Soil Management Plan** appended to the **CoCP**. This is in accordance with paragraph 5.10.8 of NPS EN-1 and Draft Policy SCLP10.3: environmental quality which states that applicants should identify any effects and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed.

5.9.3 Earthworks such as excavation of the cuttings and construction of embankments, would be required and therefore there is the potential for impacts on soil erosion and compaction, and for waste soils to be generated. However impacts would be managed through mitigation measures included within the design and as part of construction management measures such as constructing embankments in layers and compacting to design standards. The materials management strategy will seek, as far as reasonably practicable, to reuse and recycle soils on site, and to actively reduce the amount of hazardous soils generated from the development. Overall, no significant effects are anticipated.

5.9.4 During operation, there will be limited impacts of soil erosion, ground stability and compaction, on mineral resources, and on waste soils through maintenance operations. The proposed two village bypass will be operated in accordance with the relevant regulations and good practice measures. Effects on soil erosion, mineral resources and waste are therefore not considered to be significant.

5.9.5 The operation of the proposed two village bypass could introduce new sources of contamination, such as leaks and spillages from the use of the new roads (including link roads) as well as new pathways for the migration of contamination not present at baseline.

5.9.6 The proposed drainage strategy incorporates measures to prevent pollution from the operation of the two village bypass. In addition, the proposed two village bypass would be operated and maintained in accordance with relevant regulations, best practice and pollution prevention guidance. Therefore, the assessment of risks identified to human, controlled waters and property receptors during operation is not considered to be significant.

5.10 Landscape and visual impacts

5.10.1 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.

5.10.2 Draft Policy SCLP10.3 expects development to protect the quality of the environment, and draft Policy SCLP10.4 states development should be informed by, and respond to, special qualities and features of the landscape.

5.10.3 Large, medium and small-scale effects on the landscape character have been identified as a direct result of constructing the road. The large-scale effects include the change from a series of fields to a construction site. Medium and small-scale effects would arise in a number of locations around the site, at approximately 500m and 700m from the site boundary respectively. The small-scale effects are in locations where the visual relationship with the site is less pronounced than the medium scale effects.

5.10.4 Large scale effects on character are to be expected for a development of this nature. However, the effects would diminish rapidly beyond the site in many areas due to the limited vertical scale of the proposed development, the mitigation provided by the proposed and existing vegetation, and the terrain and vegetation in the wider landscape.

5.10.5 Where possible, mitigation measures have been proposed where a significant effect is predicted to occur from the construction and operational phase. Mitigation measures include the retention of existing vegetation where possible as well as proposed planting to integrate and screen the proposed development and the sinking of the route to mitigate visual effects. The mitigation approach set out above seeks to meet the policy tests set out in NPS EN-1, in that projects should aim to minimise harm to the landscape and that where possible, reasonable mitigation should be provided to reduce the impacts of the proposed development.

5.11 Social-economic considerations

5.11.1 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.

5.11.2 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 two village bypass from the wider project impacts.

5.11.3 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), and a **Supply Chain Strategy** which 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. 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.

5.12 Noise

- 5.12.1 No significant noise and vibration effects are expected from the construction of the two village bypass. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11). In addition, further acoustic screening and working methods will be considered by the contractor, such as limiting noisy construction activities on Saturday afternoons. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.
- 5.12.2 During the peak construction year for the main development site in 2028 when the two village bypass is used for Sizewell C construction traffic, significant noise effects have been identified at: Parkgate Farm, Hill Farm, The Old Vicarage, Pond Barn Cottages, Farnham Hall, Farnham Hall Farmhouse, Mollet's Farm, Friday Street Farm, 51 Friday Street, Church Bungalow and Walk Barn Farm. During the busiest month in the peak construction year of 2028, further significant noise effects are expected at: Chapel Cottages, Rosehill Cottages and Mill Lane West.
- 5.12.3 Where these outcomes are confirmed as part of a further assessment under the **Noise Mitigation Scheme (Appendix 11H of Volume 2, Chapter 11** of the ES), the provisions of that scheme will apply.
- 5.12.4 Noise levels at properties along the bypass are expected to reduce following the completion of the Sizewell C power station, as the bypass will no longer be used for Sizewell C construction traffic. However, **significant** noise effects are anticipated to remain in the long term at: Hill Farm, Pond Barn Cottages, Farnham Hall, Farnham Hall Farmhouse, and Walk Barn Farm.
- 5.12.5 Significant benefits are expected at the majority of receptors along the A12 where it passes through the villages of Stratford St Andrew and Farnham during all three of the scenarios assessed, i.e. the two scenarios in 2028 and the scenario in 2034, as a result of the reduction in traffic flows through the villages on the existing A12; the majority of vehicles are expected to use the new bypass instead.
- 5.12.6 SZC Co. will continue to seek measures to avoid or reduce these significant adverse effects. The **Noise Mitigation Scheme** will be made available for all properties, where the specified noise criteria are exceeded (see **Volume 2, Appendix 11H** of the ES). In doing so SZC Co. will engage with

stakeholders to further understand the affected receptors, their use and the benefit of the measures.

5.13 Planning balance

5.13.1 The proposed development is required to support the construction of the Sizewell C Project. This **Planning Statement** sets out the need for the development and the consideration of the impacts of the proposed development. A combination of public consultation feedback, and options testing, has determined that the route of the proposed development is the most appropriate route. This is further detailed in the Site Selection Report which is appended to this **Planning Statement (Doc Ref 8.4)**.

5.13.2 It is acknowledged that any new highway development could result in some form of residual impacts, even after site-specific mitigation measures are implemented. Where residual impacts remain however, they are considered acceptable taking into account the overall benefits of the development. The identified impacts are fully considered in **Chapters 4-12, Volume 5** of the **ES** but are summarised as follows:

- Negligible and moderate beneficial impacts on air quality for some nearby residential properties;
- No significant noise effects are expected during the construction phase. Significant adverse and significant beneficial noise effects are expected during operation;
- moderate adverse impacts on some landscape character, major-moderate adverse impacts on some visual receptors;
- moderate impacts to some footpaths within the site;
- minor adverse impacts on archaeological remains within the site and to the setting of some heritage assets, and moderate positive effects to the setting of heritage assets;
- minor and major adverse impacts on agricultural land;
- minor adverse and minor beneficial impacts on geology and land quality;
- minor adverse impacts on groundwater and surface water.

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 has been established that the proposed development is a fundamental part of SZC Co's delivery of the Sizewell C Project, and would minimise travel impacts.
- 6.1.2 The proposed development has been shown to be the most appropriate route through a process of consultation and assessment of alternatives.
- 6.1.3 Whilst the Sizewell C Project as a whole would, in common with any national infrastructure project, result in some adverse effects to the environment, the main **Planning Statement** states that these would not outweigh the important national significant benefits of the provision of new 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 development 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 two village bypass itself offers a range of local amenity benefits including a reduction in traffic noise and traffic-related emissions to the residents of Stratford St Andrew and Farnham. It also is considered to improve the setting of heritage assets within the village of Farnham. The proposed development will also make significant contributions to road capacity for the construction of the Sizewell C Project, and will reduce localised perceptions of highways issues in Farnham. The proposed alignment also offers benefit to road users and is sufficiently short enough to be considered as a viable alternative to the A12.

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