



STRATEGIC PLANNING COMMITTEE

Wednesday, 20 January 2021

APPLICATION NO DC/20/4646/FUL

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

EXPIRY DATE 17 December 2020

APPLICATION TYPE Hybrid application (part outline part full)

APPLICANT Mr. Nick Cofield, EDF Energy

PARISH Leiston cum Sizewell

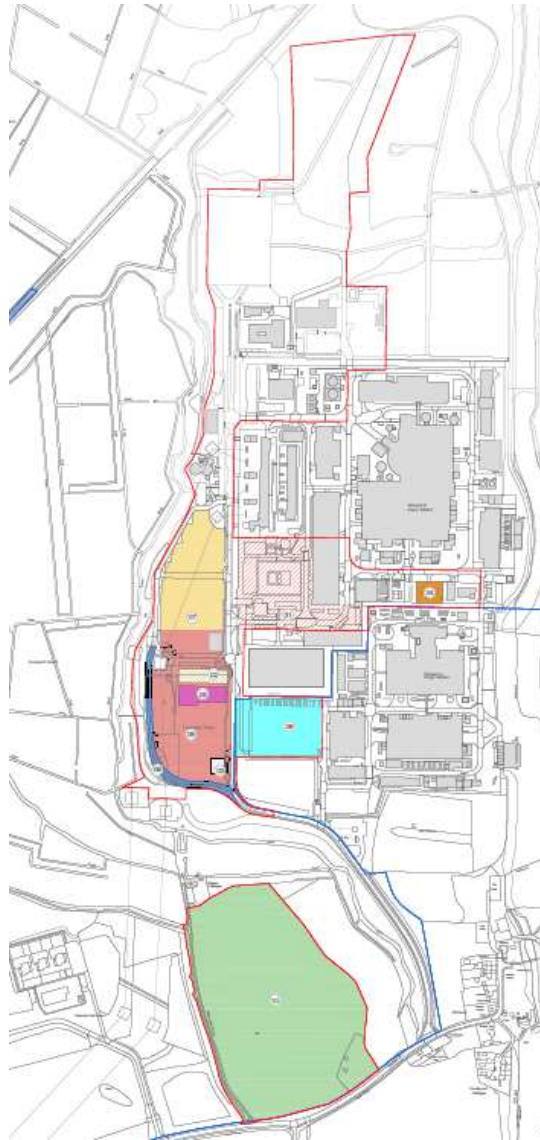
PROPOSAL Hybrid application seeking outline planning permission, with all matters reserved, for up to 9,500 square metres Gross External Area (GEA) to provide administration, storage, welfare and canteen facilities and a visitor centre of up to 1,000 square metres GEA. Detailed planning permission is sought for demolition of some existing structures and redevelopment to include a training centre and interim visitor centre, an outage store, lay down area, car and cycle parking, landscaping, associated infrastructure (including utilities, plant, and highway works), tree felling and other relevant works. | Sizewell B Sizewell Power Station Complex and Adjoining Land Sizewell Power Station Road Sizewell Leiston Suffolk IP16 4UR

CASE OFFICER

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1 EXECUTIVE SUMMARY

- 1.1 The planning application is submitted as a hybrid planning application. The formal description of development is as follows:

Hybrid application seeking outline planning permission, with all matters reserved, for up to 9,500 square metres Gross External Area (GEA) to provide administration, storage, welfare and canteen facilities and a visitor centre of up to 1,000 square metres GEA. Detailed planning permission is sought for demolition of some existing structures and redevelopment to include a training centre and interim visitor centre, an outage store, laydown area, car and cycle parking, landscaping, associated

infrastructure (including utilities, plant and highway works), tree felling and other relevant works.

- 1.2 Permission in full is sought for the outage store, laydown area, car parking, training centre, and western access road.
- 1.3 Outline permission is sought for the administration building, storage, welfare and canteen facilities, and visitor centre.
- 1.4 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 which is proposed to be developed as part of a new nuclear power station, Sizewell C. The site is identified in the National Policy Statement EN-6 as a potentially suitable site for the deployment of a new nuclear power station. While EN-6 is currently subject to review, it remains in force until such time as it is replaced, as most recently confirmed in the Energy White Paper (December 2020). 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.
- 1.5 The application is recommended for conditional approval subject to the signing of a Section 106 legal agreement.
- 1.6 The application proposes a similar scheme to a previously consented application. That hybrid planning application was submitted to East Suffolk Council in April 2019: DC/19/1637/FUL. Planning permission was recommended subject to the signing of a section 106 legal agreement by Strategic Planning Committee on 9 September 2019 following a site visit, this Committee resolved to approve the application. The legal agreement was sealed, and the decision notice issued on 13 November 2019. This application was then subjected to a lengthy judicial review process. However, the judicial review claim was dismissed by the High Court in October 2020 and an application for permission to appeal was rejected by the Court of Appeal in November 2020.

2 SITE DESCRIPTION

- 2.1 The Sizewell complex contains two nuclear power stations, Sizewell A and Sizewell B. The complex is located on the Suffolk coast, north-east of Ipswich. Sizewell A is owned by the Nuclear Decommissioning Authority, managed by Magnox Limited, and is currently undergoing decommissioning. Sizewell B is located to the north of Sizewell A and is expected to be in operation until at least 2035, with the potential for an extension of its lifetime for 20 years.
- 2.2 The application site is 31.4 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 The area formerly comprising Coronation Wood lies within the site. This was 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. Following the end of the judicial review process in November 2020, and after discharge of the necessary planning conditions attached to DC/19/1637/FUL, the felling of Coronation Wood commenced in early December. The majority of the wood has been felled. This means that Coronation Wood is authorised to be, and has largely been, felled regardless of the outcome of this application. At the time of writing, a licence from Natural England is awaited which relates to the one tree that has a confirmed bat roost within it. While that licence is awaited, the tree remains within a 15 metre cordon and no felling or works have taken place within that area. An ecological clerk of works was in place during the felling to ensure no harm was caused to protected species during the felling.
- 2.6 Tree planting has also commenced on Pillbox Field as agreed under the condition for replacement planting pursuant to DC/19/1637/FUL. This involves replacement of trees lost as a result of felling of Coronation Wood at a ratio of approximately ten to one. Detailed guidance is being adhered to which will maximise the chance of survival of the replacement trees.
- 2.7 The present application proposes development on an area of land that is within the security fence for Sizewell A. This is a concreted area that used to house the National Grid substation for Sizewell A. The scheme also proposes landscape planting in 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 are the Greater Gabbard and Galloper Offshore Wind Farm onshore sub-station facilities. Pillbox Field is retained in the red line application site for replacement

planting purposes only under this proposal.

- 2.8 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).
- 2.9 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 ParkRun (not currently running).
- 2.10 Strategic Planning Committee members undertook a site visit in relation to the previously consented scheme, DC/19/1637/FUL. As the site has not changed significantly since that time (apart from felling of Coronation Wood), and the only addition is a hard standing area within the Sizewell A site boundary – for which we have detailed photographs, it is not considered necessary for a site visit to take place in relation to this application.

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 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. The Sizewell C DCO proposes a 9 – 12-year construction length, commencing the relocated facilities proposals under this application, if consented, could save up to 2 years from the anticipated total construction period for Sizewell C. Additionally, advancing these development works under this proposal will improve construction safety on the site through better risk management including:

- Reducing the duration of peak vehicle movements on site, which further reduces the likelihood of any accidents (an already low risk due to appropriate vehicle management that will be in place under construction management plans); and
- Reducing the duration of construction activities being carried out in proximity to one another and the potential for these activities to interact / influence one another (reference to being in advance of Sizewell C construction works if granted consent).

It is considered that the early delivery of these necessary works is likely to lessen the future adverse impacts by proactively allowing EDF Energy to manage the construction programme and this is to be supported.

- 3.2 The proposed development comprises the relocation and demolition of existing Sizewell B power station facilities. The proposed replacement facilities would be

constructed and operational before demolition of the existing facilities. This sequencing is intended to minimise disruption to the continued operation of Sizewell B power station. The exception to this sequencing is the permanent visitor centre, which would be temporarily relocated to the existing technical training centre during construction.

- 3.3 The application proposes similar facilities to those consented by DC/19/1637/FUL. There are, however, certain changes from the previously approved scheme. Following the approval of the previous application, the applicant has further explored re-using previously developed land within the Sizewell power station complex, specifically land within the Sizewell A complex.
- 3.4 The proposed changes include reconfiguring the location of some of the facilities within the complex. The outage car park is no longer proposed in Pillbox Field, instead additional tree planting landscaping is proposed in Pillbox Field, and the field would remain a greenfield site under this application. The proposed outage car parking will instead be located on the site of the current western car park to the north of the Coronation Wood area. The operational car parking for the station will then be split between the remaining area on the western car park and Coronation Wood area, in place of the permitted (in the extant permission) outage laydown area. The training centre is reduced in height, to reduce its visibility within the AONB. The outage laydown area has been relocated from the Coronation Wood area to an area on redundant Sizewell A land (subject to agreement). The design of the administration building has been reviewed and it has been determined that moving the building outside the fence within Coronation Wood would improve its constructability. The design of the training centre has also been amended, with one floor removed and the width increased to accommodate the required facilities. The proposed basement in the outage store has been removed as it is no longer needed as part of the revised scheme. A separate non-material amendment application to the approved DC/19/1637/FUL was submitted seeking consent for the changes to the training building and outage store. This has been approved (DC/20/5012/AME).
- 3.5 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, hence the requirement for additional car parking.
- 3.6 The development proposal is not definitively required to be accompanied by an Environmental Statement under the 2017 Environment Impact Assessment Regulations. However, the applicant has 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 East Suffolk Council prior to the revised submission.

- 3.7 There are two clear phases for the development, the first being the detailed elements (Phase One) and the second being the outline elements (Phase Two).
- 3.8 In the event that the proposed development is consented and implemented, but Sizewell C is not consented or implemented, the majority of Phase One works would be completed. However, this would mean the existing north car park, currently used during Sizewell B outages for storage and parking would remain in use.
- 3.9 Demolition works of Sizewell B buildings in the area to the north of the Sizewell B station would be completed. The ground slabs would be removed, and the area restored and landscaped in accordance with the Landscape Restoration Plan submitted with the planning application and secured via planning condition.
- 3.10 The Sizewell B visitor centre would be moved to a temporary location within the existing technical training building during the early stages of construction under this proposal. The new visitor centre is proposed as part of the outline element of this consent, a new design would be required and submitted to this Council for approval under reserved matters (secured via condition).
- 3.11 The planning history for the Sizewell Power Station Complex reveals around 80 planning applications of varying types dating back to 1988 (both of the stations were given permission under different consenting regimes). The primary consent to note is that for the Sizewell B Dry Fuel Store consented in July 2011 under a different consenting regime.
- 3.12 A previous hybrid planning application for the relocation of Sizewell B facilities was submitted to this Council in April 2019 (application ref. DC/19/1637/FUL) and approval issued on 13 November 2019.
- 3.13 On 27 May 2020, SZC Co. submitted an application to the Planning Inspectorate for a Development Consent Order (DCO) for the development of a twin reactor nuclear power station to be known as Sizewell C. That application was accepted by the Planning Inspectorate on 24 June 2020 and examination is expected to begin in quarter one 2021.
- 3.14 As mentioned above, a judicial review challenge to the grant of planning permission DC/19/1637/FUL was brought by Joan Girling, in association with a local campaign group, Together Against Sizewell C. The claimant pursued two grounds of challenge. First, it was alleged that the Council had unlawfully failed to consider the need for, and alternatives to, the proposed development when considering whether there were exceptional circumstances to justify major development in the AONB. Second, it was alleged that the Council failed to reach a lawful conclusion that the environmental information was 'up to date', contrary to Regulation 26 Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571).
- 3.15 A judicial review was heard in the High Court in October 2020. The Claimant's

challenge was dismissed and a subsequent application for permission to appeal against that decision was rejected by the Court of Appeal in November 2020. As such, the permission remains extant.

- 3.16 Following the decision by the Court of Appeal in November 2020, EDF Energy began the development by commencing with replacement planting on Pillbox Field and felling of Coronation Wood – see 2.5 and 2.6 for further detail.

4 CONSULTATIONS/COMMENTS

- 4.1 Leiston-cum-Sizewell Town Council (HOST): Supports the revised proposal, stating *‘The Town Council notes the revised plans and can confirm that they consider them to be an improvement on the current extant proposal. The use of Sizewell A land is welcomed and the reduction in height also welcomed. Members would recommend approval’*.
- 4.2 Aldeburgh Town Council: OBJECTS to the application stating: *“The relocation of the infrastructure for Sizewell B is not required for the nuclear power station to continue in operations. It has been confirmed that this relocation is only required to facilitate access to land so that it can be used for the potential new build of Sizewell C, and as this is yet to be determined via NSIP and PINS, Aldeburgh Town Council’s view is that this matter should not be approved by East Suffolk as the Planning Authority but be rejected and considered only as part of the DCO for Sizewell C.*
- 4.2.1 *The applicant states this would enable Government targets towards Carbon reduction, assist our post Covid-19 economy, and is in line with Government policy for nuclear new build. Although Sizewell is a site identified in EN-6 as potentially suitable for the deployment of a new nuclear power station before the end of 2025, this designation does not approve or confer any set configuration or number of reactors that would be considered as suitable. EN-6 considers a single power station would be expected to require approximately 30 hectares of available land. Currently the Sizewell C proposal for a two-reactor design is based on a 32-hectare site, after the Sizewell B facilities have been moved. This illustrates why the applicant is so keen to get this approved prior to the full consideration of the DCO.*
- 4.2.2 *In approving the previous application (DC19/1637/FUL) despite an overwhelming volume of concerns from local organisations, including Parish and Town Councils, we believe East Suffolk showed prejudice towards the applicant, who had stated this was needed for the continued operation of the site and to secure ‘jobs for the future’. We therefore believe this previous determination should set no precedent in the determination of this application (DC/20/4646/FUL).*
- 4.2.3 *Aldeburgh Town Council also objects to this application on the following grounds.*

Works not required and speculative

- 4.2.4 *As outlined above these matters are not required to be completed now by the applicant. There is no certainty that the DCO for Sizewell C will be approved, so forestry and environments would be destroyed, and the adverse impacts (outlined below) would be inflicted unnecessarily. The Government (BEIS) is about to review the National Policy Statements with new criteria. Any preparatory work to relocate facilities should be postponed at least until Sizewell C is confirmed as included in the revised potential site list following BEIS review and parliamentary approval.*

Siting

- 4.2.5 *We believe there are other more appropriate locations for the siting of outage car parking, and the Training and Visitor centres on brown field sites, such as; redundant Sizewell A land currently available for re-use and more could be made available with a business case to the NDA for decommissioning, and land within Leiston High Street or adjacent to the Emergency Centre/Railway heading, which would have a far less negative impact. We do not believe the applicant has justified why these locations cannot be used. Outage car parking further away from the site would significantly reduce car traffic, as a park and ride scheme could be utilised for main shift change times and locating the Visitor Centre in Leiston would benefit the economy of the High Street (as demonstrated at Hinkley Point C/Bridgewater where there is now an established precedent for this model) and again further reduce traffic to site with only those visitors touring the site being required to access it. Training facilities are not required to be within the nuclear licensed site, although the applicant prefers this, in the past there is precedent with the simulator and training centre at Cliff Key.*

Impact on traffic and road infrastructure

- 4.2.6 *If consent is given work would start in 2020/2021 and span into 2023/2024 potentially overlapping with other large NSIP projects and potential outages with an estimation of an additional 140 HGV movements a day through a rural area of AONB.*

Impact of noise, vibration, light, air pollution

- 4.2.7 *There will be an increase in noise, vibration, light and air pollution from HGV, LGV and car movements associated with the delivery of this project should the application be approved. In demolition and construction of the new facilities there will be significant negative impact to the health and well-being of residents and those visiting the area. Conditions should be imposed to prevent any work on Sundays/Bank Holidays or outside the operating hours of 8am-6pm, and if tasks cannot be finished within this time window they should not be started. All limits regarding noise, light and air pollution should be monitored and strictly enforced. Impact should be assessed and monitored specifically on the historic setting of Leiston Abbey.*

Impact on the environmental, loss of shielding and green spaces

- 4.2.8 *There will be significant impact on wildlife, habitats and the natural environment around the station including the AONB and RSPB Minsmere and further away along the transport routes. Although we welcome the change within this application that Pillar Box field will not be used, we remain against the use of the 100yr old Coronation Wood where we believe felling has already commenced. This area was quoted in the planning process for the Dry Fuel Store as visual screening landscaping and as part of the important noise protection. The Dry Fuel Store application was approved by East Suffolk Planning Authority with this as a mitigating factor. As the Dry Fuel Store is one of the very last buildings to be decommissioned (storing spent fuel prior to removal eventually to a national GDF, if one is consented and approved) we believe Coronation Wood should be preserved, maintained and enhanced, not cleared and used for industrial buildings. Planted trees elsewhere will not mitigate its loss.*

Impact on the economy of the area

- 4.2.9 *The economy of Aldeburgh is heavily reliant on the tourism industry and this will be adversely affected by all the above issues, either by the perception of, or the actual impact of the work - if approved. There is little benefit in terms of spend within the economy from contractors or workers, and the potential demand for temporary accommodation/bed spaces would prevent other visitor occupation with a more traditional 'visitor' spend. Access to and use of RSPB Minsmere and other activity/leisure facilities would be severely restricted, along with the loss of quiet tranquillity for which this area is well known and celebrated.*

Section 106 mitigation

- 4.2.10 *The previous fund set up to mitigate for the construction of the Dry Fuel Store benefits projects which apply for funding (from a wider area than that which is impacted) to a Board upon which the applicant sits. We do not believe that this is the best or appropriate method for mitigation. Should this application be approved mitigation of a different scale and model would be required and we would request the robust involvement of Parish and Town Councils in the immediate area."*

- 4.3 Theberton and Eastbridge Parish Council: OBJECTS to the application stating: *"Theberton and Eastbridge Parish Council have several concerns regarding the hybrid planning application from EDF Energy to move and redevelop Sizewell B facilities within the Suffolk Coast and Heaths AONB as part of an enabling strategy for the Sizewell C project and, in so doing, pre-empt the consideration of a future Sizewell C Development Consent Order (DCO) application.*

- 4.3.1 *We believe that this application should only be considered within the full DCO process*

and any enabling development only commenced following DCO approval within the new National Policy Statement framework (awaiting the next stage of consultation) and following publication of an updated Energy Policy Whitepaper.

Specifically:

- 4.3.2 The hybrid development permanently removes all of Coronation Wood within the AONB, with only partial compensation and mitigation proposed.*
- 4.3.3 The applicability of the existing EN-6 framework to the Sizewell C (SZC) project is in question and has been accepted as a subject for examination in the SZC DCO examination.*
- 4.3.4 The legality of existing energy policy has been called into question as it was developed prior to the Paris Climate Agreement and the government's commitment to law of Carbon Net Zero by 2050.*
- 4.3.5 The government's response to an initial consultation on siting criteria for new NPS to replace EN-6 in 2018 states that companies, such as EDF, who wish their sites to remain on the designated sites list will have to 'provide information to demonstrate that the sites continue to meet the updated criteria' (paragraph 2.114).*
- 4.3.6 Within the new "stand-alone" NPS for new nuclear, which is designed to replace EN-6, new lifetime sustainability criteria, habitats regulations and updated sea level rise expectations due to climate change may cast a new light on the specific proposals by EDF for a dual reactor on this very confined site.*
- 4.3.7 Once the lifetime sustainability of the sites has been proposed by a developer, strategically reassessed and accepted, the new NPS, including the sites list, is expected to be further consulted 2021 and any legislation to approve the final NPS is not expected to reach parliament until late 2021 or 2022.*
- 4.3.8 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 .*
- 4.3.9 EDF state that by applying for and starting this development, they are facilitating government policy objective by enabling a more rapid delivery of Sizewell C than if the proposals to relocate the SZB facilities were only enabled by approval within the DCO.*
- 4.3.10 EDF also state that as Sizewell has been identified as a potentially suitable site within EN-6, local authorities have been encouraged by the Department for Communities and Local Government to consider such advanced works applications. However, such approval also comes with the caveat 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.' The nature of the proposed changes in this application will mean that any such restitution will simply not be possible and thus this*

advanced works application should be rejected.

- 4.3.11 *EN-6 and the new NPS also state that new single nuclear power station sites would be expected to be in the region of 30 hectares in size, although it was cognisant that the exact size would depend on the specific design and configuration of the site. Currently the platform size for the proposed dual reactor development on the SZC site is only 32 hectares once relocation of these SZB facilities is complete.*
- 4.3.12 *Despite having had its original DCO application accepted by the Planning Inspectorate (PINS) for examination, EDF have now made significant proposals for changes to the application and have entered into a further public consultation that will run between 16th November and 18th December 2020. EDF have a commitment to submit updated proposals to PINS by 11th January 2021. Further consideration and time will be needed for Interested Parties and potential newly affected parties to submit or amend Relevant Representations based on any changes that are accepted by PINS for examination.*
- 4.3.13 *There are significant impacts from this project, even outside of the overall SZC proposed development. The total duration of the SZB relocation project of over 4.5 years with 100 HDV movements per day at peak of construction using the B1122 will significantly impact residents in Theberton. It will also overlap with Scottish Power's two wind farm projects.*
- 4.3.14 *Coronation Wood is now approximately 100 years old and has been used in applications for both Sizewell A and more recently for the new SZB Dry Fuel Store as a means of screening both these facilities. The total removal of this feature and replacement with the façade of the new training centre and administration building with some immature and woodland edge planting will destroy the screening that is relied upon for all these buildings.*
- 4.3.15 *EDF state that Coronation wood is in poor condition, but that can only be because it has been neglected by EDF in its management of the estate. Despite that, three mature oaks that have great biodiversity contributions will be lost along with over 330 other trees and hedgerow.*
- 4.3.16 *EDF recognise that removal of Coronation Wood will be of high impact, and recent scientific reports make clear that the ability of mature woodland to sequester carbon cannot be replaced by new immature planting even when the ratio of new to old trees is an order of magnitude greater. EDF's own plans clearly foresee thinning of such planting occurring less than a decade after establishment. Net biodiversity loss because of the loss of such an old and established wood, even if it is considered as being in poor condition, will take at least 5 decades to recover. The potential biodiversity increase based on professionally managing the existing planting will simply never be recovered through the supposed compensation planting scheme.*
- 4.3.17 *Suffolk Coastal District Council in their December 2016 response to a Scoping Report*

from EDF for the previous project, DC/19/1637/FUL, point to two Local Plan policies SCLP 10.1 and SCLP 10.4 requiring net environmental gains in green infrastructure and biodiversity and to protect and enhance landscape elements... including woodland trees and functions as ecological corridors. The damage proposed to Coronation Wood cannot uphold this requirement.

4.3.18 *However, despite our opinion that this proposal should be rejected until such time as the SZC DCO application is approved by the Secretary of State, we are pleased that EDF has effectively removed use of Pillbox Field as the location of the outage car park by reorganising the existing SZB car parks and moving the SZB outage laydown area to an area within the existing SZA site that has now been decommissioned."*

4.4 Middleton-cum-Fordley Parish Council: OBJECTS to the proposal stating: *"Middleton-cum-Fordley is one of the villages that stands to be seriously affected by any work carried out by EDF at Sizewell. We are still appalled that the original application last year, having been 'slipped under the net', was granted permission. It gave the go-ahead to the desecration of a large portion of natural habitat before permission had been sought, yet alone granted, for the project that precipitated that application. It was, and remains, a scandal.*

4.4.1 *This hybrid variation application has done nothing to alleviate the destruction of Coronation Wood and, still to some extent, the threat to Pill Box Field, extant from the original application. Quite how East Suffolk Council can square this situation with their own declared policies regarding the conservation of the environment is difficult, if not impossible, to comprehend. The comment by one of ESC's senior officers that Coronation Wood is in poor condition and "not worth saving" is in itself a damning indictment of ESC's duplicity in this regard. Even unkempt woodland is a haven for wildlife and deserves protection.*

4.4.2 *Whatever EDF (or any of its several names it now utilises for the SZC project) chooses to do strictly within the bounds of its own current B plant perimeter and the old A site is of little consequence to its surroundings, provided it meets the law and planning regulations. But there has never been any justification for giving permission for the despoiling of natural areas outside those boundaries until an unequivocal go-ahead is given for SZC to proceed, and only then if it is absolutely necessary.*

4.4.3 *Appended below are some of the still relevant aspects raised by our objection to the original planning application.*

4.4.4 *Summary: The application(s) should only have been considered as part of the Sizewell C Development Consent Order (DCO) procedure, and not decided by the District Council as Local Planning Authority, for the following reasons, which we expand upon below:*

- *The primary purpose for relocating Sizewell B facilities is to make space for*

Sizewell C. It would be wrong to approve such a destructive development when the DCO request for Sizewell C has not been approved, and when the National Policy Statement on site selection for new nuclear reactors is under review.

- *The cumulative impact of this proposal and other energy-related infrastructure in the area is expected to be considerable, with an enormous adverse impact on the AONB, natural history, the visitor economy, local communities and the traffic and transport infrastructure. It was and is totally incorrect to exclude this part of the project from the NSIP / DCO process. EDF included it in its Stage 3 Consultation and by inference we would expect it to be included in its DCO application. This is the appropriate course of action and this separate application to the LPA is not justifiable.*

The Sizewell B development proposals should only have been considered as part of the DCO procedure for Sizewell C.

- 4.4.5 *Part 4 of the National Policy Statement EN-6 dated July 2011 identified Sizewell as a site potentially suitable for the deployment of a new nuclear power station before the end of 2025. EN-6 also considers that a single power station would be expected to require approximately 30 hectares of available land. Currently the SZC proposal for two reactors is based on a mere 32 hectare plot, even after the Sizewell B facilities have been moved. The proposed development is simply too big for the designated space.*
- 4.4.6 *In December 2017 the Government published a Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a National Policy Statement for Nuclear Power between 2026-2035. This begins the process towards designating a new National Policy Statement (“the new NPS”) applicable to nuclear plants expected to be deployed after 2025. This consultation must include Sizewell C because the power station, should it receive development consent, will not be commissioned before the end of 2025.*
- 4.4.7 *It is not appropriate for the proposed redevelopment of Sizewell B infrastructure to be considered by the Local Planning Authority (East Suffolk Council). The construction of Sizewell C, in its presently proposed dual reactor configuration, is clearly dependent on the completion of the currently proposed Sizewell B development and has significant planning implications - environment, traffic, damage to the visitor economy and the AONB. This application should therefore await the DCO process for Sizewell C, should Sizewell remain a ‘potential’ site following the Government’s review of nuclear policy.*
- 4.4.8 *Moreover, 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. Therefore, 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 when the new legislation has been approved by parliament.*

Impact on the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and on the visitor economy.

4.4.9 *We object to the application because the proposed development will result in the loss of further natural landscape and habitat and impact on the AONB, including the loss of Coronation Wood and possibly the Pillbox Field near to Sizewell village; both are significant elements of the local landscape AONB already hugely scarred by the Sizewell nuclear facility.*

4.4.10 *EDF admits in its application that the initial loss of Coronation Wood impact would be of 'high magnitude' and that it would have a significant effect at the local level. Suffolk Wildlife Trust remains concerned about the loss of Coronation Wood and the impacts on an area of grassland in Pillbox Field, and also an area of species-rich marshy grassland located between two sections of the Sizewell Marshes SSSI.*

Conclusion:

4.4.11 *As you know, we like many others in and around Sizewell object strongly to the proposed development. But until recently we believed the application would be subject to due process through the DCO inquiry. It is outrageous that East Suffolk should take it upon itself to anticipate the decision of the Secretary of State without any justification in the recently approved local plan".*

4.5 Kelsale-cum-Carlton Parish Council: *OBJECTS to the application stating: "The Parish Council strongly object to this application as it is making space for Sizewell C which the Parish Council are objecting to. Also, the cumulative impact, economic impact and sustainability, flooding and drainage, overbearing nature of the proposal, Government planning policy, Local planning policy, loss of ecological habitats, loss of trees, noise disturbance from the scheme, and the site history and previous decisions".*

Statutory Consultees

4.6 Environment Agency: *DO NOT OBJECT to the application, stating "Thank you for your consultation dated 19 November 2020. We have reviewed the application as submitted and have no objections.*

Flood Risk

4.6.1 *We have no objection to this planning application on flood risk grounds, providing that you have taken into account the flood risk considerations which are your responsibility. We have highlighted these in the flood risk section below.*

- 4.6.2 *Our maps show the site lies within fluvial & tidal Flood Zones 1, 2 and 3a, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a low, medium and high probability of flooding respectively. The proposal is for the relocation of a number of existing facilities ancillary to the operation of the Sizewell B Power Station. This will involve the construction of replacement facilities at Sizewell B followed by demolition of the existing facilities in order to release land for Sizewell C.*
- 4.6.3 *The majority of this work has been sequentially sited and is located in Flood Zone 1. However, the areas known as 'Field 2' and 'Pillbox Field' fall within Flood Zone 3a. Field 2 will be used to stockpile material and Pillbox Field will be used for a landscaping scheme.*
- 4.6.4 *According to Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance (PPG) Sizewell B power station is classified as 'essential infrastructure'. However, section 5.1.6 of the submitted Flood Risk Assessment (FRA) states that the proposed development should be considered as 'less vulnerable', as this application does not include work to the electricity generating element of the site.*
- 4.6.5 *To comply with national policy the application is required to pass the Sequential Test and be supported by a site-specific FRA. To assist you in making an informed decision about the flood risk affecting this site, the key points to note from the submitted FRA, located in Appendix 14.1 of the Sizewell B Relocated Facilities Environmental Statement, dated November 2020 are:*

Actual Risk

- *The site is at fluvial and tidal risk according to our flood maps. The Pillbox Field and Field 2 lie outside the flood extent for the fluvial 1% (1 in 100) annual probability event, including an allowance for climate change.*
- *Both the Pillbox Field and Field 2 are at risk in the tidal 0.5% (1 in 200) annual probability event including an allowance for climate change without defences being considered (undefended). Having said this the site does benefit from the presence of tidal sea defences. The defences protect the sites up to the 0.5% (1 in 200) annual probability flood level. The defences are overtopped in this event when climate change is considered but 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.*

Residual Risk

- *Although the sites are not at actual risk there is still a residual risk of a failure of the flood defence mechanism, in this case, a breach of the sea defences. Section 6 of the FRA explores the residual risk of a breach using the Environment Agency's Essex Norfolk and Suffolk Coastal Flood Modelling for the Leiston area dated 2018, breach modelling undertaken as part of the Sizewell C project, and as a worst-case scenario also refers to the Environment Agency's undefended flood levels in tables 4.1 for the present-day risk and table 5.2 with 100 years of climate change.*
- *The Environment Agency breach modelling shows that Pillbox Field and Field 2 could experience breach flood depths of up to 0.3m during the current day 0.5% (1 in 200) annual probability breach flood event and up to 1m during the current day 0.1% (1 in 1000) annual probability breach flood event.*
- *This equates to a low flood hazard rating in the current day 0.5% (1 in 200) annual probability flood event and a hazard rating of danger for most including the general public in the extreme 0.1% annual probability breach flood.*
- *When climate change is taken into account over 100 years the Pillbox Field and Field 2 could experience breach flood depths of up to 2m during the 0.5% (1 in 200) annual probability breach flood event including an allowance for climate change. In the 0.1% (1 in 1000) annual probability breach flood event including climate change flood depths could reach up to 3m.*
- *This equates to a flood hazard rating of danger for all including the emergency services in the 0.5% (1 in 200) and 0.1% (1 in 1000) annual probability flood events including climate change.*
- *As the proposed works on Pillbox field consists of landscaping, which involves no land raising, built development, or occupants, then this will have no offsite adverse impacts and can be considered a water compatible development, so there are no flood risk concerns.*
- *For Field 2, the application proposes to stockpile material which would raise ground levels by approximately 0.8m. It is understood that the stockpile will be in place temporarily until 2055, however should Sizewell C not go ahead an alternate end state is possible where the land is raised permanently. This is considered in section 6.2 of the FRA.*

- *Field 2 is not at actual risk of flooding but floods to depths of up to 2m in the design 0.5% (1 in 200) annual probability residual risk breach event including an allowance for climate change. Raising ground levels permanently has the potential to displace this flood risk elsewhere. The FRA has calculated the loss of storage volume in a breach as a result of permanently raising levels across the whole site by 0.8m. This volume has been applied across the remaining breach flood extent to determine the potential worst-case change in flood level. Levels are shown to increase by 3mm as detailed in Table 6.2 of the FRA. In a breach flood the surrounding area is already flooded to significant depths of between 1.5m to 3m so a change of 3mm is unlikely to have a significant impact on flood risk elsewhere.*
- *Our flood maps show that existing access road is at risk from reservoir flooding from 'Sizewell Walks' reservoir. This is discussed in section 6.3.6 of the FRA which states that flood depths would be small, less than 0.3m. Assuming a velocity of 0.5 m/s this equates to a very low hazard rating. Please refer to the Reservoir flood risk section below for further advice.*
- *This proposal does not have a safe means of access in the event of flooding from the sites to an area wholly outside the floodplain up to a 0.5% (1 in 200) annual probability breach flood event including an allowance for climate change, however nor does the existing development.*
- *We have no objections to the proposed development on flood risk access safety grounds because section 6.3.8 of the FRA states that "the existing Sizewell B Emergency Plan will be reviewed and updated, where appropriate, to reflect the revised layout associated with the relocated facilities", and that "this will include a review of the existing emergency procedures related to flood risk and access / egress from the site during an extreme event, should there be a breach in the existing defences". This is necessary to ensure the safety of the development in the absence of safe access with flooding on the sites in the event of a breach flood. You should determine the adequacy of any Emergency Flood Plan to ensure the safety of the site users.*

Safety of Inhabitants – Emergency Flood Plan

- 4.6.6 *The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered*

by our flood warning network.

- 4.6.7 *The Planning Practice Guidance to the National Planning Policy Framework states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.*
- 4.6.8 *In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your Emergency Planners and the Emergency Services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).*
- 4.6.9 *We have considered the findings of the FRA in relation to the likely duration, depths, velocities and flood hazard rating against the design flood event for the development proposals. This indicates that there will be a maximum hazard of danger to all (e.g., there will be danger of loss of life for the general public) on Field 2 and part of the Pillbox Field as discussed above. This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your Emergency Planners and the Emergency Services on the evacuation proposals.*
- 4.6.10 *If you would like to seek further advice on the emergency planning implications of this proposal please pass the application to the Suffolk Resilience Forum Partnership Manager, who will ensure that it is discussed at the next SRF meeting.*

Reservoir Flooding

- 4.6.11 *Reservoir flooding is extremely unlikely to happen providing the reservoir is appropriately managed and maintained. All large, raised reservoirs designated as 'highrisk' and those where the risk is still to be determined must be inspected and supervised by reservoir panel engineers. The Environment Agency are the enforcement authority for the Reservoirs Act 1975 and under this Act it is a requirement that reservoirs are inspected regularly, and essential safety work is carried out.*
- 4.6.12 *However, the failure of a reservoir has the potential to cause catastrophic damage due to the sudden release of large volumes of water with little or no warning. The local planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir.*
- 4.6.13 *The Planning Practice Guidance states that local planning authorities are advised to*

consult with their emergency planning officers as early as possible regarding any planning applications which have implications for emergency planning. Where issues affecting emergency services are identified it may be relevant to contact the local resilience forum which prepare for local incidents and catastrophic emergencies. Or in some cases, it may be appropriate for the local planning authority to consult the emergency services on specific emergency planning issues related to new developments. Local planning authorities are also advised to consult with the owners/operators of raised reservoirs, to establish constraints upon safe development.

Sequential Test / and Exception Tests

- 4.6.14 *The requirement to apply the Sequential Test is set out in Paragraph 158 of the National Planning Policy Framework. The Exception Test is set out in paragraph 160. These tests are your responsibility and should be completed before the application is determined. Additional guidance is also provided on Defra's website and in the Planning Practice Guidance.*

Other Sources of Flooding

- 4.6.15 *In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.*

Informative - Flood Risk Activity Permit

- 4.6.16 *Under the Environmental Permitting Regulations 2016 for England and Wales you may need an environmental permit for flood risk activities if you want to undertake work in, under, over or within 8 metres of a fluvial main river, flood defence structure or culvert or within 16m of a tidal main river, flood defence structure or culvert. Works beyond 8 or 16 m within the Flood Zone may also require a permit. This is set out in the flood risk activity meaning below. Please note an allowed activity is an activity which has been granted planning permission.*

(g) Any activity (other than an allowed activity) on a flood plain that is-

(i) more than 8 metres from a non-tidal main river or more than 16 metres from a tidal main river, or

(ii) more than 8 metres from any flood defence structure or culvert on a non-tidal main river or more than 16 metres from any flood defence structure or culvert on a tidal main river;

which is likely to divert or obstruct floodwaters, to damage any river control works or to affect drainage.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Pollution Prevention

- 4.6.17 *Given the potential for polluting substances to be stored on the Outage Laydown Area consideration should be given to a valve or penstock in the surface water system that serves this area. In the event of a spillage this would provide a valuable last line of defence in preventing a pollution incident and enabling containment and retrieval of the spillage.*

Groundwater and Contaminated Land

- 4.6.18 *In terms of the submitted Environmental Statement, we have the following comments:*

Chapter 12 - It is not conclusive in this document if further investigation and/or risk assessment is to be carried out at detailed design stage. It should be expected that an overall risk assessment and where data gaps remain, further investigation should be carried out, given the contamination already identified from past investigations.

Chapter 13 - 13.5.8 - please also ensure soakaways are no deeper than 2m, and minimum distance to peak seasonal groundwater is 1.2m.

Chapter 14 - Soakaways are mentioned but no other pollution prevention measures are included except trap gulleys and oil-water interceptors. As per section 13 please include references to designing SuDS in accordance with CIRIA C753. Infiltration features should be no deeper than 2.0m and have a minimum unsaturated zone of 1.2m from peak seasonal groundwater levels.

Radioactive Substances Regulation

- 4.6.19 *With respect to the existing permits for Sizewell B (XB3539DH for nuclear RSR and EP3634LR conventional combustion permits) and Sizewell A (ZP3193SW for nuclear RSR), we have no major permitting concerns”.*

- 4.7 Historic England: *NO OBJECTION to the application, stating “We offer the following advice to assist your authority in determining the application.*

- 4.7.1 *This is a hybrid application seeking outline planning permission, with all matters reserved, for up to 9,500 square metres Gross External Area (GEA) to provide administration, storage, welfare and canteen facilities and a visitor centre. Detailed planning permission is also sought for demolition of some existing structures and redevelopment to include a training centre and interim visitor centre, an outage store, lay down area, car and cycle parking, landscaping, and associated infrastructure. The applications in short, seek relocation of Sizewell B facilities from the north of the site the south and west.*
- 4.7.2 *We have previously commented on the EIA scoping application DC/20/2412/SCO from July 2020 (See ref PL00705482) and have noted that proposed layout plan in this application varies slightly from that produced for the EIA Scoping Report. We also commented on a previous planning application in May 2019 for a similar scheme (Our Ref P01067730).*
- 4.7.3 *We note that the applicant has included an updated ES (dated November 2020) and that this includes a Historic Environment chapter. Our correspondence in relation to previous stages and applications is referenced in the ES and our comments have been noted and taken into consideration.*
- 4.7.4 *The applicant has also confirmed that ‘...historic buildings recorded will be undertaken as mitigation of loss of structures of historic and architectural interest.’ As discussed in previous letters we have become aware of the potential importance of these 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. We therefore fully support this approach.*
- 4.7.5 *We also note that the applicant’s proposal to mitigation for non-designated heritage assets is also set out in the ES and we confirm we do not have any further comment in that regard.*
- 4.7.6 *If your authority is minded to grant permission we recommend the proposed mitigation is supported by appropriately worded conditions to support the archaeological mitigation and the building recording work. We would however defer to your archaeological advisers in that regard.*

Recommendation

- 4.7.7 *Historic England has no objection to the application on heritage grounds. It is not necessary for us to be consulted on this application again unless there are material changes to the proposals. If you would like further detailed advice from us, please let*

me know”.

4.8 Natural England: NO OBJECTION to the application, stating “*Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.*”

4.8.1 *SUMMARY OF NATURAL ENGLAND’S ADVICE: NO OBJECTION.*

4.8.2 *Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation.*

4.8.3 *Natural England’s generic advice on other natural environment issues is set out at Annex A.*

European sites

4.8.4 *Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.*

Sites of Special Scientific Interest

4.8.5 *Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.*

Protected Landscapes – Suffolk Coast and Heaths AONB

4.8.6 *The proposed development is for a site within or close to a nationally designated landscape namely Suffolk Coast and Heaths AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.*

4.8.7 *Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the ‘landscape and scenic beauty’ of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.*

4.8.8 *Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.*

4.8.9 *We also advise that you consult the relevant AONB Partnership or Conservation Board.*

Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

- 4.8.10 *The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.*

Other advice

- 4.8.11 *Further to the advice given by Natural England on the previous proposed application (your ref: DC/19/1637/FUL 1, our refs: 280941, 290446 and 298737, dated 24th June 2019, 19th August 2019 and 28th October 2019 respectively), we very much welcome the commitment by the developer to "avoid the construction of an outage car park in Pillbox Field, with only landscape works provided within the field instead"; this avoids development on previously undeveloped land within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) outside the main power station cluster. We welcome that this also negates the need for a previously proposed pedestrian footpath between Pillbox Field and the Coronation Wood development area with footbridges over the Sizewell Drain which, as previously advised, presented risks to Sizewell Marshes Site of Special Scientific Interest (SSSI). Furthermore, we welcome that the height of the training centre has been reduced from three storeys to two storeys to reduce the visual impact of the building within the AONB.*

- 4.8.12 *With regards those elements of the proposals which have been carried forward into this application (i.e. the Coronation Wood Development Area, Outage Store and 'Outline Development Zone') in addition to the new application elements (i.e. the former Sizewell A land) and the risks these present to internationally and nationally designated sites, our advice is as follows:*

- We reiterate the advice given in the aforementioned responses (in particular see sections i), namely that the measures proposed by the developer within the Outline CEMP, Drainage Strategy, Lighting Strategy (and summarised in the 'Summary of mitigation' document) to avoid/mitigate potential impacts arising from dust, noise, light and visual pollution, airborne pollution, waterborne pollution and hydrological and hydrogeological changes should be secured via planning condition.*
- We also reiterate the advice given in those responses with regards protected*

landscapes and protected species.

Sites of Special Scientific Interest Impact Risk Zones

- 4.8.13 *The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.*
- 4.8.14 *Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.*
- 4.8.15 *We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.*
- 4.8.16 *For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk” .*
- 4.9 Suffolk County Council - Archaeological Service: DO NOT OBJECT to the application stating *“The proposed works are situated in areas of known archaeology and of archaeological potential, recorded on the County Historic Environment Record. Archaeological evaluation of Pillbox field has defined archaeological remains of medieval date (LCS 199) and as a result there is high potential for additional archaeological remains to survive within this area. Within Coronation Wood, although an earthwork survey has not defined any previously unrecorded earthwork features, there is potential for below ground archaeological remains as multi-period archaeological finds and features are recorded in the vicinity (e.g. LCS 073). As a result, there is high potential for the discovery of 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 *It adds “There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 199), 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”.*
- 4.9.2 *In this case the following two conditions would be appropriate:*
- 1. No development shall take place within the area indicated [the whole site] 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. g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building 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 1 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 SP 15 of Suffolk Coastal District Council Core Strategy Development Plan Document (2013) and the National Planning Policy Framework (2012).

INFORMATIVE: The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

4.9.3 The response goes on to state *“I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Suffolk Coastal District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological works required in association with this development”*.

4.9.4 *‘In this case, although groundworks are no longer planned in the area of defined archaeology within Pillbox field, a management plan setting out how these remains will be preserved in situ is required, including how the archaeology will be protected from disturbance during planned landscaping works in this field. In Coronation Wood, a trial trenched evaluation is required, after tree felling but prior to de-stumping, in order to establish the below ground archaeological potential of the site. Decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation’*.

4.10 Suffolk County Council – Flood and Water Management: DO NOT OBJECT to the application, stating *“Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/4646/FUL. We have reviewed the submitted documents and we recommend approval of this application subject to conditions:*

1. *No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority.*

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained.

2. *No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.*

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. *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.

4. No development shall commence 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".

4.11 Suffolk County Council - Highway Authority and Rights of Way: DOES NOT RECOMMEND REFUSAL SUBJECT TO INCLUSION OF CONDITIONS, stating "*Suffolk County Council as the Local Highway Authority does not recommend refusal of this application subject to inclusion of the proposed conditions below. We make the following comments:*

Environmental Statement (ES): Chapter 10 Transport and Transport Statement

4.11.1 *As stated in table 10.1 of the ES the highway authority accepts that monitoring traffic flows during the current pandemic would not provide reliable information and therefore accepts the use of historic traffic data, with a suitable growth factor, for use in the assessment.*

4.11.2 *The major significant change from the previous planning application (DC/19/1637/FUL) is relocation of the outage parking area from Pillbox Field to within the existing Sizewell site. The authority accepts that this change does not have a significant impact on the highway network. There is a minor benefit by removing the need for a new junction into Pillbox Field that would have impacts on safe use of BW19. However, with the additional construction traffic the authority maintains that a safer crossing point should be provided for users of BW to safely cross Sizewell Gap is necessary due to the increase in traffic during construction.*

4.11.3 *The traffic movements detailed in ES table 10.10 and table 10.11 are not considered to create severe impact that would lead to the Highway Authority recommending refusal of this application on transport grounds.*

Cumulative Impact

4.11.4 *While recognising that the cumulative impacts of Sizewell B relocation and SPR EA1(N) and EA2 south traffic would not have a severe impact in terms of traffic using Sizewell Gap the Highway Authority would advise both parties to co-ordinate the projects to avoid imposition of traffic management creating un-necessary works during construction of either projects. The authority will be mindful of this when issuing permits under its powers conferred by the New Roads and Streetworks Act.*

Construction Traffic Management Plan and Construction Workforce Travel Plan

4.11.5 *As the Highway Authority we would ask that the Local Planning Authority places a planning condition on any permission granted requiring the CTMP and CWTP to be approved in writing by the Planning Authority in consultation with the Highways Authority and based on the outline details in 10.5 of Chapter 10 of the Environmental Statement and chapter 10 of the Transport Statement.*

Recommended Highway Conditions

4.11.6 *Condition: Before the development hereby permitted is commenced a Construction Transport Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. The CTMP shall include measures to control mud and water entering the public highway. Construction of the development shall not be carried out other than in accordance with the approved plan.*

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.

4.11.7 *Condition: Before the development hereby permitted is commenced a Construction Workers Travel Plan shall have been submitted to and approved in writing by the Local*

Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.

Reason: To reduce traffic impacts on the public highway and promote sustainable transport options.

- 4.11.8 *Condition: No other part of the development hereby permitted shall be occupied or used for construction until details of a safe crossing point of Sizewell Gap at the junction with Sandy Lane has been agreed in writing with the Local Planning Authority in consultation with the Local Highway Authority.*

Reason: In the interest of highway safety to ensure that pedestrians, cyclist and horse riders can safely cross Sizewell Gap”.

- 4.12 Suffolk Local Access Forum (SLAF): No response to consultation received. Previously SLAF raised an objection to the proposal due to the impact on Bridleway 19 (DC/19/1637/FUL). This current proposal does not directly impact on Bridleway 19. Strategic Planning Committee will be updated should a formal response be received from SLAF.

- 4.13 East Suffolk Council Economic Development: SUPPORT the application, stating “*The Economic Development team seeks to support those planning applications where the application clearly supports the economic growth and regeneration of the economy within East Suffolk. We seek to comment on non-residential floor space (increase/decrease), commercial demand, jobs (created, lost or sustained) and strategic fit.*

- 4.13.1 *The Economic Development team support the following application on the basis that it supports the following identified priorities and aims of the East Suffolk Economic Growth Plan (ESEGP) 2018-2023:*

- *The ESEGP identifies that the energy sector is crucial for East Suffolk’s economy and offers significant opportunities. It specifically identifies nuclear power as having huge possibilities.*
- *The energy sector is identified as one of 7 key sectors that bring opportunities and potential to East Suffolk.*
- *Attracting investment to East Suffolk, focused around existing and emerging*

sectors and supply chains is seen as a main priority for the district.

- *The ESEGP identifies Sizewell as a major economic asset of national significance with huge possibilities surrounding nuclear power which can bring significant economic benefits to East Suffolk.*
- *The ESEGP recognises Investment linked to Sizewell B should deliver substantial economic benefits.*
- *The ESEGP identifies that support should be given to proposed investment in Sizewell developments if it is linked to clear economic development outcomes in respect of supply chains, inward investment opportunities and issues relating to employment and skills.*
- *The ESEGP states that support should be given to the operations of Sizewell B, particularly in relation to labour market and skills.*
- *The skills profile continues to be weak in parts of the district and there is limited higher education provision and – although only one factor among many – retaining talented young people is difficult. The ESEGP recognises the importance of encouraging appropriate forms of skills and workforce development so that businesses/key sectors can find the skills they need, and people from East Suffolk are equipped for the jobs those businesses generate.*
- *Making connections between young people and local employers, particularly in the key sectors is seen as a priority for workforce development.*

4.13.2 *Given the pace of planned housing growth, it is important that East Suffolk continues to generate new jobs”.*

4.14 Suffolk Joint Emergency Planning Unit: These comments have been transposed from the previous application (DC/19/1637/FUL) any change to these comments will be updated to Strategic Planning Committee verbally. 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.

- 4.15 East Suffolk Drainage Board: provided the following comments “*The site is partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board’s Byelaws apply. A copy of the Board’s Byelaws can be accessed on our website (https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf). These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.*
- 4.15.1 *In order to avoid conflict between the planning process and the Board’s regulatory regime and consenting process, we would like to make you aware of the following points that may be relevant to certain sites as part of their development: please be aware of the following:*
- *If a surface water discharge is proposed to a watercourse from a development, then consent is required in line with the Board’s byelaws (specifically byelaw 3). Any consent granted would likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board’s charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).*
 - *If a treated foul water discharge is proposed to a watercourse from a development this proposal would require land drainage consent in line with the Board’s byelaws (specifically byelaw 3).*
 - *If there was a Board Adopted watercourse within or adjacent to a site boundary and works are proposed within 9 metres of this watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure). In addition, if works were proposed to alter a Board Adopted watercourse, consent would also be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).*
 - *If there was a watercourse which has not been adopted by the Board (a riparian watercourse) within or adjacent to a site boundary and works were proposed to alter this watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).*
- 4.15.2 *Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a*

planning permission may be dependent on the granting of these consents. As such, we strongly recommend that any required consent is sought prior to determination of a planning application”.

- 4.16 East Suffolk Council Environmental Protection: *“Noise and Vibration: No objections to the development with regard to noise or vibration. 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.*
- 4.16.1 *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.*
- 4.16.2 *Operational noise and vibration: it is not anticipated that any operational noise or vibration will impact any residential property. Recommend conditions.*
- 4.16.3 *Air quality: the applicant has addressed East Suffolk Council’s comments on potential significant impacts from the Scoping Option and consultation phase within the final Environmental Statement. Consequently, this has pre-empted any shortcomings in the assessment and there are no major air quality issues identified within the submission. It is recommended that the commitment to Euro VI construction vehicles and construction dust nuisance are secured through a planning condition if further enforcement is required beyond adoption in the Construction Environmental Management Plan. Potential amendment to the construction dust mitigation measures include; specify that the silt fence height should be equal to or higher than the stockpile height to minimise airborne dust erosion and encourage the use of electric generators in place of diesel where possible.*
- 4.16.4 *I would appreciate it if you could consider their recommendations, implement the suggested conditions if required, and encourage amendment to the construction dust mitigation measures”.*
- 4.17 Office for Nuclear Regulations (ONR): *have provided the following comments “I have consulted with the emergency planners within Suffolk County Council, which is responsible for the preparation of the Sizewell off-site emergency plan required by the*

Radiation Emergency Preparedness and Public Information Regulations (REPPiR) 2019.

- 4.17.1 *ONR support the recommendations of the Emergency planner at Suffolk County Council with the following suggested amendment.*
- 4.17.2 *Point 1 - no part of the construction works shall commence until emergency plans relating to that part of the works have been agreed and issued.*
- 4.17.3 *This project has the potential to proceed in stages. As written, it might be interpreted as meaning plans for later stages need to be in place before earlier stages start”.*

Non-Statutory Consultees

- 4.18 Suffolk Coast and Heaths Area of Outstanding Natural Beauty: *“Thank you for consulting the AONB team on the above hybrid planning application. Following a review of the documents we have the following comments to make. For the avoidance of any doubt, this response is sent by the AONB staff team and not endorsed by the AONB partnership, as we have not had the capacity to engage the AONB partnership.*
- 4.18.1 *As part of the application, permission is being sought for the relocation of a new training facility, an administration centre, a new visitor centre, an operational car park, outage carpark and new western access road in the Coronation Wood Development Area (CWDA) . To facilitate this, the proposal requires the felling of Coronation Wood. The AONB team has previously raised concerns about the loss of Coronation Wood and the associated potential landscape and visual impacts on the neighbouring Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). These concerns remain valid.*
- 4.18.2 *The AONB team acknowledge and welcome the various design principles that have been incorporated into the proposals for a number of the relocated buildings i.e. Outage Store, and training facility, in terms of the siting, orientation, materials, colour selection of finishes, fenestration and lighting (external and internal). The AONB team acknowledge that these combined measures have the potential to help mitigate the visual and landscape impacts on the AONB) although negative impacts to the defined landscape quality and character of the AONB remain. The AONB team recommend that the measures integrated into the design of the Training Facility are conditioned if the LPA is mindful to approve this application.*
- 4.18.3 *The AONB team also recommend that all the same design principles are applied and integrated to those buildings where outline planning permission is being sought i.e. Outline Development Zone, the Visitor Centre and the Administration Centre in the Coronation Wood Development Area. This will be particularly important for the Outline Development Zone given its scale, and because the buildings in the Coronation Wood Development Area are likely to be visible from land to the west of the AONB e.g. Bridleway 19, Sandy Lane.*

- 4.18.4 *Coronation Wood, which comprises a mix of broadleaf and conifer trees provides useful screening year-round as recognised in paragraph 3.5.12 of the Environmental Statement. As shown in drawing 100085 the development of the Coronation Wood Development Area involves the felling and clearance of Coronation Wood and some standard trees along the western site boundary, with the resultant loss of valuable screening.*
- 4.18.5 *The AONB team does not consider that the landscape proposals in drawing 100083 sufficiently mitigates the loss of Coronation Wood, the screening function it provides or impacts on the character of the AONB at this location. Drawing 100083 proposes tree planting on the eastern and southern edges of Pillbox Field as mitigation for the loss of Coronation Wood. Drawing 100083 also proposes the retention of woodland and hedges outside and to the west of the Sizewell B complex. Moving into the Sizewell B complex, planting will be supplemented with scrub planting merging into grassland on the edge of the proposed western access road.*
- 4.18.6 *It is acknowledged that planting in Pillbox Field will provide some screening from the south, as proposed however, the landscape mitigation measures will not effectively screen the proposed training centre, the administration building, or buildings in the Outline Development Area which are 20m high from western views e.g. Bridleway 19, Sandy Lane and Sizewell Gap. The degree of visibility is compounded by topographical variations across the site which range from 5m at the base of the escarpment to the west beyond the Sizewell B complex to approximately 9m in Pillbox Field and Coronation Wood which sits around the 10m contour.*
- 4.18.7 *The removal of Coronation Wood will open up views of the Administrative building and buildings in the Outline Development Area as illustrated in Figures 7.8.6, 7.8.8 and 7.10.1 of the LVIA. Further mitigation planting is needed to address this.*
- 4.18.8 *The application states that the relocated operational car park (579 spaces), new western access road running along the western boundary of the car park and outage layout area all require lighting. Lighting of this nature has the potential to cause harm to the defined qualities of the AONB, e.g. tranquility and landscape quality. While careful consideration has been given to the lighting approach across these parts of the development, the lack of adequate mitigation planting on the west of the site means that there will be residual impacts lighting associated with the delivery of these buildings and facilities. This is confirmed in the LVIA in the assessment of impacts on the natural beauty and special qualities of the AONB.*
- 4.18.9 *Paragraph 7.9.1 of Chapter 3 of the Environmental Statement states that mitigation planting will be delivered to the north of the Sizewell B complex if the Development Consent application for Sizewell C is not successful. This is not considered appropriate as mitigation for the loss of Coronation Wood. Further mitigation planting is needed to address this. Furthermore, it is understood by the AONB team that Coronation Wood*

has cultural associations that cannot be replaced by a newly planted woodland”.

- 4.19 Suffolk Preservation Society: provided the following comments *“I am writing on behalf of the Suffolk Preservation Society (SPS) in response to the revised application for the rationalisation and reconfiguration of facilities at Sizewell B as part of the delivery of Sizewell C.*
- 4.19.1 *The SPS continues to argue that this application is premature and should not be considered in isolation but should form part of the DCO application for Sizewell C. These proposals form a fundamental part of the EDF estate’s long-term proposals for Sizewell. Accordingly, the rationalisation and reconfiguration that is necessary to facilitate Sizewell C means that SPS considers that this application should form part of the DCO process and not be treated as a standalone matter.*
- 4.19.2 *However, SPS acknowledges the recent unsuccessful judicial review of the council’s decision to approve the previous application ref: 19/1637/FUL. While we regret the loss of Coronation Wood, we welcome the amendment to EDF’s proposals which no longer propose to locate an outage car park on Pill Box Field, but rather to retain it as an undeveloped site and provide additional landscaping to enhance its landscape and biodiversity value. Accordingly, SPS will restrict its comments to the landscape and visual impacts of the current application to develop the former Coronation Wood upon the special qualities of the Suffolk Coast and Heaths AONB.*
- The Proposals*
- 4.19.3 *Having reviewed the documents, the Society is concerned that the loss of Coronation Wood to accommodate the relocated facilities has not been adequately mitigated. Figure 3.2 and 3.4 Development Area Landscape Plan within chapter 3 of the Environmental Statement shows a combination of retained deciduous woodland and hedgerow, proposed woodland edge planting and grass mix on the western boundary, adjoining the Sizewell Marshes SSSI.*
- 4.19.4 *The SPS considers that this will be inadequate to screen, soften or provide filtered views of the proposed development. The topography of the site is relevant in this regard as the lowest part of the escarpment to the west of the proposed development area is 5m while the height of Coronation Wood is shown as 10m. The datum levels across the development area varies averages between 7- 8 metres. Therefore, it is reasonable to conclude that there will be glimpsed views of the car park as well as the Administrative Building (20m in height) and Training Facility (10m in height) by receptors to the west from Sandy Lane bridleway. Significant landscape scale planting in the form of blocks of additional woodland must therefore be provided.*
- 4.19.5 *Furthermore, the extensive illumination of the car park, including reflection off metallic surfaces of the facing materials of the Administrative Building and Training Facility, together with substantial hard landscaped areas of car parking will cumulatively result*

in a harmful impact upon the special qualities of the AONB. The loss of the evergreen Coronation Wood and replacement by modest levels of deciduous and largely small-scale planting will not adequately mitigate the landscape and visual impacts of the proposed large structures. The SPS considers that this is a serious omission and calls for materially increased levels of planting within the car park and at the boundaries of the western access road in order to soften the industrialising effects in this designated landscape.

4.19.6 *Finally, we note that the applicant argues that the proposed landscape planting at Pill Box Field will mitigate for the loss of Coronation Wood (LVIA chapter, para. 7.6.33). However, this is considered to be illogical and the SPS does not accept that the proposed planting to the south of the Sizewell Power Plant can mitigate the loss of screening from the west for the reasons set out Above.*

4.19.7 *In conclusion, the SPS calls for a significant increase in planting to both the western edge of the car park, together with planting within the car park to provide filter the views, which will provide enhanced screening as well as biodiversity net gain”.*

4.20 Suffolk Wildlife Trust: OBJECT to the application, stating “Thank you for sending us details of this application, we have the following comments relating to the accompanying Environmental Statement:

4.20.1 *Timing of proposed development - This planning application seeks to bring forward the proposed relocation of the Sizewell B facilities ahead of the permission being granted for the proposed Sizewell C power station, in order for the works to be undertaken ahead of the proposed Sizewell C development start date. We are particularly concerned that this application should not be considered separately due to the uncertainty relating to the timing and determination of the Sizewell C application. Consequently, the ecological impacts arising from implementing the facilities relocation will be incurred unnecessarily if the application is not progressed as planned. If consented, this work would happen regardless of whether Sizewell C were to proceed, we would consider that there is a potential for significant ecological loss, with the possibility of no development at Sizewell C taking place.*

4.20.2 *Sizewell Marshes SSSI - We note and welcome that it is stated within Chapter 6: 6.5.6 that the design of the western façade of the training centre is without windows to avoid light spill onto the western boundary and SSSI. As the designs for the administration building and visitor centre are subject to reserved matters, it is imperative that this measure is replicated within those designs to minimise disturbance to the SSSI.*

4.20.3 *Coronation Wood - The proposed development involves the felling of Coronation Wood, a mixed plantation woodland which has been in existence for approximately 100 years. The wood contributes to the wider ecological network through its value as*

part of the green corridor along the western side of the Sizewell A and B stations and the screening that it provides between the Sizewell Marshes SSSI and the built development of the power station. Although additional woodland screen planting is proposed on retained habitats west of Coronation Wood, as well as additional woodland and scrub planting at Pillbox field, this will take years to mature. In addition, it is stated in Chapter 6: 6.5.6 that proposed buildings will 'as far as practicable', be kept below retained tree lines on the western boundary, to help screen and minimise light intrusion. In an earlier paragraph in the same section it is stated that the lux levels spilling on to the Sizewell Marshes SSSI is to be below 0.5 Lux at maximum output. However, until the proposed screening matures the glow of these brightly lit areas will still be extremely obvious from the SSSI and so further mitigation measures are required to ensure there is no disturbance from light spillage.

- 4.20.4 *Bats - We are also concerned about the impacts upon bat foraging routes, particularly due to the loss of Coronation Wood. This would be further compounded once construction of the Sizewell C development commences. Although it is stated that there was low bat activity in this area, apart from soprano and common pipistrelle bats, this conclusion appears to be derived from surveys dating from 2015. Whilst static/automated activity surveys were used in 2020, it appears that in Figure 6.11 of Technical Appendix 6.1 only one location in the south east corner of the wood was used, so we are concerned that this not providing comprehensive coverage of the habitat. Consequently, we do not have confidence that the impacts upon bats are fully considered. To avoid conflict with the legislation protecting bats, no works should be carried out on the woodland until a Protected Species License from Natural England has been granted.*
- 4.20.5 *Reptiles - Chapter 6 states that all four common native reptiles are present on the site, particularly associated with the western edge of Coronation Wood and Pill Box Field. Whilst no information is given in this report, Chapter 6 of the Environmental Statement in application DC/19/1637/FUL predicts that they are all of 'low' population size. However, this conclusion is derived from the survey by Amec Foster Wheeler (AFW) in 2015. Significantly, this report highlights that previous surveys of the same area in 2012 found there was a 'good' population of common lizard associated with Coronation Wood. This difference is attributed to the lateness in the year and some sub-optimal conditions during the 2015 surveys and it is concluded that a good population of common lizard does occur on site, along with larger population sizes of the other three species. Whilst habitat suitability surveys conducted in 2020 concluded that the habitat within Coronation Wood was of low suitability for reptiles, the findings of the earlier reptile surveys are significant and should be used to inform the required mitigation.*
- 4.20.6 *Chapter 6 of the Environmental Statement accompanying the current application DC/20/4646/FUL, highlights the need for a comprehensive reptile mitigation strategy*

and 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 5.1 ha, yet it is proposed that the mitigation strategy will be through habitat manipulation and a phased vegetation clearance approach with the details proposed within a CEMP. 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. Due to the apparent uncertainty of population size, these impacts would be further compounded by if the populations are found to be larger than 'low'.

- 4.20.7 *In addition, 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 five years have elapsed since the AMF 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. As this location is recommended as a potential reptile receptor site, it is necessary that the further reptile surveys are carried out to determine the size of the populations that now occur there.*
- 4.20.8 *Badgers - Volume II, Technical Appendices, 6.2 Confidential Badger Report identifies that there are badger setts which will be disturbed by the proposed development. Whilst details of badger mitigation are provided this will inevitably result in an increase in badger movements and the eventual construction of new setts elsewhere. The implication of shutting setts on features of importance associated with the SSSI have not been assessed and could result in a negative impact upon the SSSI.*
- 4.20.9 *Conclusion - In addition to our comments regarding the timing of the proposed development, there is insufficient ecological information to determine this application for protected species and so we object to this application.*
- 4.20.10 *Supplementary to the above statement, we also wish to submit that our comments with regards to the application DC/19/1637/FUL (July 2019) are still valid should it be decided to pursue that application as an alternative to DC/20/4646/FUL. If this is the case, then we are concerned about the negative impacts upon the SSSI from this option and so would expect further consultations on the proposals”.*
- 4.21 Royal Society for the Protection of Birds (RSPB): Consultation response not yet received.
- 4.22 Suffolk Coastal Friends of the Earth: “*OBJECT to the application, we wish to make strong objections to this application and refer you to our submission concerning the previous application by EDF Energy: ref. DC/19/1637/FUL. Our views have not changed and are still relevant to this current application. The key points, including additional ones, are as follows:*

This application should form part of the DCO for Sizewell C

- 4.22.1 *We are opposed to the separate consideration of this application at local level. While some Sizewell B buildings may need upgrading, EDFE admits that the main reason for these relocation proposals is to clear extra space for Sizewell C. It is our view, therefore, that the application should form part of the DCO for Sizewell C and submitted to the Infrastructure Planning Inspectorate. It is by no means certain that Sizewell C will be given the go-ahead. If not, then a much-valued woodland would have been felled for no good reason. In addition, an area of acid grassland at Pillbox Field, of high biodiversity value and scarce habitat in Suffolk, could be lost under concrete.*

Energy Policy out of date

- 4.22.2 *EDFE still persists in referring to an 'urgent' need for new nuclear power stations to be deployed by 2025, under the government's Overarching National Policy Statement for Energy published in 2011. As no new nuclear power station will be deployed by this date, the government has consulted on a revised policy for nuclear power, EN-6 (2), the results of which are still awaited. With the successful employment of renewable forms of energy, nuclear power for electricity production is no longer perceived as 'urgent'. EDFE should therefore not be justifying their proposals on this basis.*

Damage to our AONB

- 4.22.3 *Instead of tranquillity and beauty, two important qualities of Suffolk Coast & Heaths Area of Outstanding Natural Beauty, a significant part of this protected landscape will suffer the ugly scars of yet more inappropriate commercial buildings. These current construction proposals alone will create noise, dust and pollution for more than four years, with the added likelihood of causing damage to the adjacent Sizewell Marshes SSSI. The proposed extra planting, allegedly to provide screening, will do no such thing as the new trees and shrubs would be on lower ground.*
- 4.22.4 *The destruction of Coronation Wood is contrary to the planning conditions of Sizewell B, which stated that this woodland should be retained to help to hide these commercial buildings and soften the landscape.*
- 4.22.5 *There is no need whatever for the Visitor Centre and Training Centre to be located within the Coronation Wood development area. We are utterly opposed to these plans. The training centre for SZB used to be in Ipswich and this was evidently found to be satisfactory. We wish to see these two centres relocated to Leiston, where there is a very large redundant school building with extensive grounds. If these were removed from Sizewell, then Coronation Wood could have been saved. As mentioned in the Arboriculture Impact Assessment, 'this constitutes a significant loss in arboricultural terms due to the amount of tree resource that would be lost'.*

4.22.6 *The felling of so many trees is contrary to the government's 25 Year Environment Plan, which aims for a 12% woodland cover by 2060. This means tripling planting by 2030. The size of Coronation Wood is quoted as being 1.6 ha, yet the new planting for screening and buffering is only assessed at 1.35 ha.*

Habitat loss

4.22.7 *The loss of suitable reptile habitat within the project area, including Coronation Wood, the stockpiling area and Pillbox Field (should this option be chosen) and surrounding areas amounts to 13.1 ha. Four UK reptiles are present here, i.e., grass snake, adder, common lizard and slow worm, which are protected under Schedule 5 of the Wildlife & Countryside Act 1981. Relocation to what, in effect, are small strips and buffer zones would not supply the necessary variety of habitats that these animals require, in terms of hibernation sites, foraging areas, mating and egg-laying and basking zones.*

Moreover, there is high risk of mortality or injury due to the heavy machinery needed to clear the site. Friends of the Earth are deeply concerned that these reptiles are not being properly cared for.

4.22.8 *As regards bats, the total loss of habitat currently used by them due to these proposals (including Pillbox Field), is estimated at 14.4 ha. The Local Authority has a duty to have regard to the protection of these protected species under the law. Such loss a loss we consider to be totally unacceptable.*

4.22.9 *Birds will suffer a similar fate. We do not agree that the birds in Coronation would be 'common'. Starling, House Sparrow, Marsh Tit, Song Thrush and Linnet have all been seen here, all of which have suffered dramatic declines and are now on the Red List. Song Thrush in particular has declined because of loss of woodland – and here we have destruction of yet more woodland.*

4.22.10 *There are known badger setts at Coronation Wood, yet, due to confidentiality, we do not know whether new setts have been created for them. This is not good enough.*

4.22.11 *EDFE assumes that all these birds and animals will go somewhere else, but this does not take into account the extra pressure that this would put on Sizewell Marshes SSSI. There will be extra competition for food and for roosting and nesting sites, so that reproduction rates will be lowered. The assemblage of invertebrates, cited as a special feature of the SSSI, many of which are scarce, endangered or Red Listed, would also diminish. These impacts are not fully assessed.*

Pill Box Field

4.22.12 *We are completely opposed to putting a car park on this field. It consists of acid grassland, now a scarce habitat in Suffolk that should be conserved. It is important for invertebrates that provide food for small mammals, that in turn feed the owls that hunt over here.*

4.22.13 *We are equally opposed to turning part of this field into woodland as compensation for that lost at Coronation Wood. Any new woodland should be planted at a more suitable location on the estate, or nearby, such as poor grade agricultural land.*

Use of Sizewell A land

4.22.14 *We find it ridiculous that this application should be submitted while it is not known whether any land at Sizewell A might be available. The dialogue with the Nuclear Decommissioning Authority and Magnox is still ongoing. If the answer is 'no', then this application will have been pointless. It is not possible for us to make any sensible comment without knowing when, nor precisely where, the laydown area might be located.*

4.22.15 *We therefore request that this application is refused"*

4.23 Third Party Representations – 81 Letters/emails of Objection have been received raising the following points:

- a. Impact on ecology/environment including destruction of woodland/Coronation Wood and nature conservation areas, loss of trees, loss of habitat and sensitive ecosystems. Cannot be mitigate the loss of habitats including scrub, wet woodland, and smaller water bodies. Currently supports flora and fauna including rare bats, badgers, and reptiles, and has done for decades. Impact on wildlife as a result of these works in advance of Sizewell C; wildlife will face 'compulsory purchase orders' and be transported to Pakenham, or risk being left without habitats.
- b. Poor condition of Coronation Wood according to EDF is a direct result of mismanagement/poor management.
- c. Clearance of Coronation Wood without the required bat licenses from Natural England shows a cavalier attitude, any woodland close to the coast is an important habitat for small birds and hibernating bats. Unethical, immoral, possibly illegal action.
- d. Removing mature trees/woodland defies commitments to climate change. The loss of mature woodland is not compensated by the planting of two and a half thousand new trees. The CO2 which mature trees absorb will take new immature trees decades to replicate.
- e. Flood risk/Contamination; concern that contaminated surface water from the Western Access road will harm sensitive flora and fauna in the AONB and SSSI in proximity. Water run-off would have a very negative lasting impact on water quality in sensitive designated landscapes.
- f. Light pollution, noise pollution and interference with water levels will impact sensitive species like bitterns, barbastelle bats, marsh harriers, otters etc., in and

- beyond the area under development. Minsmere Nature Reserve's ability to nurture and protect wildlife may be compromised by these developments.
- g. Impact on the SSSI: proximity of training centre to the SSSI and potential effects of increased traffic, noise, light pollution on sensitive ecology
 - h. Sizewell is positioned on Europe's fastest eroding coastline; Orford Ness Lighthouse was lost this year, along with a string of homes/businesses to the north in Suffolk and Norfolk. Concern about coastal erosion and instability.
 - i. Removal of Coronation Wood may adversely impact local residents, for years it has served as a sound buffer from the Sizewell estate. Sizewell B has been exceeding noise limits and complaints have been lodged. Removing Coronation Wood will exacerbate this.
 - j. There is no scope for effective screening and mitigation of the new facilities, and they will intrude into the wider landscape. Loss of important visual screening will expose the views of SZA and SZB to many footpaths around the site which are currently well screened. Coronation Wood provided good screening of the A and B stations in views from the west, and formed an important visual backdrop to the marshland, Sizewell Belts, SSSI, Broom Covert, and Sandlings landscape the west.
 - k. Impact on the AONB regarding landscape and visual amenity, loss of open space, views, new facilities should not be at all visible from the AONB. AONB should not be affected beyond the 1,000 square metres of the proposed visitor centre. AONBs are statutory designations and they should be conserved and enhanced. The proposals are large scale and inappropriate infrastructure development and will result in harm to the character of the AONB landscape, contrary to duty to preserve and protect them for future generations and our heritage.
 - l. The human presence that will exist after construction with associated traffic, litter, noise and light pollution will inhibit the growth of rich ecosystems in the area for the future.
 - m. Impact of demolition and construction logistics on local road network, increasing traffic, health and safety risks, single lane roads comprise much of the road network and it will be almost impossible for emergency services to get close enough to deal quickly with an accident. Construction traffic and workers will create 'rat runs' through quiet roads to avoid being held up in busy periods
 - n. Impact of construction on communities; including on health and wellbeing, respiratory issues exacerbated by construction, negative impact on mental health, noise and disruption to the lives of local residents
 - o. Loss of tourism, visitors driven away by construction. Potential for negative impacts on the local economy
 - p. Dominating/overbearing development, overshadowing, inappropriate development in a Conservation Area. Will create loss of amenity and overlooking.

- q. Objection to piecemeal/uncoordinated development of the Sizewell estate.
- r. This application is contrary to ESC's NSIP policies
- s. Light pollution from development; significant adverse harm to the AONB landscape.
- t. Security concerns: assumption that the outage store is an interim short term cooled facility for nuclear waste. If it is high level waste like fuel rods awaiting so called dry storage in the offsite dry storage area near Leiston, that is an area of great concern regarding security onsite and in the new location. Nuclear waste is a long-term safety/security concern.
- u. No greenfield land should be used in the Sizewell complex for development, should be brownfield land only. EDF should make better use of land within their perimeter. Pillbox Field is a wildlife habitat and greenfield and should not be built on.
- v. Sustainability concerns; EDF could be more creative than covering more land with tarmac. Instead of providing car parks, perhaps providing buses, park and rides, and incentives for car-sharing could be provided. Concern about level of parking provision being too high.
- w. Objection to French company with Chinese funding building new reactor at Sizewell, outdated technology, similar plans shelved elsewhere in Europe. Applicant has a track record of failing to deliver new model reactors; 50+ reactors still left to decommission in France and no funds to do so. Objection to British taxpayers funding further development.
- x. Objection to use of Sizewell A land for redevelopment instead of tree planting
- y. Broad objections to Sizewell C being built. The size of the site is too small for a new nuclear power station, evidenced by the government in its conclusions to the ongoing review of NPS EN-6 on new nuclear siting, concluded in July 2018 on the Sizewell site. Support for any other form of energy generation including renewables, instead of new nuclear. Risks of nuclear power, unresolved issue of how to decommission the old stations and deal with waste, nuclear power not being carbon neutral, benefits of Sizewell C will take 20 years to be seen, and is an unsightly industrial development in the AONB, villages/services will be unable to cope with influx of workers and their families.
- z. National Policy Statement on site selection for new nuclear reactors is under review. Consultation on the Process and Criteria for Designating Potentially Suitable Sites in a new National Policy Statement for Nuclear Power between 2026-2035 is ongoing and may see Sizewell removed as a suitable location for new nuclear reactors. The development should not go ahead until it is definitively clear that Sizewell will remain a potential site following governmental review of nuclear and energy policy, consultation by BEIS, and Parliamentary approval. Sizewell may not meet new National Policy Statement requirements for new nuclear power stations, i.e., latest habitat regulations, sea

level, climate data

- aa. Proposals should only be considered as part of the forthcoming Sizewell C Development Consent Order. It is inappropriate and premature to determine this application before the DCO process for Sizewell C is concluded. This development should not go ahead until Sizewell C is shown to be able to be built, i.e., current uncertainty about funding for Sizewell C, these works may not be necessary if Sizewell C is not consented or built.
- bb. This application introduces a new element of a western access road which does not appear to be part of the DCO.
- cc. Inappropriate to determine application while EDFE are holding a 5th consultation into proposed changes to the Sizewell C DCO proposals
- dd. The application should be referred to PINS and the ONR for opinion prior to any permission being granted. Responses should be published by ESC and interested parties.
- ee. Cumulative impact of this proposal and other energy-related infrastructure/NSIPs in the areas is expected to be considerable, the proposal will create additional cumulative impacts when considered with Greater Gabbard and Galloper substations which experience failed screening in Broom Covert and Sandy Lane.
- ff. Hopes to remove the outage car park from Pillbox Field are not enough, and are dependent on agreement with Sizewell A. There is no guarantee the NDA/Magnox will be able to release this land until 2026, Pillbox Field may well be brought back into consideration for development if Sizewell A land does not become available on schedule.
- gg. Safety of material transport. Any liquids should not be carried by sea. Any accident in the transport of some materials could have far reaching effects, particularly at sea e.g., long term damage to marine habitats. Solebay holds important feeding grounds for sea birds in the winter and breeding birds in the summer and is an important element of the internationally recognised Minsmere Nature Reserve
- hh. Lack of clarity/detail in the application i.e. When Sizewell land will become available, justification for the need for a visitor centre on the site and not off site e.g., in Leiston High Street, purpose and use of outage store and laydown area. Missing plans/information from the application makes assessing it much more difficult. Objection to hybrid nature of application, particularly the outline elements. The 2008 Planning Act makes no provision for outline permissions.
- ii. Not a valuable use of Council staff time and resources
- jj. The application is not a significant improvement on the previously approved application, only the removal of the outage car park from Pillbox Field is considered an improvement
- kk. Landscape plan for Pillbox Field does not create any meaningful planting. The

design follows the form of the outage car park submitted as part of the DCO. Unclear why if the outage car park can be accommodated within the SZA site this planting is still informed by the previously proposed car park. It is not replacement wood planting and will offer no visual mitigation to new development. Pillbox Field is attractive dry sandlings/acid grassland with some scrub, including willow, and should be left as natural habitat and not planted. High failure rate of scattered planting and hedges along Sandy Lane and the field to the west.

- ll. Support for longstanding objections to development in the AONB held by the AONB Partnership, RSPB, and The National Trust.
- mm. Granting permission for this application would not contribute much to the mitigation of the impact of building Sizewell C.
- nn. Maps and plans for this application do not show the complete EA flood plain. The flood zone category 3 includes the public highway C288 and areas which cover the existing entrance and proposed entrance to Pill Box Field. To allow the only road at present to the nuclear complex and complicate it with entrances to Pill Box Field creates problems with emergency planning.
- oo. The dry storage for nuclear waste should be subject to examination by the Office of Nuclear Regulation and associated statutory consultee protocols. The nuclear dry store example is by common-sense a material consideration. This B site application is not independent of the Sizewell C DCO. The facilities in this application may well be in part facilities for Sizewell C, therefore any outline permission for the B station might be considered a risk factor to be properly assessed in consideration of the tight configuration of the C station.

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
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General Site Notice	Major Development Potential Public Interest Public Right of Way Archaeology EIA		
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7 PLANNING POLICY

- 7.1 Section S38(6) of the Planning and Compulsory Purchase Act 2004 requires the planning application to be determined in accordance with the development plan unless material consideration indicates otherwise.
- 7.2 Government planning policy is set out in the National Planning Policy Framework (2019). The paragraphs considered to be of particular relevance (noting that other paragraphs will also apply to the proposed development) are as follows: 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. provides that planning policies and decisions should contribute to and enhance the natural and local environment; Para. 172 requires great weight to be given to conserving and enhancing landscape and scenic beauty of 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 and should include an assessment of (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; (b) the costs of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. Paras 174 – 177 refer to habitats and biodiversity including promoting the conservation, restoration and enhancement of priority habitats and ecological networks. Para. 158 and 160 relate to flood risk assessment and the sequential test process.
- 7.3 The East Suffolk Council- Suffolk Coastal Local Plan was adopted on 23 September 2020. The following policies are considered to be relevant to this application:

SCLP3.1: Strategy for Growth in Suffolk Coastal District

SCLP3.2: Settlement Hierarchy

SCLP3.4 Proposals for Major Energy Infrastructure Projects

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
SCLP10.2 Visitor Management of European Sites
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

7.4 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 before 2025. All of the suite of energy-related National Policy Statements, including NPS EN-6 are subject to review. However, no date has been published for their replacement. Paragraph 1.6.1 of EN-6 explains that the NPS will remain in force in its entirety unless it is withdrawn or suspended by the Secretary of State, as further confirmed in the Energy White Paper (December 2020). The decision by the Government not to suspend the NPSs pending their review is understood to be subject to legal challenge, but the outcome of that challenge is not yet known.

7.5 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 at 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 relevant. However, this application is made pursuant to the Town and Country Planning Act 1990 and must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

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 one element that is not essential to the operation of a nuclear power station, but

which are, part of the offering at Sizewell B, namely the visitor centre. The existing facilities to be relocated as part of this application are currently located on land identified as potentially suitable for the new nuclear power station: Sizewell C, to the north of the existing B Station. An application for development consent to construct Sizewell C is currently before the Planning Inspectorate for determination. The outcome of that process is not yet known.

- 8.1.2 At the time of the previous application, DC/19/1637/FUL, the timescales for large scale demolition and freeing up of land on the Sizewell A site did not align with the timeline for relocating facilities from Sizewell B. However, as that proposal has been delayed by 12 months as a result of legal challenge, the opportunity has arisen for an area of land, formerly occupied by a National Grid substation at Sizewell A, to be re-purposed for the Sizewell B relocated facilities proposals. Negotiations are still ongoing with the Nuclear Decommissioning Authority who control the land at Sizewell A and the final agreement to use the land has yet to be signed. However, there is no reason to doubt that the land will be available to EDF Energy.
- 8.1.3 Some of the proposed buildings are to be sited amongst existing facilities within the Sizewell B security fence line and as such have limited impact on the AONB noting also that they are on existing concreted sites set amongst existing buildings. However, a number of the proposals are on existing greenfield land outside the security fence line for Sizewell B and it is these elements that have primarily resulted in objections from consultees and residents.
- 8.1.4 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. The Development Consent Order application for Sizewell C was submitted to the Planning Inspectorate in May 2020, and includes the relocation of facilities at Sizewell B. However, this application for planning permission under the Town and Country Planning Act falls to this Authority to determine.
- 8.1.5 Having regard to requirements under the Planning Act 2008, the proposed works for the relocation of the Sizewell B facilities do not constitute a generating station over 50MW or an extension to a generating station within the meaning of the Planning Act 2008. As such, the proposed works do not fall within the definition of a Nationally Significant Infrastructure Project in section 14 of the Planning Act 2008, and the Council can lawfully determine the application pursuant to its powers under the Town and Country Planning Act 1990.
- 8.1.6 Indeed, 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.” A condition is proposed that would require the landscape restoration of land to the north of the Sizewell B buildings, should Sizewell C be either not consented or not constructed.

- 8.1.7 It is relatively common for applications for Development Consent to be preceded by an application under the TCPA 1990 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).
- 8.1.8 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 work, 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. EDF Energy’s approach to front-loading works through a TCPA application is both lawful and unexceptional.
- 8.1.9 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 prior to 2025. While Sizewell C is not expected to deploy before 2025, NPS EN-6 remains relevant until such time as it is withdrawn or suspended. Between 2017 and 2018 the Government undertook a consultation on the siting criteria and process for a new NPS for nuclear power beyond 2025. The consultation explained that owners of sites listed in EN-6 were able to make development consent applications during the review period and explained that the *“Government is confident that both EN-1 and EN-6 incorporate information, assessments and statements which will continue to be important and relevant to the Secretary of State’s development consent decision for projects which will deploy after 2025. This includes statements of the need for nuclear power, as well as environmental and other assessments that continue to be relevant for projects which will deploy after 2025.”* The Government published a response to the consultation in July 2018, which made it clear that it intended to carry forward the list of potentially suitable sites from EN-6 to the new NPS, subject to them meeting the updated siting criteria; updates to their environmental assessments and provided they are capable of deployment by 2035.
- 8.1.10 Parts of the Sizewell B generating station are within the identified site for Sizewell C. 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 delay to the construction timetable for Sizewell C, it is anticipated that front loading the

Sizewell B relocation works would save between 12 and 15 months from the total anticipated construction time for Sizewell C, this does not include commencement of the works already undertaken as part of DC/19/1637/FUL. Detail regarding this has been provided by the programming of construction team for Sizewell C and we do not dispute that these time savings can be achieved. Construction of Sizewell C cannot take place until on the land occupied by Sizewell B buildings until they have been replaced and the existing demolished. Adding the need to carry out these works under the DCO adds to the timescale for constructing 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 – albeit no timetable for this has yet been released by Government.

- 8.1.11 In the event that Sizewell C is permitted, it will be important that Sizewell B can maintain operation during the Sizewell C construction period. This will require the construction of certain replacement facilities before the existing facilities on the Sizewell C site can be demolished and the new Sizewell C facilities constructed. Granting this consent will enable front-loading of the relocated facilities works saving between 20 and 24 months on the overall construction period proposed for the Sizewell C DCO as detailed above. Consideration to the impacts on the Suffolk Coast and Heaths AONB is set out later in this report. 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 to ensure no disruption to the generating capability of Sizewell B nuclear power station in the event that Sizewell C is constructed and to avoid delay to the deployment of Sizewell C, given the urgent need for new nuclear energy identified in national policy.
- 8.1.12 The necessary items under the nuclear license are being considered in full under this application, the less nuclear license 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.
- 8.1.13 In addition to national policies quoted above, the proposal is considered to comply with SCLP policies: 3.4 Proposals for Major Energy Infrastructure Projects, 4.3 Expansion and Intensification of Employment Sites, 4.5 Economic Development in Rural Areas, 7.1 Sustainable Transport, 9.2 Sustainable Construction, 10.3 Environmental Quality and 12.34 Strategy for the Rural Areas. These policies assess suitability of proposals for major commercial and energy related development within the District, outside of settlement boundaries within the rural area. There is a focus on supporting existing employment sites and businesses and ensuring extensions are carried out in a sustainable manner.
- 8.1.14 In light of the assessment set out in the following sections, the principle of development is considered to be acceptable having regard to its impact on the AONB and compliance

with the development plan and relevant national policies. The proposed development would facilitate the timely delivery of the proposed nuclear power station at Sizewell C which is in the public interest and would not have any adverse effects that would justify the refusal of permission. Exceptional circumstances exist which justify the proposal for major development in the AONB.

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 in 2019, and then again during 2020, prior to resubmission of revised proposals. This includes Scoping for the Environmental Impact Assessment and more detailed advice on proposals. A newsletter was circulated to households in Leiston-cum-Sizewell informing them of the proposals and carrying out a virtual online consultation. The formal consultation period – online and by post due to the COVID-19 restrictions, took place between 10 – 24 August 2020. A Statement of Community Involvement has been included with the application which 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 its own public consultation including direct letter notification, two 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 4.23. The detailed concerns identified and listed in 4.23 are covered under separate consideration in the sections below.

8.3 Ecological impacts

General Comments

8.3.1 One change from the extant planning permission is the proposed relocation of the outage car park from Pillbox Field to an existing part of the Sizewell B complex. This is welcomed. It will avoid any impacts to the grassland habitats on Pillbox Field, provided the land at Sizewell A is secured.

8.3.2 Chapter 6 and Technical Appendix 6.1 of the Environmental Statement (ES) set out the assessment of impacts from the proposed development on onshore ecology and ornithology receptors. The receptors identified for assessment (Chapter 6 Table 6.8) are considered to be appropriate.

Designated Sites

8.3.3 In relation to the potential impacts of the proposed development on statutory designated conservation sites, the comments made by Natural England (NE) are noted and accepted. In accordance with NE's advice, a Habitats Regulations Assessment (HRA) should be carried and recorded prior to determination of this application. The

applicant has provided a Shadow Habitats Regulations Assessment with the application, which is considered adequate to inform the HRA. The Council has undertaken a HRA in January 2021, which concludes that the proposed development would not result in any likely significant effects on habitat sites (European sites).

Coronation Wood

- 8.3.4 As with the consented scheme, this proposal will result in the loss of Coronation Wood, in fact the majority of the wood has now been lawfully felled. The total area of woodland lost is slightly greater than the area of proposed replacement planting. Paragraph 6.6.15 of ES Chapter 6 assesses that *“the initial loss of Coronation Wood and associated land to the west (a receptor of low sensitivity) would result in an impact which would be of high magnitude, resulting in a moderate adverse effect. This would have a significant effect at the local level. However, once the planting proposed as part of the landscape design has established, over time this would reduce the impact to medium, resulting in a minor adverse, but not significant effect”*. Whilst the impact will eventually reduce to “minor adverse” this will only be after the replacement planting begins to mature. In order to ensure the replacement planting has the best opportunity to thrive in what is a difficult coastal location, a plan has already been agreed under planning permission DC/19/1637/FUL for the post-planting regime for the trees on Pillbox Field. This regime will be managed by the Sizewell B Estate team who provide support throughout the year to EDF Energy. This will be replicated in a condition appended to this consent. The felling of Coronation Wood commenced in December 2020, pursuant to the extant planning permission.

Protected and/or UK Priority Species

- 8.3.5 A number of protected and / or UK Priority species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006), have been identified and without adequate mitigation may be impacted by the proposed development.
- 8.3.6 It is considered that any adverse impacts can satisfactorily be addressed through appropriate mitigation measures. This will be secured through a planning condition which requires the approval of and adherence to a Construction Environment Management Plan (CEMP).

Bats

- 8.3.7 Surveys have confirmed a single non-breeding soprano pipistrelle bat roost in a tree in Coronation Wood, as well as small common and soprano pipistrelle roosts in several of the Sizewell B buildings proposed for demolition (the operations training centre, the civils workshop and store building). It is considered that the measures proposed in the application are adequate to compensate for the loss of these roosts. In any event,

no works which are likely to impact on the identified roosts can be undertaken until appropriate licences have been granted by Natural England. The applicant has applied to Natural England for the relevant licence. In the meantime, the tree in question has a 15 metre cordon set up around it within which no felling works are to take place until the licence is received.

- 8.3.8 The Lighting Strategy (ES Technical Appendix 3.1) indicates that operational lighting of the site will result in only very limited light spill above 1 lux to the west and south of the new access road. The Council agrees with the conclusion in paragraph 6.6.87 that operational lighting will not result in a significant adverse impact on bats.

Reptiles

- 8.3.9 There is a reptile mitigation strategy included in the ES. The applicant has undertaken works within Coronation Wood to date under the guidance and supervision of an ecological clerk of works. The strategy as submitted is high level and as recognised in their ES requires additional detail to be agreed via the CEMP as proposed in a condition. We are satisfied with this approach being secured by condition.

Badgers (Confidential appendix)

- 8.3.10 The mitigation works in respect of badgers are noted and it is understood that a Natural England licence has been granted for these works. We agree that the mitigation works proposed are sufficient to avoid any significant adverse effects on badgers.

Breeding Birds

- 8.3.11 The proposed development includes the loss of habitat for breeding birds (Coronation Wood and stockpiling area). While most species recorded were common and widespread, one UK Priority species (Birds of Conservation Concern (BoCC) Red listed) was recorded breeding in Coronation Wood in 2020, and three UK Priority species (one of which is BoCC Red listed, and two of which are BoCC Amber listed) and one BoCC Amber listed species were recorded in the stockpiling area. Whilst planting is proposed to compensate for the loss of Coronation Wood, there will be an overall net loss of habitat for breeding birds as a result of these proposals, at least until new planting sufficiently matures to provide suitable nesting habitat. However, it is considered that there will not be a significant adverse impact upon breeding birds as a result of the proposed development.

Biodiversity Net Gain

- 8.3.12 The Biodiversity Net Gain calculations presented in Biodiversity Metric Calculations report are noted. As recognised in the report *“The achievement of these credit scores is reliant upon meeting the target condition for created habitats, which will require*

creation and management plans". It is therefore essential that an appropriate Landscape and Ecological Management Plan (LEMP) is secured should permission be granted. A suitable condition to secure the LEMP is proposed below. The success of proposed created habitats to meet the anticipated net gains will require an agreed management scheme to be carried out.

Ecological Conclusions

- 8.3.13 Ecologically the development proposed in this application, although resulting in some biodiversity impacts at least until replacement planting matures and other mitigation is in place, is acceptable. The mitigation, compensation and enhancement identified is to be secured by condition.

Update from DC/19/1637/FUL

- 8.3.14 At the time of determining application DC/19/1637/FUL, there were concerns raised regarding the validity of some of the ecological surveys. However, the Council's ecologist took the view that the ecological surveys provided a robust assessment of the baseline position and that the applicant's assessment of ecological impacts was acceptable. This application has been accompanied by some more recent surveys. The Council is satisfied that the applicant has carried out a robust assessment of the baseline environmental information and of the likely significant effects of the proposed development. Pre-construction surveys will be secured as part of the CEMP to ensure that the mitigation measures are appropriate to the conditions on the ground at the time that works commence.
- 8.3.15 As such, the proposal is considered to comply with SCLP10.1 Biodiversity and Geodiversity and 10.3 Environmental Quality.

8.4 Landscape / Loss of Coronation Wood

- 8.4.1 Coronation Wood was planted to commemorate the coronation of King George V in June 1911 giving it an age of around 110 years. A number of objections refer to its historical significance and important national heritage connections. However, it should be noted that the felling of Coronation Wood has already been authorised through the approval of planning application DC/19/1637/FUL and is now largely complete. As such, Coronation Wood will be lost regardless of the outcome of this application.
- 8.4.2 The loss of 246 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 in excess of 2500 juvenile woodland trees on Pillbox Field, including a mix of broadleaf and coniferous species which are known to tolerate prevailing soil and coastal conditions, including exposure and salinity which was also approved as part of the

previous application. These trees will be managed through selective thinning to secure their long-term health, structure and longevity, noting that replenishment of ageing and species poor woodland such as Coronation Wood is an important component of the EDF Energy estate management strategy.

- 8.4.3 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 “long-term 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, and we agree with this assessment. In any event, the loss of Coronation Wood has already been authorised and the felling of the trees is largely complete.
- 8.4.4 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 and replacement planting has already commenced. EDF Energy manages around 650 hectares on their whole estate which is a mix of arable farmland, heathland, SSSI and woodland.
- 8.4.5 The removal of Coronation Wood represents an overall net loss (by area) of woodland that cannot be replicated in the wider EDF Energy estate without harming existing valued habitats. However, a replacement scheme under DC/19/1637/FUL has been consented and the works currently being undertaken on Pillbox Field with measurements included that should ensure success of the planting scheme. The replacement planting scheme is on a basis of 10 to 1 and uses species much more suited to the local landscape character and to prevailing planting conditions. There will be a 10 – 15-year delay until the new habitats become effective but it will provide a much more diverse habitat range than the existing Coronation Wood had. A condition will be applied to this consent requiring additional landscape planting and securing the long-term management of the planting on Pillbox field.
- 8.4.6 The proposals are considered to comply with SCLP10.4 Landscape Character.
- 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 is considered to be sound and reliable.
- 8.5.2 In summary the key areas of interest are the potential impacts on the character of the local landscape, having 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, plus wider estate woodland and other landscape management measures. Additional mitigation measure will be secured through 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 – 4.5 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 taking 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 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 These works will inevitably result in adverse impacts 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. This is noted and agreed.
- 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 site and its setting fall within the AONB, 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 will not have such a significant magnitude of change on landscape character compared to if the existing energy installations were not already there.
- 8.5.9 With that in mind the effects on landscape character are considered to be of 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 application boundary, 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 accepted to be 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 have also been 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 regard has been given in the LVIA to their various sensitivity rankings and these are considered to be reasonable. Overall, the assessment concludes that there will be 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 effects for people in the immediate locality during construction. This assessment is agreed.
- 8.5.14 That said, it is recognised that the demolition/construction phase is due to last some 4-4.5 years so these effects will be apparent to the observer during that period. 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 and the partial visibility of the proposed new structures. Other AONB special qualities such as wildness, scenic quality, and tranquility are already considered to be compromised by the presence of the existing power station site.
- 8.5.16 The AONB Partnership object to further development in the AONB. However, it is considered 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 (medium due to existing industrial development in the vicinity), the effects are judged to be of minimal significance and on balance neutral.
- 8.5.17 With the proposed reduction in building height and removal of car parking from Pillbox Field, there will be no material harm to the AONB as a result of this development. The new tree and scrub planting proposed and other woodland management measures

across the estate mitigate any overall harm to the AONB in the immediate locality.

8.5.18 The overall net loss of woodland was a concern, and EDF Energy has responded to this by increasing the level of replacement planting on Pillbox Field, a planning condition will be required to agree and manage the replacement planting. This planting has commenced under the previous consent but will be replicated in conditions attached to this permission, if consented. On balance, it is considered that there are no adverse effects on the AONB from the development with the mitigation measures as proposed. There is no objection on landscape character and visual amenity reasons. Therefore, subject to appropriate conditions, the proposal is considered acceptable from a landscape and visual impact perspective.

8.5.19 The proposals are considered to comply with SCLP10.4 Landscape Character.

8.6 Development in the AONB

8.6.1 A number of representations and consultation responses raise 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 – Coronation Wood. They consider that alongside increased vehicular movements and human activity this will adversely impact the tranquility and users' enjoyment of this part of the AONB. However, unlike the development already approved under DC/19/1637/FUL, the outage car park would not be located in Pillbox Field, thus reducing the impact outside of the nuclear fence. As part of the section 106 agreement, it will be legally secured that the outage car park approved under DC/19/1637/FUL cannot be constructed alongside this proposal incorporating land at Sizewell A. Coronation Wood is not publicly accessible and is on private land. 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 which will not be more harmful.

8.6.2 The AONB 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 and this will be secured via condition. Officers do not consider that the visual impacts will be significant. In maximising additional planting in appropriate locations, any dis-benefits of the proposal from particular viewpoints is considered to be mitigated.

8.6.3 The statutory purpose of the AONB is to conserve and enhance natural beauty as

required by Section 85 Countryside and Rights of Way Act 2000. The AONB Partnership consider that the proposal does not comply with NPPF para. 170 and 172. However, National Policy Statements EN-1 and EN-6 emphasise the importance of a future supply of low-carbon electricity for England and Wales. EN-6 identifies Sizewell as potentially suitable site for new nuclear development and both EN-1 and EN-6 identify the urgent need for the deployment of new nuclear power stations without delay. While the outcome of the Sizewell C application is not yet known, in the event that it is approved, the Sizewell B facilities will need to be relocated in order for the B Station to continue functioning within its nuclear licence. The relocation of those facilities in advance of the Sizewell C DCO will facilitate the earlier deployment of the new nuclear power station, should it be approved. This consent would save approximately 12 – 15 months in relation to the overall Sizewell C build. This is considered to weigh heavily in favour of the proposed development.

- 8.6.4 The one element of the proposed development that could be sited outside of the AONB, would be the visitor centre, and EDF Energy were asked to consider an alternative site for this. However, given the relationship between the visitor centre and visits to the operating station, the co-location of the visitor centre and the power station is considered to be important and appropriate. 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 these include 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.
- 8.6.5 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 marginally increased.
- 8.6.6 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 calculated on the

footprint in relation to the dry fuel store payments previously. Funding for the Dry Fuel Store was agreed as £120,000 lump sum payment followed by £20,000 a year. This will be agreed via a section 106 legal agreement with EDF Energy – this has been drafted and by the time of this Committee meeting will hopefully be ready to be signed. With the proposed mitigation and this additional compensation, it is not considered that there will be any residual adverse impact on the AONB. Additional funds within the AAF will be used to promote and enhance access and amenity within the AONB boundary. The AONB Partnership administer this fund.

- 8.6.7 This Council acknowledges and understands that the statutory purpose of the AONB is to conserve and enhance the area's natural beauty. As a member of the partnership, the Council carries this responsibility and as such has assessed the application carefully to determine whether the proposed development would have a significant impact on or harm that statutory purpose. It is the Council's duty, as a public body, to 'have regard' to that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). In addition, the Council must apply great weight to conserving and enhancing landscape and scenic beauty in the AONB as required under para. 172 of the NPPF. Permission for major development should only be granted in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
- 8.6.8 In this case and having regard to the factors identified in paragraph 172 (a) – (c) of the NPPF, exceptional circumstances are considered to exist.
- 8.6.9 The development is necessary to support the continued operation of Sizewell B nuclear power station, in the event that Sizewell C is approved and constructed and to facilitate the timely delivery of Sizewell C, should it be approved through the DCO process.
- 8.6.10 Options for development outside of the AONB have been explored by the applicant. However, the majority of the facilities to be relocated are integral to the safe operation of the power station and therefore need to be located in very close proximity. The co-location of the power station and the visitor centre is considered to be justified for the reasons set out above. As such, the Council do not consider that there is scope for developing outside the AONB or of meeting the need for the replacement facilities in some other way.
- 8.6.11 As a result of the embedded and additional mitigation (including the minimizing of building heights; replacement planting; biodiversity net gain), and the compensation to be secured through a section 106 agreement towards an Access and Amenity Fund for the AONB (a lump sum payment of £20,000 and an annual payment of £4,000 until

2035), it is not considered that there will be any material impact on the environment, AONB landscape or recreational opportunities as a result of the proposed development.

8.6.12 Therefore, the proposed development is considered to comply with paragraph 172 of the NPPF and with planning policies SCLP3.4 Proposals for Major Energy Infrastructure Projects, SCLP4.3 Expansion and Intensification of Employment Sites, SCLP4.5 Economic Development in Rural Areas, SCLP10.4 Landscape Character, and SCLP12.34 Strategy for the Rural Areas.

8.7 Noise and vibration

8.7.1 Having consulted with the Council's Environmental Protection 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. Subject to compliance with the CEMP (e.g. in relation to 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. As such the proposal complies with SCLP10.3 Environmental Quality and 11.2 Residential Amenity.

8.8 Air Quality

8.8.1 All air quality issues have been resolved satisfactorily following pre-application discussions. As such the proposal complies with SCLP10.3 Environmental Quality and 11.2 Residential Amenity.

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 are suggesting a number of conditions. Subject to appropriate conditions, flood risk assessment and drainage can be considered to comply with adopted planning policy.

8.9.3 The NPPF requires a sequential, risk-based approach to the location of development – it should be in flood zone 1 where possible. The aim of the sequential test is to steer new

development to areas with the lowest risk of flooding. There are two elements of EDF Energy's proposals that are within flood zone 3a – Field 2 and Pillbox Field, Field 2 will be used to stockpile material in the initial construction stages and Pillbox Field for landscaping. Both sites are protected by flood defences so they are not at actual risk of fluvial or tidal flooding. However, there is always a residual risk of a failure of the flood defence mechanism.

8.9.4 If a development cannot be located in flood zone 1, then the exception test (para. 160 NPPF) must be applied:-

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Field 2 will be used for stockpiling of materials – provided such materials are secured there will be no flood risk elsewhere resulting from use of the site. There will be no workers hosted on that Field and the site monitors weather conditions and will be prepared via flood risk notifications etc. Pillbox Field is proposed for landscaping only which is sustainable and will not increase flood risk elsewhere. The proposal for temporary storage on Field 2 is considered essential for the continued operation of Sizewell B nuclear power station, this therefore provides wider sustainability benefits to the community that outweigh the residual flood risk. As such, the proposals pass the exception test in accordance with paras 158 and 160 of the NPPF. The proposals also comply with SCLP9.5 Flood Risk.

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 planning policy as well as national planning policy in relation to the historic environment. A condition is proposed 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 no 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 SCLP11.7 Archaeology are set out below.

8.12 Highways and Public Rights of Way

8.12.1 An uncontrolled crossing to safely cross Sizewell Gap Road is considered necessary to mitigate for increased traffic during construction and should be secured via a planning condition. This will be of benefit to users of Bridleway 19 (BR19) and increase safety particularly during the construction phase.

8.12.2 It is not considered that the cumulative impacts of the relocation works along with the ScottishPower Renewables East Anglia One North and East Anglia Two proposals will have a severe impact on Sizewell Gap Road, subject to appropriate conditions having regard to the anticipated timelines for construction works to commence.

8.12.3 A condition is proposed to secure a Construction Traffic Management Plan and a Construction Workforce Travel Plan. These should be based on the outline details in 10.5 of Chapter 10 of the ES and Chapter 10 of the Transport Statement. The proposal complies with SCLP7.1 Sustainable Transport and 7.2 Parking Proposals and Standards.

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.

8.13.2 The proposal is considered to support the following identified priorities and aims of the East Suffolk Economic Growth Plan (ESEGP) 2018 – 2023:-

- The ESEGP identifies that the energy sector is crucial for East Suffolk's economy and offers significant opportunities. It specifically identifies nuclear power as having huge possibilities.
- The energy sector is identified as one of 7 key sectors that bring opportunities and potential to East Suffolk.
- Attracting investment to East Suffolk, focused around existing and emerging sectors and supply chains is seen as a main priority for the district.
- The ESEGP identifies Sizewell as a major economic asset of national significance with huge possibilities surrounding nuclear power which can bring significant economic benefits to East Suffolk.
- The ESEGP recognises Investment linked to Sizewell B should deliver substantial economic benefits.
- The ESEGP identifies that support should be given to proposed investment in Sizewell developments if it is linked to clear economic development outcomes in respect of supply chains, inward investment opportunities and issues

relating to employment and skills.

- The ESEGP states that support should be given to the operations of Sizewell B, particularly in relation to labour market and skills.
- The skills profile continues to be weak in parts of the district and there is limited higher education provision and – although only one factor among many – retaining talented young people is difficult. The ESEGP recognises the importance of encouraging appropriate forms of skills and workforce development so that businesses/key sectors can find the skills they need, and people from East Suffolk are equipped for the jobs those businesses generate.
- Making connections between young people and local employers, particularly in the key sectors is seen as a priority for workforce development.
- Given the pace of planned housing growth, it is important that East Suffolk continues to generate new jobs.

The proposal complies with SCLP4.3 Expansion and Intensification of Employment Sites and 4.5 Economic Development in Rural Areas.

8.14 Cumulative Impacts

8.14.1 There may be cumulative impacts in relation to this project with the Sizewell C project and ScottishPower Renewables proposals for East Anglia One North and East Anglia Two offshore windfarms.

8.14.2 It is 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. This does not mean that the additional vehicles will not be noticed on the highway network. However, with the restrictions proposed and the CEMP, the impacts will be appropriately timed and mitigated and will not cause an unacceptable impact on road safety or a severe residual impact. Any extended hours of working will be agreed with this authority 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 is likely to result in less impact on the highway network once Sizewell C starts construction.

8.14.3 A worst case scenario in the ES is that the relocated facilities proposed construction aligns with the Sizewell C construction (overlap with construction and demolition works of Sizewell B) and overlap with the construction of ScottishPower Renewables East Anglia One North and East Anglia Two offshore windfarms. However, the overlap with

ScottishPower proposals will not have a significant cumulative impact should it occur. On the current timelines proposed for a consented relocated facilities scheme under this application and consented DCO's for the offshore wind proposals there would be an overlap of approximately 24 months, and this would coincide with the construction of Sizewell C, the impacts of the relocated facility proposals within the Sizewell C DCO have been assessed as part of that application. Cumulatively, the impact is considered to be limited.

- 8.14.4 The peak construction of Sizewell B relocated facilities is likely to overlap with the Sizewell C project's main development site establishment and preparation work.
- 8.14.5 If built simultaneously (worst case scenario), the onshore construction of both windfarms would be during Phase 2 of the relocated facilities development construction.
- 8.14.6 The submission assesses the potential cumulative impacts and determines that the proposal is not likely to result in any further adverse cumulative effects other than these which are identified to arise cumulatively when assessed with Sizewell C proposals. We agree with these assessments:
- Terrestrial Ecology and Ornithology:
 - The invertebrate assemblage within the Zone of Influence (Zoi) of the proposed development due to loss of woodland habitat during construction;
 - The bat assemblage identified within the Zoi of the proposed development due to loss of foraging habitat and roosting resource, habitat fragmentation and disturbance from noise and lighting during construction;
 - Landscape and visual:
 - Landscape character within the Estate Sandlands Landscape Character Type (LCT) and within the Coastal Levels LCT during construction and operation;
 - Visual receptors within Receptor Group 1 Sizewell, Receptor Group 2: Sandy Lane and Receptor Group 9 Sizewell Beach during construction and operation;
 - Visual receptors on the Suffolk Coast Path between Minsmere Sluice and Sizewell and Sandlings Walk between Northern Mound and Sizewell during construction and operation;
 - Visual receptors on the Sandlings Walk between Sizewell and the Junction with the Suffolk Coast Path, to the west of the Dower House during construction and operation;
 - Designated and defined landscapes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Suffolk Heritage Coast during construction and operation;
 - Amenity and recreation:

- The Suffolk Coast Path during construction; – Sandlings Walk during construction;
- Receptor Area A: Nursery Covert, Reckham Pits Wood, Rookyard Wood and Leiston Common during construction;
- Receptor Area C: Goose Hill during construction; and
- Receptor Area D: Sizewell Beach during construction.

It is agreed that where there is potential for significant effects to arise, these would occur with Sizewell C alone and therefore cannot be reduced by the delivery of further mitigation measures as part of the proposed development. The relocated facility proposals are included with the Sizewell C DCO and mitigation measures will be a combination of embedded mitigation and external mitigation. This will be addressed in full in the determination of the Sizewell C DCO. Further mitigation measures are not required in relation to this application.

9 CONCLUSION

- 9.1 This is a 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, this Authority is aware that the proposals are included in the Development Consent Order for Sizewell C new nuclear power station which is yet to be determined. However, this does not preclude this Council from determining the proposal under the Town and Country Planning Act regime.
- 9.3 East Suffolk Council approved DC/19/1637/FUL in November 2019 for similar relocated facilities proposals to that under consideration. The works have commenced under that lawful consent as has been discussed throughout this report. The principal differences between the two schemes are:
- the training building has been reduced in height from three storeys to two storeys;
 - the basement has been removed from the outage store;
 - buildings and facilities have been reconfigured: the outage car park is now proposed on the existing western car park of Sizewell B, the outage laydown is now proposed on land within the fence line of the Sizewell A station, the administration building has been relocated; and
 - Pillbox Field is now proposed for replacement tree planting only.
- A direct comparison of the two applications demonstrates clearly that the current proposal is no worse, and could be considered better, than that previously approved due to the reductions in scale of proposed buildings and the removal of car parking from Pillbox Field resulting in less land take proposed from the AONB.

- 9.4 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 essential to the operation of the Sizewell B 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.
- 9.5 Approving this application under the TCPA 1990 prior to the determination of the Sizewell C DCO application would not be out of line with the approach adopted by other planning authorities, such as those authorised in advance of Hinkley Point C and Wylfa in the past. The facilities to be relocated, with the exception of the visitor centre, are essential to the safe operation of Sizewell B nuclear power station. Should the DCO for Sizewell C be approved and delivered, these facilities will need to be relocated. Given the urgent need for new nuclear power stations, it is considered that approving this application would facilitate the timely delivery of Sizewell C, should it be approved, in line with government policy.
- 9.6 Additionally, given the many emerging concerns regarding the construction of Sizewell C, if that is to go ahead, the early delivery of these necessary works is likely to lessen the future adverse impacts by proactively allowing EDF Energy to manage the construction programme.
- 9.7 Many have questioned the prematurity of this application and that the works are not necessary until Sizewell C is committed to be constructed. The backstop position provided for in the planning application is for the vacated land on the site identified for Sizewell C to be restored to AONB quality landscape should the Sizewell C station not be consented or delivered in the future. This is proposed to be secured via a planning condition. Therefore, there is very limited additional loss of AONB resulting from this planning application which will have no harm to the AONB, and the small additional loss which does result from the works will be compensated for through financial payment in a Section 106 agreement.
- 9.8 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.

9.9 The NPPF requires exceptional circumstances for major development in the AONB. In this instance:

- the identification of the Sizewell C site as potentially suitable for a new nuclear power station;
- the DCO application which is currently before the Planning Inspectorate; the need to relocate the Sizewell B facilities to facilitate that development (should it go ahead);
- it is not considered that there will be any material impact on the environment, AONB landscape or recreational opportunities as a result of the proposed development;
- the urgent national need for the delivery of new nuclear power stations; and
- the potential to reduce cumulative impacts by allowing these works to precede.

The Sizewell C construction works are considered to justify the approval of this major development in the AONB.

9.10 Mitigation and compensation are provided for in relation to landscape and ecology, to avoid harm to the 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.

9.11 By front-loading the necessary construction works at Sizewell B, the overlap of construction with ScottishPower Renewable proposals is reduced and the cumulative impacts are not considered to be significant (having been assessed on a worst-case basis). The identified cumulative impacts with Sizewell C proposals are minimised, this is not to say that there will not be impacts but they will be less than if this proposal was consented as part of the DCO process for Sizewell C.

9.12 The application is part outline and part full, to enable front loading of the critical works – these being clearing Coronation Wood (already commenced) and providing the outage facilities. The detail of the visitor centre and ancillary features including administration, storage, welfare and canteen 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. Throughout this section reference has been made to SCLP policies which are listed in full under 7.3 and available at

www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/suffolk-coastal-

[local-plan/adopted-suffolk-coastal-local-plan/](#). Our overall conclusion is that the proposal complies with the development plan and there are no material considerations that would indicate a decision other than in accordance with it.

10 RECOMMENDATION

AUTHORITY TO APPROVE subject to the signing of a section 106 legal agreement requiring a payment in relation to minor residual impacts on the AONB and ensuring the parking on Pillbox Field approved under DC/19/1637/FUL is not constructed alongside this consent, 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:

- Existing Site Layout Plan SZC-RF0000-XX-000-DRW-100045 Rev.01
- Proposed Site Layout Plan SZC-RF0000-XX-DRW-100046 Rev.01
- Proposed Demolition Plan SZC-RF0000-XX-000DRW-100047 Rev.1

Full component drawings:

- Proposed Outage Store Block Plan SZC-RF0000-XX-000-DRW-100048 Rev.01
- Proposed Outage Store Roof Plan SZC-RF0000-XX-000-DRW-100054 Rev.01
- Proposed Outage Store North Elevation SZC-RF0000-XX-000-DRW-100057 Rev.01
- Proposed Outage Store South Elevation SZC-RF0000-XX-000-DRW-100058 Rev.01
- Proposed Outage Store East Elevation SZC-RF0000-XX-000-DRW-100059 Rev.01
- Proposed Outage Store West Elevation SZC-RF0000-XX-000-DRW-100060 Rev.01
- Proposed Training Centre Block Plan SZC-RF0000-XX-000-DRW-100061 Rev.01
- Proposed Training Centre Roof Plan SZC-RF0000-XX-000-DRW-100065 Rev.01
- Proposed Training Centre North and South Elevations SZC-RF0000-XX-000-DRW-100067 Rev.01
- Proposed Training Centre East and West Elevations SZC-RF0000-XX-000-DRW-100068 Rev.01
- Coronation Wood Development Area Proposed Site Plan SZC-RF0000-XX-000-DRW-100070 Rev.01
- Proposed Car Parking Plan SZC-RF0000-XX-000-DRW-100073 Rev.01
- Outage Laydown Area SZC-RF0000-XX-000-DRW-100078 Rev.01
- Proposed Coronation Wood Development Area Landscape Plan – SZC-RF0000-XX-DRW-100083 Rev.01
- Proposed Coronation Wood Tree Removal Plan - SZC-RF0000-XX-DRW-100085 Rev.01
- Pillbox Field Proposed Landscape Plan - SZC-RF0000-XX-DRW-100088 Rev.01
- Landscape Restoration Plan SZC-RF0000-XX-000-DRW-100087 Rev. 01

Outline component drawings:

- Coronation Wood Development Area Proposed Site Plan SZC-RF0000-XX-000-DRW-100070 Rev.01
- Proposed Visitor Centre Parameter Siting and Height Plan SZC-RF0000-XX-000-DRW-100075 Rev.01
- Proposed Administration Building Parameter Siting and Height Plan SZC-RF0000-XX-000-DRW-100080 Rev.01
- Proposed Outline Development Zone Parameter Siting Plan SZC-RF0000-XX-000-DRW-100077 Rev.01

Supporting documents:

- Design and Access Statement;
- Arboricultural Impact Assessment;
- Arboricultural Method Statement;
- Environmental Statement;
- Shadow Habitats Regulations Assessment;
- 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.

FULL AND OUTLINE

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 and Lead Local Flood Authority. 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, or not implemented within five years of the development

consent order being issued, a scheme of restoration in accordance with details first submitted to and agreed in writing by the Local Planning Authority will occur at the 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) additional survey work (to ensure that the mitigation is appropriate to conditions at the time of constructions - primarily in relation to outline elements) as required in consultation with the Local Planning Authority;
- s) a revised methodology for relocation of reptiles within the development area;
- t) provision of biodiversity net gain measures at appropriate time scales during the construction works;
- u) vehicle emissions and non-road mobile machinery (NRMM) emissions to be minimised by incorporating best practice control and management measures; and
- v) 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 (other than Permitted Preparatory Works as defined in Informative 1) 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 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 Policy SCLP 11.7 of the Suffolk Coastal Local Plan 2020 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 [20] 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 Policy SCLP 11.7 of the Suffolk Coastal Local Plan 2020 and the 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:

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.

25. FULL:

Within three months of construction commencing (other than Permitted Preparatory Works as defined in Informative 1) a new unmanned safe crossing point is to be provided on Sizewell Gap Road at the junction with Sandy Lane, in a location and to a design to be agreed with the Local Planning Authority in conjunction with the Local Highway Authority.

Reason: In the interest of highway safety to ensure that pedestrians, cyclist and horse riders can safely cross Sizewell Gap Road.

Informatives:

1. Definition to be used in relation to the conditions detailed above (where noted):
"Permitted Preparatory Works" means:
 - a. Felling of trees and grubbing out roots;
 - b. Exposing of utility services within the site;
 - c. Surveys and geotechnical surveys; and
 - d. 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.

3. Protected Species:

The applicant should note that under the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2017) (as amended), it is an offence to damage or destroy active bird nests; disturb, kill or injure bats or disturb, damage or destroy their roosts and similar protections exist for 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 protected species will be impacted. Likewise, badgers are protected under the Protection of Badgers Act (1992) and if disturbance is likely, a licence may be required from Natural England before any work is undertaken.

4. Under the Environmental Permitting Regulations 2016 for England and Wales you may need an environmental permit for flood risk activities if you want to undertake work in, under, over or within 8 metres of a fluvial main river, flood defence structure or culvert or within 16m of a tidal main river, flood defence structure or culvert. Works beyond 8 or 16 m within the Flood Zone may also require a permit. This is set out in the flood risk activity meaning below. Please note an allowed activity is an activity which has been granted planning permission.

(g) Any activity (other than an allowed activity) on a flood plain that is-

(i) more than 8 metres from a non-tidal main river or more than 16 metres from a tidal main river, or

(ii) more than 8 metres from any flood defence structure or culvert on a non-tidal main river or more than 16 metres from any flood defence structure or culvert on a tidal main river;

which is likely to divert or obstruct floodwaters, to damage any river control works or to affect drainage.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

5. Pollution Prevention

- i. Given the potential for polluting substances to be stored on the Outage Laydown Area consideration should be given to a valve or penstock in the surface water system that serves this area. In the event of a spillage this would provide a valuable last line of defence in preventing a pollution incident and enabling containment and retrieval of the spillage.

BACKGROUND INFORMATION:

See application ref: DC/20/4646/FUL at www.eastsuffolk.gov.uk/public-access