



The Sizewell C Project

8.4 Planning Statement Appendix 8.4H Rail Planning Statement

Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

May 2020

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009





APPENDIX 8.4H: RAIL PLANNING STATEMENT

Contents

| | | |
|------|--|----|
| 1 | Introduction..... | 1 |
| 1.1 | The Planning Statement..... | 1 |
| 1.2 | Planning Statement structure | 1 |
| 2 | Site and surroundings..... | 2 |
| 2.1 | Site location | 2 |
| 2.2 | Planning and Environmental Designations | 4 |
| 2.3 | Planning history | 5 |
| 3 | Proposal | 7 |
| 3.1 | Overview..... | 7 |
| 3.2 | Proposed rail extension route | 7 |
| 4 | Planning policy context..... | 12 |
| 4.1 | National Policy Statements..... | 12 |
| 4.2 | Other national and regional planning policies | 13 |
| 5 | Principal planning issues | 16 |
| 5.1 | Introduction..... | 16 |
| 5.2 | The need for the proposed development..... | 16 |
| 5.3 | The choice of rail route | 17 |
| 5.4 | Local amenity (including noise and vibration, air quality, health and wellbeing) | 18 |
| 5.5 | Ecology and biodiversity | 20 |
| 5.6 | Soils and geology | 20 |
| 5.7 | Surface water, groundwater and flood risk | 21 |
| 5.8 | Landscape and visual | 22 |
| 5.9 | Socio-economics | 23 |
| 5.10 | Archaeological and heritage impacts..... | 24 |
| 5.11 | Traffic and transport..... | 26 |
| 5.12 | Noise and vibration..... | 26 |
| 5.13 | Planning balance | 27 |
| 6 | Conclusion..... | 29 |
| | References | 31 |

Tables

None provided.

Plates

None provided.

Figures

None provided.

Annexes

None provided.

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 in order to facilitate the construction of the 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 the rail improvements, which form part of the associated developments proposals for the Sizewell C Project. This statement considers the site-specific planning issues relevant to this associated development. Overarching planning merits/issues, such as the justification of the transport strategy as a whole, are considered within the **Planning Statement** for the main development site, the **Transport Assessment** (Doc Ref. 8.5) and other documents accompanying the Sizewell C 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 the planning history.
- **section 3:** Proposal – provides a description of development, design specifics, layout and construction programme.
- **section 4:** Planning policy context – provides a summary of site-specific planning policies.
- **section 5:** Principal planning issues – provides an assessment of the sites against relevant policy.
- **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 This associated development is split across two main work areas (together the 'proposed development'):

- the part of the green rail route comprising a temporary rail extension of approximately 1.8 kilometres (km) from the junction with the existing Saxmundham to Leiston branch line to the proposed B1122 (Abbey Road) level crossing inclusive (henceforth referred to as the 'proposed rail extension route') as shown on **Figure 1.1 of Volume 9, Chapter 1** of the **Environmental Statement (ES)**; and
- the Saxmundham to Leiston branch line upgrades (including track replacement and level crossing upgrades) (henceforth referred to as the 'proposed rail improvement works') as shown as **Figure 1.3 of Volume 9, Chapter 1** of the **ES**.

2.1.2 The proposed development would fall within the East Suffolk (formally Suffolk Coastal) district and within the Suffolk County.

2.1.3 The proposed development, including the development site boundary, is provided on the **Rail plans** (Doc Ref. 2.12).

a) Proposed rail extension route

2.1.4 The green rail route in its entirety comprises a temporary rail extension of approximately 4.5km from the existing Saxmundham to Leiston branch line to a terminal within the main development site. The 2.7km part of the rail extension route between the proposed B1122 (Abbey Road) level crossing and the terminal within the main development site is detailed in the main body of the **Planning Statement**.

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

2.1.6 In addition to the settlement of Leiston, there are a number of other smaller settlements, individual properties and isolated farmsteads to the south of the route. These are mainly concentrated along Abbey Road, a two-lane single carriageway.

2.1.7 The proposed rail extension route would cross the following local minor roads from west to east:

- Buckleswood Road.
- B1122 (Abbey Road) near Leiston.

2.1.8 It would also cross the following footpaths, all of which would require diversion during the construction and operation of the proposed rail extension route:

- Footpath E-363/003/0 – the north-south footpath between Saxmundham Road and Abbey Lane.
- Footpath E-363/006/0 – the north-south footpath linking Abbey Lane and Westward Ho.
- Footpath E-363/010/0 – the north-south footpath linking Abbey Lane to the B1122 (Abbey Road).

2.1.9 The proposed rail extension route would also involve the permanent realignment of Lover's Lane and the associated relocation of its junction with the B1122 (Abbey Road). These works would fall within the main development site and are detailed further in the Planning Statement.

b) [Proposed rail improvement works](#)

2.1.10 The proposed development includes a replacement of the track on the Saxmundham to Leiston branch line between the junction with the East Suffolk line at Saxmundham and the Sizewell level crossing in Leiston, and improvements to up to eight level crossings.

i. [Saxmundham to Leiston branch line](#)

2.1.11 The line is a single-track branch line approximately 8km long, running from Saxmundham to Leiston and terminating at Sizewell Halt. The line branches off the East Suffolk main line at Saxmundham and runs to the north of the B1119, Knodishall Green and Saxmundham Road. Grade 2 and 3 arable land (very good to moderate) lies immediately to the north and south of the line.

ii. Level crossing upgrades

2.1.12 There are nine operational level crossings on the Saxmundham to Leiston branch line between the Saxmundham junction and Sizewell Halt, which are relatively minor crossings. Eight level crossings require upgrades on the Saxmundham to Leiston branch line between the junction with the East Suffolk line at Saxmundham and the Sizewell level crossing in Leiston.

2.1.13 Sizewell Halt will not be used for the delivery of freight by rail, with delivery of freight in the early years being to a temporary rail terminal at the LEEIE, part of the Sizewell C main development site. Therefore, no upgrades will be required to the Sizewell level crossing at King George's Avenue as trains will not need to pass through it.

2.2 Planning and Environmental Designations

a) Proposed rail extension route

2.2.1 There are a number of heritage assets within close proximity of the proposed rail extension route. Leiston Abbey, which includes Leiston Abbey scheduled monument and associated grade I and grade II listed buildings, lies approximately 280 metres (m) to the north of the proposed development. Leiston Abbey houses a music school (Pro Corda Inspirational Ensemble Training). Wood Farmhouse is a grade II listed building and lies approximately 220m south-east of the proposed route and Fisher's Farmhouse is a grade II listed building and lies approximately 260m north-west of the route.

2.2.2 The proposed rail extension route falls within two landscape character areas, the 'Ancient Estate Claylands' and the 'Estate Sandlands'. It also lies within fluvial Flood Zone 1. The majority of the route has a very low risk of surface water flooding. However, there are small isolated areas with a medium to high risk of surface water flooding.

2.2.3 The proposed rail extension route lies within the Leiston Neighbourhood Plan area which was approved on 29 October 2013. The Leiston Neighbourhood Plan was made on 23 March 2017. The proposals map of the Neighbourhood Plan shows that the proposed rail extension route lies outside of the 'physical limits boundary' of Leiston.

b) Proposed rail improvement works

i. Saxmundham to Leiston branch line

2.2.4 There are five grade II listed buildings within close proximity of the existing line, these are: Oak Tree Farmhouse; Westhouse Farmhouse; Crossing Farmhouse; Wood Farmhouse; and Westward Ho. Leiston House Farmhouse is located approximately 160m to the south of the existing route and is grade II* listed.

2.2.5 The majority of the route lies within Flood Zone 1. A small section of the route lies within Flood Zone 3 where the route crosses the Hundred River.

2.2.6 The risk of surface water flooding varies along the existing route. The majority of the route has a very low risk of surface water flooding but this increases to a medium to high risk near existing watercourses.

2.2.7 The eastern part of the route lies within the Leiston Neighbourhood Plan area which was approved on 29 October 2013. The Leiston Neighbourhood Plan was made on 23 March 2017 (Ref. 1.1).

2.2.8 The western part of the route lies within the Saxmundham Neighbourhood Plan area which was approved on 28 August 2017 (Ref. 1.2). The Saxmundham Neighbourhood Plan has not yet been approved.

ii. Level crossing upgrades

2.2.9 The level crossings are located on the Saxmundham to Leiston line and therefore share the planning and environmental designations outlined above.

2.3 Planning history

a) Proposed rail extension route

2.3.1 There are no historic planning applications that lie within the site boundary. There is one planning application (LPA ref: DC/14/4224/FUL) that adjoins the southern boundary of the proposed route and was submitted by SZC Co.. The application sought permission for the creation of approximately 6 hectares (ha) of wetland habitat and was approved on 9 March 2015.

b) Proposed rail improvement works

2.3.2 There are no historic planning applications that lie within the site boundary however there are a number which border the Saxmundham to Leiston branch line. Two outline applications have been submitted on separate sites,

both bordering the south of the railway and within the settlement boundary of Leiston. One outline application (LPA ref: C/16/2104/OUT) sought the erection of 77 residential dwellings and was approved on 29 June 2017. To date no reserved matters applications have been submitted.

- 2.3.3** The other outline application (LPA ref: DC/16/1961/OUT) sought permission for 187 residential dwellings and was approved on 21 June 2017. A reserved matters application (LPA ref: DC/19/1883/ARM) was submitted on 8 May 2019 and is currently under consideration.

3 Proposal

3.1 Overview

3.1.1 The proposals for the proposed development have been designed to allow up to three freight trains (five movements) per day by rail, reducing the number of heavy goods vehicles (HGVs) on the local roads and mitigating the potential impacts of the Sizewell C Project. They are explained in more detail in **Chapter 2 of Volume 9 of the Environmental Statement (ES)** (Doc Ref. 6.10) but a summary of each proposal can be found below.

3.2 Proposed rail extension route

3.2.1 The proposed rail extension route would be a temporary rail extension from the Saxmundham to Leiston branch line, running from west to east into the main development site of the Sizewell C Project. Outside of the main development site, there are two main sections:

- Saxmundham Road to Buckleswood Road.
- Buckleswood Road to B1122 (Abbey Road).

a) **Saxmundham Road to Buckleswood Road (including level crossing)**

3.2.2 Moving from west to east, the proposed rail extension route would start with a new turnout where it connects with the existing Saxmundham to Leiston branch line. It would then travel in a north-eastern direction towards Buckleswood Road where a temporary level crossing would be installed.

3.2.3 Between the turnout and the Buckleswood Road level crossing, a landscaped bund approximately 2m in height would run alongside the rail extension on its northern side, whilst footpath E-363/003/0 would be diverted alongside the southern side of the rail extension route. Pedestrians would then divert back towards the existing footpath, travelling south-north, via the temporary Buckleswood Road level crossing.

3.2.4 The proposed level crossing on Buckleswood Road will be automated, most likely a manually controlled barriers with obstacle detection type level crossing. The railway line will be one-track only and it will not be electrified at the level crossing. The existing highway on Buckleswood Road will be widened to approximately 6m for a distance of approximately 15m beyond the stop line on each approach to the level crossing.

b) Buckleswood Road to the B1122 (Abbey Road)

- 3.2.5 From Buckleswood Road, the rail extension route would continue further north-eastwards through open countryside and farmland to the south of Abbey Lane. Again, a landscaped bund some 2m high would run alongside the rail extension route to the north, and a second bund would run to the south at the eastern end of the site, west of the B1122 (Abbey Road).
- 3.2.6 A temporary, automated level crossing is proposed on the B1122 (Abbey Road), across which footpaths E-363/006/0 and E-363/010/0 would be diverted, together with the proposed non-motorised user bridleway (Bridleway 19) from the main development site.
- 3.2.7 In order to facilitate the B1122 (Abbey Road) level crossing, Lover’s Lane will be permanently realigned such that the junction with the B1122 would be relocated approximately 100m to the south.
- 3.2.8 Both the realignment of Lover’s Lane and the non-motorised user route, which would cross the level crossing, would fall within the main development site (detailed further in the relevant section of this **Planning Statement**).
- 3.2.9 The B1122 (Abbey Road) level crossing would be lit to Network Rail standards for lighting & CCTV systems and level crossings. The lighting columns would be 10m in height and there would also be CCTV at a height of 9m. However, the rail extension route itself would be unlit.

i. Removal and reinstatement

- 3.2.10 Following the completion of the construction of the Sizewell C Project, the proposed rail extension route, including the track bed and level crossings, would be removed and returned to its original topography.
- 3.2.11 Any highway that has been diverted or stopped up as a requirement of the proposed development would be reinstated and the level crossings removed. The relocated junction of the B1122 and Lover’s Lane would remain in place.

c) Proposed rail improvement works

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

- upgrade works to up to eight level crossings on the branch line.

3.2.13 All of the proposed rail improvement works would be retained following completion of the construction of Sizewell C.

i. [Track replacement on the Saxmundham to Leiston branch line](#)

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

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

ii. [Upgrade works to the level crossings](#)

3.2.16 There are nine operational level crossings on the Saxmundham to Leiston branch line between the Saxmundham junction and Sizewell Halt, eight of which are proposed to be upgraded. The location of these eight level crossings is shown on **Figure 1.3** of **Volume 9, Chapter 1** of the **ES**, and are located at:

- Bratts Black House;
- Knodishall;
- West House;
- Snowdens;
- Saxmundham Road;
- Buckles Wood;
- Summerhill; and
- Leiston.

- 3.2.17 The level crossing upgrades have been proposed which minimise the need for level crossing barriers to be closed and reopened manually, enabling them to reopen to traffic soon after a train has safely passed.
- 3.2.18 All of the proposed upgrade works will ensure that the level crossings remain in use and that there is no need to close or divert any public rights of way (PRoW) whilst the branch line is in operation.
- 3.2.19 The level crossings at Bratts Black House, Snowdens, Buckle’s Wood and Summerhill will be upgraded to miniature stop light crossings. This involves a red/green light located on both sides of the track and operated by approaching trains. The light indicates if it is safe for a pedestrian to cross the railway.
- 3.2.20 The level crossings at Knodishall, West House and Saxmundham Road are each likely to be upgraded to an automatic barrier crossing locally monitored. Automatic barriers crossing locally monitored have wig-wags and half barriers locally monitored by train crew or other staff to check that they are working, and they are activated by approaching trains.
- 3.2.21 The Leiston and Sizewell crossings would each be upgraded to, most likely, train crew operated barriers with assistance. At train crew operated barriers with assistance, the train is forced to stop short of the crossing and the train crew operate it from a local control unit or plunger. Correct operation of the crossing and permission to pass over it is indicated to the driver by a flashing signal.
- 3.2.22 The more substantial upgrades (greater than miniature stop lights) have additional land within the red line to facilitate temporary satellite compounds during construction (see **Figure 1.3 of Volume 9, Chapter 1** of the **ES**). All of the proposed level crossing upgrades would be permanent improvements to the branch line.

d) **Approach to plans**

- 3.2.23 The parameters within which the proposed rail extension route and rail improvement works will be constructed, operated and maintained are shown on the relevant **Work Plans** (Work Nos. 4A, 4B (green rail route), 4C (branch line) and 4D (rail spur)). These are included within the **Work Plans** (Doc Ref. 2.3) set of drawings, not the **Rail Plans** (Doc Ref. 2.12) set.
- 3.1.1 The rail extension route and rail improvement works will be constructed, operated and maintained anywhere within the area as shown on the Work

Plans, which include lateral limits of deviation and a maximum vertically limit of deviation of +/- 1 metre.

3.1.2 These parameters have informed the assessment presented in the **ES Volume 9** and the flexibility being sought is consistent with the findings of the ES.

3.1.3 There are several plans within the Rail Plans set which provided additional detail and are submitted for approval. 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 include:

- Proposed General Arrangement Plans
- Proposed Horizontal and Vertical Alignment
- Green Rail Route Proposed Landscape Masterplan and Finished Levels
- Green Rail Route Site Clearance Plan
- Green Rail Route Removal and Reinstatement Plan

3.1.4 The DCO Requirements (**Schedule 2** of the **Draft DCO**) ensure that the rail extension route and rail improvement works would be carried out in accordance with the relevant **Work Plans**, 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 East Suffolk Council.

3.1.5 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**.

3.1.6 Several illustrative plans are also submitted as part of the Rail Plans which provided further illustrative details and demonstrate how the rail extension route and rail improvement works could be delivered in line with the **Work Plans** and the plans for approval listed above. The illustrative plans include proposed general arrangement plans, cross sections, drainage plan, signage plan, lighting and CCTV plan and existing utilities plans.

4 Planning policy context

4.1 National Policy Statements

4.1.1 The Overarching National Policy Statement for Energy (NPS EN-1) (Ref. 1.3) and National Policy Statement for 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**.

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

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

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 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.

4.2.2 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 Core Strategy and Development Management Policies (2013)

4.2.5 The Core Strategy (2013) (Ref. 1.6) states that Sizewell has been formally identified to accommodate additional nuclear provision (paragraph 3.132), and that it has a role to play within the larger low carbon energy corridor within the district (paragraph 2.19).

4.2.6 Strategic Policy SP13 – nuclear energy defines 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.

4.2.7 The adopted Policies Map (2018) (Ref 1.7) confirms that the proposed location of the proposed rail extension route and the majority of the Saxmundham to Leiston branch line is located outside of a settlement boundary and is therefore located within the countryside.

4.2.8 Core Strategy Policy SP29 states that development within the countryside will be limited to that of which necessity requires it to be there, and accords within other relevant policies within the Core Strategy, or would otherwise accord with special circumstances outlined in paragraph 55 of the National Planning Policy Framework (NPPF) 2012 (now paragraph 79 of the NPPF 2019).

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

4.2.9 The emerging local plan (Ref. 1.8) contains a number of site specific policies, including for sites relevant to some of the Sizewell C Project's associated development sites, such as at Darsham, the four villages or the vicinity of SZC Co.'s proposed freight management facility. As a matter of principle, however, the emerging plan recognises that the development of major infrastructure projects such as at the Port of Felixstowe or Sizewell C will generate a requirement for supporting land and that the local plan should seek to provide land to meet the needs of such main economic activities.

4.2.10 Rail capacity for both freight and passengers is an identified concern in Paragraph 1.28 of the Local Plan, and it is acknowledged that strategic improvement to the rail lines are anticipated to come forward in the future. Future enhancements to rail capacity are also identified at Paragraph 3.25.

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

- Relevant Neighbourhood Plan policies, strategies and visions;
- The development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment; and
- 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 stage of projects.
- Table 3.6 of the Local Plan refers to the identified issues relevant to the consideration of energy infrastructure proposals, including the impact on the transport network. It identifies the need to utilise the existing rail networks, and 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 infrastructure energy projects. Draft Policy SCLP7.1: sustainable transport states that development proposals will be supported where:
 - it is proportionate in scale to the existing transport network;
 - it reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
 - the cumulative impact of new development will not create severe impacts on the existing transport network.

4.2.12 Furthermore, Draft Policy SCLP7.1: sustainable transport states that proposals for new development that would have **significant** transport implications should be accompanied by a **Transport Assessment** (Doc Ref. 8.5) and **Construction Worker Travel Plan (CWTP)** (Doc Ref. 8.8). This includes new large-scale employment sites, and developments that when considered cumulatively with other developments, is likely to have a severe impact on the local community or local road network.

- Draft Policy SCLP9.6: sustainable drainage systems (SuDS) states that developments should use sustainable drainage systems to drain surface water. Non-residential development on-sites of 1ha or more will

be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Sustainable drainage systems should:

- be integrated into the landscaping scheme and green infrastructure provision of the development;
- contribute to the design quality of the scheme; and
- deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as source protection zones.

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 proposed development

5.2.1 As set out in the **Transport Assessment** that accompanies this application, there is a need to enable the delivery of construction materials by rail in order to alleviate the impacts on local roads caused by HGV movements. SZC Co. has therefore developed a strategy to transport a proportion of the Sizewell C Project construction materials to the main development site via the rail network. This strategy also offers flexibility for the delivery of freight, securing a freight transportation mode that would be operational throughout the year with much less risk of weather disruption compared to other non-road options.

5.2.2 In order to minimise HGV movements on the road network, the strategy requires any rail terminal to be within or very close to the Sizewell C main development site. This approach would enable freight trains to be unloaded close to where the materials would be used. The potential locations of the rail terminals were determined, to some extent, by the rail route alignments that were possible.

5.2.3 An examination of the capacity of Sizewell Halt and the existing local rail infrastructure to support rail freight deliveries showed that movements would be limited to one freight train per day, which would be insufficient for

achieving the aim of substantially reducing road freight. It was therefore determined that additional rail infrastructure was required in order to serve the main development site. The principal requirement for this strategy is for the railway line to be as close to the main development site as possible, to minimise HGV movements. This approach would enable freight trains to be unloaded close to where the materials would be used.

- 5.2.4 Given the extent and nature of the works, it is considered that impacts will likely be localised to areas along the route itself and to some properties close to where the works are taking place. These impacts, along with a discussion around the choice of rail route, are set out in turn below.

5.3 The choice of rail route

- 5.3.1 Three different route options for the extension of the branch line to the main development site (the blue, green and red routes) were considered, as detailed in the Site Selection Report appended to this **Planning Statement**.

- 5.3.2 The blue and green routes were to spur off the existing Saxmundham to Leiston branch line to the west of Leiston and route through open countryside to the main site. The third route (the red route) would spur off the existing branch line just north of Eastlands Industrial Estate in Leiston. All three routes would require a rail terminal within the main development site.

- 5.3.3 Detailed testing of the environmental, heritage, ecology, and landscape considerations for each of the route options demonstrated a mix of impacts. The red route option offered the advantage of being shorter in length than the other two options but would involve the freight trains passing through Leiston which would have noise and vibration effects. It would also involve construction across watercourses which feed into the Sizewell Belts and Marshes Sites of Special Scientific Interest, along with the loss of a small amount of woodland habitat. Being the shortest route however means the red route would have potentially reduced visual impacts.

- 5.3.4 The blue and green routes would avoid trains passing residential properties in Leiston but would have the greater landscape and visual impacts on the surrounding countryside including on views from Leiston Abbey. Both the green and blue options would also cross a number of roads and PRow, requiring diversion or the construction of crossings. Of the three options for the rail route presented at Stage 1, no clear preference emerged from the consultation. The different rail options would give rise to different efficiencies in the construction of Sizewell C, as well as different environmental effects. No option would meet all Sizewell C Project requirements whilst avoiding giving rise to any significant environmental impacts.

- 5.3.5 SZC Co. determined that the green route was the most suitable to avoid trains going through Leiston (red route) or unnecessary landscape and visual impacts (blue route).
- 5.3.6 The full discussion of alternatives and the evolution of design can be found at **Chapter 3** of **Volume 9** of the **ES**.
- 5.4 **Local amenity (including noise and vibration, air quality, health and wellbeing)**
- 5.4.1 NPS EN-1 sets out that infrastructure developments can have a negative impact on air quality and emissions and on noise and vibration. NPS EN-6 states that there may be associated local impacts from nuclear development in terms of significant noise, vibration or air quality, but that there may be local impacts of this nature from transport. With appropriate mitigation, the subsequent effect of these is unlikely to be significant.
- 5.4.2 Paragraph 5.10.24 of NPS EN-1 states that P_{Ro}Ws, 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 P_{Ro}Ws. 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 there would be a total of six freight train movements in any 24-hour period at the height of the Sizewell C construction, the majority of which would be at night after the last passenger train on the East Suffolk line. There are also residential properties within the vicinity of the existing Saxmundham to Leiston branch line, and the group of historic assets at Leiston Abbey are within close proximity to the proposed rail extension route.
- 5.4.4 In the construction phase of development, noise mitigation will be controlled by the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11). Mitigation measures at this stage in the development include the selection of quiet plant and techniques, the switching off of equipment when not required, and provision of training to construction site staff to minimise off-site noise and vibration impacts. There is the opportunity to introduce some screening along the proposed rail extension route to reduce night-time noise levels. The track would be continuously welded rail which would reduce noise generation at its source. The low amount of freight train movements per day (six) are also considered to have a low impact on residential amenity, particularly as speeds along the proposed development would be restricted.

- 5.4.5 The assessment of any likely impacts from construction dust has been carried out at **Chapter 5** of **Volume 9** of the **ES**, which also identifies the closest receptors to the site. There are no AQMAs within the study area for the proposed route, and dust levels are likely to be low given the arable nature of the existing land use. Dust levels are not expected to change above any notable levels.
- 5.4.6 Although there are not expected to be significant impacts on air quality, measures will be put in place to reduce construction impacts. For the proposed rail extension route, these would include locating the site access as far as practicable from receptors, the storage of soils on-site to create bunds instead of transporting them off-site, ballast stockpiling as far as practicable from receptors and the creation of new level crossings.
- 5.4.7 **Chapter 8** of **Volume 9** of the **ES** assesses the amenity and recreational impacts of the proposed development. There are three footpaths registered as PRow within the proposed rail extension route site (E-363/003/0, E-363/006/0 and E-363/010/0) that follow a broadly north-south alignment across the site. There are eleven further footpaths located close to the site boundary. There are no existing bridleways within the site.
- 5.4.8 During the construction, operation and removal and reinstatement phases of the proposed development, footpaths E-363/003/0, E-363/006/0 and E-363/010/0 would be subject to temporary but long-term diversions. This is to facilitate construction and operation of the proposed development, whilst ensuring that users can continue to have access to a safe, well connected PRow network. In all cases, diversions have been kept as short as possible to minimise disruption.
- 5.4.9 The footpath diversion to the south of the proposed rail extension route, linking Footpaths E-363/006/0 and E-363/010/0, would be retained following completion of the Sizewell C Project as a permanent legacy benefit to the existing footpath network. Full details are provided in the **Rights of Way Plans** (Doc Ref. 2.4).
- 5.4.10 The mitigation measures set out elsewhere in this **Planning Statement** also make contributions towards mitigation the amenity and recreational impacts of the proposed development. The continuous welded rail would reduce noise generation from train movements, the storage of materials on-site would reduce impacts on air quality, and the introduction of landscape bunds would reduce visual impacts on nearby footpaths. The retention of woodland, hedgerows and scrub wherever possible would also reduce visual impacts. The 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.

5.5 Ecology and biodiversity

5.5.1 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. NPS EN-6 identifies potential cumulative ecological effects in relation to nuclear development at sites in the east of England.

5.5.2 The extent of the ecological findings is set out at **Chapter 7** of **Volume 9** of the **ES**. 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 which cannot be avoided or mitigated.

5.5.3 Primary and tertiary mitigation has been incorporated into the design in order to protect the existing habitats and species. This is detailed in **Chapter 7** of **Volume 9** of the **ES**. This chapter confirms that there are some minor impacts due to habitat loss, and disturbance from noise and light. Mitigation for these is to be sought through the **CoCP** and through site-specific measures, including the retention of the county wildlife site, retention of most hedgerows onsite, the provision of landscaped bunds and security fencing, and limited operational lighting. 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.

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). As set out in **Chapter 10** of **Volume 9** of the **ES**, the site comprises predominantly grade 3a, 3b and 4. The site layout has been optimised to reduce the overall land take, with the level crossing on Buckleswood Road to be provided to reduce potential severance impacts.

5.6.2 The returning of the site to agricultural land following the decommissioning of the rail route will be made possible through the sustainable re-use of the

soil resource, which will be undertaken in line with the **CoCP** and an **Outline Soil Management Plan**, provided in **Appendix 17C** of **Volume 2** of the **ES** (Doc Ref. 6.3), as further detailed at **Chapter 10** of **Volume 9** of the **ES**. 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 SCLP10.3: 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 is located in Flood Zone 1, and therefore has a low risk of flooding from rivers or seas. The risks associated with groundwater flooding at the site are also considered to be low but an area of approximately 2ha located on the eastern boundary of the site is indicated to be at high risk from surface water flooding.

5.7.3 The proposed development will have no adverse impact on flood risk. The proposed rail improvement works will not change the existing impermeable area of the Saxmundham to Leiston branch line. The rail extension route has been designed using SuDS principles to collect run-off in swales which would then infiltrate to ground.

5.7.4 As a result of locating areas where works are proposed entirely in Flood Zone 1, there would be no loss in functional floodplain storage or displacement of sea or river flood water as a result of the proposed development.

5.7.5 The proposed development is classed as being essential infrastructure under the NPPF. As per the flood risk vulnerability and flood zone compatibility table, the green rail route is considered appropriate in terms of flood risk vulnerability and, therefore, passes the sequential test. The proposed rail improvement works pass the exception test due to the proposed works having no effect on the existing watercourse crossings.

5.7.6 The proposed development is considered to be appropriate in terms of flood risk and the proposed mitigation measures, and would be in accordance with NPPF guidance and draft and existing local plan policies.

5.8 Landscape and visual

- 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 land use within the 2km study area of the proposed rail extension route is predominantly arable farmland, with well-defined hedgerow field boundaries and interspersed with scattered woodlands and copses. The site itself is in arable use and comprises several adjoining fields, separated by hedgerows of varying levels of intactness. The site extends in a north-east direction, from Saxmundham Road to the B1122 (Abbey Road). It includes the majority of a very large field in the north-east, adjacent to the B1122 (Abbey Road) and Abbey Lane, and a single field between Buckleswood Road and the Saxmundham to Leiston branch line, joined by a narrower strip of land. The proposed development is located outside of the Suffolk Coast and Heaths AONB and aside from vegetation boundaries on the north-eastern and southern boundaries, the other boundaries do not follow any features currently defined on the ground.
- 5.8.3 As detailed in **Chapter 6 of Volume 9** of the **ES**, views of the proposed development would generally be restricted to within 500m of the site boundary with some infrequent further glimpsed views from within 1.5km. There would also be visual effects on the footpaths which currently cross the site due to the temporary but long-term change of views during their diversions. Field surveys have confirmed that there would be no views of the proposed development from the AONB or local special landscape areas.
- 5.8.4 Mitigation towards visual receptors of the proposed development is to include the creation of an approximately 2m high grassed visual and noise screening bund along the northern edge of the proposed rail extension route and a second bund to the south of the rail extension at its eastern end. Existing woodland and hedgerows would be retained wherever possible, including at Buckle's Wood. Diversion of public footpaths that cross the site to safe crossing points over the rail route at level crossings would also be implemented. This approach is compliant with Policy SCLP10.4: 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.

5.8.5 Mitigation will be ensured through the **CoCP** (Doc Ref. 8.11) to minimise landscape and visual effects through the construction process, including the sensitive design of lighting to reduce light spill and reduce impacts on road users and nearby residents.

5.8.6 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.

5.9 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 of 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 Sizewell link road from the wider 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), and a **Worker Code of Conduct** provided in **Appendix 1.A.1** of the **Community Safety Management Plan** (Doc Ref. 8.16) to help govern worker behaviour, 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 mitigation 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 **Chapter 9 of Volume 9 of the ES** sets out the detailed findings relating the terrestrial historic environment. Within 500m of the proposed rail extension route site, there is one scheduled ancient monument (Leiston Abbey second site), and nine listed buildings, with St Mary's Abbey at grade I and Leiston Farmhouse at grade II*. All other listed buildings within the study area for the proposed works are grade II and comprise houses and shops within Leiston or farmhouses and buildings within the countryside. There are no records of prehistoric activity within the site, and so the potential for this is considered to be restricted. Known records from the study area indicated an increased potential for Romano-British remains in the wider vicinity to the south of the site. There is evidence of some medieval monastic activity to the north of the site, and potential for evidence of associated industrial activities. There are some features observed associated with the military airfield at RAF Leiston.

No significant adverse effects have been identified relating to the Saxmundham to Leiston branch line upgrades.

5.10.4 The above embedded mitigation measures would go some way to avoiding a significant effect on the historic landscape and heritage character of the area. However, the adoption of an agreed scheme of archaeological investigation is proposed in **Volume 9** of **Chapter 9** of the **ES** to ensure that the archaeological interest of the site can be appropriately investigated, recorded and disseminated. This would reduce the magnitude of impact on buried archaeological remains of low and medium heritage significance from the proposed rail extension route to low.

5.10.5 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant planning permission... for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

5.10.6 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the NPPF (paragraph 196) requires that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing the optimum viable use of that asset.

5.10.7 There would be minor adverse residual impacts on Leiston Abbey and moated site (SM 1014520) and St Mary’s Abbey, grade I (LB 1215753) during the construction and operation phases of the proposed development due to changes to their setting which form part of their historic significance. The impact would be of a low magnitude but the high importance of the heritage assets renders the medium-term, temporary impact sufficient to result in moderate adverse (**significant**) effects. However, the effects of the proposed development would be temporary, and would not result in the permanent alteration to the setting of any designated heritage assets.

5.10.8 In addition to the heritage impacts being temporary, the harm would be outweighed by the substantial public benefits associated with a project that has the potential to create a significant positive legacy for both Suffolk and the UK. The use of rail for freight delivery in the construction of Sizewell C would also substantially reduce HGV movements on the local highway network, a mitigation measure in accordance with NPS EN-1 which prioritises rail transport over road transport where possible.

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 applications **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** has been undertaken in compliance with this requirement.

5.11.2 The principle of the proposed rail extension route and rail improvement works are in compliance with the NPS paragraph 5.1.3.10, which states the preference for rail transport over road transport at all stages of the Sizewell C Project, where cost-effective.

5.11.3 The proposed rail extension route will intersect with the existing road network in two locations, at Buckleswood Road and the B1122 (Abbey Road). Vehicular access to the construction site of the proposed rail extension route would be taken from Buckleswood Road. Some disruption will occur to users of the B1122 (Abbey Road) during the construction of a new level crossing. The B1122 (Abbey Road) will be temporarily re-aligned to the west of the existing carriageway. The proposed alignment of the proposed rail extension route minimises intersections with the existing road network, as well as providing some separation with Leiston. Impacts on the rail network during the operational phase are considered to be negligible as the freight trains will run at night, as to not disrupt passenger services or cause issues at the identified bottleneck between Woodbridge and Saxmundham.

5.11.4 The proposed development is considered to accord with NPS EN-1 in that it seeks to mitigate impacts on surrounding transport infrastructure, as set out at paragraph 5.13.6. NPS EN-1 also seeks the consideration of demand management measures, and as such the proposals are compliant as they seek to manage and mitigate against the transport pressures created by the proposed Sizewell C Project.

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 rail proposals. A range of mitigation measures will be implemented to secure this outcome, including the adoption of good practice measures to minimise noise and vibration as set out in the **CoCP** (Doc Ref 8.11), and further acoustic screening and working methods will be considered by the contractor. Notwithstanding these outcomes, a programme of monitoring and a system for the receipt and recording of any noise and vibration complaints from occupiers of noise sensitive receptors will be put in place.

- 5.12.2 To limit the potential noise effects of night-time train movements, no rail movements are proposed through Leiston at night to limit noise and vibration from the use of the Saxmundham to Leiston branch line. Furthermore, the use of continuously-welded rail and speed restrictions will be implemented to further minimise the potential noise and vibration effects.
- 5.12.3 Despite the mitigation, the following significant noise effects have been identified from the operational use of the rail route extension and the use of the East Suffolk line and Saxmundham to Leiston branch line:
- 5.12.4 The use of the Saxmundham to Leiston branch line during the early construction years is expected to lead to significant noise effects at night at Kelsale Covert and Westhouse Crossing Cottage;
- 5.12.5 The use of the rail extension route and the Saxmundham to Leiston branch line in later construction years is expected to lead to significant noise effects at night at Kelsale Covert, Westhouse Crossing Cottage, Crossing Cottage and Crossing East.
- 5.12.6 Along the East Suffolk line, significant noise effects are expected at night a number of properties. Assuming that train operating procedures at Saxmundham junction are amended to avoid trains having to stop to change points, the number of properties that may require noise insulation is estimated at between 5 and 10. Additionally, a number of properties near to the East Suffolk line will experience groundbourne noise impacts.
- 5.12.7 SZC Co. will develop a **Rail Noise Mitigation Strategy** in consultation with Network Rail and the rail freight operator to establish a package of measures to be implemented to mitigate noise impacts on the Saxmundham to Leiston branch line and the East Suffolk line. Examples of the types of measures that will be considered as part that document include the use of quieter locomotives and the use of track support systems on the branch line to reduce vibration on new or upgraded tracks.
- 5.13 **Planning balance**
- 5.13.1 **Chapter 11** of the **Transport Assessment** sets out the **Rail Strategy**, which forms part of an integrated strategy to co-ordinate the movement of construction material and workers to build Sizewell C. The proposed rail extension route once complete would provide capacity for three freight trains to operate in each direction daily (six movements), allowing trains to travel directly to the main development site without travelling through the town of Leiston.

- 5.13.2 It has been demonstrated that the role of the proposed rail extension route forms a core part of the construction management and implementation of the Sizewell C Project. It is necessary to assess the route and extent of the proposed rail improvements, 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 the proposed rail extension route is the most appropriate route. The suitability of this site has then been tested to demonstrate that there are no other preferable options. This is further detailed in the Site Selection Report appended to this **Planning Statement**, and further design considerations have been assessed in this **Planning Statement**.
- 5.13.4 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 9 of the ES** but are summarised as follows:
- Major adverse residual noise impacts on nearby receptors.
 - Negligible residual air quality impacts on nearby residential receptors.
 - Minimal to moderate adverse residual impacts on landscape character.
 - Moderate to major-moderate residual impacts on the PRowS crossing the proposed rail extension route.
 - Minor adverse residual impacts on heritage assets in relation to their setting.
 - Minor adverse residual impacts on soils and land use, with some minor beneficial residual impacts on crops and livestock and ecological receptors due to the proposed mitigation measures.
 - 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 residual impacts on ecology, given the extent of natural habitats in and around the site.
- Negligible residual impacts in terms of flooding.
- Minor adverse impacts on the local road network during peak construction of the Sizewell C Project but negligible residual impact on rail passenger delay as a result of the rail proposals.

5.13.5 The site selection process has enabled impacts to be fully considered, with the proposed rail extension route considered to have the least amount of impacts on the local area. When the considerations above are taken into account, it is considered that any localised negative impacts caused by the proposed development can be outweighed by the positive approach to freight management and, by extension, the reduced HGV movements towards the Sizewell C construction site that the rail improvements would enable.

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 rail extension route and rail improvement works are a fundamental part of SZC Co.'s delivery of the Sizewell C Project and would enable SZC Co. to deliver a substantial amount of construction material by rail. This in turn would reduce the number of HGVs required, minimising travel impacts and enable the careful management of construction traffic where possible. The rail proposals have been deemed to be the most suitable option through a process of site assessments and local consultation.

6.1.2 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** 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 rail improvements therefore form part of a project that has the potential to create a significant positive legacy for both Suffolk and the UK.

6.1.3 The proposed development offers the benefits of alleviating the level of HGV movements otherwise required to supply the main development site with construction material. It is considered that any localised negative impacts

caused by the proposed development can be outweighed by the positive approach to freight management and the consideration and mitigation of transport impacts, as required by NPS EN-1.

References

- 1.1 Leiston Neighbourhood Plan 2015-2029 (2017). (Online). Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Leiston/Leiston-NP-Made-Version-March-2017.pdf> (Accessed February 2020).
- 1.2 Leiston Neighbourhood Plan Area (2017). (Online). Available at: <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/leiston-neighbourhood-area/> (Accessed February 2020).
- 1.3 Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1). (London: The Stationery Office, 2011).
- 1.4 Department of Energy and Climate Change, National Policy Statement for Nuclear Power Generation (EN-6). (London: The Stationery Office, 2011)
- 1.5 Parliament of the United Kingdom. Planning Act 2008. (London, 2008)
- 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)
- 1.7 Suffolk Coastal District (2018). Adopted Policies Map. (Online). Accessed at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Saved-Policies/Saved-Policies-Map-as-at-17-July-2018.pdf> (Accessed January 2020)
- 1.8 Suffolk Coastal District Council (2019). Suffolk Coastal Local Plan: Final Draft. (Online). Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf> (Accessed January 2020)