

STRATEGIC PLANNING COMMITTEE

Monday, 9 September 2019

APPLICATION NO DC/19/1637/FUL

LOCATION Sizewell B Power Station Complex and Adjoining Land, Sizewell Power Station Road, Sizewell, Leiston IP16 4UR

EXPIRY DATE 31 September 2019

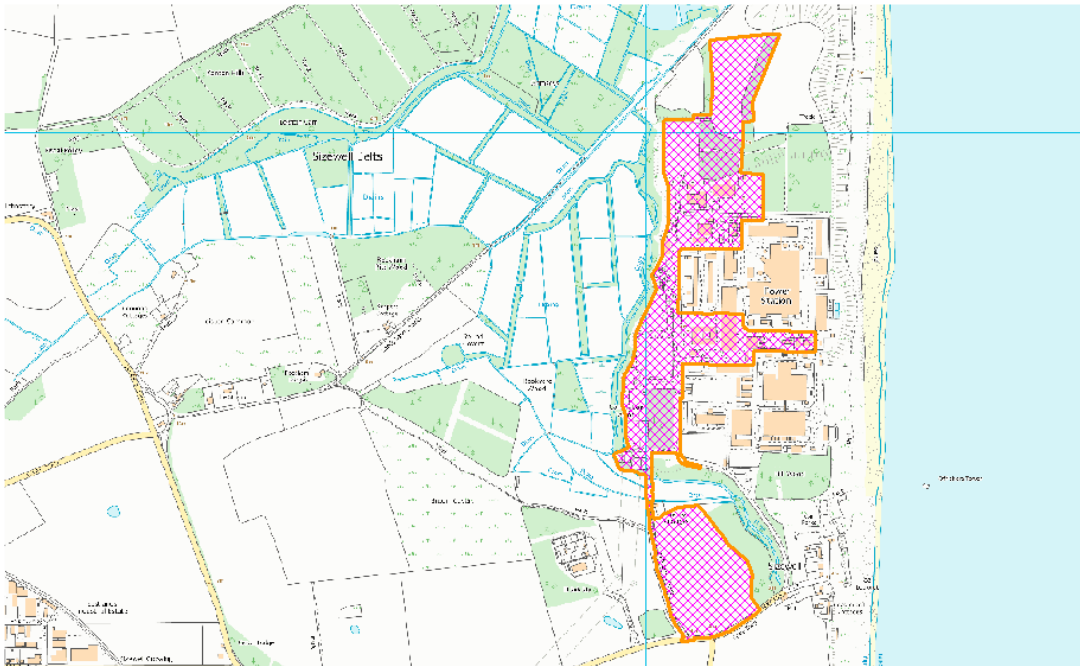
APPLICATION TYPE Hybrid application (part outline part full)

APPLICANT Mr Nick Cofield, EDF Energy

PARISH Leiston cum Sizewell

PROPOSAL 1. In outline, comprising a Visitor Centre (maximum 2,000sq.m GEA) and a maximum of 9,500sq.m (GEA) of floorspace to provide administration, storage, welfare and canteen facilities with all matters reserved apart from access. 2. In full, for the demolition of the existing Outage Store, Laydown Area, Operations Training Centre, Technical Training Facility, Visitor Centre, and Rosery Cottage garage; removal of technical training and pool car park (63 spaces), Coronation Wood car park (21 spaces), Visitor Centre car park (16 spaces) and northern outage car park (576 spaces); meantime use of the Technical Training Centre as an interim Visitor Centre followed by its demolition; and erection of new (all floorspace in GEA) Outage Store (2,778sq.m), Laydown Area (11,990sq.m) including New Western Access Road, Yardman's Office (23sq.m), Training Centre (4,032sq.m), Rosery Cottage garage (30sq.m), Replacement Car Park (2,363sq.m) providing 112 spaces, and Outage Car Park (15,525sq.m) providing (576 spaces) including new access road (and alternative access to bridleway), footpath and amended junction at Sizewell Gap; and associated landscaping earthworks/recontouring, tree felling and boundary treatment.

CASE OFFICER Lisa Chandler – Energy Projects Manager
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1 EXECUTIVE SUMMARY

- 1.1 Full Planning Permission is sought for the demolition of an existing outage store, laydown area, operations training centre, technical training facility, visitor centre and Rosery Cottage garage. A planned outage takes place approximately every 18 months at a nuclear power station, for a period of approximately 2 months, the reactors are taken off-line, fuel rods are removed / added and necessary maintenance at the plant takes place. A typical outage adds between 600 - 1300 people to the usual number of workers at the site. The removal of technical training and pool car park (63 spaces), Coronation Wood car park (21 spaces), visitor centre car park (16 spaces) and northern outage car park (576 spaces). The existing Technical Training Centre will be used as an interim Visitor Centre and then demolished. In full, the proposal includes an outage store (2778 sq.m GEA – gross external area), and Laydown area (11990 sq.m GEA), a new Western Access road, Yardman's Officer (23 sq.m GEA), Training Centre (4032 sq.m GEA), Rosery Cottage garage (30 sq.m GEA), replacement car park (2363 sq.m GEA) providing 112 spaces; and outage car park (15525 sq.m GEA) providing 576 spaces and including new access road and alternative access to bridleway 19, footpath and amended junction at Sizewell Gap; and associated landscaping earthworks / recontouring, tree felling and boundary treatment.
- 1.2 Outline Planning Permission is sought for a Visitor Centre (maximum 2000 sq.m GEA) and a maximum of 9500 sq.m GEA of floorspace to provide administration, storage, welfare and canteen facilities, all matters are reserved except for access.
- 1.3 This item has come before members because the redevelopment although submitted separately from proposals for a new nuclear power station, it is necessary as the existing Sizewell B buildings are on land allocated for the Sizewell C proposals and identified in the National Policy Statement EN-6 as a new nuclear nominated site. Given the strategic nature of the proposal, the scale of the development proposed, and the importance of nuclear generating energy to East Suffolk, it was determined that the application should be considered and determined by the Strategic Planning Committee.
- 1.4 The application is recommended for conditional approval subject to the signing of a Section 106 legal agreement.

2 SITE DESCRIPTION

- 2.1 Sizewell B Power Station is situated on the Suffolk coast to the east of Leiston. It is expected to be in operation until at least 2035, with the potential for an extension of its lifetime for 20 years. Sizewell B is located to the north of the Sizewell A Power Station which is currently being decommissioned.
- 2.2 The application site is 30.87 hectares in area; it has a frontage on the East coast to the North Sea and is bordered on the south by the Sizewell A power station and on the north partially by rural land and partially by existing facilities that are to be relocated. A large part of the area to the north of the B Station is part of the nominated new nuclear site for Sizewell C identified in the National Policy Statement for Energy EN-6, new nuclear proposals.
- 2.3 Sizewell B Power Station is accessed from the A12 via a designated HGV route on the B1122, Lover's Lane and Sizewell Gap Road. A private road runs northwards from the Sizewell Gap Road into the Sizewell Power Station complex from a priority junction off Sizewell Gap.
- 2.4 The site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) – a national designation, and is within the Suffolk Heritage Coast. The Sizewell Marshes Site of Special Scientific Interest (SSSI) is located immediately west and north of the site.
- 2.5 Coronation Wood lies within the site. This is a mixed plantation, mainly comprising semi-mature and mature pine with mature broadleaf trees around the eastern, southern and south-western edges. It is understood that this was planted to commemorate the coronation of King George V.
- 2.6 The site extends south from Coronation Wood to run alongside Rosery Cottages and includes Sandy Lane, the existing bridleway and Pillbox Field. The field is named from a World War II pillbox located in the field. The field comprises former arable farmland that has now reverted to grassland. To the west of Pillbox Field is the Greater Gabbard and Galloper Offshore Wind Farm onshore sub-station facilities.
- 2.7 Areas to the south, east and north of Pillbox Field (including the Sizewell marshes SSSI) and the northern area of the site fall within Flood Zones 2 and 3 (potential for flooding), the remaining areas of the site are within Flood Zone 1 (less potential for flooding).
- 2.8 The application site lies approximately 2 kilometres from the eastern edge of the town and Leiston and approximately 200 metres from the hamlet of Sizewell adjacent the popular Sizewell beach which is popular with locals for dog-walking and recreationally in summer. It is also the location for a weekly Park Run.

3 PROPOSAL

- 3.1 The proposal is for the relocation of essential Sizewell B facilities that are currently located on land proposed for the new build new nuclear power station Sizewell C. This consent is being sought in advance of development consent being secured for Sizewell C so that development of the Sizewell C station is not delayed. To meet the current construction programme advocated by EDF Energy for the Sizewell C project, the relocated facilities works need to begin at the start of 2020.
- 3.2 The development proposal although of a major scale is not definitively required to be accompanied by an Environmental Statement under the 2017 Environment Impact Assessment Regulations. However, the applicant has undertaken a voluntary EIA and submitted an Environmental Statement in support of the planning application, an approach which is supported by this Authority. Pre-application consultation on the proposal was

carried out with Suffolk Coastal District Council prior to the merger and formation of East Suffolk Council.

- 3.3 There are two clear phases for the development identified, the first being the elements considered in full in this application, the second being the elements being considered in outline in this application.
- 3.4 The planning history for the Sizewell Power Station Complex reveals 78 planning applications of varying types dating back to 1988 (the stations were given permission under different consenting regimes). The primary consent to note would be that for the Sizewell B Dry Fuel Store consented in July 2011 under a different consenting regime.

4 CONSULTATIONS/COMMENTS

- 4.1 Leiston-cum-Sizewell Town Council (HOST): OBJECTS to the application stating: “Cllrs strongly recommend refusal. The application proposes unacceptable incursion into green field sites and would attract a clear refusal at every level if viewed in isolation.”
 - 4.1.1 The premature destruction of green sites, and other elements in the application, cannot be allowed to go ahead until the DCO for Sizewell C has been approved, but in our opinion not even then.
 - 4.1.2 We are unconvinced by the EDF argument that this town and country application “reduces the need for an additional layer of development to be determined under the SZC DCO”. We can see no reason for this application to be developed until that DCO. This would then allow for more appropriate use of space should the DCO be forfeit for any reason. If the DCO does succeed then these works could be undertaken during the time the major road and rail infrastructure is being planned and constructed for SZC – this will give around a three year window for these proposals to be undertaken and would form part of the site preparation.
 - 4.1.3 Our comments are based on this being a standalone application under the Town and Country planning criteria.
 - 4.1.4 The Coronation Wood provides valuable screening to SZA and SZB Power stations, which will now be lost under this proposal, EDF Energy justifies this by claiming the wood is in poor condition. If this is the case, LTC suggests that the wood should be restored and the area improved as a socio-economic project, rather than turned into industrial land. Coronation Wood is on the highest elevation on the SW side of the power stations, and provides good screening, but has not received the same attention other woodland owned by EDF has had.
 - 4.1.5 The Pillbox field also provides green space to buffer the nuclear industrial sites, and it has been agreed in the past that this will remain. It is very disappointing to see the intention is to use this site in a SZC related project. LTC believes that more should be done to identify any land becoming available as SZA is decommissioned. Land at the SZA site could be liberated under this proposal and used to site infrastructure planned for coronation wood and Pillbox field. The visitors centre could also be relocated to another site, free from security restrictions, somewhere within the parish and become part of the wider tourist provision of the area.

- 4.1.6 LTC notes that it was not considered to be part of any of the 'Key Stakeholder' meetings, and therefore had no opportunity to engage with the applicant on these proposals other than to respond to the scoping request.
- 4.1.7 It is noted that the proposed outage carpark could be 'hidden' by the contours of the field. It is hoped that the lighting will be downfacing and discrete. The major issue with this proposal however is the entrance to bridleway 19. There is no need for any incursion onto bridleway 19 to access this carpark. Indeed, if the entrance was brought to roughly opposite Home Farm Road, then there would be no need for clearance of the hedgerow back from the road, as the visibility from there is better and safer. EDF could then help horses/bicycles etc. access bridleway 19 from Home Farm road with a crossing and an extended bridleway along the frontage to the new junction.
- 4.1.8 The inclusion of a pedestrian walkway and footbridge etc. from the new car park to the site would not reduce the journey that much. It should be an aim of this project to keep the woodland as undisturbed as possible. If the walkway goes ahead, it should also be engineered to ensure workers are kept clear of bridleway 19, as it is a local amenity, much enjoyed by residents and tourists alike, and its character must be respected and retained.
- 4.1.9 The retained woodland will not be high or dense enough to perform the screening function that coronation wood currently does so well. The new training centre will be very obvious and prominent, despite what the visuals are trying to make out. In particular, the light pollution from the windows will make it even more obvious through the darker evenings. Coronation Wood was cited by SZB as effective screening for the dry fuel store, and this was accepted and noted. This is an elevated position and cannot be deforested without visual consequences.
- 4.1.10 Overall, the town councils main objections are the removal of vital screening of the nuclear site, the incursion on to greenfield sites and the height of new buildings built on to the elevated site. The entrance to the Pillbox field carpark should be rethought, moved east and a crossing should be put in. Bridleway 19 must not be used during construction or operations.
- 4.1.11 None of this mentions the AONB and the transport elements. LTC will therefore fully endorse any objections, comment or criticism by Suffolk Wildlife Trust, Natural England and the RSPB. They would comment on the transport to SCC but would urge them to consider a 40mph speed limit at Halfway Cottages and the Household waste site as non local drivers will be unaware of the hazards. This inclusion will be essential as part of the mitigation for this project, and in the future, to address the impacts of other NSIP projects being muted for adjacent locations."
- 4.2 Aldeburgh Town Council: OBJECTS to the application stating: "we disagree with the use of greenfield sites where brownfield sites exist. Coronation Wood provides valuable screening to the Sizewell A and B Power Stations. EDF Energy has failed in its obligation to maintain the wood – it was described as part of the interim waste / dry fuel store permission that Coronation Wood was valuable screening against noise and visual impact. We suggest that the wood be restored and the area improved rather than turned into industrial land. If approved, ATC expects that substantial mitigation be required to replace the lost amenity. For every tree removed, at least two mature specimens should be planted.
- 4.2.1 ATC understands that the ownership of Pillbox Field would need to be established before the utilisation of this area by EDF Energy. Currently this land plays a vital part in providing green

space to buffer the industrial site. We believe it should be possible to relocate some of the proposed infrastructure on brownfield land reclaimed by the decommissioning of Sizewell A. This would avoid building on Coronation Wood and Pillbox Field. Both Magnox and EDF should be required to begin a meaningful dialogue.

Outage store, laydown and car park

- 4.2.2 ATC questions the need for the outage store to be combined with the contractor officer and mess facilities into an imposing four-storey building. If the facilities were separated, it might be possible to locate them more easily and with less visual impact.
- 4.2.3 The outage laydown area covers 140 hectares, extending 1.8km inland. ATC believes this would have a negative environmental impact.
- 4.2.4 ATC disagrees with the use of Pillbox Field. Reclaimed land at Sizewell A could be utilised. Alternatively, parking could be provided away from the site to accommodate personnel and potentially Sizewell C contractors. Development here would further industrialise the area and require extensive mitigation in the form of screening.

Phase 1 – Technical training & visitor centre car parking, training centre and access road

- 4.2.5 Parking for the technical training and visitor centre should be situated on reclaimed land at Sizewell A.

Phase 1 – Training centre

- 4.2.6 Consideration should be given to land reclaimed from Sizewell A or, preferably, a site adjacent to the Emergency Planning Centre. This would prevent the need for an access road and development on greenfield land. The location here would be of benefit to the wider community.

Phase 2 – Visitor centre and other building

- 4.2.7 The Eastlands Industrial Park in Leiston could provide a new centre free from security restrictions. Reference to the Visitor Centre at Hinkley Point which is off-site.
- 4.2.8 There is currently insufficient information to assess the impact of other buildings including the outage office, projects office etc.

Adverse impact

- 4.2.9 Noise, light and dust pollution in an area used for recreational purposes and contributes to the tourism industry of Aldeburgh and beyond.
- 4.2.10 Increased traffic would have an adverse impact on residents living adjacent to the road and visitors trying access Aldeburgh and surrounding area.
- 4.2.11 The Proposed Development would industrialise land which is currently landscaped buffer zones between the existing power stations.
- 4.2.12 Would substantially increase the footprint to the west and south of the existing site to accommodate Sizewell C.

Cumulative impact

- 4.2.13 ATC calls for greater transparency on how the Proposed Development will overlap with other major energy projects planned for this area. ATC believes this application should not be determined in isolation to other NSIPs.
- 4.2.14 As the current EDF Energy relocation proposals were not scheduled when planning permission for Sizewell B was originally granted, ATC believes the Proposed Development would impact on the total carbon rating of the energy produced.

- 4.2.15 If approved, the plans should include an additional socio-economic package of mitigation measures and the creation of alternative green space to that which has been lost. Substantial replanting of lost trees should be the minimum requirement.

Consultation

- 4.2.16 ATC does not understand why it was excluded from the Council's customary planning consultation process. Any proposed work at the Sizewell site could have a negative impact on the broader community, including Aldeburgh.
- 4.2.17 ATC is taking a keen interest in this planning application because of the cumulative impact it could have on the town's fragile economy.

Concluding comments

- 4.2.18 ATC calls for a coordinated approach to all planning applications, including this proposal, in respect of the NSIPs.
- 4.2.19 Piecemeal development of this environmentally sensitive area should not be allowed.
- 4.2.20 The opportunities afforded by the early decommissioning of Sizewell A should be fully explored before this planning application is approved.
- 4.2.21 There seems little point in increasing the footprint of the present site if a more imaginative solution is to hand."
- 4.3 Theberton and Eastbridge Parish Council: OBJECTS to the applications stating: "Application should only be considered as part of the DCO and any enabling development only commenced following DCO approval.
- 4.3.1 The development permanently removes Coronation Wood and a significant proportion of Pillbox Field, both within the AONB, with only partial compensation and mitigation proposed.
- 4.3.2 The proposal to move these facilities would be unnecessary in the event of a rejection of a DCO application and upgraded facilities could be contained within the existing Sizewell B footprint and decommissioned areas of the Sizewell A complex.
- 4.3.3 Should Sizewell C be inappropriate for the site based on EN-6 and the NPS, the need for the Relocated Facilities, the destruction of Coronation Wood and the use of Pillbox Field would be unnecessary as the existing Sizewell B and proposed Sizewell C site have enough space to accommodate such developments within the overall footprint.
- 4.3.4 140 lorry movements per day at peak over 4 years using the B1122 will significantly impact residents in Theberton. It will also overlap with Scottish Power's Wind Farm projects, and should it be approved, the initial stages of any Sizewell C development.
- 4.3.5 The removal of Coronation Wood, which acts as screening, will be replaced by immature new planting and will take decades to mature.
- 4.3.6 Three mature oaks will be lost along with over 330 other trees, hedgerow and footbridge built across SSSI land where wet woodland will also be damaged – no adequate compensation is proposed for this loss within the application.
- 4.3.7 Habitat studies are 5 years old and have only been walk-over reviewed. It is also unclear whether the areas immediately to the west and south of Coronation Wood and Pillbox Field have been thoroughly sampled or studied as they are only available if requested.
- 4.3.8 The damage proposed to Coronation Wood will fail to meet the requirements of Policy SCLP 10.1 and 10.4.

- 4.3.9 The Parish Council support and echo the ecological and environmental concerns raised by the Environment Agency and recommend that they be assessed in conjunction with the overall impact of the SZC project within the DCO process.”
- 4.4 Middleton-cum-Fordley Parish Council: OBJECTS to the proposal stating: “The application is premature and there is no justification for it in the extant or draft Local Plans. It should only be considered as part of the DCO.
- 4.4.1 It would be wrong to approve a development that would remove around 90% of Coronation Wood and up to 50% of Pillbox Field when the DCO request for Sizewell C has neither been submitted nor approved, and when the National policy Statement on site selection for new nuclear reactors is under review.
- 4.4.2 The cumulative impact is expected to be considerable.
- 4.4.3 Will have an enormous impact on the AONB, natural history, visitor economy, local communities and the traffic and transport infrastructure.
- 4.4.4 In the event of Sizewell C not going ahead, it would be unacceptable for landscape to have been destroyed and such ecological damage inflicted for no reason. EDF should be able to upgrade its facilities without destroying the landscape.
- 4.4.5 Should be considered as part of DCO
- 4.4.6 The application should form part of the DCO for Sizewell C should Sizewell remain a potential site following the Government’s review of nuclear policy.
- 4.4.7 Until the new NPS is in place and Sizewell C has been properly assessed against new criteria as well as the latest habitat regulations and Sea Level/Climate Data, then Sizewell C may not meet those requirements.
- 4.4.8 Any preparatory work should be postponed until such time as these new assessments and regulations are in place and Sizewell has been added to the potential site list within the new NPS, and the new legislation has been approved by Parliament. This requires a further BEIS consultation and the new NPS is not expected to come before parliament until 2020.

Impact on AONB and visitor economy

- 4.4.9 Will result in the loss of further natural landscape and habitat and impact on the AONB, including Coronation Wood and Pillbox Field.
- 4.4.10 The cumulative impact of Sizewell and other proposed strategy energy developments will threaten the £250m per annum local tourism industry. Noise, dust, loss of access and visual impacts will deter visitors to the coast between Southwold and Aldeburgh.

Public consultation

- 4.4.11 Unreasonable to expect communities and groups to comment on individual projects without being able to assess the cumulative impacts of projects that will be implemented at the same time, and by the same developer.
- 4.4.12 The consultation on Sizewell B facilities was short and ran concurrently at the beginning of the consultation on Sizewell C. It was overshadowed by a larger project and escaped the attention of a larger number of people that will be affected by it.”
- 4.5 Kelsale-cum-Carlton Parish Council: OBJECTION, stating: “There has not been the time to cross reference application documents with the Environmental Impact Assessment, it appears to suggest that any more recent surveys are either in the pipeline or not done as yet. This application should be looked at together with any application for Sizewell C and not

in isolation. Material grounds for objection are: cumulative impact, prematurity, site history, and biodiversity. We refer to our response on Sizewell C earlier this year."

Statutory Consultees

- 4.6 Environment Agency: No objections however, the site is within fluvial and tidal Flood Zones 1, 2 and 3a. The majority of the work has been sequentially sited and is located in Flood Zone 1. However, Field 2 and Pillbox Field fall within Flood Zone 3a, Field 2 will be used to stockpile material and Pillbox Field will be used as a car park. The works could be classified as less vulnerable if they do not include work to the electricity generating element of the site. The site is at risk from flooding however there are tidal sea defences in place and even in the event of climate change resulting in the defences being overtopped the flood water does not reach the Pillbox Field or Field 2, the sites are therefore not at actual risk of fluvial or tidal flooding. There remains a residual risk of a failure of the flood defence mechanism; this is explored in Section 3.4 of the FRA Addendum. Pillbox Field and Field 2 do not have a safe means of access in the event of a breach allowing for climate change. However, a large portion of Pillbox Field will not flood. An Emergency Flood Plan has been provided and this will ensure the safety of site users. Advisory comments to the LPA are provided.

Ecology

Chapter 6: terrestrial ecology

- 4.6.1 The loss of existing habitat can be acceptable where sufficient resource is invested into re-establishing new habitat and enhancing habitat that remains. The proposal specifies multiple ways in which mitigation measures could be implemented through replanting, but this will take a number of years to develop. The natural habitat losses stated in paragraph 6.6.37 may exceed biodiversity gain.
- 4.6.2 The EA encourage long term active monitoring, as stated in section 6.7c, of the implemented mitigation and surface water collection systems to ensure measures are effective and successful.
- 4.6.3 They note Himalayan Balsam (listed on Schedule 9 of the Wildlife and Countryside Act) was identified on site and must be managed accordingly to remove and prevent spread.

Chapter 16: cumulative impacts

- 4.6.4 The EA note that cumulative impacts are possible upon terrestrial ecology and ornithology during construction stages in combination with the proposed development of Sizewell C, SPR EA1N and EA2 despite the proposals being at various stages. This reinforces the importance of creating, enhancing and maintaining sufficient habitat and biodiversity that is resilient to future pressures.

Groundwater and contaminated land

Chapter 12: land quality

- 4.6.5 The EA note the review of previous reports refers only to soil data and comparison with Human health criteria (12.4.45, 12.4.50, 12.4.58, 12.4.63). It would be useful if it was confirmed whether groundwater quality data is available and what GAC (general assessment criteria) were used to assess the results.
- 4.7 Historic England: Do not object in principle to the proposal and consider the applicant has taken a responsible approach to the impact upon the historic environment. We have become aware of the potential importance of some of these existing buildings in relation to the story of the development of Britain's nuclear industry, and that these buildings may have an intrinsic interest beyond their current life. Such assets would be considered as non-

designated heritage assets. Mitigation in the form of a level 2 recording of the buildings was suggested. We note the applicants approach to mitigation is set out in the Environmental Statement Chapter 8.7 and acknowledge that this is suitable and takes into consideration our position. If minded to grant permission the mitigation proposed must be supported by a full set of appropriately worded historic environment conditions to support the mitigation as set out Chapter 8.7.

- 4.8 Natural England: Raise concerns with the proposal. We advise that ESC should consider whether or not it is appropriate to assess these aspects of the Sizewell C development proposals through a standalone planning application in advance of the applicant's forthcoming Development Consent Order submission. It is an important consideration from NE's remit in terms of properly assessing cumulative and in-combination impacts.
- 4.8.1 We note that EDF Energy require the training and visitor centre to be near to the power station, as users of both facilities, require access to the power plant. It is therefore considered unfeasible by EDF Energy to relocate them beyond the Sizewell Estate, outside a nationally important landscape (AONB) and away from internationally and nationally important sites for wildlife (Special Protection Areas, Ramsar Sites and Sites of Special Scientific Interest (SSSI). However, the ES states that an off-site alternative to the outage car parking was considered, given the proposed siting impacts on the AONB and SPA, Ramsar and SSSI interest features, an alternative would avoid these impacts. As a key principle for sustainable development, ESC should consider whether the justification provided in discounting any possible alternatives provided by EDF Energy outweighs the requirement to protect internationally and nationally important wildlife sites and landscapes.
- 4.8.2 Based on the information provided, NE consider there is insufficient information to allow adverse effects to the Minsmere – Walberswick Heaths and Marshes SPA and Ramsar site to be ruled out. There is insufficient information to rule out adverse effects to Sizewell Marshes and Minsmere-Walberswick Heaths and Marshes SSSIs.
- 4.8.3 However, we advise that the significance of such disturbance and adequacy of mitigation cannot be confidently assessed without consideration of the impacts to all relevant species, based on full and robust survey data. We consider that further information is therefore required as follows:
- Project-specific bird survey data covering all relevant species (SPA, Ramsar site and SSSI features) within the noise disturbance Zol;
 - Should significant numbers of birds be found to be present, modelling of predicted noise levels (during demolition, construction and operation) vs. existing background noise levels, and assessment of significance based on the project-specific bird survey data and suitable disturbance thresholds;
 - If shown to be required following the noise modelling, further details on how the proposed mitigation is likely to be effective (i.e. how it would reduce noise levels to acceptable levels in the context of the bird disturbance thresholds) and how it would be monitored to ensure its efficacy. This should consider timings of works, including any construction works phasing which would avoid/minimise noise impacts during the most sensitive times for the relevant species;

- Impact from light disturbance, welcome the Lighting Strategy but require further details of the visitor centre.
- Impacts on hydrology and hydrogeology, welcome a programme of monitoring to check the effectiveness of the proposed dewatering mitigation measures to allow them to be adjusted if necessary. These measures should be discussed and agreed with the Environment Agency and Natural England.

Advice on Protected Landscapes

- 4.8.4 The proposed development represents major development within the AONB.
- 4.8.5 One of the criteria for NPPF Paragraph 172 is whether the development need could be met in some other way or be located outside the AONB. As already outlined in our advice above, we note from the planning documents that EDF Energy requires the training and visitor centres to be near to the power station as users of both facilities require access to the power plant. It is therefore considered unfeasible by EDF Energy to relocate them beyond the Sizewell Estate outside the nationally important Suffolk Coast and Heaths AONB.
- 4.8.6 However, we note from the ES that “There was...early consideration of an offsite park and ride as an alternative to Pillbox Field for the Outage Car Park only. However, this option was discounted due to the increased logistics and costs that would be incurred around the critical outage periods”.
- 4.8.7 Bearing in mind that the siting of this car park is within the AONB, alternative options which could be sited outside it would clearly be preferable in this respect. We therefore advise that your authority must consider whether the justification provided in discounting this alternative (and any other possible alternatives) on the basis of increased logistics and cost to the developer constitute the ‘exceptional circumstances’ referred to above.
- 4.8.8 With regard to the likely impacts of the development on the AONB we are concerned that it will:
- extend the industrializing footprint of the nuclear facility further across the currently undeveloped parts of the AONB;
 - introduce new and visually intrusive built structures; and
 - through the clearance of Coronation Wood remove both an important local landscape feature and an important component of the screening of the lower parts of the Sizewell power station complex.

Other Advice

- 4.8.9 We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:
- local sites (biodiversity and geodiversity)
 - local landscape character
 - local or national biodiversity priority habitats and species.
- Environmental enhancement and LPA biodiversity duty

- 4.8.10 Advise the LPA to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, consideration to off site measures should be given.
- 4.8.11 They note that the proposed landscape mitigation planting within Pillbox Field consists of native species appropriate to the area to create new woodland, trees, scrub, gorse and acid grassland which would provide habitat for a number of species such as reptiles. Other opportunities for enhancement might include:
- Providing new footpaths through the new development to link into existing rights of way;
 - Restoring neglected hedgerows;
 - Creating new ponds as an attractive feature on the site;
 - Planting trees characteristic to the local area to make a positive contribution to the local landscape;
 - Using native plants in landscaping schemes for better nectar and seed sources for bees and birds;
 - Incorporating swift boxes or bat boxes into the design of new buildings;
 - Designing lighting to encourage wildlife; and
 - Adding a green roof to new buildings.
- 4.8.12 Also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place. For example:
- Links to existing greenspace and/or opportunities to enhance and improve access;
 - Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips);
 - Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links; and
 - Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).
- 4.9 Suffolk County Council - Archaeological Service: The County Historic Environment Record has defined archaeological remains of medieval date and as a result there is high potential for additional archaeological remains to survive within this area and proposed works will damage or destroy known archaeological features. Within Coronation Wood, which has never previously been subject to archaeological assessment, there is potential for previously unrecorded earthworks to survive as well as below ground archaeological remain as multi-period archaeological finds and features are recorded in the vicinity. As a result, there is high potential for the discovery of above and below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.
- 4.9.1 There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. Two conditions are recommended.

- 4.10 Suffolk County Council – Lead Local Flood Authority: Approval of this application subject to a number of detailed conditions relating to disposal of surface water drainage and details of sustainable drainage system components. They ask that the applicant engages with them prior to submitting an application to discharge these conditions.
- 4.11 Suffolk County Council - Highway Authority and Rights of Way: have received revised drawings with a proposed new access and as such recommend approval subject to conditions including safety in relation to the use of Sandy Lane and reassurance that any damage to the bridleway is repaired. The design of visibility splays proposed is acceptable provided there is a condition requiring visibility (x distance) of 160m to the west of the access and 120m to the east. The layout is acceptable subject to detail design and section 278 agreements; a stage 1 RSA is required. A dropping point 0 i.e. dropped kerbs opposite Sandy Lane /BR19 is required as it guides users of the PRow away from the new car park access. A TRO may be required to restrict parking on Sizewell Gap Road.
- 4.12 Suffolk Local Access Forum (SLAF): OBJECT to the proposal. SLAF consider they should have been consulted direct as the proposal has implications on users of Bridleway 19.
- 4.12.1 The documents do not make clear whether the proposal is a permissive alternative route which EDF Energy will provide and possibly maintain / remove at their discretion, or whether the actual bridleway is to be diverted onto the alignment to the east.
- 4.12.2 If the bridleway stays in situ then it will be unsafe for walkers, cyclists and horse riders whilst outages take place and having a permissive alternative route doesn't change the fact that two-way traffic would be using the bridleway. There is still the potential for hazard crossing the driveway to re-join the bridleway.
- 4.12.3 During construction of the outage car park, expected to take 9 months, there will be a lot of heavy construction vehicles on site, with increased danger and disturbance to bridleway users. At peak times, there could be up to 700 workers walking to and from the car park over a 24-hour period, who will be crossing the bridleway to gain access to the new floodlit footpath.
- 4.12.4 The junction of Sandy Lane (Bridleway 19) and Sizewell Gap is already a hazard. This will increase considerably if the outage car park is built on Pillbox Field, with hundreds of cars turning in and out of Sandy Lane onto a busy road, adjacent to the new bridleway entrance.
- 4.12.5 SLAF would suggest that alternatives for the car park entrance should be explored as during construction, EDF already plan to use an access point to the east.
- 4.12.6 If the bridleway entrance was moved further west, it would mean that users would be crossing Sizewell Gap through the traffic. All options seem to add extra traffic to be crossed somewhere.
- 4.12.7 SLAF are concerned that statements made in the full Stage 3 Consultation have been ignored.
- 4.13 ESC - Head of Environmental Services and Port Health: No objections to the development with regard to noise or vibration.

- 4.13.1 Construction noise and vibration: the assessment of noise and vibration uses the recognised Act, Noise Policy Statement for England, and British Standard in its assessments. In addition to working to numerical noise values the Environmental Statement incorporates a CEMP and describes the activities which will take place. It estimates the construction duration will be 53 months with a peak period of approximately 12 months. Working hours are proposed to be restricted, as are HGV deliveries, with only essential activities such as concrete pouring taking place out of normal working hours.
- 4.13.2 Essential primary mitigation measures will be needed for piling operations and the use of screw auger piles are recommended. Other noise mitigation measures are included in the CEMP. With respect to vibration, contractors should adhere to the guidance, as set out BS 5228-2, and follow good practice for minimising impacts from construction vibration, although none is anticipated from the site.
- 4.13.3 Operational noise and vibration: it is not anticipated that any operational noise or vibration will impact any residential property. Recommend conditions.
- 4.13.4 Air quality: Further detail on precise calculations of HGV traffic flows is requested – it is not clear if arrivals and departures have been included. Reference to the 2 Village bypass is made, however, the peak year for Sizewell B traffic will be 2022, whereas the 2VBP is unlikely to be operational until 2024, cumulative impacts with EA 1 North and EA2 offshore windfarm developments is not incorporated. We suggest the use of minimum Euro IV standard construction vehicles with appropriate management and enforcement. If the 2 VBP can be provided earlier this would be of benefit to the Stratford St Andrew AQMA. SZB relocated facilities will result in an increase of 125 vehicles (86 – HGV) through the Stratford St Andrew AQMA. Given ESC improvements in this area in improving air quality, this additional traffic has the potential to delay air quality objective compliance. The in-combination effect of SZB, SZC, EA1N and EA2 needs careful consideration.
- 4.13.5 Although the operation phase will be very similar to the existing, the outage car park will be within 100 metres of an area sensitive to air quality changes (human health exposure), it may not be appropriate for this to be scoped out of assessment. Emissions from moving and stationary cars within the car park should be assessed further.
- 4.13.6 The dust and air quality measures within the outline CEMP do not contain the entirety of ‘high risk’ mitigation measures within IAQM’s guidance on the assessment of dust from demolition and construction. Further information should be provided to justify existing dust mitigation measures, and / or additional mitigation provided in accordance with the requirements IAQM (2014) guidance. The building to the north of the outage car park is a residential property so is a sensitive receptor, a dust management plan will need to be put in place to minimise impacts upon this property.
- 4.14 ESC – Head of Economic Development: We seek to support applications where the application clearly supports the economic growth and regeneration of the economy. We recognise the value of an increased and improved Visitor Centre. It is an important feature of this key local stakeholder’s offer in terms of their communication to schools, businesses, and members of the public. We support the planning application.

- 4.15 Suffolk Joint Emergency Planning Unit: As Head of Emergency Planning at the Suffolk JEPU, will be advising the Office for Nuclear Regulation on any implications of this proposed development on existing Sizewell off-site nuclear emergency planning arrangements, issued under Radiation (Emergency Preparedness and Public Information) Regulations, as required by the Office for Nuclear Regulation land use policy. The formulation of this assessment has started and is awaiting further information from ONR. The development may impact off-site nuclear emergency arrangements and therefore it is important that any planning consent is considered in the light of any formal comments provided by the ONR.
- 4.16 East Suffolk Drainage Board: The site is within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board and therefore the Board's Byelaws apply. If a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws. Whilst not currently proposed, should the applicant's proposals change to include works within 9 metres of the watercourse, consent would be required to relax Byelaw 10.

Non-Statutory Consultees

4.17 Suffolk Coast and Heaths Area of Outstanding Natural Beauty:

General Comments

- 4.17.1 Concerned that the proposal is being brought forward in isolation from the Sizewell C DCO process when it is clearly integral to Sizewell C.
- 4.17.2 There is a lack of certainty over the future of Sizewell C meaning the approval of the application is premature given that it will negatively impact the AONB.
- 4.17.3 The objection refers to NSIP guidance:
'Local authorities may decide that such consent should potentially be granted on the basis that any preliminary works carried out will be removed if the subsequent application to the IPC is turned down or if, within a specified time, no application is made'.

- 4.17.4 Some ecological assessments and bird surveys are several years old. AONB seeks reassurance that surveys are suitable and that the application conserves biodiversity.

Outline development zone

- 4.17.5 AONB Partnership expects to be consulted on future reserve matters proposals for the outline area.

Coronation Wood

- 4.17.6 AONB Partnership rejects statements that Coronation Wood is not valued for its landscape, aesthetic or ecological value.
- 4.17.7 Instead, it plays an important landscape function by screening the lower level buildings forming part of the Sizewell B complex. The smaller lower levels buildings are not visible and the overall impression is of an uncluttered site.
- 4.17.8 The removal of Coronation Wood will prevent screening to the proposed 20m high visitor and training centres.
- 4.17.9 The proposed colour palette will make the buildings more visible at night.
- 4.17.10 The lighting from the car park and laydown area will also be visible at night. Proposed measures will help mitigate some light spillage, but there is still potential that they will be visible at night and during shorter winter months when vegetation cover is reduced.

- 4.17.11 The removal of the wood will also result in the loss of an asset linked to the Coronation of George V and Queen Mary.
- AONB Partnership Position
- 4.17.12 The AONB Partnership does not agree that the effects on receptor groups and the natural beauty of the AONB will not be significant.
- 4.17.13 It is acknowledged that significant consideration has been given to mitigate the effects of the proposed development but notes that it will extend the physical footprint into a currently undeveloped area of the AONB.
- 4.17.14 There will be significant increases in vehicular movements and human activity associated with the developments. This will adversely impact on the tranquillity and users' enjoyment of this part of the designation.
- 4.17.15 The AONB partnership considers the loss of Coronation Wood as significant because it provides an important screening function to Sizewell A and B. It will permanently alter how people view the complex adversely impacting on the experience of those visiting the AONB.
- 4.17.16 The Partnership consider that once completed, it will have a permanent adverse impact due to an increase in the amount and scale of development making up the Sizewell B complex.
- 4.17.17 If developed, a greater number of buildings will be more visible from the west than at present.
- 4.17.18 Despite proposed mitigation measures, there remains potential for an increase in light spillage from the west due to the height of the buildings and laydown and parking area.
- 4.17.19 Development within Pillbox Field should be considered as major development and will have a significant negative impact on the AONB and landscape character.
- 4.17.20 This major development should not usually be considered within a nationally designated site.
- 4.17.21 It will alter the open undeveloped character of Pillbox Field through the introduction of incongruous features and industrialise the land.
- 4.17.22 The new Western Access Road will result in a more engineered and larger entrance to the Sizewell B complex.
- 4.17.23 The increase in development and activity will reduce the tranquillity during construction and operational phases in the vicinity of Pillbox Field.
- 4.17.24 Will reduce how the historic pillbox is viewed and experienced in the later setting.
- 4.17.25 The anticipated increase in human activity, the loss of tranquillity and alterations to the PROW, the proposals will directly impact on the enjoyment of recreational users of Bridleway 19.
- 4.17.26 Proposal is not considered to have paid due regard to the statutory purpose of the AONB which is to conserve and enhance natural beauty as required by Section 85 Countryside and Rights of Way Act 2000.
- 4.17.27 It is not considered to satisfy the objectives of NPPF paragraphs 170 and 172, and Core Strategy Policy SP15.
- 4.17.28 The Proposals do not meet the management objectives L1, L4, LUW1 and LUW4 of the Suffolk Coast & Heaths AONB Management Plan 2018-2023.
- 4.18 Suffolk Preservation Society: OBJECTS to the proposal.

- 4.18.1 The application is premature and should not be considered in isolation but should form part of the DCO application.
- 4.18.2 The importance of the designated landscape is seriously underestimated. The Countryside and Rights of Way Act 2000 clearly sets out the protection afforded to AONBs and the duty to conserve and enhance their natural beauty.
- 4.18.3 Strongly reject the assessment and conclusions within Landscape and Visual Impact Assessment namely that the susceptibility of the natural beauty and special qualities indicators are low and therefore that the AONB is of only medium sensitivity.
- 4.18.4 They do not accept that the permanent effects are very limited as they only impact upon a small part of the AONB.
- 4.18.5 They refute the conclusion presented in table 7.10 which judges the scale of effects to be, at their highest level, only small with regard to landscape quality and negligible with regard to all other indicators including relative wildness, tranquillity and heritage.
- 4.18.6 The SPS strongly rejects the applicant's overall conclusion that the magnitude of effects will be negligible and that the proposed development will have a minimal significance (not significant) and on balance be neutral.

The proposals

- 4.18.7 The proposed works have a total site coverage of 36,741m² (approximately 9 acres) in a designated landscape which is nationally renowned for its tranquillity and remoteness.
- 4.18.8 They are dismayed by the proposed development of Pillbox Field to provide an outage car park. The proposed permanent development of the Laydown Area on the western edge of the site will include structures up to 6m in height with 8m high lighting columns and 100 lux light fittings on the perimeter of the estate facing into the AONB.
- 4.18.9 Structures up to 30m in height within the outline development zone have not been adequately presented to make an assessment of whether, or to what extent, they will appear visually intrusive in this location.
- 4.18.10 The proposed Training Centre is a three storey building that faces onto the AONB yet there is little detail provided and the generalised statements such as "softer appearance" and "windowless" do little to reassure.
- 4.18.11 The 270m long access road will be a metaled surface and will be lit by 4m high lighting columns and will run along the western edge of the site adjoining the highly sensitive Sizewell Marshes.
- 4.18.12 The sensitivity of the areas affected within an AONB can never be fully returned to their original conditions and environmental status and therefore the proposals should not be considered further in isolation from any potential development consent application for the area.

Pillbox Field and Coronation Wood

- 4.18.13 It will introduce further industrialisation, together with large volumes of vehicular and human activity as well as light pollution in an area that is otherwise undeveloped.
- 4.18.14 It will erode the setting of the Second World War pillbox, an undesignated heritage asset, and an important element of the nation's military coastal defences. Its significance is, in part, derived from its isolated location on the coastline. The introduction of a large, lit car park will cause harm to its significance.

- 4.18.15 The loss of Coronation Wood is unacceptable as it provides a useful contribution to landscape and visual mitigation of Sizewell A and B, but also has a communal and historic value as a commemoration of George V and Queen Mary's coronation in 1911.
- 4.18.16 In view of the hugely negative impact that the power plants have wrought upon the landscape in the last half century, the proposed loss of this belt of woodland planted at the beginning of the 20th century is an affront to all those who benefit from this landscape feature.
- 4.18.17 The proposals represent a material encroachment beyond the existing confines of the power plant and show no regard to the sensitive location within a designated landscape or the cultural heritage that it contains.
- 4.18.18 This application appears to be premature for consideration in light of the guidance provided to Local Authorities on Preliminary works for NIPS projects.
- 4.18.19 If the site layout cannot be reduced to allow for these associated developments to be included within the site area and away from the SSSI, then the scale of the development of EDF Sizewell estate should be questioned and reviewed.
- 4.19 Suffolk Wildlife Trust: Consider this application should not be considered separately to the Sizewell C DCO.
- 4.19.1 Ecological survey information: a number of survey reports are considered to be out of date for the purposes of conducting an Ecological Impact Assessment (EclA). The advice note published by CIEEM on the Lifespan of Ecological Reports and Surveys (April 2019) indicated that reports older than 3 years are unlikely to be valid.
- 4.19.2 Designated sites and other habitats: The proposed development has the potential to impact upon Sizewell Marshes SSSI; it will result in the loss of plantation woodland known as Coronation Wood, an area of wet woodland north of Rosary Cottage and an area of grassland within Pillbox Field.
- 4.19.3 Sizewell Marshes SSSI: proposed development could result in a number of adverse impacts on the SSSI including impacts on ground and surface water through the change in land use and operation uses of the proposed areas resulting in disturbance of species associated with the SSSI through construction activities, change in land use (including the loss of existing screening provided by the woodland) and the presence of the footpath; and potential damage or disturbance during construction. There is no evidence that alternative routes away from the SSSI had been considered.
- 4.19.4 The two main areas of proposed development are to be linked via a footpath which runs through an area which is part of Sizewell Marshes SSSI. Although the NVC survey in 2019 identified that the grassland in this area is not a key feature of the SSSI, there are a series of vegetated watercourses running through this area which drain northwards along the Eastern edge of the SSSI and these are listed as one of the specific features of the SSSI. One such watercourse lies to the west of Rosary Cottage, with another to the north-west. It is stated that the SSSI habitat to be lost is 0.045ha but this does not appear to take into consideration the construction impacts on this part of the SSSI. The proposal appears to be for a permeable surface but no information has been provided on whether this material could change the local soil/water chemistry. The need for de-watering in relation to the construction of the outage store basement is predicted to be less than 20m³/day but there is currently no way of monitoring if there were to be any potential impacts of the adjacent SSSI arising through dewatering, as there are no dip-wells located in this part of the SSSI.

- 4.19.5 Coronation Wood: The proposed development involves felling Coronation Wood, a 1.6ha mixed plantation woodland of approximately 100 years old. The documents say that the woodland is of limited ecological value nevertheless it is likely to be of some value to a range of species. The proposed new planting amounts to 1.36ha in various locations and consequently we are concerned that not only is the loss of this habitat not fully addressed, there is also no demonstration of net gain for this habitat.
- 4.19.6 The wood also contributes to the wider ecological network through its value as part of the green corridor along the western side of the A and B stations and the screening it provides between the Sizewell Marshes SSSI and the built development of the power station. Until proposed screening matures the glow of these brightly lit areas will be extremely obvious from the SSSI.
- 4.19.7 Wet woodland north of Rosery Cottage: This narrow belt of wet woodland between two areas of the Sizewell Marshes SSSI. The installation of the footpath in this low-lying marshy area with standing water will require considerable groundworks and the means of undertaking this has not been addressed in the ES.

Protected and/or UK Priority Species:

- 4.19.8 Bats – eleven trees with bat roosting potential in Coronation Wood and a further ten trees in the woodland strip to the south of Coronation Wood have been identified and subject to further survey. We disagree that the required emergence and / or re-entry surveys could be undertaken after the determination of planning, any likely significant effect under the TCPA (EIA) Regulations 2017, should be identified prior to determination. The likely presence of protected species is a material consideration and the full impacts of the proposal must be understood prior to determination. We are also concerned about the impacts upon bat foraging routes, particularly due to the loss of Coronation Wood. We do not have confidence that the impacts upon bats are fully considered. The proposed footpath passes through an area of mature, wet woodland between Rosery Cottage and Coronation Wood which does not appear to have been included in any bat surveys, either in terms of potential roosting features or bat activity.
- 4.19.9 Reptiles – Chapter 6 states that all four common native reptiles are present on the site, they are all of 'low' population size. However, this conclusion is derived from a survey undertaken in 2015, previous surveys of 2012 found there was a 'good' population of common lizard, it is concluded that a good population of common lizard does occur on site, along with larger population sizes of the other three species.
- 4.19.10 Pillbox Field is former arable land which has been allowed to revert to grassland. Such habitats can be quickly colonised by reptiles but in the early stages of reversion are unlikely to support anything but low populations of reptiles due to reduced food availability. As four years have passed since the 2015 survey, the habitat has continued to mature and consequently is now highly likely to support higher numbers of reptiles than recorded in the earlier surveys.
- 4.19.11 There is a need for a comprehensive reptile mitigation strategy and the 2015 report suggests a combination of on-site enhancement, trapping and relocation to a receptor site, followed by destructive searches. The area of suitable reptile habitat to be lost is 13.1ha, yet it is proposed that the mitigation strategy will be through habitat manipulation and a phased vegetation clearance approach. We do not agree that displacement of reptiles can be effectively undertaken within this size of site and the associated incidental mortality would result in a negative impact on the local population.

- 4.19.12 Water vole – the proposed footpath north of the proposed outage car park crosses two drains via new footbridges and may impact on another west of Rosery Cottage. The water vole surveys as specified are considered to be out of date. Although it is stated in 6.1:2.2.76 that the 2019 Phase 1 habitat survey revisited the ditches and found no water vole signs, we believe this survey was undertaken at a sub-optimal time of year and consequently cannot be used to predict water vole presence.
- 4.19.13 Badger – we are aware of a number of badger setts in association with Coronation Wood, which are proposed for closure ahead of any felling. No other details of badger mitigation are provided but this will inevitably result in an increase in badger movements and the eventual construction of new setts elsewhere. The implication of shutting these setts on features of importance associated with the SSSI have not been assessed.
- 4.19.14 Conclusion – in addition to our comments about the timing of the proposed development, based on the information provided as part of the consultation, we are concerned that the ecological survey information available to assess the likely impacts of the proposals is either incomplete, out of date, or undertaken at a sub-optimal time of year and therefore must be updated to allow for a robust EclA to be undertaken.
- 4.20 Royal Society for the Protection of Birds (RSPB): HOLDING OBJECTION.
Lack of complete EIA
- 4.20.1 The RSPB is concerned that the Environmental Statement (ES) and Habitats Regulation Assessment (HRA) screening are not based on a complete set of assessments. The RSPB notes the Environmental Impact Assessment (EIA), and resulting ES and HRA screening, do not contain all the further work required to be considered before a planning decision can be made.
- 4.20.2 Appendix 17.1 recommends that this work, and the further information it will provide, should be undertaken in a future CEMP and is not contained within the ES and HRA screening that supports this planning application. In effect, the planning application is proposing a “wait and see” approach where further work to identify environmental effects will take place after planning permission has been granted.
- 4.20.3 All relevant information should be included within the ES to ensure an informed planning decision which complies with the EIA Regulations, particularly the information required for inclusion within an ES.
- 4.20.4 Their response refers specifically to NPS EN-1 (5.15.3).
- 4.20.5 It is the RSPB’s position that a planning decision cannot be arrived at unless and until the information and assessments set out in Appendix 17.1 are completed and included, with assessment of significance and provision of appropriate mitigation, within the ES to inform the planning decision. The RSPB objects to this planning application until the ES and HRA screening is amended to include an EIA of information from pre-construction ecological surveys, piling risk assessment, groundwater assessment and radiological survey to support an informed planning decision.
- 4.20.6 Lack of up to date species information
- 4.20.7 In Section 6 of the ES, the RSPB notes that updating of previous baseline surveys for mammals, reptiles and ornithology is reliant upon “Site visits conducted in 2018 and 2019 confirmed that there have been no material changes to the Site since the completion of the surveys; therefore, the results of these surveys remain valid and for the purposes of the ES, no additional surveys were required.

- 4.20.8 In respect to ornithology, the ES indicates that “there is no reason that the breeding and wintering bird assemblage would have changed significantly”. We note that the ES is now reliant on a habitat survey, rather than direct species surveys.
- 4.20.9 The RSPB notes that Appendix 17.1, the ES Mitigation Register, contradicts Section 6 (Table 6.7) of the ES (which rejects the need for additional ecological surveys) by stating that “pre-construction ecology surveyswill be undertaken in advance of site clearance works”(Appendix 17.1, Table 17.1).
- 4.20.10 The RSPB highlights our concern that the ecology surveys are dated and do not meet the requirements set out in the CIEEM Advice Note on the Lifespan of Ecological Reports and Surveys.
- 4.20.11 In the case of ornithology, the Breeding Bird Report (2012) survey was undertaken in 2010- nine years before the Ecological Impact Assessment (EclA) (ES Section 6). In addition, marsh harrier, bittern and hen harrier surveys were undertaken in 2008 and 2011/12 (11 and 8 years before the EclA), and we note that the Arcadis Sizewell C marsh harrier surveys (2014/15), do not appear to have been included in the planning application supporting information . The CIEEM advice note indicates that surveys over 3 years old are: “unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist)”.
- 4.20.12 CIEEM Guidelines for Ecological Impact Assessment (EclA) should be followed to provide up to date ornithological data, less than 4 years old, to allow the accurate identification and description of relevant environmental/ ecological sensitive receptors, together with trends in species population, distribution and rates of potential colonisation by new species as a baseline for the assessment of construction and operational effects.
- 4.20.13 The CIEEM EclA guidance also states that “If there is likely to be a lengthy time between undertaking an impact assessment (for example, to inform the planning application) and project inception, potential changes in the ecological baseline during that time should be identified” (CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland, 2018, p19).

Disturbance Information

- 4.20.14 The RSPB notes that noise baseline surveys were not undertaken within the Sizewell Marshes SSSI nor the Minsmere-Walberswick Ramsar and SPA and Minsmere-Walberswick Heaths and Marshes SSSI and SAC, (Appendix 11.2, Noise Baseline Survey).
- 4.20.15 It should be noted that the bird community of the surrounding area and statutory sites does not only include waterfowl, but priority species under Section 41 of the Natural Environment and Rural Communities Act 2006 (e.g. lapwing, turtle dove, woodlark, marsh harrier, bittern, hen harrier, etc.) and Schedule 1 species under the Wildlife and Countryside Act 1981 (e.g. black redstart, Cetti’s warbler, firecrest, etc.).
- 4.20.16 The recent work by Shannon et al (2016) demonstrates that the 70 dB threshold determined by Cutts (2009) does not equally apply to all species, with levels of 40 to 60dB causing declines in species diversity, distribution, occupancy and reproductive success. The use of the 70dB threshold may not, therefore, be a delimiting level for determining disturbance.
- 4.20.17 We note the assertion in the ES that the 8 week construction period “would cause minimum disturbance to the breeding and wintering bird assemblage”. Poorly timed works, however, can impact significantly on bird assemblages, survivability and breeding success.
- 4.20.18 Without up to date ornithological survey data, the timing of works should avoid the overwintering (November to March) and breeding (March to August) periods. We note that

the resulting narrow construction window would probably be restrictive for the developer, but may be avoided with suitable robust mitigation.

4.20.19 The conclusions of the Sizewell Marsh Harrier Survey 2008, however, are based upon the assumption that “there will be no land take from the marshes” SSSI (Entec 2009, p12).

4.20.20 The RSPB is concerned with:

- the lack of up to date ornithological survey data concerning the breeding and overwintering bird assemblage;
- a reliance on an inappropriate disturbance threshold for the impacted species and habitat, and;
- insufficient noise/disturbance data (including visual intrusion of equipment and personnel) for the potentially impacted statutory sites (SSSI, SPA, SAC and Ramsar).

4.20.21 These issues make it impossible to demonstrate that the proposed mitigation (barrier fencing, hedgerows, etc.) measures will be effective. This issue may be exacerbated by the loss of buffering habitat (e.g. Coronation Wood), siting of an access road and the incursion of a footpath on to the Sizewell Marshes SSSI (within or adjacent to an area which has previously seen limited intrusion).

4.20.22 Up to date ecological surveys should be undertaken to determine the current situation. Survey information could then be used to inform appropriate mitigation, which may avoid core breeding and overwintering periods, whilst enabling a longer works duration.

4.20.23 A more robust suite of mitigation measures could then be used to manage impacts from the development, e.g. phasing of work, deployment of an Environment Clerk of Works to provide oversight, avoidance zones around active nests, etc.

4.20.24 The RSPB note that species within the bird assemblage of the area are legally protected under the Wildlife and Countryside Act (1981) and are priority species under Section 41 of the Natural Environment and Rural Communities Act (2006) and that the latter act places a duty on the planning authority, in exercising its functions, to have regardto the purpose of conserving biodiversity. The RSPB is, therefore concerned that the lack of data and inappropriate disturbance threshold may inhibit the authority from carrying out this duty.

4.20.25 The RSPB objects to the planning application over this issue until:

1. An overwintering and breeding bird survey is undertaken to bring information about the site and surrounding statutory areas up to date;
2. Appropriate disturbance thresholds are agreed, and;
3. Baseline noise and visual intrusion data is provided for within the SSSI, SPA, SAC and Ramsar sites.

Dewatering, contamination and pollution

4.20.26 We note that the ES confirms our concern that the site has a high water table, up to 1.46 metres above ordnance datum (OD) (ES, Section 13.4.8) and that the underlying Crag Aquifer is likely to be in “hydraulic continuity” with the permeable made ground of the site (ES, 13.4.10) and also underlies the peat deposits to the west of the site (i.e. the Sizewell Marshes SSSI) (ES, Section 13.4.8).

Lack of complete EIA

4.20.27 The RSPB is concerned that the Environmental Statement (ES) and Habitats Regulation Assessment (HRA) screening are not based on a complete set of assessments. The RSPB

notes the Environmental Impact Assessment (EIA), and resulting ES and HRA screening, do not contain all the further work required to be considered before a planning decision can be made.

- 4.20.28 Appendix 17.1 recommends that this work, and the further information it will provide, should be undertaken in a future CEMP and is not contained within the ES and HRA screening that supports this planning application. In effect, the planning application is proposing a “wait and see” approach where further work to identify environmental effects will take place after planning permission has been granted.
- 4.20.29 All relevant information should be included within the ES to ensure an informed planning decision which complies with the EIA Regulations, particularly the information required for inclusion within an ES.
- 4.20.30 Their response refers specifically to NPS EN-1 (5.15.3).
- 4.20.31 It is the RSPB’s position that a planning decision cannot be arrived at unless and until the information and assessments set out in Appendix 17.1 are completed and included, with assessment of significance and provision of appropriate mitigation, within the ES to inform the planning decision. The RSPB objects to this planning application until the ES and HRA screening is amended to include an EIA of information from pre-construction ecological surveys, piling risk assessment, groundwater assessment and radiological survey to support an informed planning decision.

Lack of up to date species information

- 4.20.32 In Section 6 of the ES, the RSPB notes that updating of previous baseline surveys for mammals, reptiles and ornithology is reliant upon “Site visits conducted in 2018 and 2019 confirmed that there have been no material changes to the Site since the completion of the surveys; therefore, the results of these surveys remain valid and for the purposes of the ES, no additional surveys were required.
- 4.20.33 In respect to ornithology, the ES indicates that “there is no reason that the breeding and wintering bird assemblage would have changed significantly”. We note that the ES is now reliant on a habitat survey, rather than direct species surveys.
- 4.20.34 The RSPB notes that Appendix 17.1, the ES Mitigation Register, contradicts Section 6 (Table 6.7) of the ES (which rejects the need for additional ecological surveys) by stating that “pre-construction ecology surveyswill be undertaken in advance of site clearance works”(Appendix 17.1, Table 17.1).
- 4.20.35 The RSPB highlights our concern that the ecology surveys are dated and do not meet the requirements set out in the CIEEM Advice Note on the Lifespan of Ecological Reports and Surveys.
- 4.20.36 In the case of ornithology, the Breeding Bird Report (2012) survey was undertaken in 2010-nine years before the Ecological Impact Assessment (EcIA) (ES Section 6). In addition, marsh harrier, bittern and hen harrier surveys were undertaken in 2008 and 2011/12 (11 and 8 years before the EcIA), and we note that the Arcadis Sizewell C marsh harrier surveys (2014/15), do not appear to have been included in the planning application supporting information . The CIEEM advice note indicates that surveys over 3 years old are: “unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist)”.
- 4.20.37 CIEEM Guidelines for Ecological Impact Assessment (EcIA) should be followed to provide up to date ornithological data, less than 4 years old, to allow the accurate identification and description of relevant environmental/ ecological sensitive receptors, together with trends

in species population, distribution and rates of potential colonisation by new species as a baseline for the assessment of construction and operational effects.

- 4.20.38 The CIEEM EclA guidance also states that “If there is likely to be a lengthy time between undertaking an impact assessment (for example, to inform the planning application) and project inception, potential changes in the ecological baseline during that time should be identified” (CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland, 2018, p19).

Disturbance Information

- 4.20.39 The RSPB notes that noise baseline surveys were not undertaken within the Sizewell Marshes SSSI nor the Minsmere-Walberswick Ramsar and SPA and Minsmere-Walberswick Heaths and Marshes SSSI and SAC, (Appendix 11.2, Noise Baseline Survey).
- 4.20.40 It should be noted that the bird community of the surrounding area and statutory sites does not only include waterfowl, but priority species under Section 41 of the Natural Environment and Rural Communities Act 2006 (e.g. lapwing, turtle dove, woodlark, marsh harrier, bittern, hen harrier, etc.) and Schedule 1 species under the Wildlife and Countryside Act 1981 (e.g. black redstart, Cetti’s warbler, firecrest, etc.).
- 4.20.41 The recent work by Shannon et al (2016) demonstrates that the 70 dB threshold determined by Cutts (2009) does not equally apply to all species, with levels of 40 to 60dB causing declines in species diversity, distribution, occupancy and reproductive success. The use of the 70dB threshold may not, therefore, be a delimiting level for determining disturbance.
- 4.20.42 We note the assertion in the ES that the 8 week construction period “would cause minimum disturbance to the breeding and wintering bird assemblage”. Poorly timed works, however, can impact significantly on bird assemblages, survivability and breeding success.
- 4.20.43 Without up to date ornithological survey data, the timing of works should avoid the overwintering (November to March) and breeding (March to August) periods. We note that the resulting narrow construction window would probably be restrictive for the developer, but may be avoided with suitable robust mitigation.
- 4.20.44 The conclusions of the Sizewell Marsh Harrier Survey 2008, however, are based upon the assumption that “there will be no land take from the marshes” SSSI (Entec 2009, p12).
- 4.20.45 The RSPB is concerned with:
- the lack of up to date ornithological survey data concerning the breeding and overwintering bird assemblage;
 - a reliance on an inappropriate disturbance threshold for the impacted species and habitat, and;
 - insufficient noise/disturbance data (including visual intrusion of equipment and personnel) for the potentially impacted statutory sites (SSSI, SPA, SAC and Ramsar).
- 4.20.46 These issues make it impossible to demonstrate that the proposed mitigation (barrier fencing, hedgerows, etc.) measures will be effective. This issue may be exacerbated by the loss of buffering habitat (e.g. Coronation Wood), siting of an access road and the incursion of a footpath on to the Sizewell Marshes SSSI (within or adjacent to an area which has previously seen limited intrusion).
- 4.20.47 Up to date ecological surveys should be undertaken to determine the current situation. Survey information could then be used to inform appropriate mitigation, which may avoid core breeding and overwintering periods, whilst enabling a longer works duration.

- 4.20.48 A more robust suite of mitigation measures could then be used to manage impacts from the development, e.g. phasing of work, deployment of an Environment Clerk of Works to provide oversight, avoidance zones around active nests, etc.
- 4.20.49 The RSPB note that species within the bird assemblage of the area are legally protected under the Wildlife and Countryside Act (1981) and are priority species under Section 41 of the Natural Environment and Rural Communities Act (2006) and that the latter act places a duty on the planning authority, in exercising its functions, to have regardto the purpose of conserving biodiversity. The RSPB is, therefore concerned that the lack of data and inappropriate disturbance threshold may inhibit the authority from carrying out this duty.
- 4.20.50 The RSPB objects to the planning application over this issue until:
- An overwintering and breeding bird survey is undertaken to bring information about the site and surrounding statutory areas up to date;
 - Appropriate disturbance thresholds are agreed, and;
 - Baseline noise and visual intrusion data is provided for within the SSSI, SPA, SAC and Ramsar sites.
- Dewatering, contamination and pollution
- 4.20.51 We note that the ES confirms our concern that the site has a high water table, up to 1.46 metres above ordnance datum (OD) (ES, Section 13.4.8) and that the underlying Crag Aquifer is likely to be in “hydraulic continuity” with the permeable made ground of the site (ES, 13.4.10) and also underlies the peat deposits to the west of the site (i.e. the Sizewell Marshes SSSI) (ES, Section 13.4.8).
- 4.20.52 The Environmental Statement also confirms that groundwater feeds the adjacent ditch system of the Sizewell Marshes SSSI and drains to/ within the Minsmere-Walberswick Ramsar and SPA and Minsmere-Walberswick Heaths and Marshes SSSI and SAC (ES, Section 13.4.21). The RSPB welcomes the identification of the Sizewell Marshes SSSI as sensitive environmental receptors based on hydrology (ES, Section 13.4.23 and 13.4.24).
- 4.20.53 Given the interconnectivity of drainage systems and the extent of the underlying aquifer within the area, the RSPB disagrees with the assertion that distance from the site boundary prevents the SSSI, SPA, SAC and Ramsar sites being considered a sensitive receptor to groundwater impacts (ES, Section 13.4.7).
- 4.20.54 We note that the assessment of effects to groundwater, particularly with respect to the Outage Store, is based upon a series of estimates and assumptions (ES Section 13.6.3 to 13.8.1) with a reliance on mitigation measures (not detailed within the ES) to be developed within the future CEMP.
- 4.20.55 The outline CEMP indicates that a detailed groundwater assessment is required (Section 5.10.2); together with a possible need for, as yet undefined, “additional mitigation measures” in the event of impacts to groundwater (Outline CEMP, Section 5.10.5). The Mitigation Register (Appendix 17.1) indicates the need for additional groundwater associated assessments and surveys (see above).
- 4.20.56 The RSPB further notes that no provision has been made for monitoring to detect and react to changes in the statutory site supporting ditch system water levels and quality in the event of impacts from the construction of the Outage Store or elsewhere on the site.
- 4.20.57 Given the RSPB’s advice at scoping that these investigations (assessments) should be included within the EIA/ EclA, together with appropriate mitigation measures, their omission

at this stage undermines confidence that groundwater contamination and dewatering will not have an impact on the statutory sites.

- 4.20.58 It is our view that planning permission should not be granted until the groundwater, radiological and piling risk assessments (see above) are provided to confirm that there is no significant negative impact upon the Sizewell Marshes SSSI and Minsmere Walberswick Heath and Marshes SSSI, SPA, SAC and Ramsar.

Landtake from the SSSI

- 4.20.59 The RSPB remains concerned about the loss of part of the SSSI, but notes the justification and mitigation contained within the ES. The RSPB would not object on this issue, provided a planning condition is applied to ensure the route of the footpath and footbridge adheres to the site plan in the Proposed Outage Car Park Proposed Site Plan (Drawing No. SZC-RF0000-XX-000-DRW100030) and species, disturbance and disturbance data deficiencies (see above) are rectified to enable a justified and informed planning decision based upon no significant impact to the Sizewell Marshes SSSI, the Minsmere-Walberswick Ramsar and SPA and Minsmere-Walberswick Heath and Marshes SSSI and SAC.

- 4.20.60 In summary, there are significant gaps in information on the baseline environment and environmental impacts to water levels, water quality, biodiversity, disturbance and justification of impact significance within the Environmental Statement and Habitats Regulations Assessment screening.

Conclusions

- 4.20.61 The RSPB has no alternative to object, given the substantial amount of information that has not been made available to ensure robust decisions are being made about impacts from the development and necessary mitigation measures to avoid impact on the nearby protected areas.

- 4.20.62 The RSPB expects the following information to be provided before the application is determined:

- Up to date pre-construction ecology surveys, tree and building inspections in advance of site clearance works;
- A piling risk assessment to manage the risk of introducing new contamination pathways;
- An assessment of the likely volumes of groundwater that will be pumped once detailed design information is available and prior to the temporary works being carried out;
- A radiological survey of the existing Outage Store by the Sizewell B Health Physics team to confirm if any further measures are required prior to the start of demolition works;
- An overwintering and breeding bird survey is undertaken to bring information about the site and surrounding statutory areas up to date;
- Appropriate disturbance thresholds are agreed, and;
- Baseline noise and visual intrusion data is provided for within the SSSI, SPA, SAC and Ramsar sites.

- 4.21 Third Party Representations – 113 Letters/emails of Objection have been received raising the following points:

- a. Outage car park is adjacent and bridleway and part of the Sandlings Walk, it is also onto Sizewell Gap Road which carries heavy traffic, entrances to the wind farms, Greater Gabbard jointing pit field, pub car park, Sizewell Hall, Beach View caravan park and Sizewell hamlet. It is a busy road with no speed limits and is the only entrance and exit for Sizewell B in the event of a nuclear emergency or road traffic accident.

- b. The existing car parks could be made multi-storey or the Sizewell A site used for car parking instead.
- c. EDF Energy should make better use of land in their existing perimeter.
- d. Major expansion into the AONB that should not be dealt with at a local level.
- e. Natural England should be consulted on the process – has this been done?
- f. This will be further new industrial-related expansion into an area that is AONB land, Heritage Coast land, and land that is reverting to Sandlings heathland; it is not justified by need.
- g. This development should not go ahead until Sizewell C is shown to be able to be built.
- h. Bridleway 19 forms part of a connected walking, cycling, and riding route network and used by a large number of local people and tourists. This will be dangerous with outage car park access alongside and the potential for accidents and traffic chaos will arise.
- i. The work on Pillbox Field will be detrimental to birds and bats, noise and lighting impacts, potential impacts on surface water receptors during the operation phase.
- j. Relocating buildings and siting an outage car park here would be detrimental to wildlife and birdlife.
- k. Result in historical and archaeological damage, the Pillbox itself is part of the County's World War II heritage and needs to be reserved as such.
- l. Wood should not be cut down just to provide car parking spaces. Wood could provide sound proofing from noise at the power station.
- m. If outage car parking is built here then it must be unsuitable for anything other than outage use.
- n. Relocation outside of the AONB should happen.
- o. Lighting for the outage car park should not be 6 metres high and up to 50 lights. It should be sensor lighting that does not increase light pollution.
- p. Proposals should only be considered as part of the forthcoming Sizewell C Development Consent Order procedure.
- q. National Policy Statement on site selection for new nuclear reactors is under review.
- r. Cumulative impact of this proposal and other energy-related infrastructure in the areas is expected to be considerable.
- s. Concern regarding additional traffic including 70 HGVs on local roads in particular the use of the B1122.
- t. Recommend a construction environmental management plan, a construction traffic management plan and a construction workforce travel plan be required to minimise environmental effects during demolition and construction if consented.
- u. Cutting down of trees planted 100 years ago by the Ogilvie family to commemorate the coronation of George V, destruction of flora and fauna on the site.
- v. Light, noise, and dust pollution to a green buffer zone.
- w. Landscaping gives the impression of managed neatness which is incompatible with the general nature of the AONB.
- x. Buildings aren't critical to the development of Sizewell B, so the AONB shouldn't be sacrificed.
- y. Due to no proper drainage system being installed or any oil separators, a spillage of oils, diesels etc will drain straight into vulnerable sensitive SSSI marshes.
- z. Badgers are a protected species, and several live in the area. Badgers are territorial so difficult to relocate.
- aa. If Sizewell C does not go ahead, it would be a waste of landscape.

0 Letters/emails of Support have been received.

5 PUBLICITY:

Category	Publication Date	Expiry	Publication
Major Development Potential Public Interest Public Right of Way Archaeology EIA			East Anglian Daily Times

6 SITE NOTICES

Site Notice Type	Reason	Date Posted	Expiry
General Site Notice	Major Development Potential Public Interest Public Right of Way Archaeology EIA		

7 PLANNING POLICY

- 7.1 Section S38(6) of the Planning and Compulsory Purchase Act 2004 states that the planning application is to be determined in accordance with the development plan unless material consideration indicates otherwise.
- 7.2 National Planning Policy Framework (2019). There are other paras. of the NPPF that would apply to this development but these are highlighted as the key paras: Para. 20 – strategic policies must make sufficient provision for employment and other commercial development; Para. 104 refers to minimising the number and length of journeys needed for employment; Para. 170. refers to planning policies and decisions should contribute to and enhance the natural and local environment. Para. 172. great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty. The scale of development in these areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances. Paras 174 – 177 refer to habitats and biodiversity including promoting the conservation, restoration and enhancement of priority habitats and ecological networks.
- 7.3 East Suffolk Council- Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) the following policies are relevant to this application:
- Policy SP1 - Sustainable Development
 - Policy SP1A - Presumption in Favour of Sustainable Development
 - Policy SP7 – Economic Development in the Rural Areas
 - Policy SP8 - Tourism
 - Policy SP10 - A14 and A12
 - Policy SP12 – Climate Change
 - Policy SP13 – Nuclear Energy

- Policy SP14 – Biodiversity and Geodiversity
- Policy SP15 – Landscape and Townscape
- Policy SP19 – Settlement Policy
- Policy SP24 – Leiston
- Policy SP29 – Countryside
- Policy SP30 – The Coastal Zone
- Policy DM12 - Expansion and Intensification of Employment Sites
- Policy DM19 – Parking Standards
- Policy DM20 - Travel plans
- Policy DM21 – Design: Aesthetics
- Policy DM22 – Design Function
- Policy DM23 – Residential Amenity
- Policy DM24 – Sustainable Construction
- Policy DM26 – Lighting
- Policy DM27 – Biodiversity and Geodiversity
- Policy DM28 – Flood Risk

- 7.4 The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate (PINS) for examination on Friday 29th March 2019, and the hearings are to take place in August 2019. Full details of the submission to PINS can be found through this link: www.eastsuffolk.gov.uk/localplanexamination. At this stage in the plan making process, the policies that received little objection (or no representations) can be given more weight in decision making if required, as outlined under Paragraph 48 of the National Planning Policy Framework (2018). Certain policies are now considered to have some weight in determining applications; these have been referenced where applicable. The relevant policies are:

- SCLP3.1: Strategy for Growth in Suffolk Coastal District
- SCLP3.2: Settlement Hierarchy
- SCLP4.3: Expansion and Intensification of Employment Sites
- SCLP4.5: Economic Development in Rural Areas
- SCLP6.3: Tourism Development within the AONB and Heritage Coast
- SCLP7.1: Sustainable Transport
- SCLP7.2: Parking Proposals and Standards
- SCLP9.2: Sustainable Construction
- SCLP9.5: Flood Risk
- SCLP9.6: Sustainable Drainage Systems
- SCLP9.7: Holistic Water Management
- SCLP10.1: Biodiversity and Geodiversity
- SCLP10.3: Environmental Quality
- SCLP10.4: Landscape Character
- SCLP11.1: Design Quality
- SCLP11.2: Residential Amenity
- SCLP11.7: Archaeology
- SCLP12.34: Strategy for the Rural Areas

- 7.5 National Policy Statement for Nuclear Power Generation (EN-6) identifies Sizewell as a potentially suitable site for the deployment of a new nuclear power station. A nuclear power station comprises a National Significant Infrastructure Project (NSIP) under The 2008 Planning Act and therefore requires a Development Consent Order (DCO). EDF Energy's proposal for a new nuclear power station (Sizewell C) is currently within the pre-

application stage of the DCO process. National Policy Statements provide the primary basis for decisions on NSIPs and therefore in addition to EN-6, the Overarching National Policy Statement for Energy (EN-1) is of background relevance. This planning application however as stated in paragraph 7.1 must be determined in accordance with the Development Plan unless material considerations indicate otherwise, the Development Plan has been set out in paragraphs 7.2 to 7.4.

8 PLANNING CONSIDERATIONS

8.1 Principle of development

- 8.1.1 The proposals include elements of development that are essential for the operation of a nuclear power station including: training centre, outage car park, outage laydown area, and areas that although not essential are part of the offering at Sizewell B – the visitor centre for example. The existing facilities to be relocated as part of this application are currently located on land allocated for the new nuclear power station: Sizewell C to the north of the existing B Station. In considering an alternative location for elements of the station requiring relocation, the existing Sizewell A station, currently undergoing decommissioning, was considered. However, the current timescales for large scale demolition and freeing up of land on the A Station site do not align with the timeline for Sizewell C which is driving the requirement to relocate elements of Sizewell B to areas outside the existing power station site.
- 8.1.2 A number of the proposals are to be sited amongst existing facilities within the Sizewell B security fence line and as such have limited impact on the AONB given that they are on existing concreted sites. However, a portion of the proposals are on existing greenfield land outside of the security fence line for Sizewell B and it is these elements that have primarily raised objections from consultees and local residents.
- 8.1.3 A number of consultations and representations have referenced concerns regarding the legality of a Town and Country Planning Act application for the relocated facilities. A large proportion of representations and consultations have suggested that the proposals are integral to the Sizewell C new nuclear proposals and as such should be considered as part of the Development Consent Order application for Sizewell C.
- 8.1.4 Having regard to requirements under the Planning Act 2008, the proposed Sizewell B relocated facilities works do not in themselves constitute a generating station over 50MW and as such do not require development consent by the Secretary of State under the Planning Act 2008. In order to consider whether the proposals can be considered an NSIP or can be determined under the Town and Country Planning Act 1990 (as amended), two questions need to be answered: 1. What constitutes a “generating station”; and 2. Whether the proposed development involves an extension to a generating station, within the meaning of sections 235 of the Planning Act 2008 and 36(9) of the Electricity Act 1989.
- 8.1.5 We are of the view that the generating station comprises those buildings within which electricity is generated. The buildings the subject of this application do not include buildings within which electricity is generated, rather they provide ancillary facilities. Therefore the works proposed do not involve work to the generating station itself. The next question is whether the proposed works comprise an extension to the generating station, notwithstanding that they do not involve any physical works to that station. We consider that as the proposed works relate to the overall operation of the generating station they are not directly related to the generation of electricity and therefore do not fall within the

statutory definition of an “extension” to a generating station. Therefore this Council can lawfully determine the application pursuant to our powers under the Town and Country Planning Act 1990 (as amended). There is case law available to support this position.

- 8.1.6 Notwithstanding the above, it is also common for applications for Development Consent to be preceded by an application to front load certain works, for example at Hinkley Point C in Somerset, a Town and Country Planning Act application was granted by West Somerset Council for major earth moving works on the Hinkley Point C site, a year in advance of the Secretary of State granting consent for Hinkley Point C Development Consent Order (nuclear power station).
- 8.1.7 At Wylfa Newydd in North Anglesey, a separate planning application was granted for site preparation works by the Isle of Anglesey County Council – the work consented included site establishment, soil remediation and erection of fencing, habitat clearance and demolition works, as well as the temporary closure of a road. As part of the consent a funding package of £7.5 million was put in place to undertake environmental reinstatement and management works should the main development (nuclear power station) not proceed. Therefore, front loading the works as proposed in this Town and Country Planning Act application is not unprecedented and is lawful.
- 8.1.8 National Policy Statement EN-1 – Energy and EN-6 - Nuclear Power identify a need for new nuclear power generation in England and Wales, EN-6 identifies Sizewell as a potential site for new nuclear development. Parts of the Sizewell B generating station are on the identified site for Sizewell C. In order to facilitate the efficient development of Sizewell C, it is of national importance for the B Station facilities to be moved to enable the B Station to continue operating and to avoid greater delay to the construction timetable for Sizewell C. EN-1 refers to there being an “urgent need for new electricity generation plant, including new nuclear power” and EN-6 refers to there being an “urgent need for new nuclear power stations”. Once published the draft new NPS will also be a consideration – no timetable for this has yet been released by Government.
- 8.1.9 Soon after the Planning Act 2008, the Government published a letter in July 2009 to all Chief Planning Officers encouraging Councils to be open to receiving applications for preliminary works in connection with nuclear development. The letter said that “local authorities may decide that such consent should potentially be granted on the basis that any preliminary works carried out will be removed if the subsequent application to the IPC is turned down or if, within a specified time, no application is made.”
- 8.1.10 Having regard to the circumstances, it is important that Sizewell B can maintain operation during the Sizewell C construction period, in order to do this there is a requirement for replacement facilities. Reference and consideration to construction within the Suffolk Coast and Heaths AONB will be given separately. However, with regards to principle of development, it is considered that this proposal is acceptable under the Town and Country Planning Act as site preparation works in advance of the Sizewell C construction and to ensure no disruption to the generating capability of Sizewell B nuclear power station. The necessary items under the nuclear licence are being considered in full under this application, the less nuclear licence critical items, including the visitor centre, will have details submitted at a later date. The total construction period is proposed to be 4 – 4.5 years so a detailed application for the visitor centre is expected to be submitted well within the next 3 years.

8.2 Public Consultation

- 8.2.1 The proposals have been the subject of pre-application discussions with the Local Authority for several years prior to the submission, this includes Scoping for the Environmental Impact Assessment and more detailed advice on proposals. In January 2019 a four page leaflet was prepared and distributed to 3,571 homes throughout the Leiston-cum-Sizewell parish by EDF Energy. This notified recipients of where and when relevant information and consultation documents would be available. Representations were received between 4 January 2019 and 1 February 2019 on the relocated facilities proposals. A Statement of Community Involvement has been included with the application, this details the pre-application process, responses received and how the proposals have been informed by these responses.
- 8.2.2 In addition, East Suffolk Council has carried out our own public consultation including direct letter notification, several site notices in close proximity to the site and development proposed, and newspaper advertisement. This has resulted in over 100 letters of representation from interested parties objecting to the proposal. The objections are summarised in 3.22. The detailed concerns identified and listed in 3.22 are covered under separate consideration in the sections below.

8.3 Ecological impacts

General Comments

- 8.3.1 Guidance on survey validity from the Chartered Institute of Ecology and Environmental Management (CIEEM) states that reports of more than 3 years old are “unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist)” (Advice note on the lifespan of ecological reports and surveys, CIEEM, April 2019). Such an assessment must be based on a number of criteria as set out in the advice note, and a clear statement setting out appropriate justification must be provided. EDF Energy considers that they have provided a comprehensive suite of desk-study and field survey data for the estate, collated over the last 12 years. Surveys in 2018-19 have confirmed that habitat conditions on site have remained similar throughout the period under consideration and species present are unlikely to be changed. There is also ongoing monitoring of habitat conditions undertaken by both Suffolk Wildlife Trust and EDF Energy. Pre-construction surveys are proposed as part of the CEMP, to be secured as a condition to be imposed on any planning permission and updated survey information on bats and badgers required to inform licence applications (to be determined by Natural England prior to any relevant works starting) has been provided.
- 8.3.2 There is a suite of desk study and field survey data provided with the application, much of it is more than 3 years old, including some surveys which relate to mobile species (such as breeding and wintering birds). Whilst the habitat baseline used in the environmental statement is likely to be broadly similar now compared to the time of survey, the baseline for some species may have altered and therefore the assessment provided may under assess the impact of the proposed development. This is an area of professional disagreement between the statutory consultees, our own ecologist and EDF Energy’s ecologists, with regards to the suitability and age of survey material supporting the application. However, in taking a balanced approach and mindful that some surveys are currently being undertaken (bat) and others can be updated pre-commencement (badger etc.), on balance it is considered that it is difficult to object to the proposal on these grounds as the identified impacts are likely to be the same as already identified. To ensure appropriate mitigation a conditions is proposed requiring further survey work to be undertaken where required, in particular in relation to the outline elements of the proposal prior to those works starting.

Designated Sites

- 8.3.3 The proposal originally incorporated a pedestrian access from the outage car park to the main site involving the loss of approximately 450 sq.m of SSSI, which equates to approximately 0.043% of the overall habitat recourse within the SSSI, although the land to be lost is not identified as being characteristic of the points for which the SSSI is designated, it is possible that it could play a role in supporting the SSSI and how it functions but this has not been evidenced. The original proposals did not include any proposals for replacement of this SSSI land. Given the number of objections from statutory and non-statutory consultees in relation to this element of the proposal, and given that we consider a suitable alternative to removal of SSSI is available, EDF Energy has agreed to remove this element from the proposal.
- 8.3.4 However, at this stage a fully worked up alternative has not yet been provided. It is expected that an alternative pedestrian route from the outage car park on Pillbox Field can be achieved avoiding direct loss of SSSI footprint but as a fall back position outage workers could be moved via a shuttle bus system from Pillbox Field to the main site via Sizewell Gap Road and the main power station access drive. This is considered to be a suitable fall back position given outages should only occur every 18 months for approximately 2 months. However, a condition will be applied to any consent issued requiring details of a pedestrian access from Pillbox Field to the site to be submitted to and approved by the Authority. Removing the need to directly lose an area of designated SSSI land reduces the objections from statutory consultees such as Natural England and non-statutory such as Suffolk Wildlife Trust and the RSPB and our own ecologist.
- 8.3.5 The application did look at alternatives in Chapter 4 including two which would not require the loss of any part of the SSSI. Whilst it is acknowledged that Option 2 would involve the loss of a significant area of wet woodland (which is a UK Priority habitat) to achieve an acceptable footpath width, Option 1 would largely follow the route of the existing track past Rosery Cottages, would not require the loss of wet woodland and would therefore appear to be of lesser ecological impact. Therefore there are opportunities for EDF Energy to explore alternative sites to a greater degree and to avoid partial destruction of a designated site. These will be considered at a later date.
- 8.3.6 It is proposed to install a fence and plant a hedgerow along the western boundary of the footpath to mitigate impacts arising from operational use (ES Chapter 6, Section 6.6.89). However, no further information on these features appears to be included and it is therefore not possible to provide detailed comments on this element of the scheme. Wherever the footpath is ultimately sited it is likely to require some form of fencing / hedging to demarcate it, it is important that this does not impede access to Sizewell Marshes SSSI for site conservation management purposes in the future.
- 8.3.7 Such access, including for machinery and livestock, is required for management purposes in order to maintain the condition of the site and the loss of this risks impacting on the overall management of the SSSI. A condition will be appended to support ongoing maintenance access for the SSSI.

Indirect Impacts:

- 8.3.8 The location of the Rosery Cottage garage appears to be bordered on the eastern side by a ditch which is part of the SSSI and such ditches are one of the reasons for the site's designation. There is some detail on the garage provided and it is clearly of a low standard of design and materials. Its location in such close proximity to the ditch poses a significant risk. In particular, damage to the ditch bank and contamination of the ditch during construction and operation activities are of particular concern and further details on this will need to be obtained via condition prior to these works being undertaken. The CEMP includes details on

pollution prevention and control, and this will need to be complied with to prevent demolition of the garage having any indirect effects on the SSSI. Pollution prevention and control measures are part of the embedded mitigation for the proposals to be deployed across the site. A condition is proposed to be imposed on the planning permission requiring compliance with the CEMP and any related management plans prepared in support of the works. Should an alternative pedestrian route from the outage car park be approved that does not impact on Rosery Cottage, the replacement garage may not be required – therefore these conditions are precautionary.

- 8.3.9 Only limited details of the proposed footbridges are included in the application. ES Chapter 6 paragraphs 6.5.8 and 6.6.11 states that the foundations for the bridges are likely to be screw piles; however the Proposed Outage Car Park Proposed Site Plan drawing (ref. SZC-RF0000-XX-000-DRW100030) includes an inset showing the use of foundations including concrete pads. Whilst outside of the designated site boundary, the ditches crossed by the footbridges are contiguous with those within the SSSI. Further details on the bridges will need to be approved by the Local Planning Authority once a footpath route from the outage car park is fixed upon – this will be required via condition, to ensure no significant adverse impact on the watercourses.
- 8.3.10 Drawings provided in the Lighting Strategy (Volume II, Appendix 3.1) identify that light spill on to the boundaries of the Coronation Wood area, outage car park and footpath can be limited. Whilst no vertical plane drawings are provided, EDF Energy confirm that the lighting proposals include 1m asymmetrical bollards along the walkway and ground mounted lighting on the footbridges, which would only be in use during outages as described in the Lighting Strategy. Lights would have automatic switching based on time and daylight availability, in addition to a central control system that would be used to switch off the lights outside of outages. Lighting levels along site boundaries have been modelled as less than 0.5 lux which is equivalent to starlight levels, EDF Energy say there will be no light spill into the Sizewell Marshes SSSI and the effects from lighting on the SSSI have been assessed as not significant in the ES. Further details will be required to be submitted and approved via a planning condition prior to the relevant works taking place.

Habitat Loss (non-designated sites)

- 8.3.11 The proposal involves the felling of Coronation Wood and the loss of part of Pillbox Field. Whilst neither Coronation Wood nor Pillbox Field are sites designated for their ecological value, they do form part of the habitat mosaic within this part of the Sizewell Estate.
- 8.3.12 The application includes new planting on the northern boundary of Pillbox Field to compensate for the loss of Coronation Wood. However, this planting will not mitigate for loss of connectivity along the eastern boundary of the SSSI (identified in ES Chapter 6, paragraph 6.6.14) as the planting is to south/south-east of SSSI.
- 8.3.13 However, EDF Energy considers that the primary mitigation described in Section 6.5 of the ES will mitigate loss of connectivity by increasing connectivity to the existing woodland belt to the east of Pillbox Field, which in turn improves connectivity to the SSSI.
- 8.3.14 The loss of 229 mature/semi-mature trees predominantly within Coronation Wood (of which around 73% are assessed by the Arboricultural Assessment as being category C or less, i.e. trees of low quality – typically comprising plantation trees with limited life expectancy and limited public visual amenity value) is balanced by the planting of approximately over 2500 juvenile woodland trees including a mix of broadleaf and coniferous species which are known to tolerate prevailing soil and coastal conditions, including exposure and salinity. These trees would be managed through selective thinning to secure the long-term health,

structure and longevity of new woodland, noting that replenishment of ageing and species poor woodland such as Coronation Wood is an important component of the EDF Energy estate management strategy.

- 8.3.15 Whilst in the long term the impact of the woodland loss would reduce (as the new planting matures), in the short/medium term there would be at least a “moderate” adverse effect (as recognised in ES Chapter 6, paragraph 6.6.16). Based on a consideration of the species and habitat present, the ES concludes that the loss of Coronation Wood would only result in a “minor” adverse effect which is not significant following mitigation. EDF Energy considers that the value of Coronation Wood is primarily internal to the site being only partially visible from locations offsite.
- 8.3.16 The Woodland Management Plan sets out the approach to managing and conserving areas of retained woodland and additional planting is proposed in Pillbox Field including woodland and woodland edge planting – EDF Energy have increased the level of replacement planting proposed in this location. Landscape and loss of Coronation Wood is covered in more detail in the next section. However, it should be acknowledged that EDF Energy manages around 650 hectares on their whole estate which is a mix of arable farmland, heathland, SSSI and woodland. Therefore the loss accounted for in this application is a small, albeit important, part of the wider estate. Replacement planting will be required via planning condition. We note the concerns raised by local residents and others but the balance is in favour of the scheme on this matter.

Hydrology

- 8.3.17 The proposed development includes several aspects which may result in hydrological changes in the area which may impact on the SSSI. Firstly, construction of the Outage Store building will require dewatering. Whilst the ES (Chapter 6, paragraph 6.6.10) asserts that the volume of dewatering required is likely to be small enough not to result in an impact on the adjacent SSSI, it is not clear whether there are any dipwells present in the SSSI adjacent to the construction area to allow monitoring of this. Without such monitoring infrastructure being present a pre-construction baseline cannot be collected, it will not be possible to monitor groundwater levels during and post construction and it cannot be demonstrated that no adverse impact on the SSSI will arise – the detail of this monitoring regime and agreement of additional dipwells required will be covered by planning condition.
- 8.3.18 It is unclear how surface water from both the outage car park and the buildings and hardstanding will be dealt with. Given the sensitivity of the SSSI to both hydrological change (including water availability) and contamination, further details on this are required in order to determine the likely impacts of this – this will be required via condition
- 8.3.19 EDF Energy state that a number of peat piezometers and crag boreholes have been established within the SSSI and along the site boundary, these will be used to monitor groundwater levels during and following works associated with the proposed development. During operation, surface water would be managed in line with the Drainage Strategy submitted with the application. This has been updated following queries from SCC as lead local flood authority.

Protected and/or UK Priority Species

Bats

- 8.3.20 A number of existing buildings are to be demolished as part of the development proposals, these include buildings 3; 4 and 12 which have been assessed as either ‘Low’ or ‘Moderate’ suitability for roosting bats (Sizewell B Relocated Facilities – Bat and Badger March 2019 Survey Technical Note, dated April 2019). Building 6.3 has also been identified as containing

a common pipistrelle roost and this has been confirmed, by emergence surveys undertaken on these buildings in July and August 2019. A single bat (species unknown) was also seen emerging from building 4 but no bats were seen emerging from buildings 3 or 12. Further emergence / re-entry surveys on each building in September will be undertaken by EDF Energy to fully establish the roost types and numbers of bats present within these buildings and to define the mitigation requirements. The demolition of building 6.3 will lead to the loss of the common pipistrelle roost and will require mitigation.

8.3.21 The presence or otherwise of a protected species, and the extent that they may be affected by the proposed development, is a material consideration (ODPM Circular 06/2005) and must be adequately assessed prior to the determination of this application. The application does not at present include mitigation/compensation measures appropriate to the roosts which would be lost.

8.3.22 However, further bat survey work is currently underway in order to fully define the mitigation requirements and for us to be able to secure appropriate mitigation and licences from Natural England, if required.

Reptiles

8.3.23 The results of the reptile surveys have identified that the site supports 'Low' populations of four species of reptile. The ES concludes that there will be a total loss of 13.1ha of habitat suitable for reptiles, but includes details of proposed mitigation measures to avoid killing and injury of animals through displacement via habitat management. Whilst such a technique is acceptable in some situations, it is not considered by some stakeholders appropriate for clearance of large blocks of habitat such as that present on Pillbox Field.

8.3.24 The development will result in a net loss of suitable reptile habitat and some stakeholders consider that insufficient measures are included to prevent killing and injury of animals during construction. However, EDF Energy is of the opinion that there is a low number of individual reptiles present and, therefore, displacement is considered to be an appropriate technique to avoid incidental harm and injury. In addition, there are habitat improvements proposed for the periphery of Pillbox Field as a mitigation measure. We disagree on this point but it is a minor disagreement and one that can be covered through appropriate detailing in the CEMP to ensure ecological mitigation is of an appropriate standard.

Badger

8.3.25 Information provided in the application identifies a number of subsidiary and outlier badger setts present within and around the proposed development area. Whilst it is acknowledged that the use of the area by badgers (and the number of setts present) may change prior to construction commencing, the ES does not indicate what level of sett closure is considered likely to be required. For example will all setts within the red line boundary require closure or can some be retained? Full clarification on this should be sought prior to the determination of the application. EDF Energy have confirmed that not all badger setts will be closed, the licence is currently being developed with Natural England but the intention is only to close setts that it is necessary to do so. We support this approach.

Breeding Birds

8.3.26 The proposed development will result in the loss of habitat for breeding birds (Coronation Wood; Pillbox Field and surrounding hedgerow), some of which may be UK Priority species. Whilst planting is proposed to partly compensate the loss of Coronation Wood, there will be an overall net loss of habitat for breeding birds as a result of this proposal.

8.3.27 The most recent survey work provided for this group dates from 2015 and therefore there is the potential that the range of species and the number of pairs, present may have changed since that time, however, as referenced earlier we are content that the 2015 bird survey along with the precautionary approach and ability to carry out further surveys if required under the CEMP, that we are content with this approach. EDF Energy considers that given the small amount of habitat to be impacted by their proposal there is unlikely to be any significant change in the breeding bird assemblage. There are methods to support biodiversity net gain that could be employed to mitigate adverse impact and it is suggested that these be required via planning condition.

Habitat Regulations Assessment

- 8.3.28 The HRA identifies that there is a functional linkage for birds between the Sizewell Marshes SSSI and the Minsmere-Walberswick Special Protection Area (SPA) and Ramsar site. Whilst paragraph 5.2.8 recognises foraging marsh harrier as one of the species for which this linkage exists, the HRA screening does not go on to consider in detail likely significant effects (LSE) on this species from the sources identified as potentially impacting (noise, lighting and visual disturbance). However it is later stated in Table 5.3 (page 33-34) under 'Potential disturbance from noise on sensitive species' and 'all bird interest features' (which includes marsh harrier) of the SPA / Ramsar site that 'No effects from construction/demolition phase noise on the SPA due to distance from the proposed development. No effect on birds that could be associated with the SPA population present with the Sizewell Marshes SSSI due to low numbers of birds present, temporary nature of construction / demolition noise, and availability of higher quality habitat elsewhere.' Similar statements are provided for artificial light and visual disturbance. The HRA screening has been updated since original submission to address some of the omissions previously identified, a precautionary approach is taken within the Screening which is supported. The conclusion is that despite the possible occasional presence of birds from the SPA and Ramsar site in the Zone of Influence of airborne noise disturbance, LSE is not predicted. This is due to the low number of birds present, the availability of higher quality habitat elsewhere within the local area and the fact that such impacts will be temporary and reversible.
- 8.3.29 With regard to the screening undertaken, the conclusion of no LSE appears to be partly based on the use of 70dB noise disturbance and 200m visual disturbance zones. However, it is unclear exactly where these zones are predicted to fall. The 70dB buffer zone is set at 20m for the purposes of the HRA screening exercise and has been derived by assuming typical construction plant and equipment as defined in BS 5228-1. The values used by the HRA screening of 20m and >200m (50dB LpA) are considered to be highly precautionary, particularly when it is considered that this generic propagation modelled over open fields.
- 8.3.30 An assessment of operational noise levels is included in the ES, the HRA screening report states that during operation, the proposed development will produce noise that is largely similar to the current Sizewell B operations, with the exception of a small increase in airborne noise from the development at the Coronation Wood area. This assessment is based on fact that there will be some development in an area where there is currently none.
- 8.3.31 The use of these thresholds constitutes an assessment and controlling measures are required to achieve them which would not be part of the standard construction of the development. Appropriate Assessment of impacts arising from these sources should therefore be undertaken.
- 8.3.32 Appropriate Assessment must also assess the statement made in paragraph 5.2.25 that the predicted operational noise of the site will be similar to levels currently experienced. This conclusion does not appear to be supported by any noise survey results or modelling and

given that the proposal includes a car park and footpath on land which is currently only accessed for habitat management purposes does not appear to be justified. The intention is for this Authority as competent authority to adopt the shadow HRA provided by EDF Energy with the application..

Biodiversity Net Gain

8.3.33 The NPPF and Local Plan policy DM27 require that new developments seek to deliver biodiversity net gain as part of their design and implementation. From the information provided in this application it does not appear that this development proposal will deliver such gain. EDF Energy suggest that in managing reinstated and replanted habitats to maximise their ecological potential there will be improvements overall to the ecological network. EDF Energy is currently undertaking a biodiversity net gain calculation for the development proposals, it is expected that this will show a negative impact and therefore we will need to consider either additional mitigation works or the potential for a payment to offset biodiversity net gain. It is suggested that biodiversity net gain could be achieved by:

- Restoring neglected hedgerows;
- Creating new ponds as an attractive feature on the site;
- Planting trees characteristic to the local area to make a positive contribution to the local landscape;
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds;
- Incorporating swift boxes or bat boxes into the design of new buildings; and
- Adding a green roof to new buildings.

In addition improvements could be achieved by:

- Improving links to existing greenspace and/or opportunities to enhance and improve access;
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips);
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links; and
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

8.3.34 A point for EDF Energy to note is the identification of Himalayan Balsam on site, this must be managed accordingly to remove and prevent spread.

8.3.35 In order to address the identified impacts, further detail and survey work is required. This needs to be accompanied by an appropriately detailed mitigation plan – this can be achieved through conditions and an adequately detailed CEMP. The above concerns have been highlighted by Natural England and Suffolk Wildlife Trust as well as our own ecologist. A number of the concerns have also been raised by neighbour representations.

8.3.34 In summary, there are a number of ecological issues that will need to be addressed in planning conditions and via the CEMP. It is considered that concerns raised can be addressed positively by the use of appropriate conditions and these are suggested at the end of this report.

8.4 Landscape / Loss of Coronation Wood

8.4.1 The proposals involve removal of 229 trees, 20 tree groups, and 2 hedgerows. The majority of tree losses are from Coronation Wood. The wood was planted to commemorate the

coronation of King George V in 1911 giving it an age of approximately 108 years. A number of objections received refer to its historical significance and important national heritage connections.

- 8.4.2 However, aerial photography evidence shows that the wood has been halved in size since 1945 and it is evident that it has been somewhat neglected and many of the plantation trees (conifers) have reached the end of their useful sustainable life – it is not considered appropriate to place the blame for this solely on EDF Energy's shoulders as the neglect began prior to their taking ownership of the site. If the wood were to be retained, many of the trees would decline in quality and be susceptible to windblow, and the wood would therefore need replanting, thus beginning to disconnect from its cultural / historical origins.
- 8.4.3 The wood has limited public amenity value with the main visual value only achievable from a relatively short stretch of the Sandy Land bridleway. Its principal amenity value lies with users of the Sizewell complex site. Notwithstanding that, there is a broadleaved component to the wood in its south western corner which may in part pre-date the 1911 planting date. It includes mature oak and beech, the loss of which is likely to have greater adverse visual impact than the wood as a whole.
- 8.4.4 The proposals for the new outage carpark in Pillbox Field require the removal of sections of low level flailed hedgerow with limited impact on public amenity, the need for soil stockpiling to the north of the main site requires the removal of a small area of scrub for machinery access, and the access from Pillbox Field to the site, as currently proposed by EDF Energy with a route aligned through the SSSI, west of the Rosery Cottages track, through an area of wet woodland requires selective tree thinning to achieve the desired route. There is only minor to negligible impact on public amenity arising from these latter proposed tree removals.
- 8.4.5 Coronation Wood is not considered to be in a sustainable condition and much of its make-up is not suited to the local landscape character. However, there are some valuable landscape quality contributing broadleaved trees on its southern and southwestern edges, and the loss of these is detrimental to landscape quality and character.
- 8.4.6 The removal of the wood represents an overall net loss of woodland that probably cannot be compensated for in the wider EDF Energy estate without harming existing valued habitats, although a fully considered opinion on this has not yet been sought. Options for compensation planting have been provided by EDF Energy including increased planting on Pillbox Field to fully compensate for the loss of woodland.

8.5 Landscape and Visual Impact Assessment (LVIA)

- 8.5.1 The submitted LVIA has been reviewed and it can be confirmed that it has been carried out in accordance with the landscape professions best practice guidance and appears to be sound and reliable.
- 8.5.2 In summary the key areas of interest will be the potential impacts on the character of the local landscape with full regard to its high level designation as part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), and on key visual receptors in the locality.
- 8.5.3 In assessing the conclusions of the LVIA it is necessary to understand the embedded mitigation measures that are included within the development proposals. These include the design and finish of proposed new buildings, their orientation, minimal lighting provision, fencing to screen vehicle lights on western access road, new tree and hedge planting in Pillbox Field, screen planting along Bridleway 19, targeted lighting in the Outage Carpark, plus wider estate woodland and other landscape management measures. Additional

mitigation measure will be included within the Outline Construction Environmental Management Plan.

- 8.5.4 In considering the anticipated effects arising from this proposal, it is important to understand the different phases of the proposal from initial demolition and subsequent construction, and the operational phase both in the very early years of any mitigation planting and subsequently once new planting has established (15 years). The construction/demolition phase is anticipated to last around 4 ½ years which is regarded as Medium term in LVIA terms.
- 8.5.5 The range of anticipated effects would vary over this period depending on what activity is in place at any one time, but the most apparent will be the felling of Coronation Wood, other tree felling to the south of the Wood, the raising of new buildings and the movement of plant and machinery including construction cranes.
- 8.5.6 Whilst construction activity will be intermittent and with varying degrees of scale, it is considered to be of Adverse impact on landscape character. Similarly visual effects will also vary over this phase and will again be most apparent with the felling of Coronation Wood and during peak construction/demolition activity.
- 8.5.7 It is inevitably considered to be of adverse impact on visual receptors. The assessment considers that there will be no difference in effects on the designated AONB landscape special qualities between the construction phase and the operational phase, and that during the construction phase these are considered to be adverse.
- 8.5.8 With regards to the operational phase of the proposals, in LVIA terms these are considered to be long term up to 15 years and thereafter as permanent. Whilst the setting of this site falls within the AONB, it cannot be avoided that the existing Sizewell complex and nearby Galloper/Greater Gabbard windfarm substations and their associated infrastructures all exert an influence on local landscape character to the extent that the proposed new development currently under consideration will not have such a significant magnitude of change on landscape character compared to if the existing energy installations weren't already there.
- 8.5.9 With that in mind the effects on landscape character are rated as Medium scale in respect of Pillbox Field and Coronation Wood and their immediate environs, and Small scale in respect of the remaining areas of the proposal. Beyond the red line, the effects would reduce to Negligible.
- 8.5.10 Effects on the prevailing Landscape Character Type (Estate Sandlands SCC Landscape Character Assessment) carry a similar assessment having full regard to the high-medium level of sensitivity of the landscape because of its designated status. Overall the significance of effects is rated as Moderate (and not significant in EIA terms). Again effects decline to negligible fairly quickly with distance from the site. Effects on the adjacent Coastal Levels Landscape Character Type would not exceed Negligible.
- 8.5.11 Visual Effects are considered through a series of representative and illustrative viewpoints, and also through a series of identified visual receptor groups that are considered to be representative of the users of the surrounding area.
- 8.5.12 These groups include people in the general immediate local Sizewell area, users of Sandy Lane, and people on Sizewell beach between Minsmere Sluice and Thorpeness. Specific recreational routes are also considered and these include the coast path between Minsmere and Sizewell, and the Sandlings Walk in the vicinity of the northern mound.

- 8.5.13 Within these various user groups, due account is given of their various sensitivity rankings and these are considered to be reasonable. Overall the assessment concludes that there will no significant adverse effects either during the construction phase or during the operational phase. At worst it is anticipated that there will be moderate adverse for people in the immediate locality during construction.
- 8.5.14 That said it should not be overlooked that the demolition/construction phase is due to last some 4-4.5 years so these effects where they occur, will nonetheless be apparent to the observer. This is the case for people in and around Sizewell hamlet and people on the Sandlings Walk from Sizewell to the junction with the Coast Path (west of Dower House). It is only for this latter group of receptors that the moderate adverse effects persist into the operational phase. None of the effects are considered to be Significant in EIA terms.
- 8.5.15 With regard to the high level designated landscape of the AONB and its natural beauty indicators and special qualities, long term permanent effects, where they occur, do so over a very limited area of the AONB. The greatest rated scale of effect is a Small effect on landscape quality through the removal of Coronation Wood, the conversion of part of Pillbox field to outage carpark, and the partial visibility of the proposed new structures. Other AONB special qualities such as wildness, scenic quality, and tranquillity are already considered to be compromised by the presence of the existing power station site.
- 8.5.16 Natural England have raised concerns with the proposal extending the industrialising footprint of the nuclear facility further across the currently undeveloped parts of the AONB by the introduction of new and visually intrusive built structures. Coronation Wood is an important component of the screening of the lower parts of the Sizewell power station complex.
- 8.5.17 However, taking into consideration the slightly differing views, the AONB Partnership share Natural England's view with regard to further development in the AONB, it is concluded that the proposed development would have a Negligible magnitude of effect on the natural beauty and special qualities of the AONB. Factoring in the medium sensitivity of the AONB in this location, the effects are judged to be of minimal significance and on balance neutral.
- 8.5.18 There will be some who will not agree with these conclusions and they will often tend to focus on one or two specific areas of attention where effects and impacts are more apparent than for other areas, but this assessment takes a step back and looks at the slightly wider picture of the locality as a whole. This conclusion makes the assumption that all new mitigation planting is properly and thoroughly implemented as described and in the light of further approved details.
- 8.5.19 The overall nett loss of woodland was a concern, and EDF Energy has responded to this by increasing the level of replacement planting on Pillbox Field, planning conditions will be required to manage the replacement planting. It is also feasible for EDF Energy to undertake to provide additional tree planting across the wider Sizewell Estate through their management plan should that be considered appropriate.

8.6 Development in the AONB

- 8.6.1 A number of representations and consultation responses highlight objections to further development in the AONB. In particular the AONB Partnership does not agree that effects on receptor groups and the natural beauty of the AONB will not be significant. Although the Partnership acknowledges that the application gives significant consideration to mitigating the effects of the proposed development, it will still extend the physical footprint into a currently undeveloped area of the AONB. Alongside increase in vehicular movements and

human activity this will adversely impact on the tranquillity and users' enjoyment of this part of the designation. However, the outage car park will only be in use every 18 months for up to 2 months, thus reducing the impact outside of the nuclear fence. The facilities are all relocating from an existing site within the AONB that is accessed via Sizewell Gap Road so there will not be any increase in vehicular or people movements outside of the existing Sizewell complex. The movements will simply be moved to a different part of the complex.

- 8.6.2 The Partnership considers that a greater number of buildings will be more visible from the west than at present. The applicant is seeking to ensure appropriate planting and screening in the vicinity to minimise any impact arising from this, our own LVIA assessment detailed above is that any impacts will not be significant. In maximising additional planting in appropriate locations, any dis-benefits of the proposal from particular viewpoints are considered to be reduced.
- 8.6.3 Reference is made to the statutory purpose of the AONB which is to conserve and enhance natural beauty as required by Section 85 Countryside and Rights of Way Act 2000, the AONB consider the proposal does not comply with NPPF para. 170 and 172 and Core Strategy Policy SP15. However, reference must be made to National Policy Statements EN-1 and EN-6 which require future supply of low-carbon electricity for England and Wales, EN-6 identifies Sizewell as a site for new nuclear development, as such the Sizewell B facilities (which are currently on a site in the AONB) must be moved, in order for the B Station to continue functioning within its nuclear licence, a site has been identified within close proximity to the operating station, it continues to be within the AONB. This is unfortunate but essential development. Elements could be sited outside of the AONB such as the Visitor Centre and EDF Energy were asked to consider this. However, given the relationship between the visitor centre and visits to the operating station, EDF Energy was not keen to have a greater separation between the visitor centre and the site. By co-locating with the training centre, the potential impact of the proposal is considered to be minimised. The benefits of co-locating the visitor centre with the station can be appreciated and the minimisation of additional vehicle movements between an alternate location and the site. The existing visitor centre has co-located adjacent to the station since its construction. It is expected that in due course the visitor centre would accommodate visitors to the C station site thus reducing the requirement for an additional separate building for the C station in the future and enabling construction visits to take place close to but avoiding conflict with the main construction site for Sizewell C. On balance the benefits of the visitor centre adjacent the operating station can be understood and supported.
- 8.6.4 However, it is important to acknowledge that the proposal will move existing development from one area of the AONB to another, and the footprint will be increased. As such, there is a residual impact on permanent loss of the AONB that cannot be addressed through mitigation.
- 8.6.5 The footprint of existing development in the AONB to be demolished has been subtracted from the total footprint of development proposed. Based on this figure a calculation will be made for an appropriate sum to compensate for additional footprint of development in the AONB. The model used for this is that which was used for the Dry Fuel Store development at Sizewell B. The payment will be made into the Access and Amenity Fund (AAF) administered by the AONB. EDF Energy has agreed the principle of mitigation in the form of a payment, the level of contribution is currently under discussion. Funding for the Dry Fuel Store was agreed as £120,000 lump sum payment followed by £20,000 a year. Current rough calculations have the increase in development proposed through this planning application equating to approximately 50% of the footprint of the dry fuel store. This will be agreed via a section 106 legal agreement with EDF Energy.

8.7 Noise and vibration

- 8.7.1 Having consulted with the District's Environmental Health team, it has been confirmed that based on the details submitted there are no objections from a noise or vibration position. The assessment of noise and vibration meets the recognised standards used for assessment in England and the ES incorporates a CEMP. Provided requirements in the CEMP are complied with such as restricted working hours, HGV deliveries etc. there are no objections from a noise and vibration perspective. Essential primary mitigation measures will be needed for any work outside normal hours including concrete pouring, piling etc, noise mitigation measures included in the CEMP will be expected to be complied with.

8.8 Air Quality

- 8.8.1 Further detail on precise calculations of HGV traffic flows have been requested and reference to the 2 Village Bypass is questioned as it is unlikely to be available in time to provide mitigation for this development. It is suggested that a condition is appended to any permission issued requiring agreement of environmental management measures for the control of vehicle emissions.
- 8.8.2 Assuming the 2 Village Bypass will not be provided on a timescale to support these proposals, there is a question over whether this development will have the potential to delay air quality objective compliance at Stratford St Andrew. During operation – the outage car park will be within 100 metres of an area sensitive to air quality changes (human health exposure); this may need further assessment and mitigation through the CEMP.
- 8.8.3 The dust and air quality measures within the outline CEMP do not contain the entirety of 'high risk' mitigation measures within IAQM's guidance on the assessment of dust from demolition and construction. A dust management plan will need to be put in place to minimise impacts upon the property to the north of the outage car park (Rosery Cottage).

8.9 Flood Risk Assessment and Drainage

- 8.9.1 The site is within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board and therefore the Board's Byelaws apply. If a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws. Whilst not currently proposed, should the applicant's proposals change to include works within 9 metres of the watercourse, consent would be required to relax Byelaw 10.
- 8.9.2 The Environment Agency and SCC as lead local flood authority have withdrawn their original objections/concerns with the proposal and are suggesting a number of conditions. Subject to appropriate conditions, FRA and drainage can be considered to comply with adopted planning policy.

8.10 Heritage Impacts

- 8.10.1 Historic England has confirmed that they do not object in principle to the proposal and consider that the applicant has taken a responsible approach to the impact upon the historic environment. As such, the proposal is considered to comply with adopted and emerging planning policy as well as national planning policy. However, prior to demolition of the existing buildings, it is considered that they are of industry with regards to the story of Britain's nuclear industry, as such we recommend a condition requiring photographic recording of the buildings prior to demolition – this is set out in ES Chapter 8.7 and a condition is recommended to ensure it is complied with.

8.11 Archaeology

- 8.11.1 There is high potential for additional archaeological remains to survive within this area. Although it is acknowledged that there are not grounds to refuse planning permission on this basis, any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. Recommend conditions in order to comply with the NPPF and local planning policy.

8.12 Highways and Public Rights of Way

- 8.12.1 SCC Highways and Rights of Way team raised some concerns primarily with the use of Bridleway 19 from Sizewell Gap Road for shared bridleway users and motor vehicles accessing the outage car park. In order to address this concern, an alternative access is being proposed direct from Sizewell Gap Road providing a distinct separation from bridleway users and addressing the safety concern highlighted.
- 8.12.2 This revised access is being re-consulted upon using a draft plan, the specifics of the access and visibility splays will need to be secured via planning condition. This condition will also be required to require methods for minimising the landscape impact of the amendment and securing the access in the time between outages which could be up to 18 months.
- 8.12.3 Lighting columns are shown on Pillbox Field – we requested that these be replaced by low level lighting and we will use a condition to ensure that happens. Further detail on highway drainage will be required for the proposed configuration to ensure no water from the development will flow onto the public highway.
- 8.12.4 An uncontrolled crossing to safely cross Sizewell Gap Road is welcomed and will be provided via a planning condition, this will be of benefit to users of Bridleway 19 (BR19). The revised access arrangement enables the safety of users of BR19 to be maintained, the bridleway is a popular route for walkers, riders and cyclists, and this safety needs to be maintained. The separate access proposed secures the safety of users of BR19 during outages. The revised access would need to be constructed prior to work commencing on the outage car park to ensure that all construction vehicles can access from Sizewell Gap Road. There may need to be some use of Bridleway 19 for construction vehicles, this will need to be agreed with the LPA and where appropriate banks-people used to ensure safety of non-motorised users.
- 8.12.5 Highways have raised a concern that the outage car park is not big enough, however, it is being provided on a like-for-like basis as Sizewell B has not had problems previously. The main concern is the potential for parking on Sizewell Gap Road which is likely to be unsafe or inconsiderate; there is no provision for cyclists either. However, an appropriate management plan could ensure that workers do not park on Sizewell Gap Road – EDF Energy has proved itself capable of controlling the behaviour of its workers in the past so it is assumed this can continue. It is also assumed that outage workers will be entitled to use existing cycle parking available on the B Station site during outages.
- 8.12.6 Although the new access from Sizewell Gap Road is not ideal, it is preferred to the more dangerous use of BR19, as such, subject to appropriate detailing and landscaping, highways arrangements for the proposals are considered acceptable and in accordance with adopted and emerging planning policy.

8.13 Economic Development

- 8.13.1 The proposal supports the economic growth and regeneration of the economy and as such we welcome the increased and improved Visitor Centre. It is an important feature of this key local stakeholder's offer for the local area and forms a key part of their overall Inspire

Programme aimed at educating primary and secondary school children in the benefits of a STEM (Science, Technology, Engineering and Mathematics) education.

8.14 Cumulative Impacts

- 8.14.1 There are potential cumulative impacts within the project such as upon terrestrial ecology and ornithology during construction. Where appropriate these are being mitigated and managed. However, these impacts may be further increased with the Sizewell C project and Scottish Power Renewables (SPR) proposals for East Anglia One North and East Anglia Two offshore windfarms. This reinforces the importance of creating, enhancing, and maintaining sufficient habitat and biodiversity that is reliant to future pressures.
- 8.14.2 It is also important when considering the transport implications of this proposal during the construction phase and the potential cumulative impacts when combined with Sizewell C construction and SPR construction traffic. The mitigation proposed to be in place before peak construction of Sizewell C will not be available for the bulk of Sizewell B relocated facilities construction should it commence on the timeline proposed in the application. However, the vehicles proposed to be associated with the Sizewell B proposal do not warrant such mitigation in their own right. However, this does not mean that the additional vehicles will not be noticed on the highway network, there is enough of an increase in vehicles for it to be noticeable on the local network. However, with the restrictions proposed and the CEMP, the impacts will be appropriately timed and mitigated. Any extended hours of working will be agreed with the LPA in advance and nearest sensitive receptors notified in advance. Similar processes have been in place during other sensitive major construction schemes such as the cable route for the East Anglia One offshore windfarm. The early delivery of these works in advance of the DCO for Sizewell C will result in less impact on the highway network once Sizewell C starts construction.

9 CONCLUSION

- 9.1 This is a very complex proposal which has raised a number of concerns from local residents, various statutory and non statutory bodies as well as town and parish councils in the vicinity of the development proposals.
- 9.2 In reaching a conclusion on the proposal, the Local Planning Authority is aware that the proposals are intended to be included in the Development Consent Order for Sizewell C new nuclear power station; this does not preclude or prevent this Council from determining the proposal as a planning application under the Town and Country Planning Act regime. In this instance the proposal is for the relocation of existing facilities that are (for the most part) essential for the operation of the Sizewell B nuclear power station. The visitor centre is the only element that is not strictly speaking required for the safe operation of the nuclear power station but it is an important facility in this area and is an opportunity for the station to offer a tourist and education facility back to the town. There is reference to potential for the outage car park to be located off site but this would necessitate additional further journeys to and from the station, one aim of the NPPF is to ensure employment opportunities are accessible, by providing for alternatives to the private car through bicycle parking etc at the B Station and an appropriate Travel Plan, journeys can be minimised. However, it is understood that for the purposes of outage it is critical for EDF Energy to be able to manage their additional staff in an appropriate manner and the nearer they are to the power station the simpler the management becomes.
- 9.3 Accepting these proposals as site preparation works for the wider Sizewell C proposal would not be out of line with pre-emptive planning applications that were submitted in

relation to Hinkley Point C and Wylfa in the past. The difference with this proposal is that it directly relates to an existing operating nuclear station rather than pure earthworks in relation to a new station. This also references the fact that the site within which the facilities are currently located is designated for new nuclear development in the National Policy Statement EN-6, as such there is a need for the Sizewell B station to move its facilities in order to secure its continuity of operation as a nuclear power station. Additionally, given the many emerging concerns regarding the construction of Sizewell C, if that is to go ahead, the early delivery of these needed works may lessen the impact of future adverse impacts by proactively allowing EDF Energy to manage the construction programme. As Local Planning Authority the Council will be the responsible authority for ensuring compliance with any permission consented and the mitigation identified including that in a S106 agreement.

- 9.4 Many have questioned the prematurity of this application and that the works are not necessary until Sizewell C is committed to be constructed. These are legitimate concerns however the backstop position provided for in the planning application is that for the vacated land to be restored to AONB quality landscape should the Sizewell C station not be consented in the future. Therefore, there is limited additional loss of AONB resulting specifically from this planning application – the additional loss resulting will be compensated for by EDF Energy through financial payment. The existing nuclear power station is extended in a different location but within the vicinity of its existing nuclear licenced site. There are mitigation and compensation opportunities associated with the proposals. This would align with the NPPF requirements that where development is consented in a nationally protected landscape that any detrimental effect on the environment and the landscape is moderated. By providing for the vacated parts of the site that will not be re-used (in the event of Sizewell C not progressing) to be re-landscaped, this will be an improvement in the AONB. The NPPF says there should be exceptional circumstances for major development in designated areas, in this instance the NPS designating Sizewell as a new nuclear site, and is requiring Sizewell B to move their facilities off the site as designated. This is therefore considered to be an exceptional circumstance facilitating delivery of a new nuclear power station in line with Government guidance. In addition, a condition is proposed that would reinstate Pillbox Field should Sizewell C not go ahead.
- 9.5 Mitigation is provided for in relation to landscape and ecology, to avoid unnecessary harm to the designated SSSI and AONB, further mitigation in the form of access arrangements, crossing points that will benefit the wider population, and the ongoing economic benefit of this large scale employer in East Suffolk. In addition, the principle of an additional mitigation payment has been agreed with EDF Energy, the details of this including the contribution amount are currently under discussion but it is expected to reflect the approach previously agreed for contributions in relation to the Dry Fuel Store at Sizewell B.
- 9.6 By front-loading the necessary construction works at Sizewell B, the cumulative impacts with SPR proposals and the Sizewell C proposals are minimised, this is not to say that there won't be impacts but they will be less than if this proposal was consented as part of the DCO process for Sizewell C.
- 9.7 The application is part outline and part full, to enable front loading of the critical works – these being clearing Coronation Wood and providing the outage facilities. The detail of the visitor centre and ancillary features including canteen etc. will follow at a later date. This

will be the subject of a reserved matters application for planning permission so will be consulted on at a later date.

- 9.8 There were originally a number of concerns regarding permanent loss of an element of designated site – Sizewell Marshes SSSI; the application has been revised to remove this element in lieu of an alternative, not yet agreed access from Pillbox Field to the main site for outage workers during outage periods. Further work is required on the alternative proposed but there is an adequate fall-back position that can be implemented should a suitable alternative not be agreed through condition.

10 RECOMMENDATION

AUTHORITY TO APPROVE subject to receipt of additional bat survey information including impacts and mitigation measures, the signing of a section 106 legal agreement requiring a payment in relation to residual impacts on the AONB, and the inclusion of appropriate conditions including those detailed below:

1. FULL AND OUTLINE:

The full and outline development to which this permission relates shall be begun no later than:

- (a) the expiration of three years from the date of this planning permission,

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

2. OUTLINE:

The relevant part of the development as hereby permitted shall not commence until the Reserved Matters of the relevant part of the development have been submitted to and approved in writing by the Local Planning Authority and that part of the development shall be carried out and completed in all respects in material compliance with the details so approved before the building(s) are occupied. Such details shall include:-

- i) Layout;
- ii) Scale;
- iii) Appearance; and
- iv) Landscaping.

Development within the Outline Area shall be carried out and completed in all respects in material compliance with the details so approved.

Reason: These details are required to ensure that a satisfactory development is achieved.

3. FULL AND OUTLINE:

The development shall be carried out in material compliance with the following approved drawing(s) and/or document(s):

Site wide drawings:

- Sizewell Land Ownership Boundary (000001)Rev. B;
- Location Plan (100000);
- Proposed Site Layout Plan (100002) Rev. B; and
- Proposed Demolition Plan (100004) Rev. B.

Full component drawings:

- Proposed Outage Store Block Plan (100005);
- Proposed Outage Store Basement Plan (100006);
- Proposed Outage Store Ground Floor Plan (100007);
- Proposed Outage Store First Floor Plan (100008);
- Proposed Outage Store Second Floor Plan (100009);
- Proposed Outage Store Third Floor Plan (100010);
- Proposed Outage Store Roof Plan (100011);
- Proposed Outage Store Section 1 (100012);
- Proposed Outage Store Section 2 (100013);
- Proposed Outage Store North Elevation (100014);
- Proposed Outage Store South Elevation (100015);
- Proposed Outage Store East Elevation (100016);
- Proposed Outage Store West Elevation (100017);
- Proposed Training Centre Block Plan (100018);
- Proposed Training Centre Ground Floor Plan (100019);
- Proposed Training Centre First Floor Plan (100020);
- Proposed Training Centre Second Floor Plan (100021);
- Proposed Training Centre Roof Plan (100022);
- Proposed Training Centre Section 1 & 2 (100023);
- Proposed Training Centre North & South Elevations (100024);
- Proposed Training Centre East & West Elevations (100025);
- Coronation Wood Development Area Proposed Site Plan (100027);
- Coronation Wood Development Area Yardman's Office (100028);
- Proposed Outage Car Park Proposed Site Plan (100030) Rev. B;
- Proposed Replacement Rosery Cottage Garage Plans, Elevations & Sections (100031);
- Proposed Coronation Wood Development Area Landscape Plan (100035);
- Proposed Coronation Wood Development Area Sections (100036);
- Proposed Tree Removal Plan (1 of 2) (100037);
- Proposed Tree Removal Plan (2 of 2) (100038);
- Proposed Indicative Landscape Restoration Plan (100039);
- Pillbox Field Proposed Outage Car Park Landscape Plan (100040) Rev. B;
- Pillbox Field Proposed Outage Car Park Sections (100041) Rev. B; and
- Landscape Key Plan (100042)

Outline component drawings:

- Proposed Visitor Centre Parameter Siting Plan (100032);
- Proposed Visitor Centre Parameter Height Plan (100033); and
- Outline Development Zone Parameter Siting Plan (100034).

Supporting documents:

- Arboricultural Impact Assessment;
- Arboricultural Method Statement;
- Environmental Statement;
- Habitats Regulation Assessment Screening;
- Transport Statement; and
- Woodland Management Plan

Reason: For the avoidance of doubt and in the interests of proper planning.

4. FULL AND OUTLINE:

Prior to the commencement of development (other than the Permitted Preparatory Works as defined in Informative 1), a scheme containing the details set out in (i) to (v) below shall be submitted to and approved by the Council.

- (i) The siting, design and external appearance of temporary buildings and structures to be erected and used during the period of construction of the development;
- (ii) Details of vehicular circulation roads, parking, hard-standing, loading and unloading facilities and turning facilities required during the construction of the development;
- (iii) Details of ground levels and heights of all permanent buildings and structures together with cross-sections through the site showing existing and proposed ground levels;
- (iv) Details of the colour, materials and surface finish in respect of vehicular circulation roads, parking, hard standing, loading and unloading facilities and turning facilities on site; and
- (v) Phasing of work.

Reason: To enable the Council to exercise reasonable and proper control over the design and appearance of the Development.

5. Prior to the above ground construction of any building or structure (other than Permitted Preparatory Works as defined in Informative 1), details of the colour, materials and surface finish in respect of that building or structure shall be submitted to and approved by the Council.

The Development shall thereafter be carried out only in accordance with the approved details.

Reason: To enable the Council to exercise reasonable and proper control over the design and appearance of the Development.

6. FULL AND OUTLINE:

Artificial lighting shall only be installed and used in accordance with the approved scheme in accordance with a detailed Lighting Plan to be submitted for approval in writing by the Local Planning Authority in tandem with details for each phase of development. No lighting scheme is to be implemented without the approval of the Local Planning Authority.

Reason: To limit the impact of light spillage during construction on the surrounding environment including the impact on nocturnal species such as bats.

7. FULL AND OUTLINE:

Other than in an emergency or when construction activities are required to be continuous, or if otherwise agreed by the Local Planning Authority, no heavy goods vehicle traffic, plant, machinery or earth moving equipment associated with the construction of the development shall enter or leave the site on any Sunday or Bank Holiday. On any other day, no such heavy goods vehicle traffic, plant, machinery, or equipment shall enter or leave the site except between the hours of 08:00 and 18:00 Monday to Friday and between the hours of 09:00 and 16:00 on Saturdays other than:

- i) When continuous periods of construction operations are required such as concrete pouring and steel works or;
- ii) For the delivery of abnormal loads to the site or;
- iii) Cases of emergency; or
- iv) If otherwise agreed by the Local Planning Authority.

When such operations or deliveries are required outside of these hours, the Local Planning Authority will be notified at least 36 hours in advance.

Reason: In order to safeguard the amenity of local residents.

8. FULL AND OUTLINE:

All activities associated with the construction of the development shall be carried out in accordance with BS 5228 Parts 1 and 2: 2009+A1:2014 Noise and Vibration Control on Open Sites.

Reason: To enable reasonable and proper control to be exercised over noise during construction activity and in order to safeguard the amenity of local residents.

9. FULL AND OUTLINE:

Prior to the commencement of the relevant part of the development (other than the Permitted Preparatory Works as defined in Informative 1), a schedule of plant items to be used in that part of the development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To enable reasonable and proper control to be exercised over noise during construction activity and in order to safeguard the amenity of local residents.

10. FULL AND OUTLINE:

External construction work associated with the development shall not take place on the site at any time on any Sunday or Bank Holiday unless continuous periods of construction operations are required such as concrete pouring or erection of steel. On any other day, no external construction work associated with the development shall take place except between the hours of 07:00 and 19:00, unless continuous periods of construction operations are required such as concrete pouring or erection of steel.

When such operations or deliveries are required outside of these hours, the Local Planning Authority will be notified at least 36 hours in advance.

Reason: To enable reasonable and proper control to be exercised over noise during construction activity and in order to safeguard the amenity of local residents.

11. FULL AND OUTLINE:

The commencement of the relevant part of the development shall not take place until there has been submitted to and approved in writing by the Local Planning Authority, a scheme for the monitoring of noise and vibration generated during the construction of the relevant part of the Development.

The scheme shall:

- (i) specify the measurement locations from which noise and vibration will be monitored and the maximum permitted levels at each such monitoring location; and
- (ii) make provision for such noise and vibration measurements to be taken as soon as possible following requests by the Local Planning Authority and such measurements shall be given to the Local Planning Authority as soon as they are available.

Levels specified in the approved scheme, shall not be exceeded, unless otherwise approved in writing by the Local Planning Authority or in an emergency. In any instance where the noise levels approved are exceeded because of an emergency then the Local Planning Authority shall be provided with a written statement as soon as possible following the relevant exceedance and such statement shall detail the nature of the emergency and the reason why the noise levels could not be observed.

Reason: To enable reasonable and proper control to be exercised over noise during construction activity and in order to safeguard the amenity of local residents.

12. FULL AND OUTLINE:

Prior to the above ground construction of the relevant part of the development (other than Permitted Preparatory Works as identified in Informative 1) a landscape plan including the details set out in (i) to (vii) below shall be submitted to and approved by the Local Planning Authority.

i) Planting;

ii) Management of existing and new planted areas;

iii) Restoration of areas affected by construction works;

iv) Details of the height, type, size and species of the shrubs and trees to be planted;

v) Details of the measures to be taken to create new flora and fauna habitats and of the management of such new habitats;

vi) Phasing of works included in the scheme; and

vii) Details of protective fencing.

The approved plan shall be implemented within the first available planting season after the commencement of above ground construction of the relevant part of the development and appropriately managed and maintained for a minimum period of 5 years, any plant or tree dying within that 5 year timeframe will be replaced.

Reason: To ensure proper landscaping for the development and for the protection of semi natural habitats within the development site boundary.

13. FULL AND OUTLINE:

Prior to the commencement of the relevant part of the development (other than Permitted Preparatory Works as defined in Informative 1) a suitably qualified person must have:

(i) carried out an investigation to assess the degree of ground contamination of the site and identify any resulting need for remedial measures; and

(ii) submitted a written report of the investigation's findings to the Local Planning Authority.

Reason: To ensure that contaminated waste found on the site is disposed of properly.

14. FULL AND OUTLINE:

Contaminated material arising from the construction of the relevant part of the development shall be treated on the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority, in consultation with the Environment Agency, or shall be disposed of to licensed disposal facilities subject to such variations to the approved scheme as have been approved in writing by the Local Planning Authority.

Reason: To ensure that contaminated waste found on the site is disposed of properly.

15. FULL AND OUTLINE:

Prior to the commencement of the relevant part of the development (other than Permitted Preparatory Works as defined in Informative 1) a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the relevant part of the development and infiltration testing, must be submitted to and approved in writing by the Local Planning Authority, in consultation with the Environment Agency. The scheme shall be implemented, maintained and managed in accordance with the approved details.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.

16. FULL AND OUTLINE:

In the event that Sizewell C Nuclear Power Station is not permitted by the Secretary of State, a scheme of restoration in accordance with details first submitted to and agreed in writing by the Local Planning Authority will occur at Pillbox Field and any other areas previously vacated by Sizewell B buildings and not to be re-used.

The scheme shall be submitted to and approved in writing within 18 months of the date of the final decision by the Secretary of State to refuse consent for the Sizewell C Nuclear Power Station (or, if later, the date that any legal challenge to such decision is finally resolved).

All restorative works shall be carried out in accordance with a Restoration Scheme, including a timeframe for the restoration works, in accordance with details first submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that development does not occur unnecessarily and to protect the environment.

17. FULL and OUTLINE:

Before the construction of any elements of the hereby approved built development are commenced, a detailed Construction and Environmental Management Plan (CEMP), based on the outline CEMP, shall be submitted to and approved in writing by the Local Planning Authority.

Construction of the built elements of the proposal (full and outline) shall not be carried out other than in accordance with the approved plan.

The Construction and Environmental Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors;
- b) loading and unloading of plant and materials;
- c) piling techniques;
- d) storage of plant and materials;
- e) provision and use of wheel washing facilities;
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works;
- g) site working and delivery times;
- h) a communications plan to inform local residents of the program of works;
- i) provision of boundary hoarding and lighting;
- j) details of proposed means of dust suppression;
- k) details of measures to prevent mud from vehicles leaving the site during construction;
- l) haul routes for construction traffic on the highway network;
- m) monitoring and review mechanisms;
- n) details of delivery times to the site during the construction phase (to avoid peak deliveries passing through Stratford St Andrew and Farnham at peak periods);
- o) ecological mitigation measures in relation to noise, vibration, and visual disturbance;
- p) the presence on site of an ecological clerk of works when particularly sensitive areas within the site are being developed (an agreed list of areas can be agreed with the Local Planning Authority for avoidance of doubt);
- q) ecological mitigation measures in relation to impacts from light disturbance;
- r) a detailed plan for ongoing access between the eastern and western compartments of Unit 4 of the SSSI which has the potential to be bisected by this development (pre, during and post-construction);
- s) additional survey work as required in consultation with the Local Planning Authority;
- t) a revised methodology for relocation of reptiles within the development area;
- u) dust management measures / positioning of any standby generators in relation to occupants of Rosery Cottage;
- v) provision of biodiversity net gain measures at appropriate time scales during the construction works;
- w) vehicle emissions and non-road mobile machinery (NRMM) emissions to be minimised by incorporating best practice control and management measures; and
- x) Restriction of site access for members of the public.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase, and to ensure the development is carried out in a considerate manner with regards to human and ecological receptors.

18. FULL AND OUTLINE:

No part of the construction works shall commence until emergency plans relating to the construction have been submitted to and agreed in writing by the Local Planning Authority.

Radiation emergency plans cover the EDF Energy Sizewell B Operators emergency plan and SCC Off Site Emergency Plan issued under Radiation (Emergency Preparedness and Public Information) Regulations. Wider civil contingency arrangements cover Suffolk Resilience Forum emergency plans for identified risks e.g. flooding, that might affect the construction site and any associated infrastructure.

Reason: To ensure the ongoing nuclear safety of the Sizewell B site.

19. FULL AND OUTLINE:

The emergency plans, as required under Condition 18, shall be carried out as approved in relation to the relevant part of the relevant works, unless otherwise agreed after consultation through the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.

Reason: To ensure the ongoing nuclear safety of the Sizewell B site.

20. FULL AND OUTLINE:

No development shall commence (other than the Permitted Preparatory Works as defined in Informative 1) until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording.
- b. The programme for post investigation assessment.
- c. Provision to be made for analysis of the site investigation and recording.
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
- e. Provision to be made for archive deposition of the analysis and records of the site investigation.
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The site investigation shall be completed prior to the commencement of development (other than the Permitted Preparatory Works), or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Policies SP1 and SP15 of Suffolk Coastal District Council Core Strategy Development Plan Document and the NPPF.

21. FULL AND OUTLINE:

None of the buildings hereby approved shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition [28] and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Policies SP1 and SP15 of Suffolk Coastal District Council Core Strategy Development Plan Document and NPPF.

22. FULL AND OUTLINE:

The development hereby permitted shall not be occupied until details of all Sustainable Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

23. FULL AND OUTLINE:

No development shall commence (other than Permitted Preparatory Works as defined in Informative 1) until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

A) Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater.

24. FULL AND OUTLINE:

Notwithstanding the submitted and approved drawings, the consent hereby granted does not allow for any removal, works within or development within the designated Sizewell Marshes SSSI - the pedestrian footpath linking the outage car park with the main site is not permitted under this planning consent. Details are to be submitted of an alternative pedestrian access (including detailed bridge design if required) from the outage car park on Pillbox Field to the main site and agreed by the Local Planning Authority prior to first use of the hereby approved outage car park facility. If an agreed alternative route cannot be achieved, users of the outage car park will access the main site via Sizewell Gap Road and

the primary Sizewell B vehicular access. Use of an agreed alternative pedestrian route will not commence until it is complete to a design agreed by the Local Planning Authority.

Reason: To avoid unacceptable and unnecessary loss of the designated and protected SSSI and to achieve an alternative pedestrian route to the site avoiding public highway (if possible).

25. FULL:

Before the construction of the outage car park is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the outage car park onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: In the interests of highway safety to prevent hazards caused by flowing water or ice on the highway.

26. FULL AND OUTLINE:

Prior to dewatering commencing in relation to development on the site, monitoring points to be used during the dewatering process are to be agreed in writing with the Local Planning Authority, the results of the monitoring is to be shared with the Local Planning Authority at intervals to be agreed in advance of works commencing on dewatering and if proposed mitigation measures prove ineffective, potential additional mitigation measures may need to be agreed with the Local Planning Authority and implemented in an appropriately agreed timescale to enable works to continue.

Reason: To ensure that there are no adverse effects on designated sites occurring through dewatering of the site as proposed.

27. FULL AND OUTLINE:

Mitigation measures associated with additional bat survey work on the site are to be carried out prior to development commencing on site (this includes Permitted Preparatory Works as defined in Informative 1), the details of this is to be agreed in writing with the Local Planning Authority and carried out at an appropriate timescale to be agreed with the Local Planning Authority.

Reason: To ensure any adverse impacts on protected bat surveys in the vicinity of the development proposed is appropriately mitigated and managed.

28. FULL:

Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6

metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

29. FULL:

No other part of the outage car park shall be constructed until the access/new junction with Sizewell Gap is submitted and approved with the Local Planning Authority.

Reason: In the interests of highway safety to ensure the approved layout is properly constructed and laid out and to avoid multiple accesses which would be detrimental to highway safety.

30. FULL:

Notwithstanding the requirements of Condition 29, a means for securing the vehicular access to the outage car park when not in use is to be submitted to and approved in writing by the Local Planning Authority, the agreed security measures are to be in place and available use prior to the vehicular access being made available for use.

Reason: To ensure Pillbox Field can be protected from unauthorised vehicular access.

31. FULL:

As detailed in Chapter 8.7 of the Environmental Statement, a photographic recording of the buildings to be demolished is to be carried out prior to any demolition works on site, this record is to be made available to the Local Planning Authority and lodged with the Suffolk Records Office if required.

Reason: To detail the history of the Sizewell B nuclear power station and to maintain a record of original buildings on the site.

32. FULL:

Prior to first use of the vehicular access onto Sizewell Gap Road, a new unmanned crossing point is to be provided on Sizewell Gap in a location and to a design to be agreed with the Local Planning Authority in conjunction with Suffolk County Council Local Highway Authority.

Reason: To improve safety for pedestrians in the vicinity given the new vehicular access to Sizewell Gap Road.

33. FULL:

Full details of the precise location of the garage proposed at Rosery Cottages is required along with details of mitigating measures to ensure no adverse impact or effects arising from the construction on adjacent ditches, this is to be submitted prior to development commencing on site (except for the Permitted Preparatory Works defined in Informative 1), and constructed in accordance with the agreed details.

Reason: To ensure the garage has no unacceptable effects or impacts on the sensitive ditch network in close proximity to the construction area.

Informatives:

1. Definition to be used in relation to the conditions detailed above (where noted):

"Permitted Preparatory Works" means:

- (1) Felling of trees and grubbing out roots;
- (2) Exposing of utility services within the site;
- (3) Surveys and geotechnical surveys; and
- (4) Provision for temporary contractors' facilities necessary for (1) to (4) above within the site.

2. BS 3998: 2010

The applicant should note that the work hereby permitted should be carried out in accordance with good practice as set out in the 'British Standard Recommendation for Tree Work' BS 3998: 2010, or arboricultural techniques where it can be demonstrated to be in the interests of good arboricultural practice.

Protected Species:

The applicant should note that under the terms of the Wildlife and Countryside Act 1981, it is an offence to disturb nesting birds, bats their roosts and other protected species. You should note that work hereby granted consent does not override the statutory protection afforded to these species and you are advised to seek expert advice if you suspect that nesting birds, bats and other species will be disturbed. Likewise, badgers are protected under the Badgers Act 1992 and if disturbance is likely, a licence may be undertaken from the Ministry of Agriculture and Food before any work is undertaken.

3. The proposal is located adjacent to Sizewell Drain, an ordinary watercourse which falls under the jurisdiction of the East Suffolk Drainage Board. Footbridges installed as part of this application may require consent from the IDB if works are required to be undertaken on or near the watercourse.

BACKGROUND INFORMATION:

See application ref:
at www.eastsuffolk.gov.uk/public-access