

SIZEWELL C ACCOMMODATION CAMPUS STUDY
SUFFOLK COUNTY COUNCIL PREFACE

EDF Energy, as the proposed developer of a nuclear power station at Sizewell, in Suffolk, undertook a Stage 2 consultation on their scheme at the end of 2016/beginning of 2017. As part of this, they included proposals for an accommodation campus for staff at the entrance to construction site. This is within the area of Leiston-cum-Sizewell Town Council but close to the small village of Eastbridge.

Suffolk County Council and Suffolk Coastal District Council are statutory consultees on this Nationally Significant Infrastructure Project. In response to the Stage 2 consultation, both councils agreed a joint response to EDF Energy. This included the following statement:

“While the Councils understand the rationale of an accommodation campus located at or close to the construction site, we remain concerned about the environmental impacts of the proposed site location, which may cause an overload on the sensitive environment of the AONB. The Councils expect a review of potential alternative sites for the accommodation campus, to consider whether or not there are credible alternative sites in proximity to the development site, which may be considered to have less environmental impact, more legacy potential and/or better community integration. The review should also consider alternative site layouts for the currently proposed site, such as a layout that spreads the development to the whole of the site area of option 1 without the sports facilities, to achieve lower level accommodation units.”

Suffolk County Council recognises that it is for EDF Energy to make its proposals for a Development Consent Order for the Sizewell C Power Station in due course and this will include means of accommodating construction workers. However, the Council is aware of concerns in the local area about the impact on the local communities and environment of the current proposals and considers that there should be further examination of the suggested location for the development of a campus. In order to further this consideration, the Council has commissioned consultants (Boyer - with Cannon Engineering) to look at whether there are possible other options that would meet EDF Energy’s criteria for the location of such a facility but also take account of wider planning objectives.

Boyer has produced a report which shows that there are a number of possible alternatives to EDF Energy’s current proposal which are likely to meet their criteria but appear to be more acceptable in wider planning terms. The conclusions of the report are those of the consultants, not of the County Council, nor does it advocate any one of the sites assessed, but it reinforces the concern of the Council that there

are options available that would overcome the disadvantages of the existing proposal but that have not yet been considered by EDF Energy.

Accordingly, the County Council calls upon EDF Energy to undertake a wider appraisal of options for development of a campus, to take into account wider issues affecting communities and the environment and to publish a clear justification of the position taken in due course. The County Council would be willing to work with EDF Energy in pursuing this work.

July 2017

Sizewell C

Accommodation Campus Review



Boyer

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EXECUTIVE SUMMARY

In November 2016, EDF Energy commenced their Stage 2 Consultation as part of their proposed nuclear power station at Sizewell in Suffolk. This latest phase of development of the power station is known as 'Sizewell C'. The Stage 2 Consultation included further details in relation to bus and train routes, Park and Ride facilities, and a Visitor Centre, as well as a wider accommodation strategy that included the identified location for a proposed temporary accommodation campus for the construction workers.

Boyer and Cannon Consulting Engineers were commissioned by Suffolk County Council to undertake an independent review of any potential alternative sites just for the accommodation campus, compared to the site being proposed by EDF Energy in the Sizewell C Stage 2 Consultation. It is acknowledged that this is only one element of the overall accommodation strategy, and this review does not consider other aspects, such as the private rental market or the use of existing vacant housing as part of EDF Energy's wider accommodation strategy. This review does make reference to certain parts of the wider strategy, including temporary caravan accommodation, but the focus has remained solely on alternative campus accommodation sites.

The purpose of this review was to firstly evaluate the preferred accommodation campus proposed by EDF Energy as part of this consultation phase. The next part of the review was to then assess whether there are any sites that might be genuine alternatives that would be better placed to accommodate the campus development, when considered against EDF Energy's own criteria plus other criteria considered relevant by Suffolk County Council.

A number of sites representing a variety of different scenarios, either having the accommodation campus on one site or across several sites, were presented by Suffolk County Council at the commencement of the project. These included both large and small sites, as well as sites attached or detached from abutting settlements.

The sites considered in this review are set out in the map below.

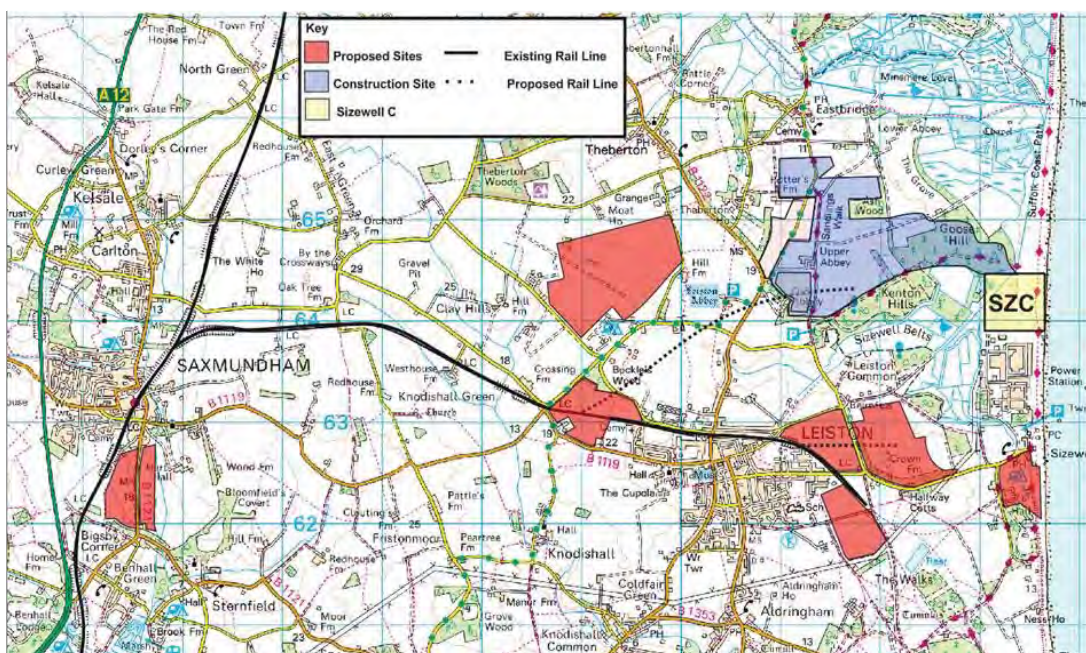


Figure 1: Map to show the sites assessed by Boyer and Cannon¹

EDF Energy’s preferred accommodation campus site was considered at the start of the assessment. The purpose was to establish a “benchmark” against which the alternative sites would then be considered. For completeness, and to act more as a “control” during this process, Boyer and Cannon have also considered the alternative sites proposed and assessed by EDF Energy during their Stage 1 Consultation.

Boyer and Cannon have concluded that EDF Energy’s preferred site has significant cumulative environmental impacts, and limited legacy potential. EDF Energy’s consultation material does not appear to have fully considered these significant factors.

In assessing the other sites, Boyer and Cannon suggest there are genuine alternative sites that should be considered further for the campus, as part of a comprehensive approach to providing a wider “accommodation strategy”.

Such an “accommodation strategy” should be undertaken by EDF Energy in conjunction with Suffolk County Council and Suffolk Coastal District Council, as was requested in the Joint Response to the Stage 1 Consultation in February 2013.

¹ A map to identify the sites included as part of an Accommodation Campus Review (Cannon; 2016, Ordnance Survey)

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C1 - EDF Energy Preferred Site Suitability Assessment

C2 - Saxmundham South Site Suitability Assessment

C3 - Leiston Airfield Site Suitability Assessment

C4 - Leiston West Site Suitability Assessment

C5 - South Sizewell Gap (EDF Energy Option 2) Site Suitability Assessment

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1. INTRODUCTION

- 1.1 This review has been prepared jointly by Boyer and Cannon Consulting Engineers on behalf of Suffolk County Council (SCC).
- 1.2 It provides an independent review of the preferred accommodation campus as proposed by EDF Energy in relation to the Sizewell C Stage 2 Consultation.
- 1.3 This review then goes on to give further consideration to other potential sites in the area, and to assess whether there are any genuine alternative sites that should be considered further by EDF Energy at this current stage.
- 1.4 It appears that EDF Energy's Preferred Site is the only proposal that has been considered in conjunction with any detailed layouts, and how the proposed development would actually work on this site. It is unclear if any similar detailed layout exercises for "alternative sites" has been considered by EDF Energy.
- 1.5 For the purposes of this accommodation campus review, there has been no consideration for detailed layouts involving landscaping, access, infrastructure, or drainage for any of the alternative sites that have been proposed. Instead the review has concentrated on the "potential" of alternative sites, without considering specific detail at this time.
- 1.6 The review has been set out as follows:
 - *Chapter 2* sets out background information on Boyer and Cannon and the commissioning of the report by Suffolk County Council;
 - *Chapter 3* explains the methodology used by Boyer and Cannon in the assessment of the sites set out within the report;
 - *Chapter 4* sets out the overall transport issues associated with this form of development based on information provided by EDF Energy on Sizewell C and Hinkley Point as well as a review of additional reports that have been undertaken;
 - *Chapters 5* provides a review of EDF Energy's preferred site;
 - *Chapters 6-13* individually assesses the alternative sites;

- *Chapter 14* provides a summary of findings and conclusions as set out by Boyer and Cannon; and
- *Chapter 15* sets out the references used as part of this independent Accommodation Campus Review.

2. BACKGROUND TO THE ACCOMMODATION CAMPUS REVIEW

Introduction

- 2.1 In November 2016, EDF Energy undertook their “Stage 2 Consultation” as part of their proposed nuclear power station at Sizewell in Suffolk (referred to as Sizewell C).
- 2.2 As part of this consultation, and further to the work carried out during their previous Stage 1 Consultation, EDF Energy have proposed that a campus would be located close to the Sizewell C site, in order to accommodate construction workers throughout the construction phase of Sizewell C.
- 2.3 In their consultation material, EDF Energy has considered that this accommodation campus would be ‘temporary’ and would only be in place for the duration of the construction programme, which is anticipated to be between approximately 10 and 12 years.
- 2.4 Three potential sites for the accommodation campus were proposed during their Stage 1 Consultation. At their Stage 2 Consultation this was reduced to one proposed accommodation site, which is located on the construction site between Theberton and Eastbridge. This is the EDF Energy’s preferred site, as identified at the Stage 1 Consultation.
- 2.5 Local residents and Councillors raised concerns in relation to the impact of any proposed accommodation campus in this location on the surrounding environment, especially given its proximity to Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the east, and Minsmere’s Special Landscape Area to the west. Local residents and Councillors are understood to be concerned by the impact of the proposed site on the immediate environment, the local communities and transport. The overriding issue is one of cumulative impact in association with the construction site itself.
- 2.6 This was highlighted in the Suffolk Coastal District Council and Suffolk County Council’s Joint Response to the Stage 1 Consultation, as set out in Appendix A of this report.
- 2.7 Suffolk County Council has remained keen to test whether alternative sites for the accommodation campus exist. They have therefore commissioned a review of EDF Energy’s Preferred Accommodation Campus Site at Theberton and Eastbridge, plus an assessment of whether there were alternative sites available that would equally meet EDF Energy’s broad project requirements and be acceptable when judged against a broad range of criteria. The aim has been to see if there are alternative sites which would meet EDF Energy’s broad requirements, but have less impact on the issues identified by residents and Councillors.
- 2.8 Following a tender process, Boyer and Cannon Consulting Engineers were successfully appointed in December 2016 to carry out this independent assessment.

Boyer

Background

- 2.9 Boyer are a multi-skilled national planning consultancy comprising over 70 employees with 5 offices across the UK at London, Wokingham, Cardiff, Bristol and Colchester.
- 2.10 Boyer has a range and depth of expertise which include: Strategic Planning; Development Economics; and Design.

Experience

- 2.11 Boyer's Colchester Office has extensive knowledge of Suffolk and the local area. They also have experience of working for Suffolk County Council, including their long-standing assistance with Suffolk County Council's Planning Obligations team.
- 2.12 Boyer Colchester has previous experience of working on the Sizewell C proposals. In 2012, they were commissioned by EDF Energy and Suffolk Coastal District Council to assist 25 Town and Parish Councils in Suffolk with their responses to the EDF Energy's Stage 1 Consultation.

Personnel

- 2.13 The Boyer Sizewell Project Team comprised of two colleagues from the Colchester Office, these being James Bailey (Director) and Bethan Roscoe (Graduate Planner).
- 2.14 James Bailey has been the project lead for this Accommodation Campus Review given his extensive knowledge of the Suffolk area and his experience in managing Boyer's earlier involvement with the Stage 1 Consultation.
- 2.15 Bethan was also chosen as part of the team given her experience in carrying out site and land appraisals following her close working relationship with Boyer's Land Team and her current experience in studying towards her RTPI and RICS.
- 2.16 Boyer took the view that in order to provide the necessary comprehensive assessment of the Accommodation Campus Review, it was essential to involve the external knowledge and expertise of highway consultants to consider traffic and highways issues. As such, Boyer collaborated with Cannon Consulting Engineers who form the remainder of the Project Team.

Cannon Consulting Engineers (CCE)

Background

- 2.17 Cannon Consulting Engineers are a Suffolk based company that provide focused highways, transport and infrastructure advice to the development industry. As such, they have extensive knowledge of the Suffolk area and its highways issues.

Experience

- 2.18 Cannon have worked on many projects in Suffolk including helping to deliver Chilton Leys at Stowmarket, the Eastern Relief Road at Bury St Edmunds and other residential developments in Red Lodge, Eye, & Holbrook. Cannon have also recently supported Concertus for the County Council on the new high school project in Bury St Edmunds at Moreton Hall

Personnel

- 2.19 Rob Evans, the co-founder and director of CCE, together with his colleagues, Jessica Pratt (Associate) and David Jones (Transport Planner) form the project team at Cannon.

3. NATIONAL PLANNING POLICY

Nationally Significant Infrastructure Project

- 3.1 As set out in The Planning Act (2008), the proposal for a new nuclear power station at Sizewell constitutes a “nationally significant infrastructure project” (NSIP) by virtue of its size, scale and importance.
- 3.2 According to Government Guidance and National Legislation, nuclear generation of this size is required to comply with National Policy Statements (NPS), which include the overarching NPS (EN-1) and the technology specific NPS, in this case, EN-6 on nuclear power generation.
- 3.3 The Government states that these two National Policy Statements will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 3.4 National infrastructure needs to be considered against national policies, which should take primacy over regional or local policies, such as Local Plans and Neighbourhood Plans.
- 3.5 Paragraph 3 of the National Planning Policy Framework (NPPF) states that: “This Framework does not contain specific policies for nationally significant infrastructure projects for which particular considerations apply. These are determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant national policy statements for major infrastructure, as well as any other matters that are considered both important and relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and are a material consideration in decisions on planning applications.”

Additional Guidance

- 3.6 In April 2013 the Secretary of State for Communities and Local Government issued the: "*Planning Act 2008: Guidance on associated development applications for major infrastructure projects*". Examining authorities must have regard to this guidance in reaching a view as to whether development constitutes associated development.
- 3.7 The guidance states that "*associated development should not be an aim in itself but should be subordinate to and necessary for the development and effective operation to its design capacity of the NSIP*" (Para.10).
- 3.8 Annex A of this guidance confirms that accommodation for staff that must be on site to enable the operation or maintenance of the NSIP also constitutes as associated development.
- 3.9 The Planning Act (2008) sets out in sub-section 6 of 115 that "*To the extent that development consent is granted for associated development, section 33 applies to the development as it applies to development for which development consent is required.*"

- 3.10 Associated development should be considered as part of the proposal and would therefore require complying with National Policy Statements and Guidance. In light of this, the necessary National Policy Statements are set out below.

National Policy Statements and Additional Guidance

- 3.11 As set out above, National Policy Statements are the primary benchmark against which proposals for NSIPs should be decided. However, other policies should also be considered which firstly include those at the national level, such as the NPPF, and then include those at the local level, such as regional, county and local plans and policies for the area as well as any Supplementary Planning Guidance.
- 3.12 This Chapter will set out the primary NPSs that will need to be considered in determining this application for the nuclear power plant in Sizewell, and its associated development.

EN-1 (Energy)

- 3.13 National Policy Statement EN-1 forms the over-arching NPS for energy infrastructure.
- 3.14 According to NPS EN-1, paragraph 5.12.8 of this NPS supports the inclusion of legacy planning as part of the NSIP proposals. It states, "*the IPC [Infrastructure Planning Commission] should consider any relevant positive provisions the developer has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.*"
- 3.15 It is acknowledged that the detail of "legacy benefits" as described in paragraph 5.12.8 requires significantly more consideration than has been provided in this Review.
- 3.16 Paragraphs 5.9.5 and 5.9.14 state that certain Development Plan policies, if available, need to be considered by the Panel. This includes relevant development plan policies in relation to landscape designations.

Landscape Impacts

- 3.17 EN-1 Paragraph 5.9.8 states that: "*Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*"

- 3.18 This is reiterated in the decision notice for Hinkley Point C, which states that, *“Notwithstanding the policies in favour of granting development consent for new nuclear power stations noted above, the NPS is nonetheless clear that the decision as to whether any particular proposal should be granted consent, should depend on how the proposal measures up against a range of impacts identified as potentially associated with new power stations in NPS EN-1 and NPS EN-6. This accords with s104(3) of the Act, which requires applications for nationally significant infrastructure to be decided in accordance with any relevant NPS except where, amongst other matters, the adverse impact of the proposed development would outweigh its benefits.”* [The Planning Inspectorate; p13; 2012]
- 3.19 Part 4.4 of the NPS EN-1 states that *“applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant’s choice taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility”*.
- 3.20 As set out in this review, it is in Boyer and Cannon’s view that these main alternatives have not been studied comprehensively and fail to include sufficient information to indicate the main reasons for the applicant’s choice taking into account the environmental, social and economic effects.

EN-6 (Nuclear Energy)

- 3.21 National Policy Statement EN-6, which is specific to developments relating to Nuclear Energy, is also considered relevant when undertaking Sizewell C’s Accommodation Campus Review.
- 3.22 Paragraph 3.16 of the NPS states that, *“Some activities associated with the proposed development may take place outside of the boundaries of the listed site (for example construction and decommissioning activities – see Section 2.3 of this NPS). In considering an application for development consent IPC should assess all impacts of the proposed development that it considers relevant and important to the application in accordance with the Planning Act 2008, the policy set out in EN-1 and this NPS.”*
- 3.23 It is therefore considered that the accommodation campus at Sizewell C must be considered and have regard to National Planning Policy Statements EN-1 and EN-6, and relevant development plan documents including those relating to Landscape Designations.
- 3.24 In reviewing the sites set out in this review, Boyer and Cannon have considered these necessary policies.

4. HINKLEY POINT C

- 4.1 As set out throughout this review, Hinkley Point C (HPC) has been used as a focal point in the assumptions for Sizewell C's accommodation campus. This has been due to the absence of evidence and information made available by EDF Energy at the Stage 1 and Stage 2 Consultations for Sizewell C.
- 4.2 In the absence of evidence, Boyer and Cannon have therefore sought to use a similar and recent nuclear power station as a comparable example, hence the use and reference to Hinkley Point C.
- 4.3 This chapter sets out the details of the Hinkley Point C's accommodation campus and reflects on how they compare to those proposed at Sizewell C.
- 4.4 It is noted that proposals at Hinkley Point C also includes an on-site 510 bed accommodation campus.

Bridgwater A and Bridgwater C Accommodation Campus

Original Application

- 4.5 In the approved application, EDF Energy originally proposed to have two off-site temporary accommodation campuses, these being Bridgwater A and Bridgwater C. Both of which were located approximately 12km from the construction site at Hinkley Point.
- 4.6 In determining the location of these temporary accommodation campuses, legacy planning was an integral part of their decision process.
- 4.7 Whilst EDF Energy noted that their Bridgwater site is located within Sedgemoor District Council's designated Master Plan area, EDF Energy's Planning Statement stated that, in developing the accommodation site on a brownfield site at Bridgwater, EDF Energy would remediate its current status as contaminated land. In doing so, EDF Energy would be assisting the Local Authority in the ultimate completion of the Bridgwater Masterplan Document (EDF Energy; p.43; 2011).
- 4.8 In their proposals EDF Energy also stated that during their use of the land, local residents would be given access to the on-site sports pitches, thus benefiting the local community.
- 4.9 This confirms that EDF Energy's proposals at Hinkley not only focused on legacy planning and the future development of the local area, but also sought to provide something for the local residents by encouraging integration between existing residents and the construction workers. In their decision making process, EDF Energy also considered existing the local area's future development plan to ensure that the development of an accommodation campus in this location would have a long lasting benefit to the local area.

Revised Application

- 4.10 EDF Energy are currently seeking to amend their original approved application by having just one campus at Bridgwater A to include the additional accommodation originally being located at Bridgwater C.
- 4.11 In justifying their rationale for this proposed change, EDF Energy stated that “*consolidating campus accommodation in Bridgwater onto a single site has advantages for the project in terms of logistics, transportation, security and safety*”².
- 4.12 It is apparent that, whilst the locations of the accommodation campuses has changed somewhat, legacy planning has still formed an integral part of the decision making process.
- 4.13 In their reviewed proposals, EDF Energy has stated that, following Bridgwater A’s use as a temporary accommodation campus, the site will most likely be developed for permanent housing for the local area, which has been planned to comply with the Local Authority’s long term housing strategy for Bridgwater. EDF Energy have confirmed that they have been working closely with the relevant authorities (Sedgemoor District Council and Somerset County Council) to finalise their amended application to reflect the needs of the district.
- 4.14 It is apparent from Hinkley Point C, that EDF Energy have taken a view of alternative sites, and considered the legacy of sites, set some distance from the Construction Sites for the Accommodation Campus. As such, it is considered that a similar approach should be taken for the accommodation campus at Sizewell C.
- 4.15 There is no reason as to why this ideology of legacy planning should not also be adopted in relation to determining the location of Sizewell C’s Accommodation Campus. Throughout this review, Boyer and Cannon would encourage EDF Energy to undertake a similar working relationship with both Suffolk County Council and Suffolk Coastal District Council in relation to the location of the temporary accommodation campus at Sizewell C.

² EDF Energy, Application Statement for Hinkley Point C Minor Amendment (2017 p.5)

5. METHODOLOGY

Introduction

- 5.1 The purpose of this review is to assess the accommodation campus proposed by EDF Energy, as part of the Sizewell C Project. It will look to assess whether there are any sites that might be genuine alternatives that could be better placed to accommodate this development than that currently being proposed by EDF Energy.
- 5.2 This chapter sets out the methodology that has been used to review the sites for an accommodation campus.
- 5.3 It was important to assess EDF Energy's Preferred Site for an accommodation campus at the beginning of this review in order to establish a "benchmark" against which alternative site should then be considered. It is noted that EDF Energy's preferred site is located at the entrance to the construction site near to the villages of Theberton and Eastbridge.

Alternative Sites

- 5.4 A series of "other" sites were initially presented by Suffolk County Council at the start of the project. These were determined from earlier work undertaken by Suffolk County Council which were considered to have potential to deliver an accommodation campus. The sites presented are not definitive, but do cover a wide range of different alternatives that could be considered and have different opportunities and constraints. Boyer and Cannon also suggested that there were additional sites that could be assessed further. These alternative sites were then considered against the findings of the EDF Energy's Preferred Site.

EDF Energy's Consultation Stages 1 and 2

- 5.5 At the Stage 1 Consultation three sites were considered:
- Option 1: EDF Energy's Preferred Option between Theberton/Eastbridge;
 - Option 2: Sizewell Gap; and
 - Option 3: Leiston East.
- 5.6 These sites are set out in the following maps that were taken from EDF Energy's Stage 1 Consultation material.



Figure 2: Stage 1 Consultation EDF Energy Preferred Option³

5.7 The figure above identifies EDF Energy's Stage 1 Consultation Option 1 for an accommodation campus located between Theberton and Eastbridge. This site has been considered by EDF Energy as the preferred location for an accommodation campus.



Figure 3: Stage 1 Consultation EDF Energy Option 2: Sizewell Gap⁴

³ Stage 1 Consultation Option 1 EDF Energy's Preferred Option (EDF Energy, 2012; p.107)

⁴ Stage 1 Consultation Option 2 Sizewell Gap (EDF Energy, 2012; p.109)

- 5.8 The figure above identifies EDF Energy's Stage 1 Consultation Option 2 for an accommodation campus located just north of Sizewell Gap. This site has been reassessed as part of this accommodation campus review and its findings are set out in Chapter 10 of this report.



Figure 4: Stage 1 Consultation EDF Energy Option 3: Leiston East⁵

- 5.9 The figure above identifies EDF Energy's Stage 1 Consultation Option 3 for an accommodation campus located just south of Leiston. This site has also been reassessed as part of this accommodation campus review and its findings are set out in Chapter 11 of this report.
- 5.10 As previously set out, during the Stage 2 Consultation it is only the preferred site (Theberton/Eastbridge) which has been put forward for consideration.
- 5.11 The preferred site is located within the western boundary of the construction site. The sites at Sizewell Gap and Leiston East, included in the Stage 1 Consultation, are located further south in close proximity to the existing Sizewell B site and within reasonable distance of the nearby settlement of Leiston.
- 5.12 There appears to have been no further analysis of alternative sites for a temporary accommodation campus, nor is it apparent that any further research has been undertaken regarding transport impacts of such an alternative location.

⁵ Stage 1 Consultation Option 3 Leiston East (EDF Energy, 2012; p.111)

EDF Energy Preferred Site – “Benchmark”

- 5.13 In assessing alternative sites, it was considered important to establish EDF Energy’s Preferred Option and to understand EDF’ Energy s criteria in order to set out a “benchmark” from which any alternative sites could then be assessed.
- 5.14 From analysis of the information available, EDF Energy’s main criterion was to allocate a site that best meets the strategic needs of the project, whilst avoiding or reducing likely significant adverse effects.
- 5.15 Other EDF Energy criteria were centred on the following:
- Proximity to the construction site (for the convenience of workers, efficiency of operation and significant benefits in terms of limiting impacts on local communities);
 - The ability to get their construction workers to and from the construction site swiftly and efficiently; and
 - The desire to avoid and reduce potential adverse environmental effects.
- 5.16 As a result, EDF Energy defined the search area for a potential accommodation campus to be constrained to the north of Theberton and to the south of Leiston.

Agreed Alternative Sites

- 5.17 As noted, a number of sites representing a variety of different scenarios were presented by Suffolk County Council at the commencement of the project. These sites included both large and small sites, as well as sites attached or detached from abutting settlements.
- 5.18 The purpose of representing a variety of different scenarios was to give a range of options for consideration, which may include looking at accommodating the entire development on one single site or splitting the accommodation campus across several sites.
- 5.19 As noted, in addition to these sites, Boyer and Cannon also considered additional alternative sites from their local knowledge of the area and against the evidence available.
- 5.20 The concluding list of sites to be assessed was as follows:
- **Site 1: EDF Energy Preferred Site – As Benchmark**
 - Site 2: Saxmundham South;
 - Site 3: Leiston Airfield;
 - Site 4: Leiston West;
 - Site 5: Sizewell Gap/EDF Energy Option 2;
 - Site 6: Leiston East/EDF Energy Option 3;
 - Site 7: South Sizewell Gap / Sizewell Coast; and
 - Site 8: Lovers Lane West.

The Assessment

- 5.21 This review has been based on initial individual site visits; analysis of evidence; and review of the information available, which subsequently helped to establish a series of criteria against which to assess the sites.

Site Visits

- 5.22 Prior to assessing the sites, the Project Team visited each site. All site visits took place in early December 2016.
- 5.23 The site visits enabled the Project Team to visualise the development on each of the sites and to understand potential issues concerning traffic or impact on the surrounding area.

Establishing Criteria

- 5.24 It was considered important to establish a set of criteria against which to assess every site. The EDF Energy “benchmark” and criteria provided a useful starting point, but other evidence was also required.
- 5.25 A set of criteria was discussed in conjunction with Suffolk County Council’s Officers against which all of the assessed sites were considered.
- 5.26 The main criteria included:

Environmental Impacts

- 5.27 This included both environmental and visual impacts particularly those relating to designations. Sites were considered against their distance from designations such as Areas of Outstanding Natural Beauty (AONB), Special Landscape Areas (SLA) and whether there were any Public Rights of Way routes through the site that would need to be considered.

Transport Impacts

- 5.28 Transport impacts were divided into work and non-work related trips and were assessed based on their proximity to the construction site and their proximity to existing settlements. It was considered that sites located in close proximity to the construction site would likely have a reduced transport impact on existing road networks and users. However, it should be noted that a general assumption has been that Campus trips to/from the construction site would be actively managed and provided for by bus as was the case at Hinkley Point C and there is a reduced impact as a result. Sites located in close proximity to existing settlements were also positively assessed as they would also reduce the need for car trips when considering non-work related trips to access facilities.

Legacy Potential

- 5.29 As set out in the previous chapter, legacy planning formed an integral part in determining the location of the Bridgwater A Accommodation Campus at Hinkley Point C. As such, it was considered that legacy planning should also form a criteria when assessing the location of the accommodation campus at Sizewell C. Sites were assessed positively on the basis that they would have the potential to be developed in the future. For example, where infrastructure provision was to be used for the accommodation campus, it would have the ability to be re-used for some form of development in the future. Examples of this may include road network, utilities provision or specific buildings or facilities such as sports provision. The consideration of 'legacy' was not restricted to future residential development.

Community Effects

- 5.30 The concerns of locals regarding the previous experiences with Sizewell A and B in relation to impacts on existing settlements and communities have been duly noted. However, for the purposes of this assessment, the proximity of sites to existing settlements has been reflected positively. Boyer and Cannon are of the view that sites located in close proximity to existing settlements will encourage integration between the construction workers and existing residents. It is considered that increased integration will encourage the construction workers to have a strong association with the existing settlements and would increase their respect for the area, thus overcoming previous community issues which were experienced during Sizewell A and B. It is acknowledged that this is a view that may not be shared by everybody.

Amenity Impacts

- 5.31 Amenity impacts included any impacts that a site might have on immediately existing residents. Assessing this criterion was based on the proximity of the sites to existing settlements and assessing their likely noise, lighting and privacy impacts on existing residents. Sites which were considered to have a limited impact on existing residents were assessed positively in this respect. Issues such as transport or integration with the community are considered elsewhere in the assessment, and are not being considered as part of the "amenity impacts".

Physical Constraints

- 5.32 Boyer and Cannon have considered the physical constraints associated with each of the sites reviewed. Physical constraints included physical barriers, for instance the size of the site, watercourses and any existing development which might prevent the site from accommodating development. This has been recorded on a factual basis, and no positive or negative assessment has been applied.

Planning Policy

- 5.33 As set out in Chapter 3 of this review, applications of this nature must consider National Planning Statements (NPS). Whilst Local Planning Policy is not given the same weight as NPS, Boyer and Cannon considered it important to set out the policy context of each site. In doing so, this assisted in determining whether the site has any potential for future development.

Evidence Assessment

- 5.34 As part of assessing these sites, Boyer undertook extensive analysis of the available EDF Energy Documents from their previous Stage 1 and current Stage 2 Consultation. This included further analysis in relation to how EDF Energy assessed the aforementioned three site options during their Stage 1 Consultation (EDF Energy Preferred Option; South Sizewell Gap; and Leiston East).
- 5.35 There was also analysis of the approach used by EDF Energy in assessing the potential sites for an accommodation campus for their Hinkley Point scheme and this included reviewing the most recent documents as part of the Hinkley Point Development Plan.
- 5.36 In order to acquire the necessary information, Boyer and Cannon have also had access to Suffolk County Council's mapping and Planning Policy information. Relevant planning applications were also used to obtain information especially with regards to statutory consultee responses. Boyer also reviewed Suffolk Coastal District Council's previous accommodation campus review and assessments.

Legacy Planning

- 5.37 Suffolk County Council was also keen to incorporate the importance of "Legacy Planning" within this accommodation campus review. This had been considered important in identifying a suitable accommodation campus for EDF Energy's scheme at Hinkley Point, therefore it was considered relevant for Sizewell C.
- 5.38 Indeed, the "Bridgwater A" Accommodation Campus in the Hinkley Point development was considered to leave a positive legacy for the future. EDF Energy confirmed that after its use as an accommodation campus, the buildings will be removed but key infrastructure will be maintained for future development.
- 5.39 It is also noted that "legacy planning" formed an integral part of the Suffolk County Council and Suffolk Coastal District Council Joint Local Authority Group response to the Stage 1 Consultation. As set out in Appendix A, in their response, they stated that there was a need *"to formulate an Accommodation Strategy which not only meets the requirements of the development, but also the future needs of the local community, possible future housing and tourism functions"*.

- 5.40 Legacy Planning stems from the NPPF's focus on sustainability and positive growth by *"making economic, environmental and social progress for this and future generations"* (NPPF; 2012) and, as defined by the Bruntland Report,
- "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs."*
- 5.41 In line with these definitions, Boyer and Cannon consider that legacy planning should form an essential part of EDF Energy's proposals and that any potential accommodation campus should have some future potential. In terms of an off-site location, this would mean that it needs to closely accord with normal development requirements and guiding planning policy.
- 5.42 Whilst it is noted that "legacy planning" is not a requirement of National Policy, as set out in Chapter 3, the Government states that the Infrastructure Planning Commission should consider *"any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts"* in deciding National Infrastructure Projects. In considering future legacy, EDF Energy should be assisting in providing a long term contribution to the community.
- 5.43 It is considered that existing and future residents of Leiston and similar settlements should be able to benefit from the infrastructure used as part of the accommodation campus. Following its use as an accommodation campus the site could also be potentially developed for residential housing to meet the needs of the local area.
- 5.44 It is noted that legacy planning formed an integral part of the Sizewell B proposals with the "Leiston Social and Sports Club" forming part of its development. Whilst it is unclear whether this facility is fully utilised, it is considered that there is no reason why legacy planning should not still form a central part in the planning and implementation of Sizewell C.
- 5.45 However, it is apparent that any legacy potential does not appear to have been properly considered in relation to the EDF Energy Preferred Site at Theberton and Eastbridge.

6. HIGHWAYS AND TRANSPORT

Introduction

- 6.1 As set out in Chapter 2, Cannon Consulting Engineers have provided highways and transport advice in relation to the Accommodation Campus Review. Their role was to provide an understanding of likely trip generation associated with the alternative accommodation campuses set out in this independent review.
- 6.2 In order to understand likely trip generations, Cannon have reviewed the work undertaken as part of the off-site accommodation at another of EDF Energy's proposals at Hinkley Point C. In researching Hinkley Point C, Cannon have identified the likely pattern of workforce trips related to an off-site accommodation campus, and have been able to apply this knowledge to fully understand the impacts that an alternative location might have for Sizewell C.
- 6.3 As set out in the previous chapter, EDF Energy's Stage 1 consultation considered 3 potential sites for an accommodation campus. This included a site as part of the construction site and two other alternative off-site locations reasonably close to Sizewell C and Leiston.
- 6.4 In their criteria, EDF Energy have set out their practical need to have a workforce that is readily accessible to the construction site, therefore minimising their external impact and transport cost. It is considered throughout their consultation documents that sites that are further removed from the construction site will increase transport cost and associated impacts.
- 6.5 The standard principle is therefore that all off-site alternatives would incur some cost in delivering transport for the workforce and have an external impact. However, in the case of an on-site accommodation campus, it will still be necessary for there to be some means of transport to get workers from the accommodation to the construction site internally and it is not practical to consider that all workers would potentially walk. At Hinkley Point C, the workforce residing in an off-site accommodation campus were going to be transported to/from the site each day by bus. It is however acknowledged that savings can be made if the accommodation site is located close to the construction site as a reduced number of buses would be required.
- 6.6 At EDF Energy's Hinkley Point C site, the accommodation campuses were located within a 30 minute drive time from the construction site. A drive time of 30 minutes is therefore considered to be acceptable to EDF Energy and with this in mind it is important that all the off-site accommodation sites considered for Sizewell C within this review are located no more than a 30 minute drive time to the construction site.
- 6.7 At the Stage 2 consultation only the preferred site has been put forward for consideration by EDF Energy. No analysis of any alternative off site location has been provided and there is no information regarding the likely traffic/transport impacts of such an off-site alternative accommodation campus.

- 6.8 For Hinkley Point C, EDF Energy proposed to use buses to deliver the workforce from the accommodation sites to the construction site. All work related travel was therefore by bus. For comparison, the overall workforce for Hinkley Point C is generally the same as Sizewell C, although the number of construction workers accommodated off-site at Hinkley Point C is reduced at only 1,000 compared to 2,400 proposed at Sizewell C. For all work related travel to/from Sizewell C it is assumed that EDF Energy would consider the same solution as that for Hinkley Point C and they would provide buses to deliver the workers to/from the site.
- 6.9 Whilst Boyer and Cannon have not been employed to comment on the validity of the assumptions used by EDF Energy in the Hinkley Point C work, it seems fair to suggest that these assumptions, especially with regards to a potential off-site accommodation campus, will be fully supported within supporting documentation that will be submitted as part of the Sizewell C application.
- 6.10 Cannon have considered the following trips associated with the alternative off-site accommodation campuses set out in this report:-
- the movements between the campus and the construction site;
 - recreational movements associated with the campus; and
 - movements between the campus and the wider network.

The Movements between the Campus and the Construction Site

- 6.11 Table 7.10 of the Hinkley Point C Transport Assessment chapter of the Environmental Statement identifies the number of workers arriving / leaving the site for each shift during a typical weekday of the construction period⁶. The table is based on a total workforce of 5,600, and therefore represents the peak period of construction activity. It is acknowledged that this will be the worst case impact of the proposals. The overall workforce is the same as the total number of workers anticipated at Sizewell C.
- 6.12 The arrival and departure profile for workers at the Hinkley Point C construction site has been used by Cannon as the basis for calculating the arrivals and departure profile at the Sizewell C accommodation campus based on 2,400 workers. This is considered appropriate as a departure/ arrival at the construction site will result in the corresponding a departure / arrival at the accommodation campus. Given the distance and journey time between the potential sites both a departure from the accommodation campus and arrival at the site will take place within the same hour. It is also assumed that the average weekday arrival and departure profile is applicable to the workforce residing at the accommodation campus.
- 6.13 The anticipated Sizewell C accommodation arrival and departures are presented in the graph below. The graph assumes 100% of staff will be accommodated on the campus work on a given day. The pattern of shifts and downtime would result in this taking place and is therefore a robust worst case to assess.

⁶ Hinkley Point C Environmental Statement: Transport Assessment (EDF Energy; 2011; p.117)

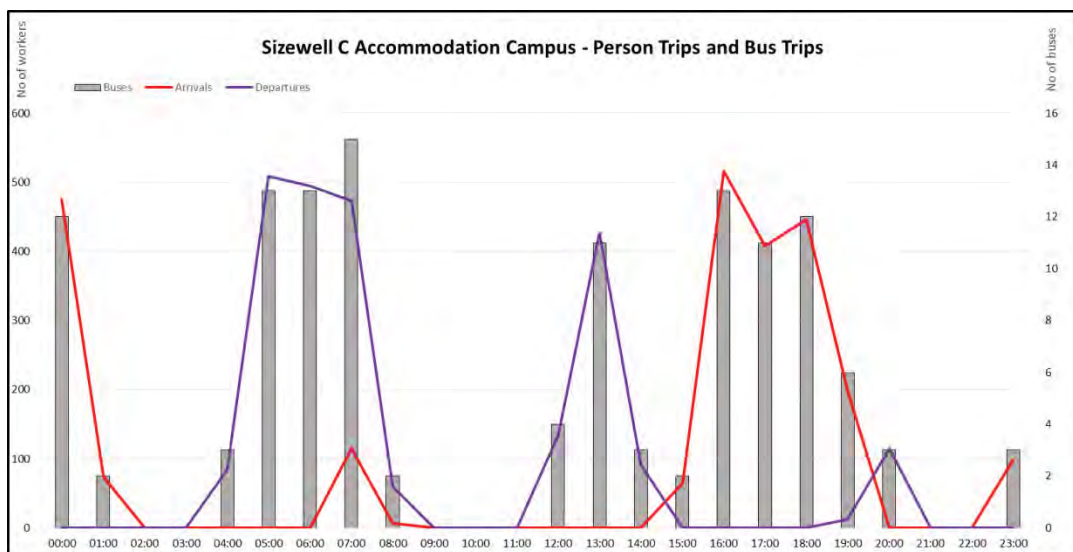


Figure 5: Sizewell Accommodation Campus Average Day - Person and Bus Trips⁷

- 6.14 The graph in Figure 5 shows the total movement of construction workers at the accommodation campus based by time of day over the course of a normal day. The left hand axis (purple and red line graph) shows the number of workers leaving/arriving at the accommodation. The right hand axis (bars) identifies the number of buses necessary to move the number of construction workers from the accommodation to the site at that time.
- 6.15 For example, the graph illustrates that during the hour commencing 7am there are around 475 workers leaving the accommodation campus (identified by the purple line) and just over 100 arriving (red line). This activity would require some 12 bus journeys over that hour period to convoy that said number of passengers (based on 40 passengers per bus as assumed for Hinkley Point C).
- 6.16 It is accepted that the normal network peak hour lies between 08:00 and 09:00. As identified in the graph above, the peak travel periods for the construction workers in the morning occurs prior to this network peak hour. As such, the construction worker morning traffic is likely to have a limited impact on the normal existing peak period. That said, the peak movements for construction workers in the evening coincide more closely with the usual network peak period of between 17:00-18:0, which may have a bigger impact.
- 6.17 The total number of bus journeys required varies between 13 and 15 for the peak movements of the workforce. If the round trip is 20-30 minutes including pick up and drop off, the total bus fleet would need to consist of approximately 7 vehicles. At Hinkley Point C it is understood that 6 buses were required. This is a reduced quantity given that the number of workers accommodated in the accommodation campus at Hinkley Point C was reduced at around 1,000.

⁷ Sizewell Accommodation Campus Average Day Person and Bus Trips (Cannon, 2017)

- 6.18 The route of the buses will be dictated by the location of the off-site accommodation campus. As set out in the following chapter, this area of search was considered when identifying potential alternative sites for an accommodation campus.
- 6.19 Whilst no details have been provided regarding the likely number of operational staff for the Sizewell C accommodation campus (e.g. catering, bar staff, cleaning staff etc.), the Hinkley Point C Transport Assessment makes the following reference in relation these staff:- *“The number of workers would be very low in the context of the overall construction workforce and these individuals are in the main likely to be home-based workers working on a shift or part-time basis – with much travel to and from work likely to occur outside peak periods.”*⁸ The EDF Energy Stage 2 consultation documents makes reference to *“500 staff working at the offsite associated developments and accommodation campus”*. There is no breakdown of this by shift pattern or time of day and the actual numbers involved will be related to the actual provision of facilities. Cannon considered that trips associated with the operation of the accommodation campus will be the same regardless of its location. The method of travel to the accommodation campus will vary depending on its locations relative to local settlements where the staff are likely to reside. If the accommodation campus is located within walking and cycling distance of a local settlement then it is considered that staff associated with the operation of the campus could be actively encouraged to walk or cycle. However, if the accommodation campus is located beyond reasonable walking and cycling distance these journey will most likely be made by car or provided for by the dedicated bus services as would be the case for work and non-work related trips by workers.

Recreational movements associated with the campus

- 6.20 The other aspect of transport/travel impact associated with the accommodation campus is non-work related trips. This could be undertaken outside of shifts and for many reasons, not least socialising. Cannon have reviewed the Hinkley Point C information in order to be able to consider the potential non-work related trips for construction workers at Sizewell C in relation to an alternative off-site accommodation campus. Table 8.20 of the Hinkley Point C Transport Assessment identifies the daily profile for non-work related car trips to/from the accommodation campus. Again, Cannon has not validated the information used to derive the daily profile. This table has been used to estimate the non-work related trip generation from the Sizewell C accommodation campus and is presented in the graph in Figure 6 below.

⁸ Hinkley Point C Environmental Statement: Transport Assessment (EDF Energy; 2011; p.142)

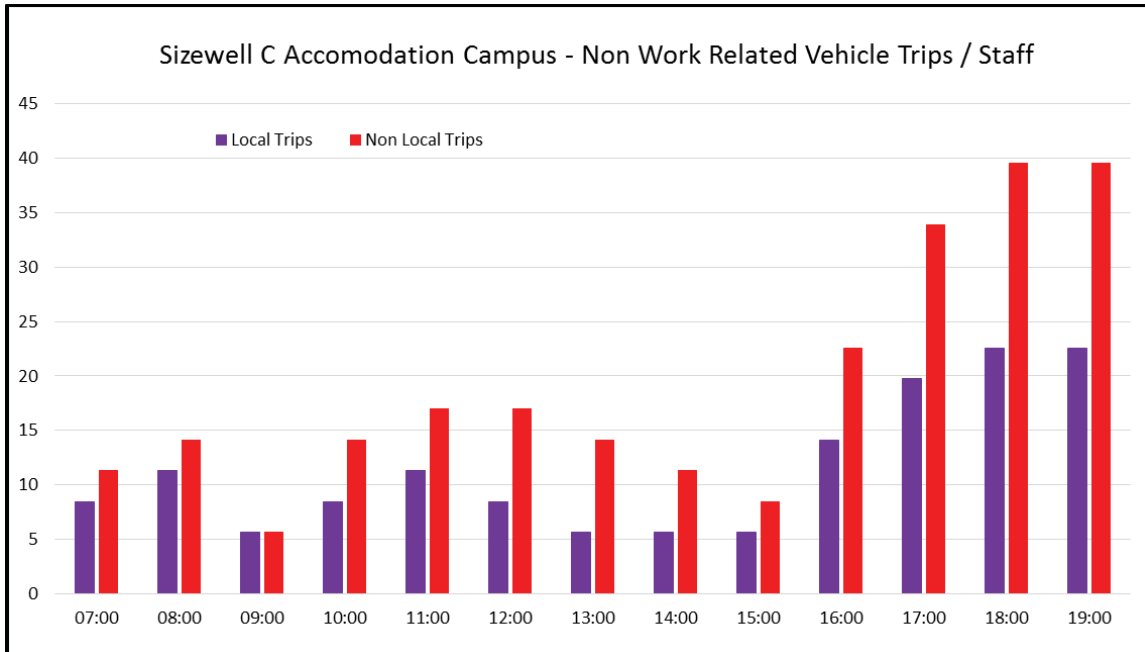


Figure 6: Non-work related vehicle trips (two way) from the accommodation campus⁹

6.21 Figure 6 shows the anticipated number of car trips for non-work journeys from the accommodation campus. This travel demand is heavily influenced by location and the provision of facilities within the site itself. It is important to note that a remote location, (which includes the EFD preferred location at the construction site), would be likely to provide a greater range of on-site facilities such as staff canteen, than an accommodation campus located within a settlement. It is acknowledged that the Sizewell C construction workforce is very different to occupants of residential developments. As an example, it would not be necessary to consider a family going about its everyday business, school, work and social/leisure trips when considering the non-work journeys for construction workers. The table below identifies the daily profile for non-work car trips associated with Hinkley Point C's off-site accommodation campus. This profile has been applied to the Sizewell C accommodation campus for 2,400 workers.

Time of day	HPC Bridgewater A (850 workers)		Sizewell C Campus (2,400 workers)	
	Local	Non-local	Local	Non-local
07:00	3	4	8	11
08:00	4	5	11	14
09:00	2	2	6	6
10:00	3	5	8	14
11:00	4	6	11	17
12:00	3	6	8	17
13:00	2	5	6	14
14:00	2	4	6	11
15:00	2	3	6	8

⁹ Non-work related vehicle trips (two way) from the accommodation campus (Cannon; 2017)

16:00	5	8	14	23
17:00	7	12	20	34
18:00	8	14	23	40
19:00	8	14	23	40
Total	53	88	150	248
Daily total two way	141		398	

Figure 7: Daily non-work vehicle trips¹⁰.

- 6.22 Over the course of a day the number of vehicle trips for non-work related travel is approximately equivalent to that for a residential development of 80 dwellings. The TRICS database is the UK's national system for calculating trip generation. It contains a large number of surveys from which trip rates for different land uses can be derived. A typical daily vehicle trip rate for a residential dwelling would be in approximately 5 two way vehicle trips per day. As such the total trips 80 dwellings could therefore be expected to generate would be in the region of 400 two way vehicle trips over a day. The overall scale of impact of the accommodation campus is therefore considered low when compared to a similar scale of residential development. The timing of journeys related to shift patterns and periods of home leave for resident workers will dissipate the effects as shown in the assessment prepared for Hinkley Point C.
- 6.23 It is noted that EDF Energy proposed to provide a limited bus service from their proposed accommodation campus to local facilities during the day for non-work related journeys as part of the Hinkley Point C proposals.
- 6.24 According to the EDF Energy consultation report, the peak workforce at 5,600 people will only be for a short period. Clearly, a benefit of accommodating as many workers as possible on-site or in managed accommodation will be to reduce the overall transport impacts from further afield made by non-homes based workers. There is currently no information provided as to the period over which the accommodation would be fully utilised. Clearly, maximising its use over as long a period as possible will reduce transport impacts.

Movements between the campus and the wider network

- 6.25 Movements between the accommodation campus and the wider network are likely to consist of workers returning to home for periods of leave. According to the Stage 2 EDF Energy consultation document, workers will operate in shift cycles. Within these cycles, there would be longer weekends that result in earlier departure of staff on Thursdays and Fridays, generally between 2pm and 4pm. The shift patterns enable a three day weekend once a month, allowing workers to return home on a regular basis. As such, these movements will be spread over time as well as amongst workforce and will be unlikely to cause severe peaks. The movements will be the same whether an accommodation campus is built on site or off-site.

¹⁰ Figure to show daily non-work vehicle trips (Cannon; 2017)

7. EDF ENERGY'S PREFERRED SITE

Introduction

- 7.1 This review has been undertaken to assess potential alternative sites for Sizewell C's accommodation campus. It was considered necessary to start by reviewing EDF Energy's preferred site for the accommodation campus.
- 7.2 The figures below identify EDF Energy's preferred site, which is approximately 34ha in area. It is located at the western entrance of the Sizewell C Construction Site close to the rural settlements of both Theberton and Eastbridge.
- 7.3 Figure 8 identifies EDF Energy's site in red. It can be seen that its surrounding area generally comprises green fields with a very rural landscape. It can also be seen from the images below that the area is predominantly green in nature. The road through the centre of the site is considered a physical barrier that separates the site and, as shown in the layout options proposed by EDF Energy in their Stage 2 Consultation, a set of different scenarios have been proposed.

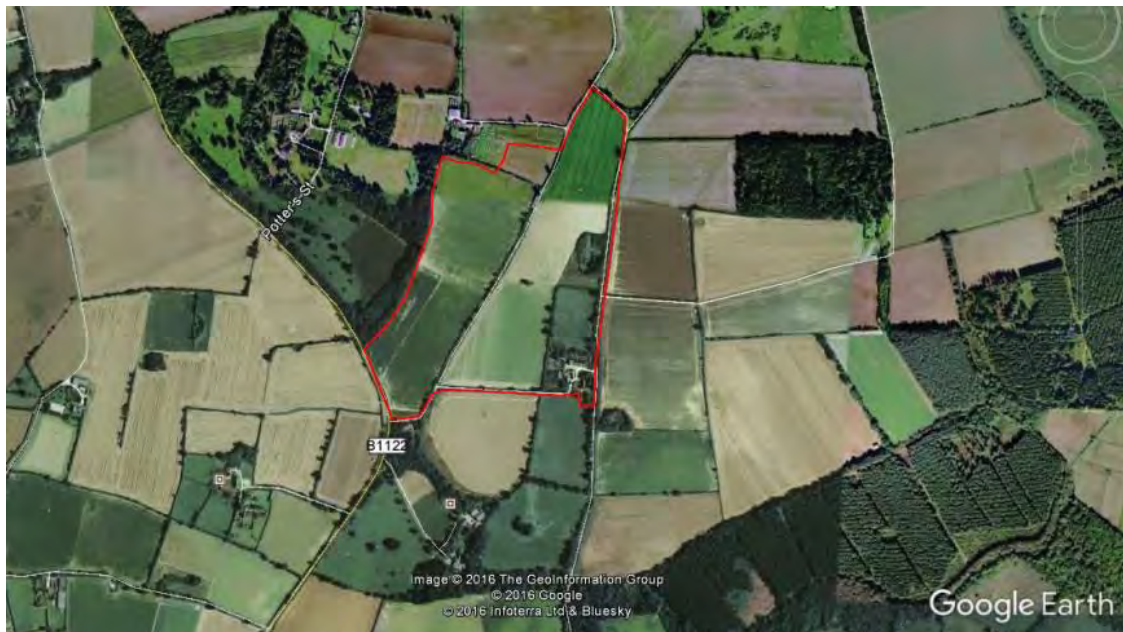


Figure 8: A Site Location Plan of EDF Energy's Preferred Site¹¹

- 7.4 Figure 9 shows that EDF Energy's preferred site lies adjacent to the Construction Site (set out in purple). It also identifies the site in relation to the Sizewell C power station and its relationship to the surrounding area. Its proximity to the nearby settlements of Theberton and Eastbridge can also be seen from this map.

¹¹ Site Location Plan of EDF's Preferred Site (GoogleEarth; 2016)



Figure 9: Map to illustrate EDF Energy's Preferred Site in relation to its surrounding area¹²

Stage 1 Consultation

- 7.5 EDF Energy's preferred site was identified as "Option 1" during the initial Stage 1 Consultation in 2012 alongside two other potential sites as identified in Chapter 3.
- 7.6 During this Stage 1 assessment, this site was considered favourably given its proximity to the construction site to the east. The consultation document stated this would mean *"workers could walk to work, thereby avoiding the need for buses and, consequently, reducing traffic generation"*.
- 7.7 The proximity of the site to the Suffolk Coast and Heaths AONB and its relationship with the Abbey Farm Complex were both recognised during this assessment. However, the assessment considered that the site was *"on par"* with EDF Energy's Option 3 campus at Leiston East and *"as a consequence, it is the project efficiency benefits, transport benefits and workforce management benefits of the accommodation campus being part of the main development site which weighs in its favour against the other options"*¹³.
- 7.8 As such, it is the only preferred accommodation campus which is being considered by EDF Energy during their Stage 2 Consultation.

¹² Map to illustrate EDF Energy's Preferred Site in relation to its surrounding area (Canon; 2016, Ordnance Survey)

¹³ EDF Energy Stage 1 Consultation Environmental Report (EDF Energy 2012)

Stage 2 Consultation

7.9 During EDF Energy's Stage 2 Consultation, which commenced in November 2016, EDF Energy proposed their preferred site for an accommodation campus and three options for its layout. These options included the following:

- Option 1: Two areas of accommodation either side of the existing Eastbridge Road;
- Option 2: The built form of the accommodation campus located solely on the east side of Eastbridge Road and the recreational facilities located on the western side; and
- Option 3: The built form of the accommodation campus located solely on the east side of Eastbridge Road with the recreational facilities located off campus.



Figure 10: A map to show the three layout options for the EDF Energy Preferred Site¹⁴

7.10 Figure 10 set out above identifies three options for the layout of the accommodation campus, with the accommodation campus located across different parts of the preferred site. Option 1 also identifies a proposed relief road to the west of the site; it is unclear however as to whether a relief road will be necessary in this location and its implications for the surrounding environment.

7.11 As part of the consultation material, EDF Energy identified “fly-overs”, which were illustrated at the consultation exhibitions. These “flyovers” help to visually illustrate the three layout proposals for an accommodation campus in this location and have been helpful in setting out the proposed development in relation to scale and massing of the development that is proposed.

¹⁴ EDF Energy Preferred Site layout options taken from the Stage 2 Construction Document (EDF Energy; 2016; p.165-167)

- 7.12 The final flyover (figure 14) depicts that it is EDF Energy's intention for the site to return to "greenfield" following its use as a temporary accommodation campus. As will be discussed later in this chapter, this is a clear indication that there is no legacy planning involved in this proposal and the infrastructure used for the accommodation campus will be removed after its use, thus not providing any lasting benefit to the local residents.
- 7.13 It is accepted that the construction access and its associated works will be in this location. However, it is questioned whether the construction access and its ancillary uses, as well as the campus accommodation in this location will be a "*step too far*" in environmental terms.
- 7.14 It is noted that, as set out in the Stage 2 Consultation document, EDF Energy proposes several soil tips to be located near this site; however, this has not been clearly indicated in the images below.



Figure 11: A “flyover image” to illustrate EDF Energy’s Preferred Site Option 1 layout¹⁵



Figure 12: A “flyover image” to illustrate EDF Energy’s Preferred Site Option 2 layout¹⁶

¹⁵ EDF Energy Preferred Site Post-Construction Flyover taken from the Stage 2 Consultation Video (EDF Energy; 2016)

¹⁶ EDF Energy Preferred Site Option 2 Flyover Taken from the Stage 2 Consultation Video (EDF Energy; 2016)



Figure 13: A “flyover image” to illustrate EDF Energy’s Preferred Site Option 3 layout¹⁷



Figure 14: A “flyover image” to illustrate EDF Energy’s Preferred Site Post-Construction layout¹⁸

¹⁷ EDF Energy Preferred Site Option 3 Flyover Taken from the Stage 2 Consultation Video (EDF Energy; 2016)

¹⁸ EDF Energy Preferred Site Post-Construction Flyover Taken from the Stage 2 Consultation Video (EDF Energy; 2016)

Boyer and Cannon's Assessment

Environmental Impacts

- 7.15 It is considered that an accommodation campus in this location would have significant environmental impacts, notably given its proximity to both local and national designations.
- 7.16 The site abuts the Suffolk Coast and Heaths Area of Outstanding Natural Beauty to the east and Minsmere's Special Landscape Area to the west. It is also considered that the site will be clearly visible from Whin Hill at Minsmere's Area of Outstanding Natural Beauty.
- 7.17 Whilst helpful, the fly-overs do not give the full impression of the views of the construction site. There is an absence of the soil tips which is understood to be proposed to be located in close proximity to this site. It is suggested that collectively this will have a dramatic impact on the views of the area.
- 7.18 From the visuals and the evidence provided, it remains unclear as to whether any screening will be provided as part of these proposals.
- 7.19 Given this site's rural location and open nature, there is concern that both noise and particularly light pollution will be prevalent in this area and will be more likely to have further impacts on the environment and surrounding area.

Listed Buildings

- 7.20 There are listed buildings identified in this locality which are likely to be affected by an accommodation campus in this location. These include Upper Abbey Farmhouse and the barn to the south-east of the site and Leiston Abbey to the west.

Conclusion

- 7.21 Considering the site's location and its close proximity to a number of designated areas, an accommodation campus together with the other proposals set for this location will cumulatively have a significant impact on the surrounding environment. Any development will have an impact on the rural environment in this location and a development consisting of up to 5-storeys will have an increased impact.

Traffic Impacts

- 7.22 An accommodation campus at this location would be co-located with the construction site and would share the same point of access. EDF Energy have suggested that this site also provides the potential for workers to walk to work, although this is questioned in reality. All work related travel will be contained within the construction site and there will be no direct impacts on trips to and from the site. This option has the benefit of a short journey time for workers between the accommodation campus and the construction site.

- 7.23 The construction site access will be the focus of activity regardless of the location of the accommodation campus. The co-location of the accommodation campus immediately adjacent to the construction site will minimise worker trips at this location. An off-site campus would require commuting trips to and from the construction site, however this has been managed by EDF Energy at Hinkley Point C. There is currently no assessment by EDF Energy of the transport impacts associated an alternative off-site accommodation campus. This assessment is required to allow a comparison of impacts with other potential campus locations. The assessment included within Chapter 4 of this report reviews the assumptions contained within the Hinkley Point C Transport Assessment regarding trip generation associated with transporting workers to/from the construction site. Applying these assumptions to the Sizewell C proposals, the transport impact appears to be relatively low if buses are used to shuttle workers to and from the site, with a peak requirement of 12-15 bus journeys in an hour.
- 7.24 Non-work related off site activities (e.g. involving access to shops, services and facilities from the surrounding area) will require off site trips. All of these will have a direct impact off-site. Non-work related trips is not presented in the Stage 1 & 2 consultation as to the specific number of potential off-site trips but comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis. That is only an average of 0.2 per worker per day. We have presented a comparison of this scale of traffic generation with normal residential development and it would be equivalent to 80 dwellings.
- 7.25 It is understood that EDF Energy propose to extend the footway along Abbey Road to Lovers Lanes and make cycleway improvements to provide a continuous connection to Leiston. The route from the accommodation campus entrance to Leiston is 2km. This equates to a walking time of 24 minutes and a cycle journey time of 6 minutes. Vehicular traffic would use the same route to access Leiston.
- 7.26 There would be limited transport legacy potential if the site was to sustain a use after the construction period. The site is isolated and poorly located in relation to local amenities, facilities and sustainable transport opportunities. It would not meet normally acceptable transport related development criteria in relation to NPPF.

Legacy Potential

- 7.27 It is acknowledged that it is EDF Energy's intention to return this potential site back to "greenfield" through a specific landscape strategy. The site is very detached from existing settlements and it is therefore highly unlikely that there will be residual legacy benefits from developing on this site. It is some distance from any significant settlement, services or facilities. The new road alignment, suggested through Option 1, would in reality have only very limited future benefits for the area.
- 7.28 It is noted that Option 2 (iii) does offer the potential for some form of legacy planning by suggesting the sports and leisure facilities could be located off-site. This could potentially be in the likes of Leiston, but the Stage 2 Consultation simply states "*at a site be identified*".

Community Effects

- 7.29 The site is located in the Suffolk countryside which has its advantages and disadvantages. Although the site is well located adjacent to the Sizewell C Construction Site, it is not in close proximity to any existing settlement. The nearest settlements of Theberton and Eastbridge are located approximately 1.65km and 1.67km from this site respectively.
- 7.30 An accommodation campus in this location would have limited benefits to the immediate local economy given its detached nature from any existing settlement. The remote location may also deter construction workers from travelling to the local settlements and spending income.
- 7.31 An accommodation campus in this location would also discourage any integration between existing local residents and Sizewell C construction workers. This could have wider implications by resulting in a “them” and “us” scenario.

Amenity Impacts

- 7.32 The site is very remote and detached from any settlements in the area.
- 7.33 Therefore, it is considered that any impacts on neighbouring amenities are considered to be limited, either in a positive or negative way. There are very low levels of neighbouring properties in the area and the site’s layout is considerably self-catered.

Physical Constraints

- 7.34 This site is well contained, although development will result in the loss of Agricultural Grade 3a/3b land. Generally, there are little physical constraints with the site.

Planning Policy

- 7.35 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 7.36 In considering this proposed development, the IPC should look to consider any potential *“adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts”* (EN-1 page 44).
- 7.37 The NPS EN-1 does suggest that *“the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework”*.
- 7.38 In light of this, set out below are relevant planning policies which should be considered relevant when determining this application.

- 7.39 The site has not been promoted through the SHLAA process, nor has the site been identified through any Neighbourhood Plan. There are no relevant planning applications on or near to this site.
- 7.40 Suffolk Coastal District Council have assessed the site in some detail, and concluded that the site has limited legacy potential.
- 7.41 It would have an environmental impact on the AONB, the landscape character, and on the setting of the listed buildings, as well as an impact on nearby Eastbridge and Theberton.
- 7.42 EDF Energy have said that this site has advantages for Sizewell, notably reduced workers' travel time and its central location making it easier to monitor codes of behaviour. If brought forward for an accommodation site EDF Energy consider that this site would present a better face to the entire development if well designed and may improve security into the Sizewell Construction Site.
- 7.43 Suffolk Coastal District Council has also highlighted the intentions of EDF Energy to return the site to its "greenfield" status.
- 7.44 In their Stage 1 Consultation Response (see Appendix A), Suffolk County Council and Suffolk Coastal District Council noted that this site should be considered further and required additional work to be undertaken to determine the merits of the site. They also considered it necessary to assess whether there are alternative permutations or locations that are more satisfactory. It is unclear whether this additional work has yet to be undertaken by EDF Energy.
- 7.45 In their response, Suffolk County Council and Suffolk Coastal District Council also considered the need for EDF Energy to formulate an "accommodation strategy" which meets the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts.

Overall Assessment

- 7.46 It must be recognised that this site fulfils EDF Energy's criteria of proximity to the construction site, and the ability of getting workers to and from the site quickly and effectively, with no external transport impacts. The cost of developing this site should also be relatively low.
- 7.47 Construction transport is considered to be low, however, the legacy potential for this site is poor, and all non-work related traffic impacts will be higher due to the distance from the local facilities. There will also be some significant environmental impacts from developing this site. The site lies within the former Special Landscape Area boundary for Minsmere, is visible from both Dunwich Heath National Trust Site and Leiston Abbey during winter months and it also abuts Suffolk Coast and Heaths AONB to the east. The cumulative impact of an accommodation campus on this site together with the proposed soil tips and its ancillary proposals will equate to too much development in this location.

- 7.48 The greatest impact of this site will be on residents of both Theberton and Eastbridge and cumulatively would impact on their environment, highways, community and amenity of their everyday life.
- 7.49 It is noted in their Stage 2 Consultation Document that EDF Energy considered that this site was “*on par*” with the EDF Energy Option 3 south of Leiston. However, this site was viewed favourably given its project efficiency benefits. This included the transport benefits and workforce management benefits from the campus accommodation site being part of the larger construction site. This site provides benefits for EDF Energy but not necessarily the wider community. Whilst EDF Energy considered this site to be the preferred option for an accommodation campus, Boyer and Cannon strongly consider that this site has not been assessed comprehensively and, as a result, overlooks significant impacts, especially in relation to the environment and limited legacy potential.
- 7.50 Given the rural nature of this location, it is considered that “normal” development would not be permitted in this location. The “temporary” nature of the proposed development should not detract from the fact that there will be environmental impacts from developing the accommodation campus on this site for a significant number of years.

8. REVIEW OF ALTERNATIVE SITES

- 8.1 Following the assessment of EDF Energy's preferred site, this review now focuses on the assessments of the potential alternative sites.
- 8.2 The map set out below in Figure 15 identifies the sites that were assessed as part of this independent review. It identifies their relationship with the eastern part of Suffolk, the Sizewell C Construction Site and EDF Energy's preferred site close to Theberton and Eastbridge.

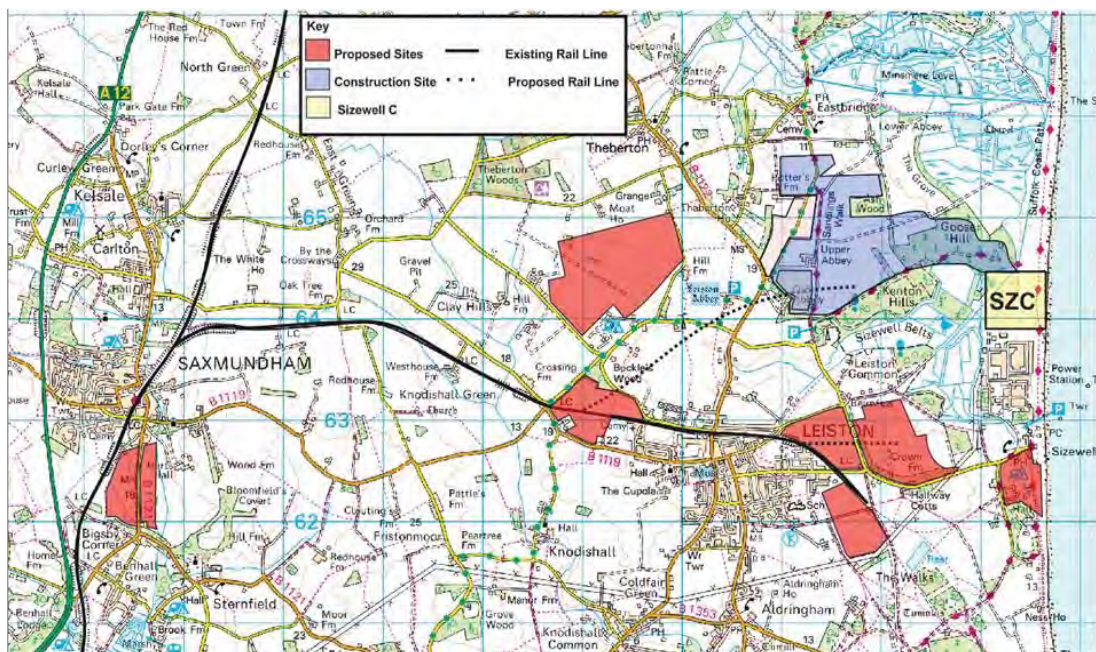


Figure 15: A map to identify the Alternative sites assessed by Boyer and Cannon in relation to the Sizewell C Construction Site¹⁹

¹⁹ A map to identify the Alternative sites assessed by Boyer and Cannon in relation to the Sizewell C Construction Site (Cannon; 2016, Ordnance Survey)

8.3 The map set out below in figure 16 illustrates how these sites lie within a 7.5mile radius of the Construction Site. Therefore, they are all considered to be in relatively close proximity to the Sizewell C Construction Site as set out in EDF Energy’s criteria.



Figure 16: A map to identify the 7.5mile radius buffer from Sizewell Site²⁰

8.4 The list of sites to be assessed are:

- Saxmundham South;
- Leiston Airfield;
- Leiston West;
- Sizewell Gap / EDF Energy Option 2;
- Leiston East / EDF Energy Option 3;
- Lovers Lane West / “Big Field”; and
- South Sizewell Gap / Sizewell Coast.

²⁰ A map illustrating the 7.5mile radius from the Sizewell Site (Cannon; 2016, Ordnance Survey)

9. SAXMUNDHAM SOUTH

Introduction

- 9.1 “Saxmundham South” lies south of the settlement of Saxmundham and is approximately 42 ha in area, which is slightly larger than EDF Energy’s Preferred site. Saxmundham is a settlement with a population of 3,644 and is identified as a focal point for employment, shopping and community facilities as set out in Suffolk Coastal District Council’s adopted Core Strategy.
- 9.2 Figure 17 below identifies the location of the site and its relationship with Saxmundham. The site was not considered through Suffolk Coastal District Council’s SHLAA process, but it is still considered to relate well to the existing settlement. The site lies on either side of the B1121 in Saxmundham and is located approximately 8.7km from the Sizewell site.



Figure 17: A Site Location Plan of Saxmundham South²¹

- 9.3 Figure 18 below shows the Saxmundham site (outlined in red) and its relationship to the Sizewell Construction Site (in purple) and the EDF Energy preferred site (in pink).
- 9.4 The distance between the site and the construction site is noted, but it is considered that the site is in proximity to a number of services and facilities in Saxmundham that should be within walking distance, and there will therefore provide economic benefits for the settlement.

²¹ A Site Location Plan for Saxmundham South(GoogleEarth; 2016)



Figure 18: A map illustrating Saxmundham South in relation to the surrounding area²²

Environmental Impacts

- 9.5 The site is located on a “greenfield” site, but it is considered to have relatively low environmental impacts. Given the contained nature of the site it benefits from good natural screening from existing mature hedgerows which would mitigate potential impacts from an accommodation campus in this location. The proximity of Saxmundham’s Conservation Area to the north is noted, but no implications are envisaged.
- 9.6 The development could be spread across the entire site thus reducing height and massing over the site which would reduce visual impacts. Therefore this site offers the opportunity to mitigate environmental impact when compared to EDF Energy’s preferred site.

²² Map to identify Saxmundham South in relation to the surrounding area (Cannon; 2016, Ordnance Survey)

Traffic

- 9.7 Traffic from this site is likely to have some impact on Saxmundham. The two potential routes from this site to the construction site for work related trips are identified as routes A and B on Figure 19. Route A would require routing through the cross road junction of B1121/Chantry Rd/B1119/High Street which is nearing capacity in the peak periods. However, Route B can overcome this by directing traffic towards the A12 to the south west, to access the A12/B1122 route to the site access. Another alternative that supports potential for a wider development allocation would be the creation of a new link and junction onto the A12 as indicatively shown on Figure 19 as Route C. As for all alternative off-site locations, it is assumed that EDF Energy would provide a direct bus service shuttling workers to/from the accommodation to site and therefore the impacts are minimised. This is the same proposal as that developed for Hinkley Point C. Journey time to the construction site would be longer than the other alternatives, but this is still only around 12-16 minutes dependent on the route adopted (route A or route B). An access time of 30 minutes was noted as being acceptable by EDF Energy for Hinkley Point C, and the Saxmundham site is within this travel time. At peak construction when the accommodation would be full, the direct bus service would require up to 12-15 buses in a peak hour, and some 60 bus trips per day.
- 9.8 The local routes to the construction site from this location have been identified as routes of key concerns by local residents during the consultation to date. This could only be overcome with some significant infrastructure investment, such as a new direct link to the A12 avoiding the centre of Saxmundham (Route C), or a direct link from the A12 to the B1119 avoiding the centre of Saxmundham.
- 9.9 The cross road junction of B1121/Chantry Rd/B1119/High Street is a known constraint and nearing capacity in peak periods. Construction workers could have to be transported by bus along the B1119 which would spread the impact of the accommodation traffic over a wider area. Given the constraints on route the B1119 is not considered ideal and the A12 route via Yoxford and B1122 to the site would be preferred.
- 9.10 Alternatively an access could be provided directly onto the A12 if the site were extended to the west between the railway line and the A12. This would result in a further increase in traffic movements along the A12/B1122 access route to the site however this is limited to the shuttle buses used to transport workers to/from the site.
- 9.11 The site is within walking and cycling distance of Saxmundham. The site is well located in relation to Saxmundham if the site were to have an alternative use beyond the construction period.
- 9.12 The map below illustrates potential transport routes from this site to the Construction Site for workers traffic.

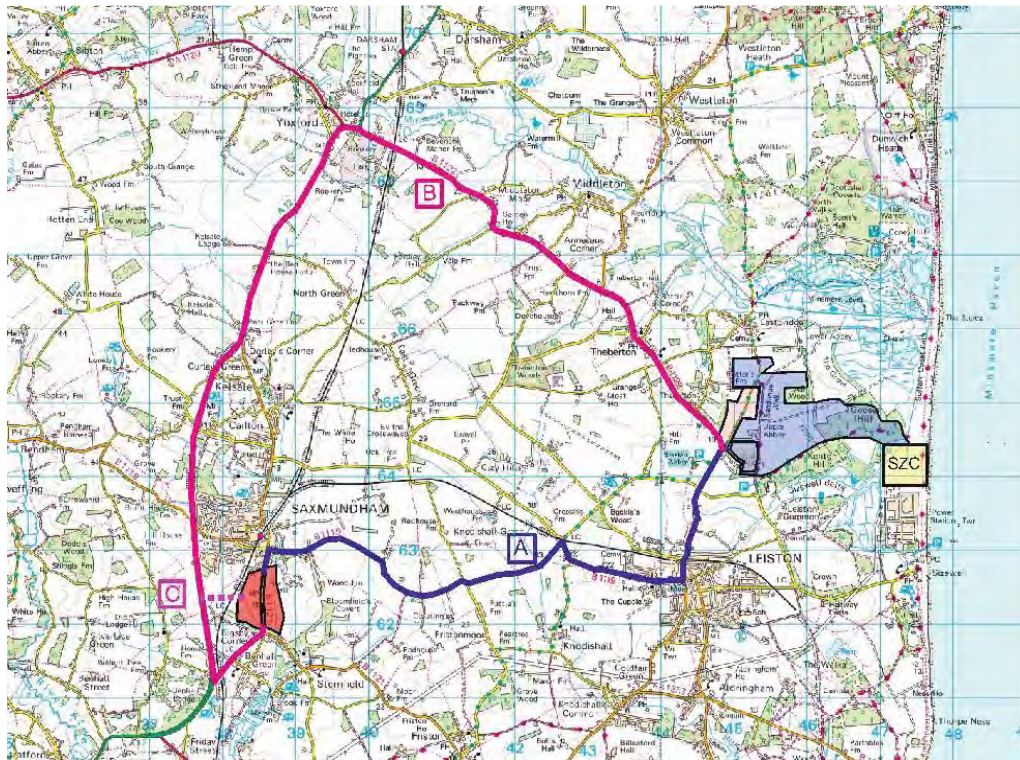


Figure 19: A map illustrating potential transport routes from Saxmundham South to the Construction Site²³

- 9.13 There is the opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with Hinkley Point proposals this might generate up to 400 vehicle movements per day to local and non-local destinations. Not all of this traffic would impact on Saxmundham.
- 9.14 It is important to note that Saxmundham has good public transport facilities, including a train station, which could be utilised by the construction workers during their non-shift hours. The site is also well located to the A12 which would greatly benefit the construction workers during non-work related trips.
- 9.15 In relation to legacy, providing for future growth to the south of Saxmundham could be acceptable, pending access and infrastructure provision. This might be enabled in part by the alternative campus location and this would therefore offer a positive legacy. The central traffic signal controlled cross road junction within Saxmundham is a known pinch point and recent improvement to the operation is likely to have exhausted localised improvement to deal with further peak hour traffic. A wider allocation of development to the south with a road link between the A12 and B1119, through this site location might be such a future consideration to enable Saxmundham to deliver further growth. Any highway improvements would likely require consideration of additional costs.

²³ Map illustrating potential transport routes from Saxmundham South to the Construction Site (Cannon; 2016, Ordnance Survey)

Legacy Potential

- 9.16 The site is considered to have good linkages with Saxmundham, including access and connectivity. It is therefore suggested that development and infrastructure on this site could be reused in the future by those in Saxmundham, and that this site could form a natural extension to the settlement if properly planned. A possible Neighbourhood Plan or Local Plan extension to Saxmundham may therefore be possible.
- 9.17 It is therefore considered that this site would offer legacy potential in the long-term for local residents of the town.

Community Effects

- 9.18 The site is considered to be well connected to Saxmundham to the north, which would naturally encourage some form of integration between construction workers and residents. This could provide further positive economic benefits for the local economy of Saxmundham.
- 9.19 It is considered that any facilities developed as part of an accommodation campus, such as sports or recreational facilities, could be used by the local residents of Saxmundham thus providing community benefits. As set out in Chapter 5 of this report, this would provide a legacy opportunity as the community facilities could continue to be used during and after the use of the accommodation campus.
- 9.20 Likewise, if an accommodation campus was located on this site, the construction workers could benefit from the existing facilities and good transport links of Saxmundham, which include the rail network at Saxmundham Station.
- 9.21 If correctly managed, given the previous experiences of Sizewell A and B at Leiston, then there could be opportunity for a positive integration between the accommodation campus and Saxmundham.

Amenity Impacts

- 9.22 It is likely that the local residents of Saxmundham may be concerned that an accommodation campus in this location would result in anti-social behaviour between the construction workers and existing residents of Saxmundham. However, Boyer and Cannon consider that by locating the accommodation campus near to a settlement could encourage positive integration between the construction workers and the existing residents of Saxmundham. Providing people with a “sense of place” and belonging is more likely to encourage construction workers to take an active role and consideration for their surrounding environment.

Physical Constraints

- 9.23 Whilst the site is well-contained, it is important to note the B1121 runs through the centre of the site which will form a physical barrier to any development that might come forward. Development in this location would amount to the loss of Grade 3 Agricultural Land and the eastern part of the site does lie within Flood Zone 2 and 3.
- 9.24 Given its size, it is not anticipated that the entire site would be developed for an accommodation campus. It is also considered that an extensive site such as this could reduce the storey height of the accommodation campus by spreading the built form over a wider area, thus mitigating its impact on neighbouring residents and the surrounding environment.

Planning Policy

- 9.25 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 9.26 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).
- 9.27 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”
- 9.28 In light of this, set out below are relevant planning policy which should be considered relevant when determining this application.
- 9.29 There are no designations on or around this site. This site has not been promoted through the most recent SHLAA and there are no relevant planning applications on the site. The Saxmundham Neighbourhood Plan is in its most preliminary stages, and the designated area does include this site, although no specific allocations have been identified as yet.
- 9.30 This site was previously considered by Suffolk Coastal District Council in their initial assessment of alternative accommodation sites. Suffolk Coastal District Council concluded that, whilst the site is large enough to accommodate workers on a single campus, it is poorly related to Sizewell and, as a result, traffic impacts on the local area are likely to be more severe. They also stated that they did not believe the site would come forward for development in the future, therefore the legacy potential of this site was considered limited.
- 9.31 Boyer and Cannon are of opinion that the site offers genuine legacy potential and should be considered as an alternative site.

Overall Consideration

- 9.32 The distance of this site from Sizewell is likely to result in increased transport costs for EDF Energy for the work related trips. However, when compared with the accommodation campus at Hinkley Point this site is considered closer to Sizewell C than the Bridgewater Accommodation Campus. The construction workers' non-work related trips are likely to have a low impact given the range of facilities that exist in Saxmundham and the proximity of the site to good transport links, including the A12 and a railway station.
- 9.33 The site is also accessible by bus, foot and cycle to the centre of Saxmundham. As noted, external trips to/from the site can be accommodated on the A12 without impact on the centre of Saxmundham. Whilst the potential for legacy on this site is relatively high and generally environmental impacts are considered to be low, development on this site would come at a cost. However, transport and access improvements as a logical urban extension would be expected to support its potential for future development and from further "legacy planning".
- 9.34 The location of this site is further away from Sizewell Construction Site when compared with other sites considered in this assessment, but it is still considered that this site has the potential to be brought forward as an accommodation campus.
- 9.35 Boyer and Cannon suggest that this site should be considered further as part of an "accommodation strategy" undertaken collectively by EDF Energy, Suffolk County Council and Suffolk Coastal District Council.
- 9.36 Boyer/Cannon are now aware that an application is being considered by Hopkins Homes for the development of part of the site for 225 dwellings. Developer intentions on the site, which are clearly commercially attractive, would appear to confirm the site's legacy potential.

10. LEISTON AIRFIELD

Introduction

- 10.1 Leiston Airfield is located just north of Leiston and south of Theberton. As expected from a former airfield, it is of a considerable size, with an approximate total area of 101ha and is relatively flat across the site.
- 10.2 The map below (figure 20) identifies the location of the site, with the extent of the airfield shown in red.

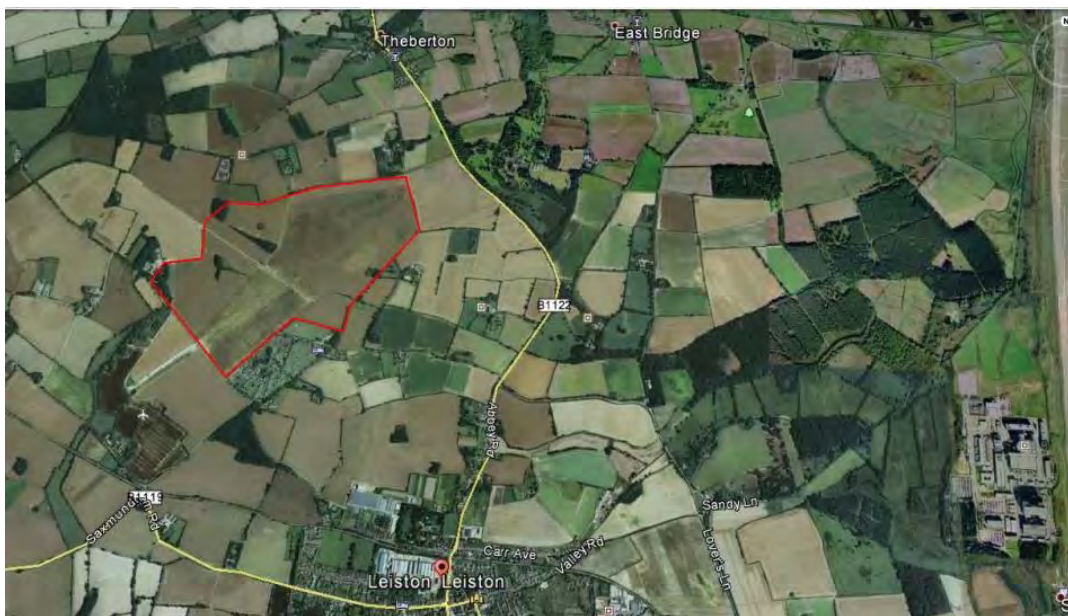


Figure 20: A Site Location Plan of Leiston Airfield²⁴

- 10.3 Figure 21 below helps to illustrate the location of Leiston Airfield in relation to EDF Energy's preferred site (in pink), the Construction Site (in purple) and Sizewell. It can be seen that the site is relatively close to the EDF Energy preferred site and the Construction Site but is still located some distance from Theberton, Eastbridge and Leiston.

²⁴A Site Location Plan of Leiston Airfield (GoogleEarth 2016)

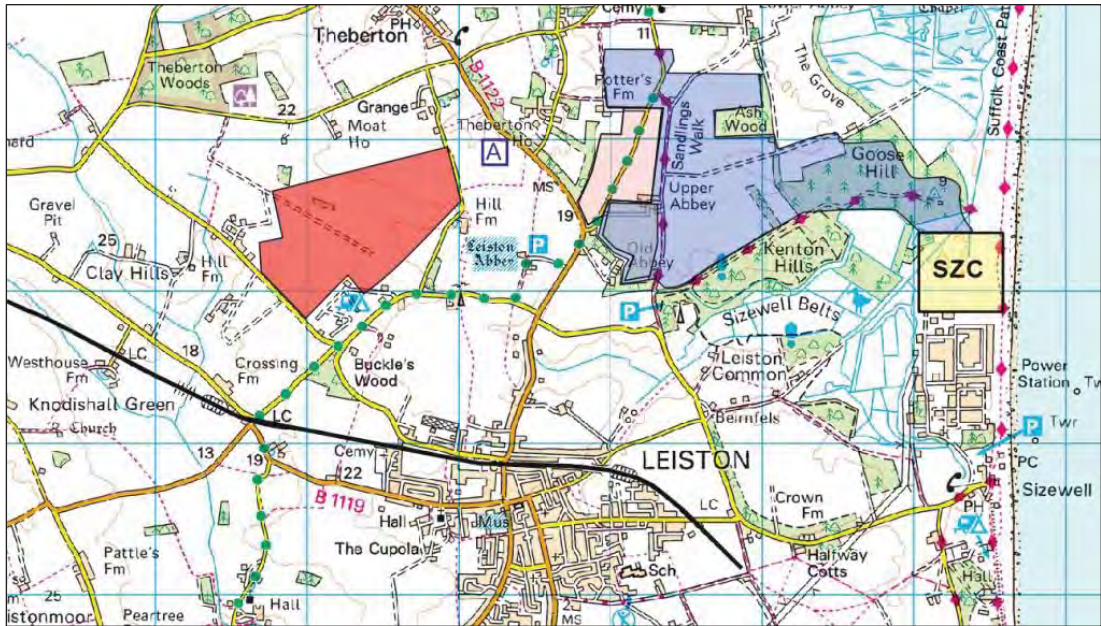


Figure 21: A map identifying Leiston Airfield in relation to its surrounding area²⁵

Environmental Impacts

- 10.4 The site is a former airfield therefore it is very open and very flat. However, its vast expanse could offer several environmental benefits and any development on the site could be carefully and sensitively located in order to minimise any impacts on the surrounding environment and countryside. The proposed 3-5 storey accommodation could therefore be comfortably spread over the site, reducing the height and massing to 2-storey buildings.
- 10.5 The proximity of Leiston Abbey is acknowledged, and would need to be carefully considered if any development was to come forward on this site. This should be possible given the extent of the site.
- 10.6 The site does not lie within an SSSI or an AONB, although, there are several PROW in and around the site. Views from these PROW would need to be considered if this site is considered further for development.
- 10.7 Overall, if this site was to be brought forward for the accommodation campus its impacts on the environment could be carefully mitigated and would therefore be considered relatively low.

²⁵ A map identifying Leiston Airfield in relation to its surrounding area (Cannon; 2016, Ordnance Survey)

Transport Impacts

10.8 Given the size of the site and its former airfield use there are several transport and access options that could be explored in order to get workers to and from the nearby construction site. There are two potential routes from the site to the construction site, these are identified as routes A and B on Figure 22. These routes could provide opportunities for one-way systems, or in-out routes, which could be carefully controlled and managed. This also includes the potential to provide a link road direct from the site to the proposed construction site entrance. This link is shown indicatively on Figure 22. This would minimise travel time and contain traffic impacts. The site also has reasonable existing access to the B1122.

10.9 Potential transport routes are illustrated in the map below²⁶.

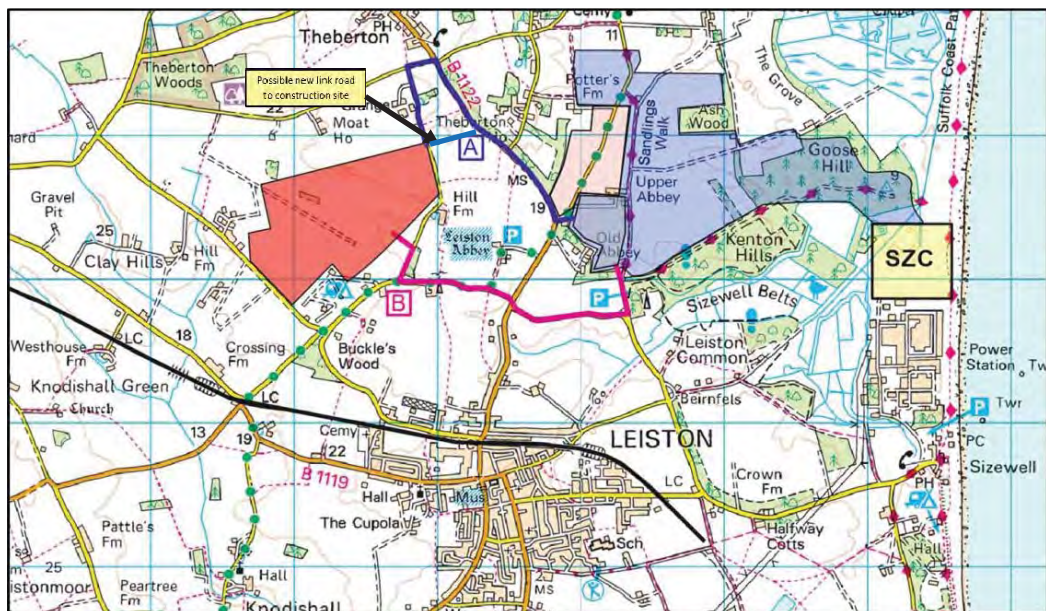


Figure 22: A map to illustrate the potential transport routes from Leiston Airfield to Sizewell

10.10 If an accommodation campus was sited in this location, it should be possible to contain traffic impacts. However, as with EDF Energy's preferred site, given the remote nature of Leiston Airfield, non-shift traffic patterns are likely to have more impact as workers would look to travel to nearby Leiston, Saxmundham or Yoxford for additional facilities / services. There are limited walking and cycling opportunities to the surrounding larger settlements such as Leiston, and improvements would be required.

²⁶ A map to illustrate the potential transport routes from Leiston Airfield to Sizewell (Cannon; 2016, Ordnance Survey)

- 10.11 Non-work related off-site activities (e.g. involving access to shops, services and facilities from the surrounding area) would require off-site trips. These will have a direct traffic impact. Non-work is presented in the Stage 1 & 2 consultation as to the number of potential off-site trips. Comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis.
- 10.12 It is considered that this site has no transport legacy potential if the site was to sustain a use after the construction period. The site is isolated and poorly located in relation to local amenities, facilities and sustainable transport opportunities. It would not meet normally acceptable accessibility transport related development criteria in relation to the NPPF.

Legacy Potential

- 10.13 The site is a “greenfield” site in the countryside and is very detached from existing settlements. There is going to be limited opportunity for any significant legacy planning on this site, unless it is to be identified for development post Sizewell, possibly as part of a new settlement.
- 10.14 Whilst this ideology for a new settlement, such as garden cities, may be considered appropriate in this location, Leiston Airfield is currently considered to have a very low potential to contribute to any long lasting legacy.

Community Effects

- 10.15 The site is not readily related to existing settlements. This may offer both advantages and disadvantages such as reducing potential anti-social behaviour in the area whilst also inadvertently creating an “us” and “them” environment. Due to the remote location of this site, construction workers would be heavily reliant on transport to access the wider area and the facilities at nearby settlements. Locating an accommodation site on the airfield would not necessarily enhance integration between the construction workers and the existing residents of nearby settlements.
- 10.16 Overall, it is considered that no one nearby settlement or local economy would necessarily be impacted on in either a positive or negative way if an accommodation campus were to be developed in this location.

Amenity Impacts

- 10.17 Given its detached nature, it is unlikely that any development on the airfield would have a major impact on the amenity of existing residents of the area. Lighting and noise impacts would need to be carefully considered.

Physical Constraints

- 10.18 The site has an open and generally flat landscape and has limited physical constraints. Development on this site would result in a loss of Grade 2/3 agricultural land.

Planning Policy Designations

- 10.19 As set out in Chapter 3 of this review, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 10.20 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).
- 10.21 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”
- 10.22 In light of this, set out below are relevant planning policy which should be considered relevant when determining this application.
- 10.23 The site has not been assessed through Suffolk Coastal District Council’s most recent SHLAA (2014), and the site does not lie within any Neighbourhood Plan boundary.
- 10.24 There have been no relevant planning applications submitted in relation to this site. However, there have been several historic planning applications in relation to improving the infrastructure for the “Cakes and Ale” Caravan site, which is located to the south of the airfield.
- 10.25 The site was not previously assessed by Suffolk Coastal District Council in their consideration of alternative accommodation campus sites.

Overall Consideration

- 10.26 The detached nature of this site means any genuine legacy potential would be limited without it forming a larger scale development site post Sizewell C.
- 10.27 An accommodation campus in this location could potentially have limited impact on transport, and would meet the EDF Energy criteria of proximity to the construction site and the ability for its workforce to access the site quickly and efficiently.
- 10.28 Non-work related trips from this site would have the same likely impact as the EDF Energy preferred site, but in overall terms this is considered to be low. It is noted that the existing Cakes and Ale Caravan Site could offer the potential to expand, either with the accommodation campus or as a location for the temporary caravan site. It is unclear if this option has been fully explored by EDF Energy but it offers several opportunities that should be explored further as part of a wider “accommodation strategy”.

10.29 Overall, this site does not differ greatly from the EDF Energy Preferred Site at Theberton/Eastbridge, although it does offer a better opportunity to reduce any visual impacts by way of spreading the height and massing over a much wider area, whilst still retaining proximity to Sizewell Construction Site. It is noteworthy that this site is also more remote from the AONB and Special Landscape Area and would therefore have merits in that context.

11. LEISTON WEST

Introduction

- 11.1 An area of land has been identified to the west of the town of Leiston. It abuts the settlement's existing urban edge and measures approximately 32.76ha in size. There is an approved planning application to the east of the site which is discussed further in the "Policy Designations" section set out below. Figure 23 shows the site lies to the west of Leiston, clearly identifying its proximity to the built form of the town. The B1119 forms a physical barrier to the south and an ancient woodland is located to the north, dissecting the site in two is the existing railway line.



Figure 23: A Site Location Plan of Leiston West²⁷

- 11.2 The figure 24 set out below shows the site to the west of Leiston and highlights its relationship to the town, and its proximity to the Sizewell Construction Site and Sizewell power station. The railway line is also identified running through the centre of the site and the ancient woodland is identified to the north of the site in green.

²⁷ A Site Location Plan of Leiston West (GoogleEarth; 2016)

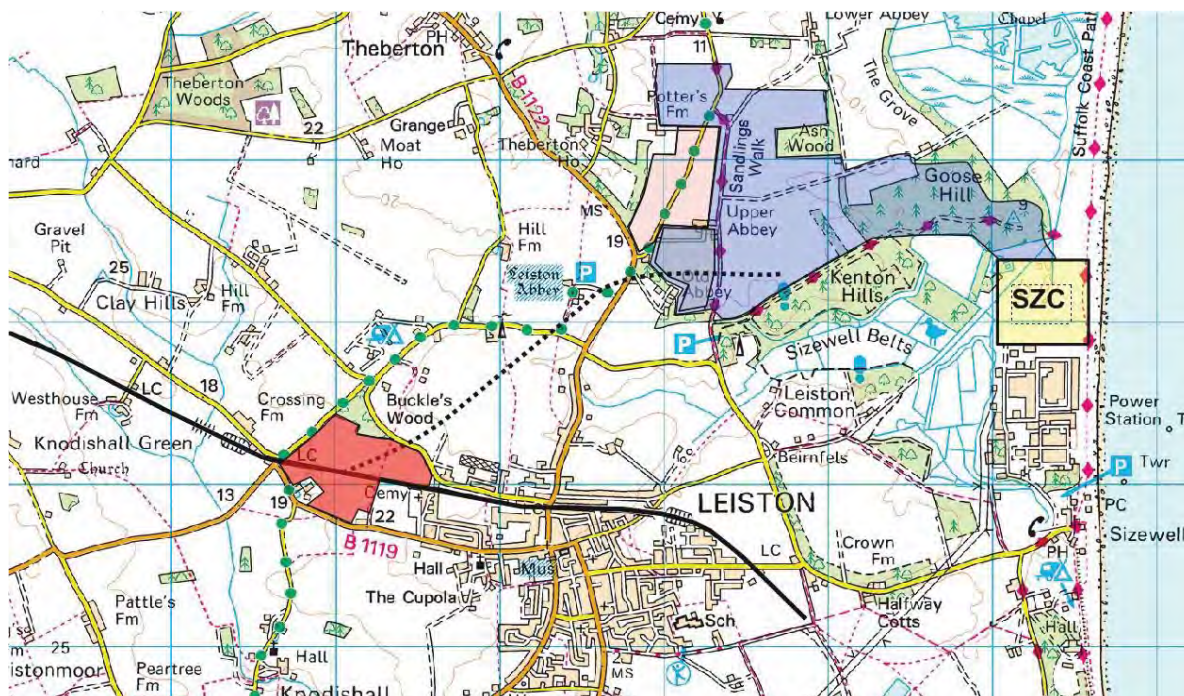


Figure 24: A figure identifying Leiston West in relation to the surrounding area²⁸

Environmental Impacts

- 11.3 This site is not located within or in close proximity to any SSSI or AONB. The site lies approximately 2.7km from the Leiston Aldeburgh SSSI and Sandlings SPA; 2.1km from the Sizewell Marshes SSSI; and 4.3km from Minsmere-Walberswick Heaths and Marshes SSSI. There is an area of Ancient Woodland to the north of the site which would need to be considered if development was to come forward on this site.
- 11.4 An application for residential development was submitted and subsequently approved on land on the eastern part of the site (ref: 16/1961/OUT). Its ecological survey suggested that the site has limited wildlife value with arable farmland and poor, semi-improved grassland. This report also stated that the majority of the application site was thought to be of low value to foraging or commuting bats, as it was mostly open farmland with very little cover. As such, impact on wildlife more generally is considered to be relatively limited.
- 11.5 Overall, it is considered that any development impact on this site and the wider area is likely to be limited in environmental terms.

²⁸ A map identifying Leiston West in relation to the surrounding area (Cannon; 2016, Ordnance Survey)

Transport

- 11.6 It is acknowledged that the majority of worker traffic would be likely to travel through Leiston to arrive at the construction site (via route B as shown on Figure 22) or via Abbey Lane (via route A shown on Figure 22), neither of which are ideal for bus traffic. As such, traffic impacts from this site are considered to be moderate. Abbey Lane is a narrow, rural carriageway which may need upgrading to accommodate bus traffic to the construction site. Alternatively, a new one-way routing arrangement could be deployed to manage the situation. There may be potential to provide a busway/footway/cycleway direct to the construction site adjacent to the proposed railway line (EDF Energy's green rail extension route). This would require further investigation.
- 11.7 The map below illustrates the potential traffic routes from this site to the Sizewell C Construction Site. It is assumed that the proposed entry road into Sizewell C will be used to transport workers to the site.

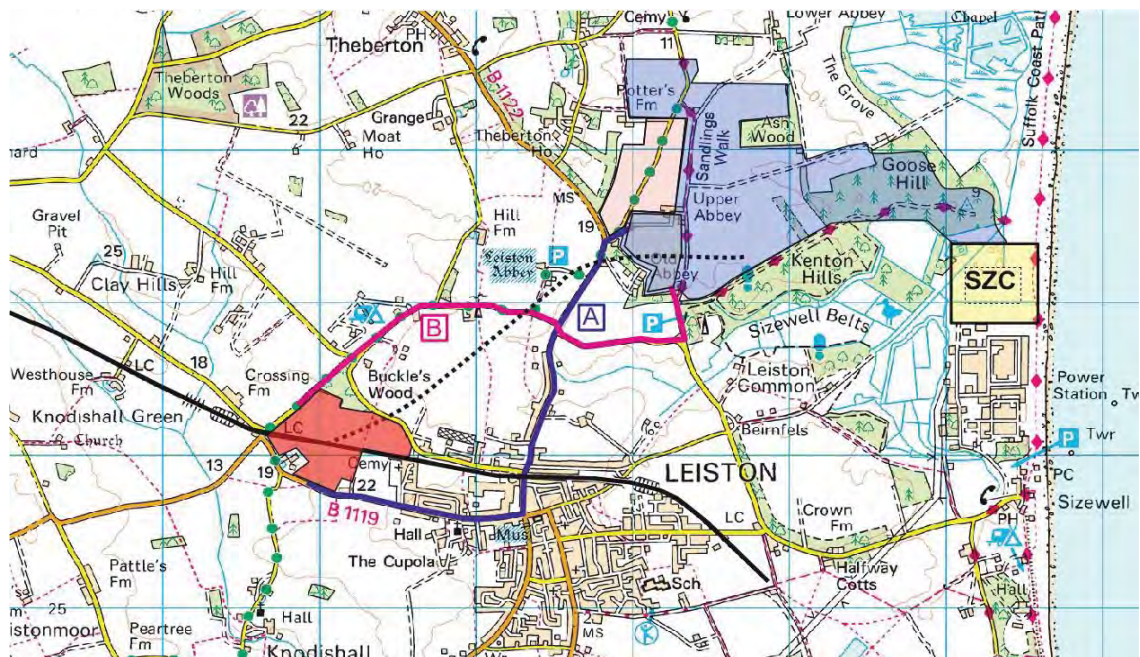


Figure 25: A map identifying potential transport routes from Leiston West to Sizewell C²⁹

²⁹ A map identifying potential transport routes from Leiston West to Sizewell C (Cannon; 2016, Ordnance Survey)

- 11.8 In relation to the adjacent application (ref: 16/1961/OUT), whilst there was no objection from SCC Highways in relation to access and road visibility from the site, they did require the applicant to consider cumulative impacts from all 712 dwellings currently coming forward in Leiston. This will be something that will need to be considered if any accommodation campus was pursued further on this site. The traffic movements associated with the construction campus may not be totally compatible with the recently approved residential scheme on the adjoining site.
- 11.9 Traffic impacts would be confined to routes to the construction site. The proximity of the site to the EDF Energy proposed construction site access is good and commute time would be short. For an off-site location it is assumed that EDF Energy would provide a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day. It is acknowledged that there will be a potential traffic impact on junctions within Leiston and this will need to be considered alongside the impacts of other Sizewell C traffic from home based workers accessing the site. It was noted in the consultation that there would be a potential increase in traffic on Abbey Road of 43%. Whilst the impacts of campus traffic would be modest, the baseline position for testing impact needs to consider recently permitted development in Leiston alongside the reported increases due to other Sizewell C traffic.
- 11.10 There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with Hinkley Point C proposals this might generate up to 400 vehicle movements per day.
- 11.11 The site is reasonable well located to Leiston if the site were to be used for other uses post construction period, although it would likely require a different access strategy to that of the accommodation campus.

Legacy Potential

- 11.12 This site to the west of Leiston offers genuine development potential post Sizewell especially given the approved planning application on the adjoining site. Therefore there is potential for future site and infrastructure provision of a potential accommodation campus in this location to be used for the future use of Leiston.
- 11.13 It appears that there is a level of acceptance from both the Town Council and the District Council that organic growth to the west would be acceptable and that the principle of development is obtained on this site.
- 11.14 Development on this site may be a good long-term option for the Leiston Neighbourhood Plan and future reviews.

Community Effects

- 11.15 Although the site is outside of the settlement boundary, it is considered to be well related to the edge of Leiston, and could be considered a natural extension of the town.
- 11.16 The parcel of land in the eastern part of the site has been identified within the Leiston Neighbourhood Plan for 150 dwellings, and a recent application for 187 dwellings has been approved on the site (ref: 16/1961/OUT) (15.12.2016). The principle for development on this site, and this side of the town would therefore appear logical.
- 11.17 The proposed development was not considered to have significant visual impacts on the surrounding area. As such, an accommodation campus on the western part of this site could also be similarly acceptable to development, and may offer a longer-term site for the future review of the Neighbourhood Plan.

Amenity Impacts

- 11.18 It is considered that amenity impacts from any development on the western part of this site would be low. The Officer's Report for the planning application (ref: 16/1961/OUT) stated that the proposed development lies sufficient distance from neighbouring properties so to limit adverse impact upon outlook, light, sunlight or privacy. Nevertheless, careful consideration of the aforementioned planning application submitted for the eastern part of the site (ref: 16/1961/OUT) for the development of 187 dwellings will need to be taken into account.
- 11.19 Existing concerns from local residents following the experiences of Sizewell A and B will also need to be carefully considered, but lessons should have been learned from previous experiences. EDF Energy have suggested that all employees will be required to follow a strict code of conduct.

Physical Constraints

- 11.20 The existing railway line running through the centre of the site, and the Ancient Woodland to the north, would act as natural constraints to development on the site. The site also has a PROW which runs from north to south across the centre of the site. Development would also need to consider the aforementioned approved planning application to the east (ref: 16/1961/OUT).
- 11.21 There is also the opportunity of 'splitting' the site, with the accommodation being on this site to the south closest to the B1119, and possibly any sports and recreation facilities being located elsewhere in the town. The temporary caravan park could also be considered to be located on land to the north of the railway line.

Policy Designations

- 11.22 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 11.23 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).
- 11.24 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”
- 11.25 Set out below are relevant planning policy which should be considered relevant when determining this application.
- 11.26 The south-eastern part of this site was identified in Suffolk Coastal District Council's most recent SHLAA (2014), and was considered capable of delivering up to 109 units (site ref: 810b). The same eastern part of the site, identified in hatchings on Figure 23 and set out in the image below, (east of Highbury Cottages) has also been identified for residential development within the Leiston Neighbourhood Plan, in this case for up to 150 units.



Figure 26: Planning Application 16/1961/OUT: Site Location Plan³⁰

- 11.27 Leiston Parish Council considered that the B1119 provided sufficient visibility for access and good pedestrian links from the site into Leiston. It was also considered that the site is related reasonably well to Leiston and could represent an important entrance in to the town.

³⁰ A Site Location Plan of planning application 16/1961/OUT (Pegasus; 2016)

- 11.28 The eastern part of the site was previously assessed by Suffolk Coastal District Council in their assessment of alternative accommodation sites. They considered that the site is located some distance from the centre of Leiston and there would be additional traffic movements through Leiston that would be associated with any development on this site. Suffolk Coastal District Council also noted that this site could result in a greater worker presence in town, which may have the potential for conflict with local residents. Boyer and Cannon consider there are advantages of locating the accommodation campus on this site, notably: infrastructure provision for future development; additional economic spend in Leiston town; adjacent to built-up areas; and that the workers will potentially have an “attachment” to Leiston, instead of being remote, and should therefore have more respect and consideration for the town and the existing residents.
- 11.29 A planning application was submitted and has been subsequently approved for the development of 187 dwellings on the part of the site east of Highbury Cottages (ref: 16/1961/OUT). In the Officer’s Report, it was considered that the proposed development was in a sustainable location and was well related to Leiston. The proposed development would provide the local area with much needed affordable housing and additional economic benefits in the form of job creation during its construction. The application’s landscape and visual impact matters were considered to be mitigated by the generally enclosed nature of the site, and it is noted that the Council’s Landscape Manager did not object to the development.

Overall Assessment

- 11.30 This site to the west of Leiston is very well related to the town and offers excellent legacy potential. A recent planning permission for development of 187 dwellings suggests development should be acceptable in this location. Current planning documents confirm that the Town Council and District Council consider that residential development is acceptable in this area.
- 11.31 The site has limited environmental impacts, and the site has potential for acceptable access onto the B1119. It is acknowledged that the transport from this site to the construction site could have an impact on Leiston town centre, albeit marginal. It is considered that alternative transport routes exist and impacts could be managed. Overall, it is considered that this site would be a good option for a potential accommodation campus, either as a full or a split site. There may be an opportunity to reduce the 3-5 storey proposed buildings over this site. This would depend on the size of the actual site and depending on whether the railway running through the centre of the site is proposed for expansion. It is considered that, if the accommodation site was to be split, (either into two or more separate sites), this site should be suitable to accommodate part of the residential element and/ or, the temporary caravan site. The site complies with EDF Energy’s criteria of being located in close proximity to the construction access, with the ability to get their workers to and from site quickly.

11.32 This site should be considered as a genuine alternative option for the accommodation campus and requires further consideration and assessment from EDF Energy as part of a wider “accommodation strategy”.

12. EDF ENERGY OPTION 2 / SIZEWELL GAP

Introduction

- 12.1 The site south of Sizewell Gap is located just east of Leiston, between Leiston and Sizewell B, and is approximately 44ha in area. The site was previously assessed by EDF Energy as part of their Stage 1 Consultation but was dismissed because of its unacceptable impact on the AONB. Regardless of this, it was considered important to re-assess the site as part of this accommodation strategy and campus review.
- 12.2 It has been concluded that it was correct to discard this site at Stage 2 due to the environmental impacts on the AONB.
- 12.3 A site plan below identifies the site and its relationship with the surrounding area.



Figure 27: A Site Location Plan of Sizewell Gap / EDF Energy Option 2³¹

³¹ A Site Location Plan of Sizewell Gap / EDF Energy Option 2 (GoogleEarth; 2016)

12.4 Figure 28 shows the site being in close proximity to the existing construction site access. It is located just north of the Sizewell Gap road and is considered to be located relatively close to the north east of Leiston, albeit there are rail and roads acting as physical barriers in between.

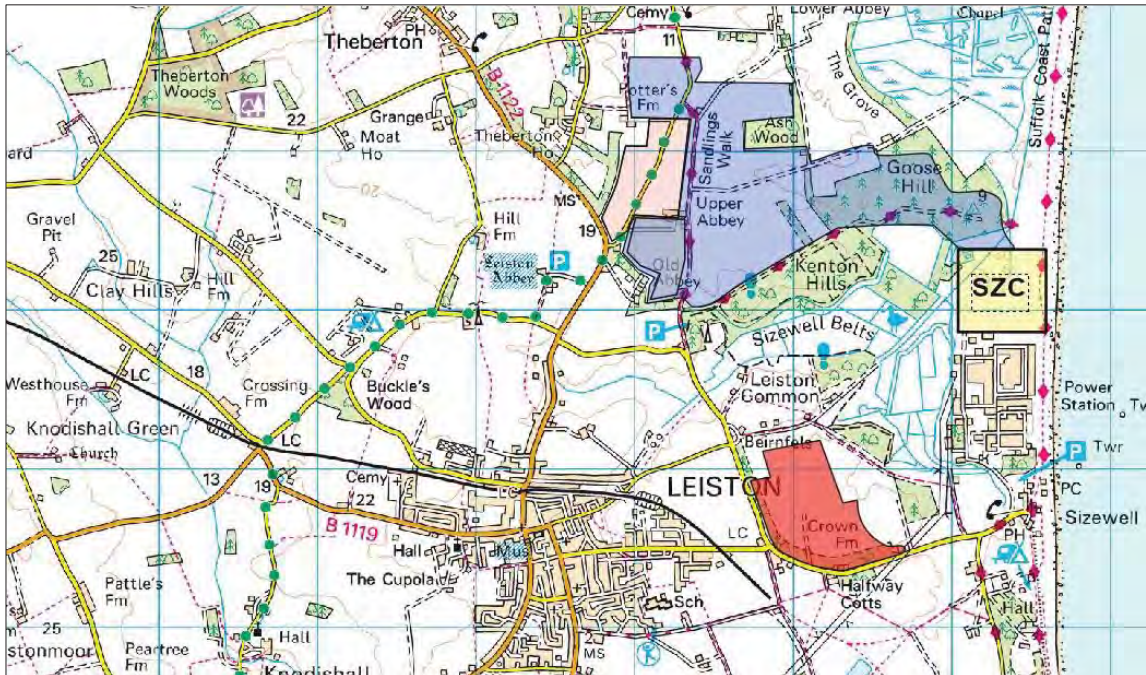


Figure 28: A map to identify South Sizewell Gap in relation to its surrounding area³²

Environmental Impacts

- 12.5 South Sizewell Gap is located within the “Suffolk Coast and Heaths AONB”. Its proximity to Sizewell Marshes SSSI to the north and Leiston-Aldeburgh SSSI to the south would mean there would be significant impacts in developing this site.
- 12.6 The site is also recognised as being within the “Sizewell Gap”, which has been identified to try and keep a degree of separation between the construction site, the town of Leiston, and the surrounding countryside, which is used by tourists and dog walkers. Equally, impacts on views could potentially be relatively minimal considering the contained nature of the site.
- 12.7 It is also noted within the Stage 2 consultation material that “*reptile mitigation and a landscape enhancement scheme are currently being implemented*”³³, so any development would be likely to have an impact on this work. The site also lies within an area of Archaeological Importance.

³² A map to identify Sizewell Gap / EDF Energy Option 2 in relation to its surrounding area (Cannon; 2016, Ordnance Survey)

³³ EDF Stage 2 Consultation Document (EDF Energy 2016; p.112)

12.8 In line with comments from the Stage 1 Consultation, it is agreed that development in this location would amount to inappropriate development within an Area of Outstanding Natural Beauty.

Transport Impacts

12.9 There is good access to the construction site, including footpaths and cycleways. There is equally good connectivity to Leiston which is much closer to this site. There are multiple locations for potential access into the site.

12.10 Traffic impacts would be confined to routes to the construction site. Routes A and B from the site to the Construction Site are shown on Figure 29. The proximity of the site to the EDF Energy proposed construction site access is good and commute time would be short. Route A would contain all Sizewell related traffic to the roads predominantly used to access Sizewell thus minimising impact on the surrounding roads. Route B could be used by shuttle buses if they were also collecting off-campus workers from Leiston on route. If the existing Sizewell A/B construction access could be utilised for construction workers then Sizewell Gap site could transport workers via a shorter route. This is identified on Figure 29 as route C.

12.11 For an off-site location it is assumed that the EDF Energy proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12-15 buses in a peak hour, and some 60 bus trips per day.

12.12 There is an opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with Hinkley Point C proposals this might generate up to 400 vehicle movements per day. The location is likely to focus construction workers into Leiston and away from Eastbridge and Theberton for non-work activities. There is an existing footpath which runs along the southern side of King George's Road into Leiston. This could be enhanced to provide a footway/cycleway into Leiston.

12.13 In terms of NPPF, the site is well located to Leiston if it was to be used for others uses after the construction period.

12.14 The map below illustrates potential transport routes from this site to the Sizewell C Construction Site.

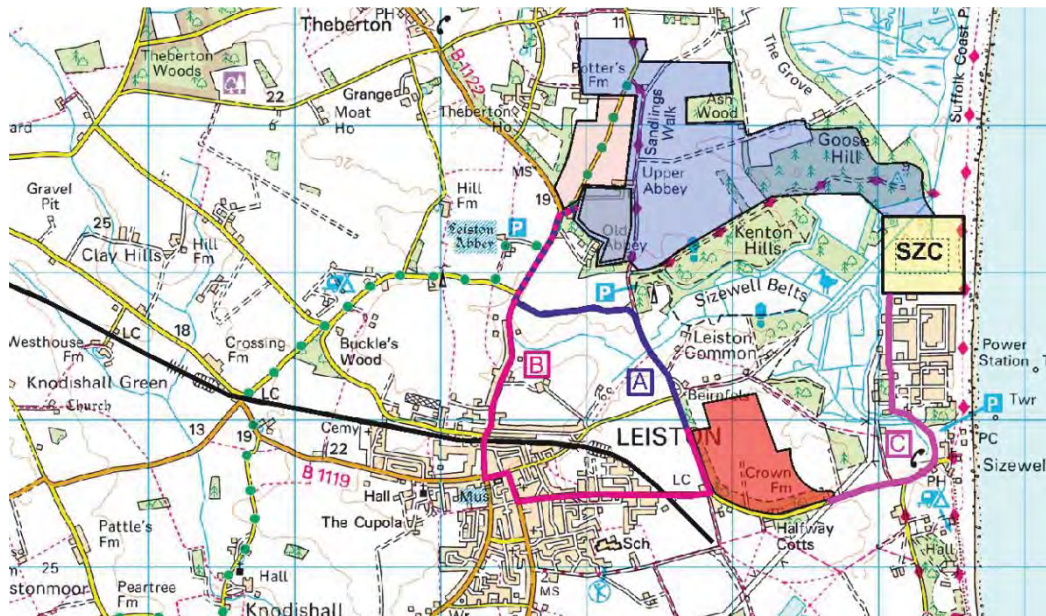


Figure 29: A map to illustrating the potential transport routes from South Sizewell Gap to Sizewell C³⁴

Legacy Potential

12.15 Although the site is slightly detached from Leiston itself including distance and the barrier of the B1119, there would be a genuine opportunity for some form of legacy planning with this option. Given the detached nature, its location it is unlikely that an accommodation campus may not support a long lasting legacy opportunity. However, the site could benefit from being split, with any sports and recreation facilities being provided on the eastern edge of the town near to other sports and recreation sites, such as the existing “Sizewell Sports and Social Club”. This would provide a long lasting legacy benefit to the residents of Leiston.

³⁴ A map illustrating the potential transport routes from Sizewell Gap / EDF Option 2 to Sizewell C (Cannon; 2016, Ordnance Survey)

Community Effects

12.16 The site is well related to the town of Leiston, and offers good potential opportunities to local businesses and the overall economy of the town. Alternatively, it is acknowledged that there are potentially negative aspects associated with housing a significant number of construction workers in such close proximity to the town. Such aspects have previously been experienced with Sizewell A and B. It is anticipated that lessons have been learned from these previous experiences, and that EDF Energy will take increased responsibility for the conduct and behaviour of their worker force.

Amenity Impacts

12.17 Concerns were raised during the Stage 1 Consultation with regards to anti-social behaviour increasing in Leiston as a result of the proximity of this site to the settlement, as was experienced during Sizewell A and B. As noted, it is anticipated that these experiences from the past have been taken on board by EDF Energy.

12.18 The site is located a little distance from the built residential form of the town, therefore direct lighting and noise impacts from any potential development would be limited.

Physical Constraints

12.19 Despite the environmental designations, the site is relatively flat and benefits from good natural screening from the road to the south. There are overhead power lines to the east which could prevent some of the site from coming forward.

Planning Policy

12.20 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.

12.21 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).

12.22 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”

12.23 Below are relevant planning policy against which should be considered relevant when determining this application.

- 12.24 The site has not been included in any previous SHLAAs, nor has the site been identified within the Leiston Neighbourhood Plan. There is no relevant planning history on this specific site. However, there has been a planning application for Galloper Offshore Wind Farm on land to the east of the site (ref: DC/16/4810/DRC). This site was not assessed by Suffolk Coastal District Council in their recent consideration of alternative accommodation sites.
- 12.25 In their Stage 1 Consultation Response, Suffolk County Council and Suffolk Coastal District Council noted that this site should be "*eliminated immediately*" due to its prominence in the Area of Outstanding Natural Beauty. Given its location, it is considered that any development on this site would have an impact on the Area of Outstanding Natural Beauty (AONB). As set out in National Policy Statement EN-1, in their decision-taking, the Infrastructure Planning Commission should have "*regard to [the] siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*" In light of this, impacts on landscape designations, which is inclusive of the AONB, should be considered when determining development proposals of this nature.
- 12.26 At the same time, Suffolk County Council and Suffolk Coastal District Council also considered the need for EDF Energy to formulate an "accommodation strategy" which would meet the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts. This is why it has been reassessed at this stage.

Overall Assessment

- 12.27 In their Stage 2 Consultation Document, EDF Energy suggested that this site was discounted on the basis that the site was in an exposed setting and within the AONB. It is also noted that Suffolk County Council and Suffolk Coastal District Council also considered that this site should be discounted based on its wider environmental impacts. It has however been assessed as part of an "overall strategy".
- 12.28 Whilst this site appears favourable in relation to potential for some form of legacy, this site is within a specific AONB designation. It is therefore considered unlikely that any permanent development will come forward on this site. The site is also located within the 2km radius of the Emergency Planning Zone and there is a need to keep this part of Sizewell free from construction.
- 12.29 Transport impacts would be limited, given EDF Energy's proposal to use buses for all work related trips.
- 12.30 Given the environmental impacts, it is considered that any development is less likely, when compared to other sites, to be taken forward for an accommodation campus development.

13. EDF ENERGY OPTION 3 / LEISTON EAST

Introduction

- 13.1 This is a further site located south east of Leiston, just south of the Sizewell Sports and Social Club and is approximately 33ha in area. The site was previously assessed by EDF Energy as part of their Stage 1 Consultation (EDF Energy Option 3), but is considered relevant to be reassessed as part of this accommodation campus review.
- 13.2 Figure 30 below identifies the site and its relationship with the surrounding area in relation to Sizewell and the settlement of Leiston. As shown, this site is well related to the settlement of Leiston and should be considered as an organic extension to the town.



Figure 30: A Site Location Plan of Leiston East / EDF Energy Option 3³⁵

³⁵ A Site Location Plan of Leiston East (GoogleEarth; 2016)

13.3 Figure 31 below further illustrates this site and its relationship with Sizewell, EDF Energy's preferred accommodation site (in pink) and the construction site (in purple).

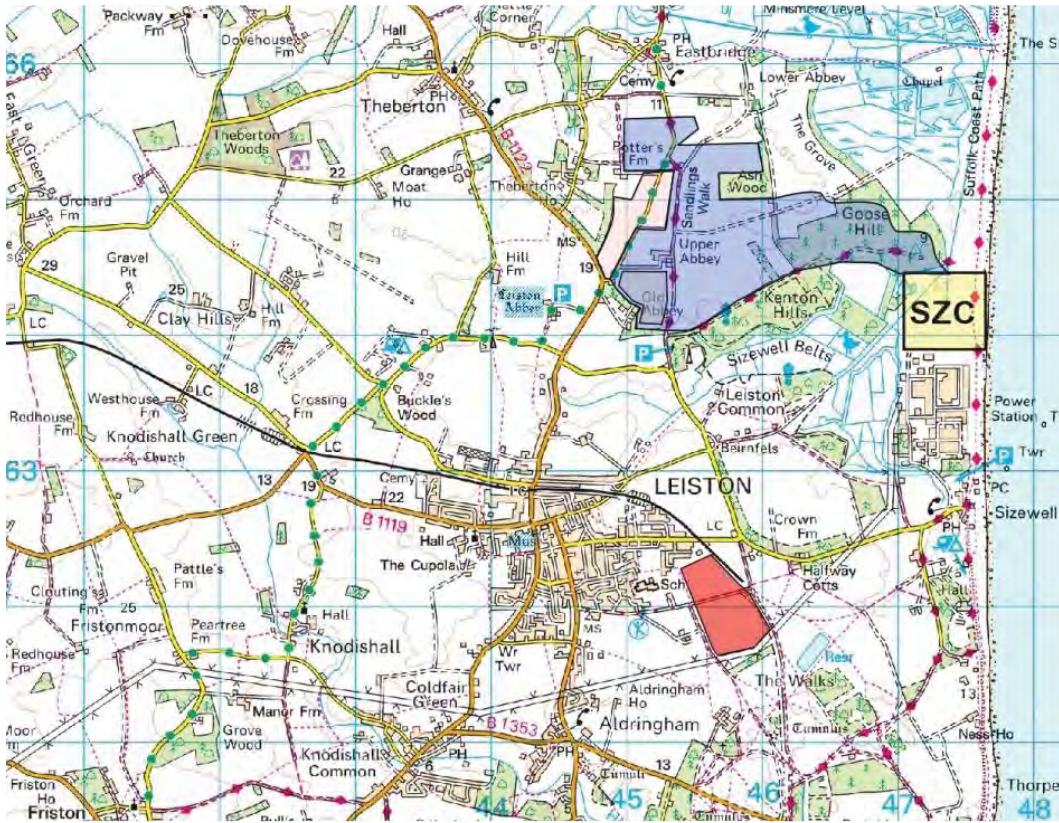


Figure 31: A map to identify Leiston East and its surrounding area³⁶

Environmental Impacts

13.4 The eastern part of this site abuts the “Suffolk Coast and Heaths AONB”. However, it is considered that development could be carefully contained to the west. The Leiston-Aldeburgh SSSI is within 200m to the south of the site and the Sandlings SPA also lies to the south. The site is relatively well contained, and there are several PROW within and around the site which would also need to be considered if any development was to come forward on this site.

³⁶ A map to identify Leiston East and its surrounding area (Cannon; 2016, Ordnance Survey)

Transport Impacts

- 13.5 The Leiston East site has good potential links to the existing Sizewell entrance, and is also within easy walking and cycling distance of Leiston. The site is therefore considered to have relatively limited transport impacts in relation to accommodation campus traffic. . The routes to the Construction Site from the Leiston East site are identified on Figure 32. Route C has minimal impact on the local highway network if it is feasible to use the existing Sizewell access road. Route A provides a direct route to the Construction Site via Lovers Lane. A new connection would need to be provided from the campus to King George's Avenue/Sizewell Gap/Lovers Lane. Route B could be used by shuttle buses if they were also collecting off-campus workers from Leiston on route. It would require the use of Grimseys's Lane/Red House Lane.
- 13.6 The potential for a wider southern access from Aldeburgh Road to Sizewell Gap could be investigated as part of any wider proposals for accommodation at this location. It was noted in recent failed planning application in this vicinity that there were concerns expressed over traffic impacts on Red House Lane that currently provides access to the School and Leisure centre.
- 13.7 Non-work related off site activities (e.g. involving access to shops, services and facilities from the surrounding area) will require off site trips. These will have a direct impact off-site. Non-work related trips is presented in the Stage 1 & 2 consultation as to the number of potential off-site trips, but comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis.
- 13.8 The site is very well located in terms of its relationship to Leiston and the amenities and facilities the town has to offer, although direct links may need to be considered. This would minimise the impact of non-work related off-site trips. The site provides a good opportunity for legacy by way of opening up access into the site.
- 13.9 The map below identified the potential transport routes from this site to the Sizewell C Construction Site.

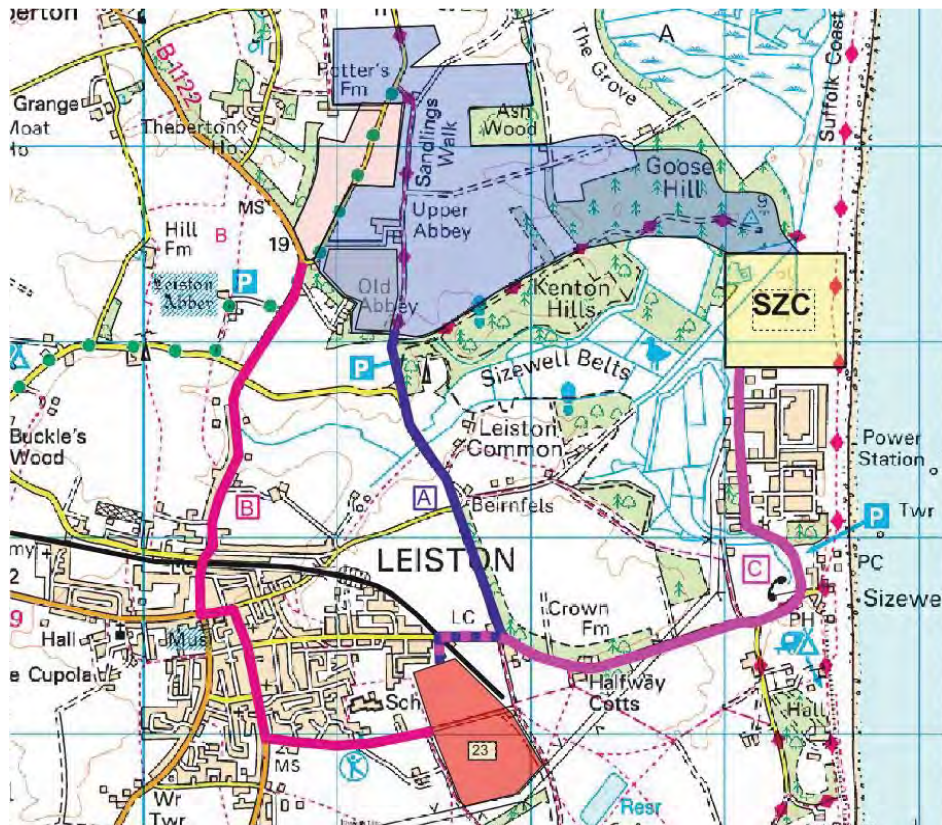


Figure 32: A map to identify the potential transport routes from Leiston East to Sizewell C³⁷

Legacy Potential

- 13.10 It is considered that development on this site could result in a genuine legacy opportunity for the area. The accommodation element could potentially be reused for future housing, through its inclusion in the Leiston Neighbourhood Plan and any further reviews, whilst the infrastructure and sports and recreation facilities could add to the strong sports offer of the town.
- 13.11 In conjunction with the other sports facilities in the area, including the Leiston Sports Club, School, Leisure Centre, there is an opportunity to create a “Sports Hub”. There is also a genuine business legacy that could be generated through the development of this site which could have long-standing positive implications for Leiston if planned and managed carefully.
- 13.12 Overall, the site should be considered as a genuine long-term opportunity for any subsequent review of the Neighbourhood Plan.

³⁷ A map to identify the potential transport routes from Leiston East to Sizewell C (Cannon; 2016, Ordnance Survey)

Community Effects

13.13 The proximity of the site to Leiston and its good access to facilities means there is the potential for positive integration between a positive integration and the town. There would be potential benefits to the local economy if an accommodation campus was to be located on this site, although the existing concerns from experiences with Sizewell A and B must be carefully managed. It is expected that EDF Energy would take responsibility in assisting to manage its workforce.

Amenity Impacts

13.14 Whilst this site is located in close proximity to Leiston, given that it is some distance from existing residents, impacts in terms of noise, lighting and privacy are likely to be minimal. It is clear, however, that the site would need to consider the proposed development at Red House Lane (ref: 16/1684/FUL) for 188 dwellings submitted by Hopkins Homes as Phase 2 of their existing development and its reasons for refusal (as set out below).

Physical Constraints

13.15 This site is relatively contained and has some good natural screening, which could be utilised should any development come forward on this site. There are overhead powerlines to the south-eastern part of site which would limit any potential development in this particular area.

Planning Policy

13.16 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.

13.17 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).

13.18 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”

13.19 Set out below are relevant planning policy against which should be considered relevant when determining this application.

13.20 This site was not considered within Suffolk Coastal District Council’s most recent SHLAA, however, land to the west of the site and west of Hawsell’s Farm was considered capable of accommodating up to 295 units (SHLAA ref: 1004).

- 13.21 The site lies within the Leiston Neighbourhood Plan area, but has not been specifically identified for any form of development.
- 13.22 There is no direct planning history on this site but a planning application for 188 dwellings was submitted on land at Red House Lane (ref: 16/1684/FUL). This planning application was recommended for approval by the Case Officer given the development's sustainable location and that its impact could be adequately mitigated in respect of designated habitats and the combination of effects on traffic and air quality. This was supported by Natural England who stated that, whilst the development was likely to have some form of impact on disturbance to bird at designated sites, this impact could be suitably mitigated. It is also of note that Emergency Planning considered that the proposed development would not impact on the ability to implement emergency arrangements for a Sizewell radiation emergency based upon a reasonably foreseeable accident. The application was refused by Suffolk Coastal District Council Members in December 2016 on the basis that the proposed development would give rise to significant increased traffic movements.
- 13.23 This site does not appear to have been assessed by Suffolk Coastal District Council beyond the original Option 3 presented by EDF Energy at the Stage 1 consultation. The land to the west was assessed by Suffolk Coastal District Council and it was considered that traffic impacts would be too severe on Leiston and its existing residents. According to Suffolk Coastal District Council, the site is unlikely to require any unusual mitigation that would enable future development.
- 13.24 In their Stage 1 Consultation Response, Suffolk County Council and Suffolk Coastal District Council noted that this site should be considered further and required additional work to be undertaken to determine the merits of the site (see Appendix A). It is unclear whether this additional work has yet to be undertaken by EDF Energy.
- 13.25 In their response, Suffolk County Council and Suffolk Coastal District Council also considered the need for EDF Energy to formulate an "accommodation strategy" which meets the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts.

Overall Assessment

- 13.26 It is considered this site presents a very good opportunity to be considered as an alternative accommodation site. It has good links with Leiston and genuine legacy potential whilst enhancing integration between the residents and the construction workers. There are existing facilities within the area to support an accommodation campus. There is also potential for this site to have a cyclical benefit for local businesses and the town's economy.

- 13.27 Access to and from the site could be to the east of the site, which would look to reduce any impact on Leiston itself for work related transport by bus. The proximity to Leiston for non-work related trips offers good access by foot, cycle and bus and would therefore help to minimise any associated non-work related trips. The site lies in close proximity to the 2km Emergency Planning Buffer Zone and therefore mitigation measures may be required. Comments on a recent planning application on a neighbouring site are interesting to note, and may be equally applied to this site. The site is detached from the proposed Sizewell Construction Site access, but access via the existing social/leisure site entrance would alleviate this problem. It is also important to note that, at a later stage in the construction period, the secondary access to Lover's Lane would give this site good access to the Construction Site.
- 13.28 It is important to note that, in their Stage 2 Consultation Document, EDF Energy considered that this site was "*on par*" with the EDF Energy Preferred Option at Theberton and Eastbridge.
- 13.29 Overall, this is considered to be a favourable site that should be considered further for an accommodation campus as part of a wider "accommodation strategy" that has previously been referred to, either as a full or split site. The site lies next to the existing Sizewell sports facilities as well as a school and leisure centre. The opportunity for the creation of a future 'sports hub' therefore exists. Future development of the site for housing would appear to present a natural organic extension of Leiston associated with the recently proposed development site to the west.

14. LOVERS LANE WEST / 'BIG FIELD'

Introduction

- 14.1 The site off Lovers Lane, also known as “big field” is located along the eastern boundary of Leiston and is approximately 31 ha in size. The site was not assessed by EDF Energy during the Stage 1 Consultation, however, the site has since been included in EDF Energy’s Stage 2 Consultation as a potential site to accommodate for the setting down of materials and for a “workers’ caravan accommodation”.
- 14.2 This “workers’ caravan accommodation” has only been introduced at the Stage 2 Consultation and no alternative sites seem to have been assessed for this.
- 14.3 EDF Energy refer the flexibility of this particular site, therefore it would be pre-emptive to exclude the site until a final decision has been taken in relation to the railway line, which may impact on the use of this land.
- 14.4 The maps below identify the location of this site and in relation to its surrounding area. The figure below illustrates the site is greenfield in nature, it is well related to the built form of Leiston and abuts industrial units to the south west.



Figure 33: A Site Location Plan of Lovers Lane West / “Big Field”³⁸

³⁸ A Site Location Plan of Lovers Lane West (GoogleEarth; 2016)

14.5 The figure below identifies this site in relation Sizewell, the construction site and the EDF Energy preferred site, as well as this part of Suffolk more generally.

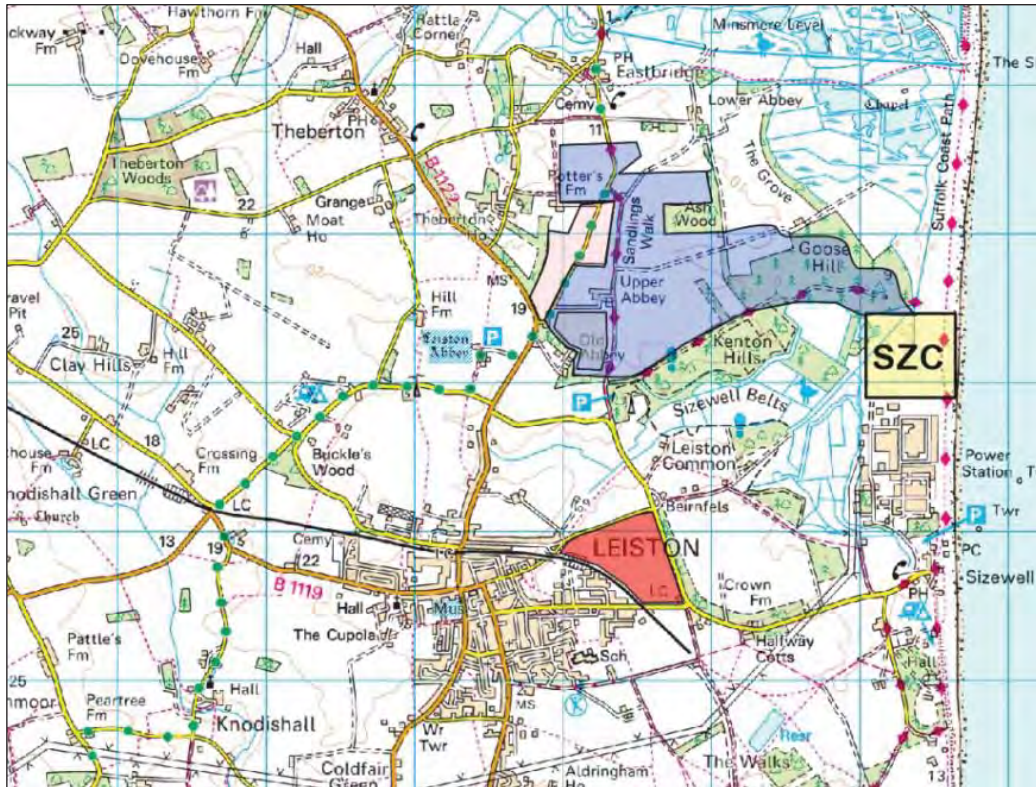


Figure 34: A map to identify Lovers Lane West in relation to its surrounding area³⁹

Environmental Impacts

- 14.6 This site is relatively contained and benefits from good natural screening. The site is located in close proximity to Sizewell Marshes SSSI to the north and Suffolk Coast and Heaths AONB to the east.
- 14.7 It is noted that the parcel of land to the north (DC/15/3954/AME) is subject to an approved application for the creation of approximately 6ha of wetland development to mitigate the loss of the SSSI on the Sizewell C Construction Site. Whilst this area of wetland is not afforded the same status as SSSI designations, any development on “Big Field” would need to consider its impact on this wetland area to the north.
- 14.8 Overall, it is considered that there are limited environmental impacts associated with this site.

³⁹ A map to identify Lovers Lane West in relation to its surrounding area (Cannon; 2016, Ordnance Survey)

Transport Impacts

- 14.9 There are three potential routes from this accommodation site to the Construction Site, these are identified on Figure 35 It is considered that route A would have limited transport impacts on the settlement of Leiston from this site. Transport to the construction site should not impact on Leiston itself given that access route would be in a north-easterly direction. There is also a short commute time to the construction site for any accommodation campus on this site. Route B could be used by shuttle buses if they were also collecting off-campus workers from Leiston on route. Route C has minimal impact on the local highway network if it is feasible to use the existing Sizewell access road.
- 14.10 Traffic impacts would be confined to routes to the construction site. The proximity of the site to the EDF Energy proposed construction site access is good, commuting time would therefore be short. For an off-site location it is assumed that the EDF Energy proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12-15 buses in a peak hour, and some 60 bus trips per day.
- 14.11 There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with Hinkley Point C proposals this might generate up to 400 vehicle movements per day. There is an existing footway on the southern side of King George's Ave which could be upgraded to a footway/cycleway into Leiston. This connection would serve this development, and possibly development into the future.
- 14.12 With regards to the NPPF, the site is reasonably well located to Leiston if it was to be used for other uses after the construction period.
- 14.13 The map below sets out the potential transport routes from this site to the Sizewell C Construction Site.

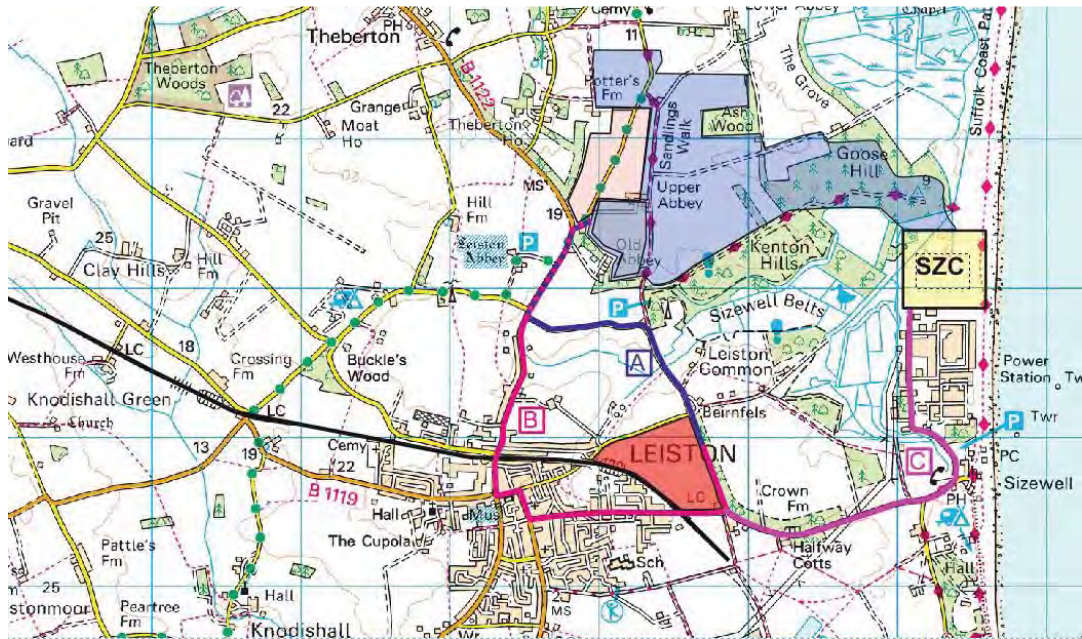


Figure 35: A map to identify the potential transport routes from Lovers Lane West to Sizewell C⁴⁰

Legacy Potential

14.14 The site could be utilised by Leiston and would have the potential for either long-term residential or employment use. It could also be considered by Leiston Neighbourhood Plan as part of a future review. The site has the potential to be considered in conjunction with the other sites either west or to the east of Leiston.

Community Effects

14.15 The site is well related to Leiston and is within close enough proximity to encourage walking and sustainable modes of transport. Any development on this site could therefore provide a natural extension to the settlement.

Amenity Impacts

14.16 It is considered there would be limited impacts on neighbouring residents. The site has good natural screening from hedgerows and abuts existing employment land rather than residential development to the south west. As with any development, lighting and noise pollution would need to be carefully considered.

Physical Constraints

14.17 To the south, there is existing employment land and a railway. It is also noted that the site lies within 2km of the Emergency Planning Zone for Sizewell and therefore is within a relatively vulnerable area. However, a large parcel of Leiston does not feature within this Emergency Planning Zone, see Appendix B.

⁴⁰ A map to identify the potential transport routes from Lovers Lane West to Sizewell C (Cannon; 2016, Ordnance Survey)

Policy Designations

- 14.18 As set out in Chapter 3 of this review, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 14.19 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).
- 14.20 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”
- 14.21 In light of this, set out below are relevant planning policy against which should be considered relevant when determining this application.
- 14.22 The site has not been assessed in Suffolk Coastal District Council’s most recent SHLAA. The site lies within Leiston’s Neighbourhood Plan area, but has not been identified for any future development at present. There are no relevant planning applications on the site, and the site was not assessed by Suffolk Coastal District Council as a potential for an alternative accommodation campus. A planning application was however submitted by EDF Energy and subsequently approved for the site to the north to be an area of wetland habitat including grassland, heathland, scrub and scattered trees (ref: DC/14/4224/FUL).
- 14.23 The site has been promoted by EDF Energy in their Stage 2 Consultation Document to be used for the following uses:
- Storage of materials;
 - Short-term Park and Ride area to allow workers to be shuttled by mini-bus to the power station platform;
 - A HGV holding area to regulate flow into Sizewell; and
 - A space in the north part of the site for worker’s caravan accommodation.

Overall Assessment

- 14.24 This site appears favourably when considered against the various criteria set out in this review, including environmental impact, legacy planning and transport. Although it should be considered further, it is acknowledged that EDF Energy have identified this site for the flexibility it provides them, and they anticipate utilising the site for rail heads, set-down areas and other such uses. Therefore, until EDF Energy have taken a final decision on their preferred rail line, this site should still have the option of being considered for the accommodation campus.
- 14.25 If the proposal for the temporary caravan park were to be relocated from this site then there should be a sufficient area for the accommodation campus. In light of this, this site should still be considered further as part of a wider “accommodation strategy”.

15. SOUTH SIZEWELL GAP / SIZEWELL COAST

Introduction

- 15.1 This site is located further to the east of the town of Leiston and is on the coast of Sizewell. It is approximately 16 ha in size and is therefore considerably smaller in size when compared to the EDF Energy Preferred site.
- 15.2 This site has therefore been excluded from consideration from the Accommodation Campus Review, whilst acknowledging that it could be considered as a potential alternative or additional location for the proposed “temporary caravan park”.
- 15.3 The figures below illustrate the site's location in relation to the Suffolk coast and Sizewell to the north. As shown, the site is considered to be relatively remote and detached from existing settlements in the area to be considered for an accommodation campus.



Figure 36: A Site Location Plan of South Sizewell Gap / Sizewell Coast⁴¹

⁴¹ A Site Location Plan of South Sizewell Gap/ Sizewell Coast (GoogleEarth; 2016)

- 15.4 The figure below also illustrates the site and its proximity to Sizewell, the EDF Energy Preferred accommodation site to the north, and the Sizewell C Construction Site. Also visible on this map is the existing caravan park in the northern part of the site.

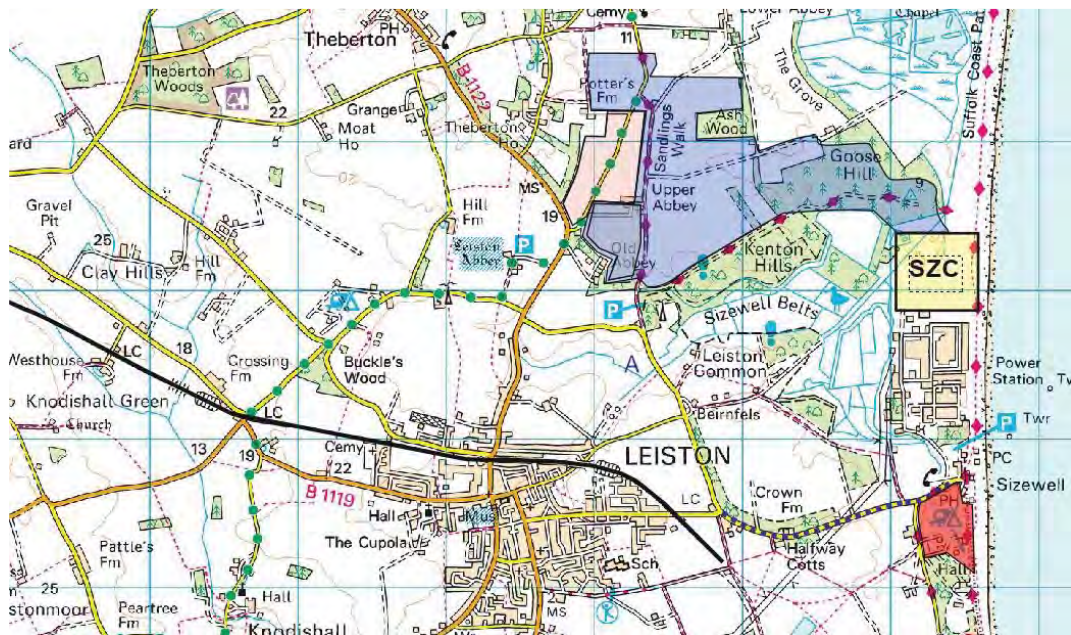


Figure 37: A map to identify South Sizewell Gap (Coast) in relation to the surrounding area⁴²

Environmental Impacts

- 15.5 This site is located in a very prominent position with high landscape sensitivity. This is due to its cliff-top location. Any development of a significant height will be clearly visible.
- 15.6 The site is located within Suffolk Coast and Heaths AONB and partly within Leiston-Aldeburgh SSSI. Views to and from the site will be significantly affected if an accommodation campus were to be delivered on this site. There are also several PROW across and around the site which would need to be considered.
- 15.7 A 3-5 storey accommodation campus would therefore clearly be unsuitable in this location, but a temporary caravan park as a natural extension to the existing caravan park would have minimal environmental impact in this location.

⁴² A map to identify South Sizewell Gap (Coast) in relation to the surrounding area (Cannon; 2016, Ordnance Survey)

Transport Impacts

- 15.8 The site is considered to have very good access to the main site entrance and any development related to Sizewell C construction would therefore be more likely to have limited impact on the local transport network for construction traffic. Construction workers could be transported through the existing Sizewell A/B access if this is permitted. Alternatively the route to the construction access would be via Sizewell Gap, Lovers Lane, Abbey Road. This would add to commute times. However, given the remote location of this site, non-shift traffic flows are likely to have a wider impact on the local area as the construction workers will need to travel to nearby settlements for facilities and services. The construction site is within walking/cycling distance. There is a footway/cycleway along Sizewell Gap but it is likely to be undesirable at certain times of the day
- 15.9 The map below indicates potential transport routes from this site to the Sizewell C Construction Site.

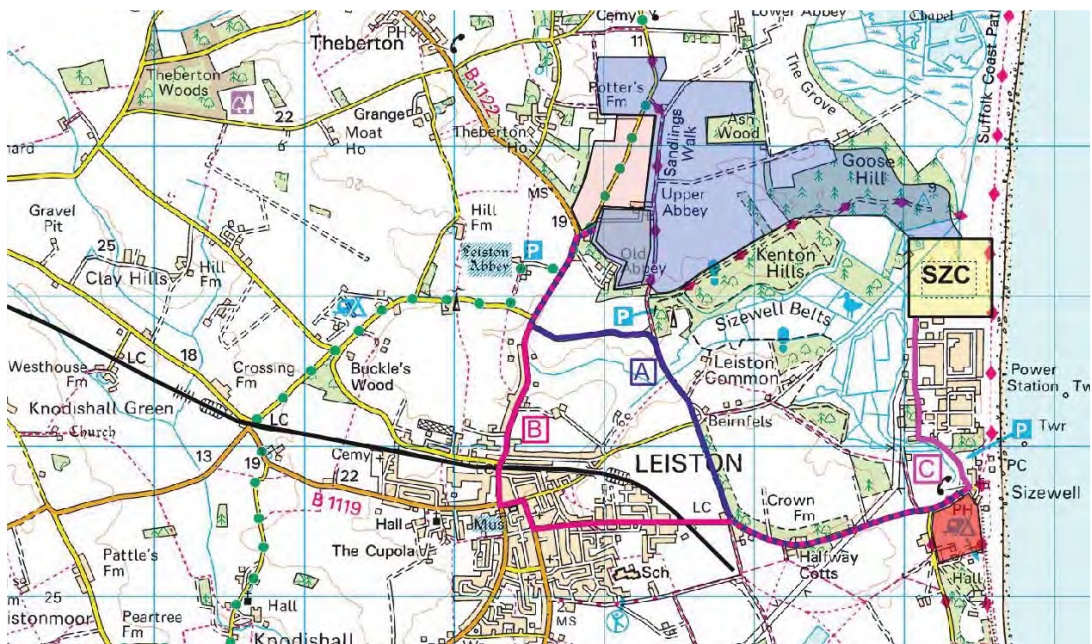


Figure 38: A map to identify the potential transport routes from South Sizewell Gap (Coast) to Sizewell C⁴³

⁴³ A map to identify the potential transport routes from South Sizewell Gap / Sizewell Coast to Sizewell C (Cannon; 2016, Ordnance Survey)

15.10 For an off-site location it is assumed that the EDF Energy's proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that has been developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day.

Legacy Potential

15.11 Whilst the site has limited potential as a genuine option for the accommodation campus, there is a real possibility of some form of legacy being achieved if the site was considered for the "Temporary Caravan" site.

15.12 Part of the site is currently used as a caravan park and therefore some infrastructure is already available. An extension to this caravan park, although needing to be carefully managed, could accommodate the temporary caravan park EDF Energy have introduced at the Stage 2 consultation.

Community Effects

15.13 The site is considered to be very detached from Leiston, although it benefits from good access via road and footpath links. As such, it is unlikely that this site would form a natural extension of an existing settlement. An accommodation campus in this location is also unlikely to encourage integration between the Construction Workers and existing residents of the local area. A temporary caravan park could however enhance community integration with the existing caravan park and its associated infrastructure could benefit the existing users of the park.

Amenity Impacts

15.14 Any amenity impacts from this site are considered to be relatively low given the remote location of the site. However, there would need to be due consideration given to both the owners of the existing mobile homes and tourists on the existing campsite. Further, given the rural location of this site, it is likely that both noise and lighting impacts are likely to be more prevalent.

Physical Constraints

15.15 The site's cliff top location is considered to have very high landscape sensitivity. This site is not big enough to accommodate a temporary accommodation campus site, but could be suitable for a temporary caravan park.

Policy Designations

- 15.16 As set out in Chapter 3 of this report, National Policy Statements form the overarching policy requirements against which national infrastructure projects should be decided. In the case of a nuclear power station, the Government states out that National Policy Statements EN-1 and EN-6 will be the primary basis for Infrastructure Planning Commission (IPC) decision making.
- 15.17 In considering this proposed development, the IPC should consider any potential “*adverse impacts including any long term and cumulative adverse impacts, as well as any measure to avoid, reduce or compensate for any adverse impacts*” (EN-1 page 44).
- 15.18 Further, as previously set out, NPS EN-1 does suggest that “*the IPC may consider both important and relevant in its decision-making may include Development Plan Documents or other documents in the Local Development Framework.*”
- 15.19 In light of this, set out below are relevant planning policy against which should be considered relevant when determining this application.
- 15.20 As this site is considered a potential location for the temporary caravan park, it is necessary to review Local Planning Policy which refers to caravan parks in the AONB.
- 15.21 Local Planning Policy SP8 relates to tourism and states that, within areas of landscape designations, including the Heritage Coast and the Suffolk Coast and Heaths AONB, development will only be considered as acceptable in unexposed areas whereby impact on the landscape will not be considered as adverse. In light of this, a temporary caravan park in this location would need to provide a landscape assessment which would illustrate how landscape impacts could be mitigated.
- 15.22 This site was not assessed in the most recent Suffolk Coastal SHLAA, nor does the site feature within the emerging Leiston Neighbourhood Plan. There have been a number of planning applications submitted in relation to this site, mainly relating to infrastructure for the existing caravan park. The site was also subject to an assessment of light emissions from the proposed Galloper Wind Farm on an adjacent parcel of land. It does not appear that the site has been previously assessed by Suffolk Coastal District Council.

Overall Assessment

- 15.23 The site is considered to be too small for the accommodation campus site and is also located in a sensitive location whereby views and the environment are likely to be severely impacted upon. It is therefore unsuitable for the accommodation campus.
- 15.24 However, given the existing caravan park on the site, the site would be suitable to accommodate the proposed temporary caravan site for construction workers. This temporary caravan park has been introduced in the Stage 2 Consultation, however no further alternatives have been proposed. This would have good legacy potential given that the potential improved infrastructure could provide for an additional permanent caravan park. Although a caravan park in this location could be seen as competition to the existing caravan park, if carefully planned utilities and improvements to infrastructure could benefit the existing business and provide a year round income.
- 15.25 It is unclear what, if any, alternative sites for the temporary caravan park have been assessed by EDF Energy during the Stage 2 Consultation. It is strongly advised that this site is considered further for this specific aspect of Sizewell C and should be considered collectively as part of a wider “accommodation strategy” for Sizewell C.

16. CONCLUSION

- 16.1 Boyer and Cannon Consulting Engineers were commissioned by Suffolk County Council to assess whether there were any genuine alternative sites for the Sizewell C accommodation campus.
- 16.2 A series of sites were discussed and agreed with Suffolk County Council early in the process. This included land put forward through Suffolk Coastal District Council's Strategic Housing Land Availability Assessment (SHLAA; 2014); previous sites considered by EDF Energy; and further land put forward through local knowledge.
- 16.3 Suffolk County Council were also keen that EDF's preferred site for the accommodation campus was also included within the assessment.
- 16.4 Suffolk County Council emphasised the need to explore any 'legacy potential' of the different sites. It is the view of Boyer and Cannon that in true planning terms any future 'legacy', such as important infrastructure, must be considered.
- 16.5 The County Council were equally interested to assess the impacts on the environment and local communities.
- 16.6 A series of criteria were therefore agreed with Suffolk County Council, against which all of the sites would be assessed. This included EDF Energy's own criteria of proximity and efficiency as well as: impacts on the environment; effects on local communities and the local amenities; any notable physical constraints; and any legacy potential with the particular site.
- 16.7 It was suggested that an accommodation campus should not necessarily be based on a single site, if there were genuine possibilities for splitting a campus across two or more sites that would be beneficial or reduce impacts on the surrounding area. This could include residential accommodation across one or more sites, and any sports or recreation facilities at a different location. Combined or split sites were therefore also considered as part of this assessment, although identifying specific locations for split sites was not considered as part of this review.
- 16.8 Boyer and Cannon have carried out a detailed assessment for the various sites put forward, through desk based research; evidence provided by either the County or District Council or joint information; site visits; review of previous and current consultation material; comparison work undertaken for similar schemes, notably the Hinkley Point C project; and independent analysis and calculations.
- 16.9 An assessment of EDF Energy's preferred site was undertaken early into the assessment in order to establish a 'benchmark' position from which other sites could equally be assessed. This particular site was clearly favourable towards EDF Energy's preferred criteria, but was equally tested against the other agreed criteria.

- 16.10 Our findings show that EDF Energy’s preferred site featured positively against proximity to their own construction site, and the ability to move their workers swiftly and efficiently to and from this site. However, EDF Energy’s preferred site was considered to be less favourable when considered against environmental impacts, and its legacy potential.
- 16.11 The findings illustrate that other alternative sites assessed did appear more positive than EDF Energy’s preferred site against some of the agreed criteria, which is set out in the Summary Table below.
- 16.12 This assessment re-affirms that before one particular site is selected as an accommodation campus, a full and proper “accommodation strategy” must be undertaken. This was advised by the Joint Response sent to EDF Energy in February 2013. To date, it does not appear that EDF Energy have undertaken such a strategy. It is unclear how the options were decided upon prior to the Stage 1 consultation and what, if any, alternatives were assessed prior to reaching these limited options.
- 16.13 The introduction of the “temporary caravan park”, has only been proposed at the current Stage 2 consultation. No alternative options have been proposed. The inclusion of the site for the temporary caravan park has not been properly justified, and as this review has shown, there are clearly alternative sites that could be considered for this specific element of work. It is suggested that this appears to be an oversight by EDF Energy.
- 16.14 The table below is indicative only, and illustrates a summary of the high level assessment undertaken in this report by Boyer and Cannon. This summary table provides an indication that a more in-depth analysis of alternative sites for the temporary accommodation campus needs to be undertaken.
- 16.15 Based on the high level information provided in this report, these alternative sites have been assessed using a theoretical traffic light system (the “RAG Assessment” below), with their overall potential for an accommodation campus has been considered⁴⁴.
- 16.16 As illustrated on the following table, the criteria “physical constraints” and “community effects” have been removed from being assessed as it is not considered that their assessment should be reviewed positively or negatively, but rather as a fact.

Key	Level of Impact
Green	Limited
Amber	Moderate
Red	Significant

Red, Amber, Green: a “RAG Assessment” was used when considering each of the sites against the level of likely impact

⁴⁴ A table to illustrate the findings of Boyer and Cannon’s Accommodation Campus Review (Boyer; 2017)

	Site Area (Ha)	Proximity to the Construction Site	Environmental Impacts	Transport Impacts (work related)	Transport Impacts (Non-work related)	Amenity Effects	Legacy Potential	Proximity to Settlements and Community	Physical Constraints	Possibility for a split site	Comments
1. EDF Energy Preferred Site	Approx. 34ha							Not in close proximity to settlements, integration with existing residents unlikely.	Limited constraints.	Y	Close proximity to the Construction Site; No legacy potential being suggested (except for Option 2 (ii)); Significant cumulative environmental impacts.
2. Saxmundham South	Approx. 42 ha							Proximate to Saxmundham, opportunities for integration likely.	Limited constraints.	N	Greater distance from Construction Site; Positive legacy potential, and well related to Saxmundham.
3. Leiston Airfield	Approx. 101 ha							Not in close proximity to settlements, integrations with existing residents unlikely.	Limited constraints.	N	Similar distance to Construction Site as EDF Energy Preferred Site; Good transport links / options; Limited legacy potential, unless part of a wider settlement; Ability to limit environmental impacts.
4. Leiston West	Approx. 32 ha							Proximate to Leiston,	Limited constraints.	Y	Moderate distance to Construction Site;

								opportunities for integration likely.			Limited environmental impacts; Good links and location to Leiston; Positive legacy potential; Could be considered as a full or split site for EDF Energy's accommodation campus.
5-EDF Energy Option	Approx. 44ha							Relatively close to Leiston,	Limited constraints.	Y	Impact on AONB rules this site out for consideration of the accommodation campus.
2-EDF South Sizewell Gap								potential for some integration.			
6. Leiston East	Approx. 33ha							Proximate to Leiston, opportunities for integration likely.	Limited constraints.	Y	Close proximity to the Construction Site and to Leiston; Limited environmental impacts, and good legacy potential; Could be considered as a full or split site for EDF Energy's accommodation campus.
7. Lovers Lane West	Approx. 31ha							Proximate to Leiston, opportunities for integration likely.	Limited constraints.	Y	Close proximity to the Construction Site and to Leiston, with limited environmental impacts, and good legacy potential. Should be considered until the

											preferred rail line route has been agreed.
8. South Sizewell Gap	Approx. 16ha							Not in close proximity to settlements.	Very small site.	N = Temporary Caravan Park	Too small for the accommodation campus, therefore dismissed.
								integrations with existing residents unlikely.			Could be considered as an alternative for the temporary caravan accommodation.

Figure 39: Summary table setting out the findings of Boyer and Cannon in relation to the Accommodation Campus Review

Overall Assessment

16.17 Boyer and Cannon Consulting were commissioned by Suffolk County Council to assess whether there were any alternative sites for the Sizewell C accommodation campus.

16.18 The findings of this review are:

- EDF Energy's preferred site, and a series of alternative sites, have been assessed against a number of criteria, including: EDF Energy's preference; environmental impacts; transport impacts; community and amenity impacts; physical constraints; and legacy potential.
- EDF Energy's preferred site successfully meets their own criteria for proximity and efficiency, but offers no legacy potential to this sensitive part of the District in its current form.
- Even if legacy opportunities are discounted, the EDF Energy Preferred site will cumulatively still have significantly more environmental impacts on this sensitive part of the Suffolk countryside than alternative sites.
- Alternative sites could offer reduced environmental impacts, and greater legacy potential, whilst still fulfilling EDF Energy requirements.
- Sites exist whereby the accommodation campus could be on a single site, or split across a number of sites, which would result in reduced impacts on the surrounding area.
- Sites to the west or east of Leiston appear to offer genuine opportunities for further consideration.
- The site of an existing caravan park on the coast (identified as part of the Sizewell Gap) offers a potential for the temporary caravan park, which must be explored.

Final Conclusion

16.19 The findings set out in this report suggest that there are significant environmental and legacy issues with EDF Energy's preferred site which require further assessment.

16.20 It is also considered that there are alternative sites available which are considered to have a reduced environmental impacts on the surrounding area.

16.21 There are genuine alternative sites that should be considered for an accommodation campus, as part of a full and proper "accommodation strategy".

16.22 It is suggested that, EDF Energy, in conjunction with Suffolk Coastal District Council and Suffolk County Council should collectively discuss potential sites for an accommodation campus as part of a “strategy”.

Boyer & Cannon Consulting Engineers

17. BIBLIOGRAPHY

1. Sizewell Consultation Material
 - I. Sizewell C Stage 2 Consultation Document
 - II. Sizewell C Stage 1 Consultation Document
 - III. Attend Sizewell C Stage 2 Consultation Event (Yoxford 19.12.2016)
 - IV. Fly-through view of preferred accommodation site at Theberton/Eastbridge (Youtube)

2. Suffolk County Council Material
 - I. Suffolk County Council and Suffolk Coastal District Council's response to Stage 1 Consultation
 - II. Suffolk County Council's A12 Four Villages – Sizewell C Traffic Impacts (AECOM)
 - III. Accent Report (2016)
 - IV. Magic Mapping
 - V. Constraints Mapping (Suffolk County Council)

3. Suffolk coastal district council (Suffolk Coastal District Council)
 - I. Suffolk Coastal District Council's Proposals Map
 - II. Suffolk Coastal District Council's SHLAA
 - III. Suffolk Coastal District Council's Review of Alternative Accommodation Sites
 - IV. Officer's Reports and Statutory Consultee Comments for Planning Applications DC/15/1961/OUT and DC/16/1684/FUL

4. Hinkley Point
 - I. Bridgwater A Accommodation Campus Video
 - II. Somerset County Council response to EDF Energy Stage 2 Consultation

5. Other Documents
 - I. Leiston Neighbourhood Plan
 - II. GoogleEarth Pro

**APPENDIX A – SUFFOLK COUNCILS' RESPONSE
TO THE STAGE 1 CONSULTATION 6TH FEBRUARY,
2013 (RESPONSE ON BEHALF OF SUFFOLK
COUNTY COUNCIL AND SUFFOLK COASTAL
DISTRICT COUNCIL**



Sizewell Nuclear New Build
FREEPOST LON20574
London W1E 3EZ

Suffolk Coastal District & Suffolk County
Councils
c/o Sizewell C Project Office
Melton Hill
Woodbridge
Suffolk IP12 1AU

6 February 2013

Dear Mr Mayson

Suffolk Councils' response to the Stage 1 Consultation

Please find enclosed a joint response from Suffolk Coastal District and Suffolk County Councils in response to your Stage 1 consultation in respect of the proposed Sizewell C nuclear new build. This response has been agreed by both councils' cabinets and has taken on board views from officers across the two councils as well as those from external stakeholders.

In addition to the councils' response please find attached a copy of both councils' cabinet reports and a copy of the updated A12 Four Villages By Pass report produced by AECOM on behalf of Suffolk County Council.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Guy McGregor'.

CLlr Guy McGregor
Chair Sizewell C Joint Local Authorities
Group

A handwritten signature in black ink, appearing to read 'Andy Smith'.

CLlr Andy Smith
Vice-Chair Sizewell C Joint Local
Authorities Group

Joint Response from Suffolk County & Suffolk Coastal District Councils to EDF's Sizewell C Stage 1 Consultation

1. The Councils recognise the significant scale of the proposals being developed by EDF, as the largest infrastructure project in the East of England, and its importance at a local, sub-regional and national level. The contribution to the nation's energy resources and the economic opportunities it could afford locally are acknowledged to be positive benefits. These benefits have to be balanced against the impacts on the environment, the pressures on our communities and the transport network. The local authorities see their role as maximising the potential benefits whilst minimising the inevitable negative impacts of a project of this magnitude.
2. The Councils continue to support the development of nuclear power stations in principle and support the Sizewell C proposal on the basis that EDF should provide a lasting legacy for the economy and the local communities, act as an environmental exemplar, and make appropriate provision for transport and the funding of wider community benefits.
3. Inadequate information has been made available by EDF on a wide range of topics which makes giving robust comments very difficult at times. The Councils therefore reserve the right to supplement this response in due course. Further information must be urgently provided by EDF so that the Councils and communities can engage fully on the development of proposals before the second stage of consultation.
4. The Councils welcome the economic opportunities that a new power station could bring in terms of the construction and operational phases. However it considers that:
 - a) EDF will need to continue working with the local authorities and other bodies in the East of England to provide **opportunities for local businesses** to take advantage of this project. This can be effectively achieved both through the stimulation of the local supply chain and the development of a lasting economic legacy which endures beyond the construction phase .
 - b) following stage 1 and prior to the application to the Planning Inspectorate, EDF will need to agree with the local authorities on the following matters related to **skills**:
 - i) Development and implementation of education and workforce strategies relating to the construction and operational phases of the project; including how 'hard to reach' groups will be engaged;
 - ii) The type of interventions and support projects required to maximise the opportunities for Suffolk people. These could include pathways to higher skilled occupations and the up-skilling/ re-skilling of workers to sustain employment at each stage of the development and into the operational phase in association with the Suffolk's Raising the Bar initiative. EDF

will need to work with other companies in the energy sector in the region; and

- iii) The degree to which skills displacement as a result of the project can be mitigated.
5. Tackling the **social and community issues** that will emerge during the construction and operational phases of a new power station will be a critical element in achieving the success of the project. Accordingly the Councils will expect to work closely with EDF in developing proposals in this area which minimise the disruption to local communities.
 6. A package of **community benefits** is essential to compensate the community for the perceived dis-benefits of hosting a nuclear power plant. The Councils will continue to work together with local authorities elsewhere in the country to lobby Government and industry to ensure that an adequate package is provided.
 7. Given the high quality of the **landscape and ecology** in the area, and in particular the national designations of both that will be affected, it is critical that EDF delivers the scheme as an environmental exemplar. This needs to cover how this major infrastructure scheme can be accommodated in an area with such constraints and how mitigation measures may be developed to overcome any remaining impacts . In particular:
 - a) a very high quality of design for all of the proposals needs to be achieved and unavoidable impacts effectively mitigated;
 - b) enhancements to the landscape of the Area of Outstanding National Beauty and wider area should be achieved for the benefit of people and the environment. Enhancements to the local biodiversity network should also be implemented to facilitate climate change adaptation for wildlife and to improve the amenity value of the land around the site. These could partly be attained through implementing a landscape vision for the EDF estate but will also require measures over a wider geographical area; and
 - c) any structures that could have an effect on **coastal processes** will need to be specifically designed to minimise impact on the wider coast, not just the immediate frontage of the power station. The proposed development has potential to change shoreline evolution over the construction, operation and decommissioning phases and therefore there should be continued monitoring of processes and avoidance or correction if necessary. The objective should be for EDF to manage the coast jointly with the Environment Agency and Suffolk Coastal DC to ensure that Sizewell C does not become a promontory. There should be continued involvement of local communities in sharing information and engagement of the local authorities with EDF and the Environment Agency in the development of coastal management proposals.
 8. The Councils consider that it is particularly important that the transport implications of the construction and operational phases are positively and robustly addressed. In this context:

- a) it strongly believes that a **bypass for all four villages along the A12** (Farnham, Stratford St Andrew, Little Glemham and Marlesford) is necessary as a consequence of the additional traffic that will come from the Sizewell C construction project and that proposals for this should be included as associated development in any application to the Planning Inspectorate. All three options currently proposed by EDF are inadequate and not supported by the Councils. Further local consultation will be required to look at other options for this area;
- b) a study prepared by the County Council's consultants updating the 2006 study on the Four Villages Bypass will be submitted to EDF in support of this case;
- c) the Councils recognise that there will be serious impacts on the **B1122** and considers that further information is necessary on the traffic volumes likely on that road and **through Yoxford** and the mitigation necessary to deal with any impacts on the communities or environment. This may include road schemes considered for previous Sizewell projects;
- d) the Councils believe that due to the cumulative impact of traffic increases related to Sizewell C and other proposed developments along the A12 that this will justify a significant upgrading to the Seven Hills roundabout.
- e) the Councils strongly believe that the minor roads west of the A12 should be protected from substantial increases in traffic flows and that the strict enforcement and control of HGV routing both to and from the site will provide such protection
- f) further work is undertaken on the impact of the proposals on the **wider highway and rights of way** networks and possible mitigation. In addition there will need to be resources made available for continued maintenance of the existing road network during the construction phase ;
- g) further work needs to be undertaken urgently between the local authorities and EDF to provide a more realistic assessment of the transport implications upon which robust decisions on appropriate measures can be taken;
- h) further work needs to be undertaken to understand the in combination traffic impacts of other developments proposed along the A12 e.g. potential major housing development at Adastral Park, Martlesham.
- i) with regard to **access for construction workers** to the development:
 - i) EDF's forecasts currently under-estimate the potential level of car traffic to the site. Revised figures must be used in assessing impacts for what is required to support this development;

- ii) park and ride sites should not be located close to the construction site;
 - iii) more sustainable links will need to be put in place to provide transport for workers residing east of the A12; and
 - iv) rail has a greater role in providing access for construction workers closer to the site and provision should be made for the legacy use of the rail link to Leiston. Consideration should be given to the new technology that is available for rail provision.
- j) the Councils encourage the use of rail and sea for **freight deliveries** but further information on quantities and modes must be urgently provided so that the full impact of the proposals can be assessed;
- k) contingency measures will need to be provided to deal with freight deliveries in the event that weather and other events prevent delivery by sea;
- l) with regard to **rail freight**:
- i) the Councils, whilst welcoming the use of rail for freight deliveries, consider that the Rail Head Option east of Leiston (Option 1) for the location of a railhead would add to traffic flows on the immediate local highway network and that this could be overcome by direct rail deliveries to the site (Option 2). However, in considering routes for any such new rail link, significantly greater detail on the environmental consequences, the impact on local residents and the effect on highways and public rights of way is required. The local authorities would wish to engage with EDF on this matter and there is a strong case for a further round of local public consultation once more detail is available. In addition measures to reduce the impact of level crossings on the existing rail route needs to be given further consideration and
 - ii) the Councils welcome the proposals to increase the capacity of the East Suffolk line by providing a new loop at Wickham Market station. Further assurance is needed on the current and future capacity of the East Suffolk line and wider network to accommodate the extra freight movements without jeopardising other rail services.
- m) despite the inadequacies of the traffic data that has been provided, it is already evident that **Heavy Goods Vehicle (HGV) movements** will increase substantially. In order to mitigate the severe impacts of this increased HGV traffic significant improvements will be needed to the road network used by such vehicles. Further work will be required to identify the locations affected and the mitigations required; and
- n) the Councils support the provision of a **freight management facility** and has a strong preference for sites off the A14 rather than

as part of the southern park and ride sites. Such sites should also be considered for freight consolidation purposes and for their possible legacy potential. More information is required on the effectiveness of other proposals for managing freight deliveries.

9. For the **main site**, the Councils consider that:
 - a) that the building should be seen as an exemplar of good design, both in terms of the buildings themselves and the lighting and landscaping around them;
 - b) the area of land taken for permanent development should be minimised to limit the impact on the Sites of Special Scientific Interest (SSSI);
 - c) the important ecological corridor between SSSIs must be retained, and the impact on coastal processes and flood defence minimised; and
 - d) public access to the beach should be retained during the construction process
 - e) EDF should ensure, in conjunction with the relevant water supply company, adequate supplies of freshwater are made available to the site without prejudicing water supplies in the area
10. With regard to **nuclear waste** arising from this development, EDF must:
 - a) clarify its choice of spent fuel storage;
 - b) clarify its contingency arrangements for fuel storage should it prove impossible to deliver a geological repository or the period for delivering such a facility is significantly delayed;
 - c) demonstrate the relationship of the fuel storage buildings on the B and C sites; and
 - d) consider an element of the community benefit being related to the possible long term issues of hosting the waste storage.
11. EDF must provide greater clarity on the destination of any **non-radioactive waste** arisings consequent on the construction of the power station
12. With regard to the **lay-down and construction areas**, the Councils consider that:
 - a) these are very extensive and the need for them should be more fully justified. In particular the Councils object to the use of land which overlooks the Minsmere Valley, Theberton and Leiston Abbey and the land at Pill Box Field;
 - b) the bridleway running between the lay-down area and the site for the northern most accommodation campus (Option 1) should remain open at all times;
 - c) any use of land at Coronation Wood should retain the screening effect for the buildings at Sizewell B;

- d) more work needs to be done to assess the impact of the use of the land at east Leiston on local residents and on traffic volumes on Lover's Lane; and
- e) a phasing plan should be prepared for the restoration of the lay-down areas in line with a vision for the EDF estate. In addition, EDF should demonstrate how the access road will be treated so that it minimises its impact on the AONB once the construction phase is completed.

13. On **Associated Development**, the Councils consider that there are deficiencies in the process of evaluating the impacts of the options proposed for development and EDF should act to rectify the issues accordingly. With regard to the specific proposals, the Councils consider that:

- a) with regard to the **accommodation campus** proposals, the Councils do not agree that there is a strong rationale for a single site when all factors are taken into account. On the sites included in EDF's consultation, Option 2 (Sizewell Gap) should be eliminated immediately due to its prominence in the Area of Outstanding Natural Beauty.. Further work is needed to understand the comparative merits of Options 1 (adjacent to the lay-down area) and 3 (Leiston East) and indeed whether there are alternative permutations or locations that are more satisfactory. EDF should work with the local authorities to formulate an Accommodation Strategy which not only meets the requirements of the development, but also the future needs of the local community, possible future housing and tourism functions and furthermore minimises the overall traffic impact :
- b) with regard to the **northern park and ride sites**, Options 1 (Yoxford Road) and 3 (A12/A144 junction) should be discounted immediately. Option 2 (Darsham) is the relative preference and should be retained for more detailed study, though it may still be considered to be too close to the main site for the primary northern park and ride site. It could, however, serve a more localised function, complementing an additional facility further north which would be closer to larger towns hosting a major share of the labour supply;
- c) with regard to the **southern park and ride sites**, Option 3 (Potash Corner, Bredfield) should be discounted immediately. Option 1 (Wickham Market) should be retained to consider whether appropriate archaeological mitigation and safe highway access could be achieved. Option 2 (Woodbridge) should also be retained for more detailed study, including consideration of any potential low-intensity legacy use and, depending on further studies, could be the Council's preferred option. In advance of the outcome of detailed traffic modelling it is not possible to say that either of these potential sites is ideally located. Furthermore EDF should also keep open the option of using other potential sites to the south.

- d) for the **freight management facility**, Option 3 (Seven Hills) must be discounted for environmental reasons immediately. Further work must be undertaken to consider how legacy use can be secured on Option 2 (east of Orwell Lorry Park). The impacts on the AONB of either Option 1 (west of Orwell Lorry Park) or 2 should be taken into account and if necessary mitigated; and
 - e) the proposal for a **visitor centre** is supported in principle and should address Sizewell's contribution to carbon reduction, its part in the Suffolk energy coast and its location in an Area of Outstanding Natural Beauty. Option 1 east of Lover's Lane must be discounted for environmental reasons immediately. Further consideration needs to be given as to the role of the visitor centre in the short and long term and consequently where this important facility is best located.
14. The Councils will work with other interested parties to lobby for the inclusion of the full Four Villages Bypass on the A12 within this scheme.

APPENDIX B – SIZEWELL'S EMERGENCY PLANNING ZONE MAP

EXTENDED EMERGENCY PLANNING ZONE

1. Map of EEPZ. Area shown in orange on map below.



APPENDIX C – INDIVIDUAL SITE SUITABILITY ASSESSMENTS

APPENDIX C 1 - EDF PREFERRED SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 1: EDF Energy Preferred Site

Site Size (ha): Approximately 34 ha



Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

Boyer

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	The site abuts the Suffolk Coast and Heaths AONB to the east and Minsmere SLA to the west, which is of national significance. There are also Grade II listed buildings in the area, notably Upper Abbey Farmhouse and the Barn, to the south-east of the site. It is likely that this site may also have a moderate impact on Leiston Abbey to the west. The proposed construction access will have considerable environmental impact on this site. The new road realignment, as proposed in Option 1, would have increased environmental impacts on this area. 3-4 storey development in this location would also be visible when viewed from certain wider locations, notably from Whin Hill at Minsmere SLA to the north-east. However, the wider context of the construction site, such as the spoils mounds and borrow pits, is acknowledged. There is also a bridleway which runs to the east of the site, and development on this site could have an impact on the amenity of this existing route. It is therefore considered that the accommodation campus in this location is likely to have moderate environmental impacts.	Moderate
Community Effects	This site is poorly related to the settlements of both Eastbridge and Theberton, and it is considered unlikely that any development in this location would have any benefits to the immediate local economy. The site is also located in the countryside. It is considered that "normal" development would not be permitted in this location	Poor
Amenity Impact	Due to the site's detached location from surrounding settlements, the impact on immediate residents and facilities is likely to be very limited. The Stage 1 consultation responses viewed this favourably, and it was suggested that a campus accommodation in this location would potentially lead to limited crime or anti-social behaviour in the nearby area, compared to other sites or options. Given the remote location of the site, it is suggested that noise and light pollution may be more prevalent in this exposed countryside location.	Limited
Physical Constraints	This site is well contained, although development will result in the loss of Agricultural Grade 3a/3b land.	Limited
Transport Impacts	The campus at this location is co-located with the construction site and shares the same point of access. This site also provides the potential for workers to walk to work. In any event all work related travel will be contained within the construction site and no direct impacts will be experienced external to the site. Short journey time for workers between the accommodation campus and the construction site. Non-work related off site activities (e.g. involving access to shops, services and facilities from the surrounding area) will require off site trips. These will have a direct impact off-site. Non work is presented in the Stage 1 & 2 consultation as to the number of potential off-site trips but comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis. No transport legacy potential if the site was to sustain a use after the construction period. The site is isolated and poorly located in relation to local amenities, facilities and sustainable transport opportunities. It would not meet normally acceptable transport related development criteria in relation to NPPF.	Limited
SHLAA / Neighbourhood Plan / Planning Applications / SCDC Assessment	The site has not been promoted through the SHLAA process, nor has the site been identified through any Neighbourhood Plan. There are no relevant planning applications on or near to this site. SCDC have assessed the site in some detail, and concluded that the site has limited legacy potential. It would also have an environmental impact on the AONB, the landscape character, and on the setting of the listed buildings, as well as an impact on nearby Eastbridge and Theberton. SCDC do consider that this site has some advantages for Sizewell, notably reduced workers' travel time; its location making it easier to monitor codes of behaviour; and if brought forward for an accommodation site that this site would present a better face to the entire development if well designed and may improve security into the Sizewell Construction Site. SCDC have also highlighted the intentions of EDF Energy to return the site to its greenfield status. In their Stage 1 Consultation Response, SCC and SCDC noted that this site should be considered further and requires additional work to be undertaken to determine the merits of the site as well as to assess whether there are alternative permutations or locations that are more satisfactory, it is unclear whether this additional work has yet to be undertaken by EDF Energy. In their response, SCC and SCDC also considered the need for EDF Energy to formulate an Accommodation Strategy which meets the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts.	Poor
Legacy Potential	The site is considered to be very detached from existing settlements. It is therefore highly unlikely that there will be residual legacy benefits from developing on this site, given the distance of the site from any significant settlement, services or facilities. It is also anticipated that the new road alignment, suggested through Option 1, would in reality have only very limited future benefit for the area. It is however, acknowledged that it is EDF Energy's intention to return this potential site back to 'greenfield' through a specific landscape strategy.	Poor
Overall Assessment	It is important to note that this site fulfils EDF Energy's criteria of proximity to the construction site, and the ability of getting workers to and from the site simply and with zero external transport impact. The cost of developing this site should also be relatively low. Construction transport and amenity impacts are considered to be low. However, the legacy potential for this site is very poor, and non-work related traffic impacts (i.e. construction workers travelling to local facilities) will be higher due to distance from the local facilities. Though overall impact of non-work related trips is low in overall terms. There will also be some moderate environmental impacts from developing this site, notably the significant change in visual appearance beyond that just envisaged for the construction access. The site lies within the old SLA boundary for Minsmere, is visible from both Dunwich Heath National Trust Site and Leiston Abbey during winter months and it also abuts Suffolk Coast and Heaths AONB to the east. The greatest impact of this site will be on residents of both Eastbridge and Theberton. It is noted that, in their Stage 2 Consultation Document, EDF Energy considered that this site was "on par" with the EDF Energy Option 3 south of Leiston. However, this site was viewed favourably given its project efficiency benefits, transport benefits and workforce management benefits of the campus accommodation site being part of the larger construction site. This site provides benefits for EDF Energy but not necessarily the wider community.	Potential Option

Criteria	Assessment
Planning Policy	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	<p>Site lies outside of the 2.4 km Emergency Planning Zone</p> <p>The site lies outside of the physical boundary of the town. Leiston allocated as a town in SCDC Core Strategy.</p> <p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>'In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities.' <p>Within Leiston Neighbourhood Plan area.</p> <p>Within Haven Gateway.</p>

Neighbourhood Plan	The site lies within the Leiston Neighbourhood Plan boundary.
Emergency Planning Zone	The site mainly lies within zone N3 and is therefore within a 3km radius of Sizewell.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	Sizewell Marshes (SSSI) approximately 900m south-east of the site and Minsmere-Walberswick Heath and Marshes SSSI 800m to the north. Partly within Special Landscape Area.
Impact on Nationally Protected Sites e.g. AONB, SPA	Site lies outside of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). However, eastern part of site abuts AONB and eastern tip of the extensive Minsmere River Special Landscape Area (SLA).
Impact on Local Wildlife Sites	Close to known barbastelle bat commuting routes and roost and other features of conservation importance including a Natterer's bat breeding roost and a known hibernation roost.
Flood Risk	Site is not crossed by watercourses – although a licensed groundwater abstraction is located within the site boundary at Upper Abbey.
Impact on Heritage Assets	Sites' south eastern corner – Upper Abbey (Grade II listed farmhouse and barn). Leiston Abbey
Impact on Archaeology	Part of the site has been subject to an archaeological geophysical survey. Sandlings Walk (bridleway) is a potential important Historic Landscape Feature.
Impact on Views	Site is generally enclosed with mature woodland and trees.
PROW	Bridleway on site
Community Effects	
Distance to local amenities	Approximately 1.6km from Theberton
Distance to nearest bus stop	Approximately 1.4 km from a bus stop in Theberton
Distance to nearest GP surgery	Approximately 1.9 km from nearest doctors surgery in Leiston
Distance from employment site (Sizewell C construction site)	Very close to construction site – workers could walk to work
Distance to nearest settlement	Leiston in the south (1.7km) Theberton in the north (1.4km)
Impact on neighbouring residents (noise/floodlights)	Farms located to the east, west and south.
Physical Constraints	
Brownfield / Greenfield land	Greenfield – arable land
Impact on agricultural land	Loss of agricultural land (western area); eastern area was under arable use until recently – now managed by EDF Energy as a potential location for the translocation of reptiles from main development site. Site is registered as Grade 3B Land to the west and Grade 3A Land to the east.
Landscape sensitivity	Site relatively well contained – mature woodland to the west protecting the site from Theberton.
Topography constraints	Landscape is generally flat with a slight slope from south to north. Western area is arable use.
Distance to oil and gas pipelines / power lines	EDF Energy will have own utilities on site.
Access to utilities	EDF Energy will have own utilities on site.
Contamination constraints	Unlikely – greenfield site.
Traffic Impacts	
Transport impacts – route to construction site	No off site impact. The site is co-located with the construction site. Construction workers will be able to walk to work. Minimum travel time for workers to commute to the construction site.
Transport impacts – route to local facilities	Minimal – EDF Energy propose to extend the footway/cycleway along Abbey Road to Lovers Lane to provide a continuous connection. Vehicular traffic would use the same route. Provision of walking and cycling routes to encourage workers south to Leiston as opposed to Eastbridge and Theberton to the north.
Access	Good access – new purpose built access as part of the construction site access. The construction site access will be the focus of activity regardless of the location of the accommodation campus. The co-location of the accommodation campus with the site minimises impact at this location. An off-site campus would require commute trips to and from the construction site access as well as all other construction related traffic.
Walking and Cycling (Local Connections)	EDF Energy propose to extend the footway/cycleway along Abbey Road to Lovers Lane to provide a continuous connection.
Transport Legacy (NPPF)	Poor location in terms of accessibility to amenities and facilities if the site was to sustain a use after the construction period.
Legacy Potential	
Opportunities for continued use of buildings	Unlikely – relatively detached from settlements.
Opportunities for continued use of infrastructure	Unlikely – relatively detached from settlements.

APPENDIX C 2 - SAXMUNDHAM SOUTH SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 2: Saxmundham South

Site Size (ha): Approximately 42 ha

Site Address: Land south of Saxmundham



Boyer

Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

CRITERIA	COMMENT	ASSESSMENT
Environmental Effects	The site is located just south of Saxmundham's Conservation Area. The impacts on any potential views are considered to be generally limited if the accommodation campus were to be developed on this site, given its contained nature and good natural screening from mature hedgerows.	Moderate
Community Effects	The site is very well connected to Saxmundham which could encourage integration between construction workers and residents. This site would also offer potentially positive benefits to the local economy of Saxmundham. Furthermore, facilities provided on this site could also be utilised by the residents of Saxmundham. It is acknowledged that experiences with Sizewell A and B have had some potential negative impacts between construction workers and existing residents, but it is anticipated that lessons should have been learned moving forward.	Limited
Amenity Impacts	With the proximity of the site to Saxmundham it is acknowledged that some residents may be concerned that an accommodation campus should be located so close to the town, which might encourage anti-social behaviour. As with the experiences of Sizewell A and B, it is anticipated that EDF would take some responsibility for the behaviour of their workforce.	Limited
Physical Constraints	Although the site is relatively self-contained and has good natural screening, the B1121 which runs through the centre of the site will be a physical barrier. Development on this site would also amount to the loss of Grade 3 agricultural land. The eastern part of the site lies within Flood Zones 2 and 3 and would also considerably restrict development. There are also several PROW routes through the western parts of the site which may need to be retained.	Limited
Transport Impacts	Traffic from this site is likely to have a profound impact on Saxmundham unless it can somehow be directed towards the A12 to the south west to access the A12/B1122 route to the site access. The local routes to the construction site from this location have been identified as routes of key concerns by local residents during the consultation to date. This can only be overcome with significant infrastructure investment. For an off-site location it is assumed that the EDF proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day. There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with HPC proposals this might generate up to 400 vehicle movements per day to local and non-local destinations. However, it is important to note that Saxmundham has good public transport facilities, including a train station, which could be benefited by the construction workers during their non-shift hours. In relation to legacy, providing for future development to the south of Saxmundham could be acceptable, pending access and infrastructure provision. The central traffic signal controlled junction is a known pinch point and recent improvement to the operation using MOVA is likely to have exhausted localised improvement. A wider allocation of development to the south with a road link between the A12 and B1119, through this site location might be such a future consideration.	Significant
SHLAA / Neighbourhood Plan / Planning Applications / SDCD Assessment	This site has not been promoted through the most recent SHLAA. The Saxmundham Neighbourhood Plan is in its most preliminary stages, and the designated area does include this site, although no specific allocations have been identified as yet. There are no relevant planning applications on this site. This site was considered by SDCD in their assessment of alternative accommodation sites. SDCD concluded that, whilst the site is large enough to accommodate workers on a single campus, it is poorly related to Sizewell and, as a result, traffic impacts on the local area are likely to be more severe. SDCD also stated that they did not believe the site would come forward for development in the future, therefore the legacy potential of this site was considered limited.	
Legacy Potential	The site is considered to have good links with Saxmundham, including connectivity. It is therefore suggested that development and infrastructure on this site could be reused in the future by those in Saxmundham, and that this site could form a natural extension to the settlement if properly planned.	Very Good
Overall Score (potential as accommodation site)	The distance of this site from Sizewell is likely to result in increased transport costs for EDF for the work related trips. However, in comparison to Hinkley the site is closer to SZC. The non-work related trips are likely to have a low impact given the range of facilities that exist in Saxmundham. The site is practically accessible by bus, foot and cycle to Saxmundham. External trips to/from the site can be accommodated on the A12 without impact on the centre of Saxmundham. Whilst the potential for legacy on this site is relatively high and generally environmental impacts are considered low, development on this site would come at a cost to EDF. However, transport and access improvements as a logical urban extension would be expected to support its potential as future development. Given the location of this site it is therefore acknowledged that this site is therefore more unlikely to come forward as an accommodation campus.	Potential

Criteria	Assessment
Policy Designations	
Policy designations	<p>Site abuts town centre boundary and is abuts an area of land allocated to be protected from development (Saved Proposals Map 2007).</p> <p>The site lies outside of the physical boundary of the town. Saxmundham is allocated as a town in SDCD Core Strategy.</p> <p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities. <p>Site not promoted in most recent SHLAA.</p> <p>Within Haven Gateway.</p> <p>Adjacent to conservation area.</p>

Neighbourhood Plan	The site is within the area proposed for Saxmundham's Neighbourhood Plan (the neighbourhood plan is in early stages only).
Emergency Planning Zone	The site lies some distance outside of the Sizewell Emergency Planning Zone.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	N/A – Site located some distance from SSSI.
Impact on Nationally Protected Sites e.g. AONB, SPA	N/A – Site located some distance from SSSI.
Impact on Local Wildlife Sites	N/A although further research may be required.
Flood Risk	Waterway along eastern boundary of site (River Fromus).
Impact on Heritage Assets	To the east – Herts Hall (Grade II listed building) ; Crown House to the north (Grade II listed building)
Impact on Archaeology	The site lies within an area of Archaeological Importance; trial trenching is likely to be required.
Impact on Views	Limited – relatively well contained site.
PROW	PROW along northern and western part of the site.
Community Effects	
Distance to local amenities	Very close to Saxmundham – existing pavement along western part of road.
Distance to nearest bus stop	Approximately 215m from nearest bus stop providing links to Halesworth and Framlingham / also train station within Saxmundham providing rail links with Ipswich and Lowestoft.
Distance to nearest GP surgery	Approximately 750m from Saxmundham Heath Medical Centre.
Distance from employment site (Sizewell C construction site)	8.5km from Construction Site (therefore outside of criteria for EDF)
Distance to nearest settlement	On boundary of Saxmundham Town Centre.
Impact on neighbouring residents (noise/floodlights)	Impact likely – due to proximity to settlement.
Physical Constraints	
Brownfield / Greenfield land	Greenfield land
Impact on agricultural land	In Agricultural Use – land is registered as mainly Grade 3 b with some parts Grade 3 a
Landscape sensitivity	Limited – well contained site although could have impacts on landscape and views from PROW to west.
Topography constraints	Relatively flat relief sloping eastwards.
Distance to oil and gas pipelines / power lines	N/A
Access to utilities	Utilities to be provided on site.
Contamination constraints	Unlikely due to Greenfield nature of land.
Transport Impacts	
Transport impacts – route to construction site	Severe traffic impact on Saxmundham & the B1119. The cross road junction of B1121/Chantry Rd/B1119/High Street is a known constraint and nearing capacity. Construction workers would have to be transported by bus along the B1119 which is not ideal and would spread the impact of the accommodation traffic over a wider area. Substantial new infrastructure in the form of a new link road might be required to mitigate impacts on Saxmundham if the B1119 was considered to be the best route option to the site. Journey time to the construction site would be longer than the other alternatives. However, an access time of 30 minutes was noted as being acceptable for HPC when considering the off-site campus options. Alternatively an access could be provided directly onto the A12 if the site were extended to the west between the railway line and the A12. Traffic could then route via Yoxford. However, this would result in a further increase in traffic movements along the A12/B1122 access route to the site.
Transport impacts – route to local facilities	The site is within walking and cycling distance of Saxmundham.
Access	Access onto the A1121 for all modes. Site would be split either side of the road.
Walking and Cycling (Local Connections)	Good existing connections to Saxmundham.
Transport Legacy (NPPF)	The site is well located in relation to Saxmundham if the site were to have an alternative use beyond the construction period.
Legacy Potential	
Opportunities for continued use of buildings	This site has been rejected by SCDC as a potential SHLAA site and therefore does not have much potential for legacy.
Opportunities for continued use of infrastructure	Very good – also proximity to A12 suggests future growth of Saxmundham which will require use of the infrastructure.

APPENDIX C 3 - LEISTON AIRFIELD SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 3: Leiston Airfield

Site Size (ha): Approximately 101 ha

Site Address: Land at Leiston Airfield



Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

Boyer

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	The site is a former airfield, therefore by its nature it is very open and very flat. However, the site is quite vast and remote, therefore any development on the site could be potentially located so that impacts were minimised on the surrounding environment and countryside. The proposed 3-4 storey accommodation could easily be spread over 2-storey buildings. The location of Leiston Abbey is acknowledged, and would need to be carefully considered. The site does not lie within an SSSI or an AONB. There are several PROW in and around the site and views to and from these PROW would need to be considered if this site is considered further for development.	Limited
Community Effects	The site is not easily related to existing settlements, which may reduce any focussed potential anti-social behaviour in one area. However, due to the remote location of this site, construction workers would be very reliant on transport to access the wider area. It is considered that no one nearby settlement or economy would necessarily be impacted on in either a positive or negative way.	Poor
Amenity Impacts	Given the detached nature of this site, it is unlikely that development on this site would have a major impact on the amenity of existing residents of the area. However, development of this site would be within the countryside, so lighting and noise impacts would become more obvious.	Limited
Physical Constraints	The site has an open and flat landscape. Development on this site would also result in a loss of Grade 2/3 agricultural land.	Limited
Transport Impacts	Given the site's vast nature, there could be several transport and access options that could be explored in order to get workers to and from the nearby construction site. This might include opportunities for one-way streets, priority junctions, or in-out routes, which could be carefully controlled and managed. The site also has good access to the B1122. If an accommodation campus was located in this location, it should be possible to contain traffic impacts. However, given the remote nature of this site, non-shift traffic patterns are likely to be more severe as with workers travel to nearby Leiston, Saxmundham or Yoxford for additional facilities / services. Non-work related off site activities (e.g. involving access to shops, services and facilities from the surrounding area) will require off site trips. These will have a direct impact off-site. Non work is presented in the Stage 1 & 2 consultation as to the number of potential off-site trips but comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis. No transport legacy potential if the site was to sustain a use after the construction period. The site is isolated and poorly located in relation to local amenities, facilities and sustainable transport opportunities. It would not meet normally acceptable transport related development criteria in relation to NPPF.	Limited
SHLAA / Neighbourhood Plan / Planning Applications / Assessment by SCDC	The site has not been assessed through Suffolk Coastal's most recent SHLAA, and the site does not lie within any Neighbourhood Plan boundary. There have been no relevant planning applications submitted in relation to this site. However, there have been several historic planning applications in relation to improving the infrastructure for the "Cakes and Ale" Caravan site to the south. The site was not assessed by SCDC in their consideration of alternative accommodation campus sites.	
Legacy Potential	It is acknowledged that the site is on Greenfield land in the countryside, therefore there is limited opportunity for any significant legacy planning. The site is very detached from existing settlements and, as a result, it is unlikely that this site would be deemed useful for future development. Whilst a new settlement (e.g. garden city) may be considered appropriate in this location, given the cost of this, it is unlikely that this will be viewed favourably by EDF.	Poor
Overall Assessment	Given the detached nature of this site from any settlement, any genuine legacy potential is limited with this site without it forming a larger scale development site. It could potentially have limited impact on transport, and would meet the EDF criteria of proximity to the construction site and the ability for its workforce to access the site quickly and efficiently. Non work related trips would have the same likely impact as the EDF preferred site, but in overall terms this is considered to be low. It is noted that the existing Cakes and Ale Caravan Site could offer the potential to expand, either with the accommodation campus or as a location for the temporary caravan site. It is unclear if this option has been fully explored and tested by EDF.	Limited Potential

Criteria	Assessment
Policy Designations	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	The site lies outside of the physical boundary of the town. Leiston allocated as a town in SCDC Core Strategy. SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states: "In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following: a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities. Site not promoted in most recent SHLAA. Within Haven Gateway.
Neighbourhood Plan	Site lies just outside of Leiston Neighbourhood Plan boundary.
Emergency Planning Zone	The site lies approximately 5km from the Sizewell site and therefore does not lie within the Emergency Planning Zone.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	Site lies within the SSSI Impact Risk Zone
Impact on Nationally Protected Sites e.g. AONB, SPA	Does not lie within AONB
Impact on Local Wildlife Sites	Further research required.
Flood Risk	Site lies entirely within Flood Zone 1.
Impact on Heritage Assets	No listed buildings within close proximity of the site, however, Hill Farmhouse is a Grade II listed building lies further to the east of the site.

Impact on Archaeology	The site lies within an area of Archaeological Importance. It is likely that trial trenching will be required prior to developing this site.
Impact on Views	Long distance views across this site but relatively little settlements. Relatively open site but the site is vast with a number of hedgerows which are likely to mitigate any severe impact on views.
PROW	There is a PROW to the west of the site.
Community Effects	
Distance to local amenities	Approximately 1km from the edge of Leiston.
Distance to nearest bus stop	Approximately 1.6km from the bus stop on Waterloo Avenue.
Distance to nearest GP surgery	Approximately 1.7km from the Doctor's surgery in Leiston.
Distance from employment site (Sizewell C construction site)	Approximately 940m from the Construction Site Entrance.
Distance to nearest settlement	Approximately 1km from the edge of Leiston.
Impact on neighbouring residents (noise/floodlights)	Limited due to its detached nature from existing settlements.
Physical Constraints	
Brownfield / Greenfield land	Brownfield – former airfield.
Impact on agricultural land	Site now used for agricultural purposes but was formally airfield. Land is classified as Grade 2/Grade 3 Agricultural land.
Landscape sensitivity	Fairly sensitive due to its open nature however no nearby settlements likely to be affected.
Topography constraints	Flat and Open land
Distance to oil and gas pipelines / power lines	From a desk top study, there does not appear to be any overhead power lines on this site.
Access to utilities	Utilities to be provided on site.
Contamination constraints	Former airfield – potential.
Transport Impacts	
Transport impacts – route to construction site	Relatively close to proposed Construction Access. Potential to provide a link road direct from the site to the proposed construction site entrance. This would minimise travel time and contain traffic impacts.
Transport impacts – route to local facilities	Development on this site is unlikely to have any major impact on surrounding transport networks. Given the vast nature of the site, access points could be created north of the site onto the B1122 – traffic could then be directed through the main construction site access.
Access	Lots of opportunities for access; potential for split access; "in or out" options. Development on this site is unlikely to have any major impact on surrounding transport networks. Given the vast nature of the site, access points could be created north of the site onto the B1122 as close to the construction site access as possible.
Walking and Cycling (Local Connections)	Detached from existing settlements in the area. Limited walking and cycling opportunities to Leiston. Improvements would be required.
Transport Legacy (NPPF)	Poor location in terms of accessibility to amenities and facilities if the site was to sustain a use after the construction period.
Legacy Potential	
Opportunities for continued use of buildings	Relatively limited due to the detached nature of the site.
Opportunities for continued use of infrastructure	Relatively limited due to the detached nature of the site.

APPENDIX C 4 - LEISTON WEST SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 4: Leiston West

Site Size (ha): Approximately 32.76ha

Site Address: Land west of Leiston, Leiston



Boyer

Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus

Review 2016

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	This site is not located within or in close proximity to any SSSI or AONB. The site lies approximately 2.7km from the Leiston Aldeburgh SSSI and Sandlings SPA; 2.1km from the Sizewell Marshes SSSI; and 4.3km from Minsmere-Waberswick Heaths and Marshes SSSI. There is an area of Ancient Woodland to the north of the site. An ecology survey was submitted for the application on the eastern part of the site (ref:16/1961/OUT) which suggested that the site is of limited value to wildlife with arable farmland and poor, semi-improved grassland. This report also stated that the majority of the application site was thought to be of low value to foraging or commuting bats, as it was mostly open farmland with very little cover. As such, impact on wildlife more generally is considered to be relatively limited. Overall, it is considered that any development impact on this site and the wider area is likely to be limited in environmental terms.	Limited
Community Effects	Although outside of the settlement boundary, the site is considered to be well related to the edge of Leiston, and could be considered a natural extension of the town. The parcel of land in the eastern part of the site has been identified within the Leiston Neighbourhood Plan for 150 dwellings, and a recent application for 187 dwellings has been approved on the site (ref: 16/1961/OUT) (15.12.2016). The principle for development on this site, and this side of the town, has therefore been established. Furthermore, the proposed development was not considered to have significant visual impacts on the surrounding area. As such, an accommodation campus on the western part of this site could also be acceptable to development, and may offer a longer-term site for the Neighbourhood Plan.	Moderate
Amenity Impacts	It is considered that amenity impacts from any development on the western part of this site would be low. Whilst the Officer's Report for the planning application (ref: 16/1961/OUT) stated that the proposed development lies sufficient distance from neighbouring properties so to limit adverse impact upon outlook, light, sunlight or privacy, careful consideration of the aforementioned planning application submitted for the eastern part of the site (ref: 16/1961/OUT) for the development of 187 dwellings will need to be taken into account. Existing concerns from local residents following the experiences of Sizewell A and B will also need to be carefully considered.	Currently low but likely to increase
Physical Constraints	The existing railway line running through the centre of the site, and the Ancient Woodland to the north, would act as natural constraints to development of the site. The site also has a PROW which runs from north to south across the centre of the site. Development would also need to consider the approved planning application to the east. There could still be the opportunity of 'splitting' the site, with the accommodation being on this site, and any sports and recreation facilities being located elsewhere in the town.	Limited
Transport Impacts	It is acknowledged that the majority of worker traffic is likely to travel through Leiston to arrive at the construction site or via Abbey Lane, neither of which are ideal for bus traffic. As such, traffic impacts from this site are considered to be moderate/severe. There may be potential to provide a busway/footway/cycleway direct to the construction site adjacent to the proposed railway line. This would require further investigation. In relation to the adjacent application (ref:16/1961/OUT), whilst there was no objection from SCC Highways in relation to access and road visibility from the site, they did require the applicant to consider cumulative impacts from all 712 dwellings currently coming forward in Leiston. This will be something that will need to be considered if any accommodation campus was pursued further on this site. Traffic impacts would be confined to routes to the construction site. The proximity of the site to the EDF proposed construction site access is good, commute time would be short. For an off-site location it is assumed that the EDF proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinckley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day. There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with HPC proposals this might generate up to 400 vehicle movements per day. The site is reasonable well located to Leiston if the site were to be used for other uses post construction period, although it would likely require a different access strategy to that of the accommodation campus.	Moderate / Significant
SHLAA / Neighbourhood Plan / Planning Applications / SCDC Assessment	The south-eastern part of this site was identified in Suffolk Coastal's most recent SHLAA, and was considered capable of delivering up to 109 units (site ref: 810b). The same eastern part of the site (east of Highbury Cottages) has also been identified for residential development within the Leiston Neighbourhood Plan, in this case for up to 150 units. Leiston Parish Council considered that the B1119 provided sufficient visibility for access and a good pedestrian links from the site into Leiston. It was also considered that the site is related reasonably well to Leiston and could represent an important entrance in to the town. A planning application was submitted and has been subsequently approved for the development of 187 dwellings on the part of the site east of Highbury Cottages (ref: 16/1961/OUT). In the Officer's Report, it was considered that the proposed development was in a sustainable location and was well related to Leiston. The proposed development would provide the local area with much needed affordable housing and additional economic benefits in the form of job creation during its construction. The proposed development's landscape and visual impact matters were considered to be mitigated by the generally enclosed nature of the site, and the Council's Landscape Manager did not object to the development. The eastern part of the site was previously assessed by SCDC in their assessment of alternative accommodation sites. They considered that the site is located some distance from the centre of Leiston and there would be additional traffic movements through Leiston that would be associated with the development of this site. SCDC also noted that this site could result in a greater worker presence in town, which may have the potential for conflict with local residents. SCDC considered that there were advantages of locating the accommodation campus on this site, notably: infrastructure provision for future development; additional spend in Leiston town, adjacent to built-up areas; and that the workers will have an attachment to Leiston and will therefore have more respect for the town.	Principle of Development obtained
Legacy Potential	There is potential for site and infrastructure to be used for future use of Leiston, especially given the approved planning application on the adjoining site. It appears that there is a level of acceptance from both the Town Council and the District Council that organic growth to the west is acceptable. Therefore, development on this site may be a long-term option for the Neighbourhood Plan.	Very Good
Overall Assessment	The site is very well related to Leiston and has a very good legacy potential. A recent planning permission for development suggests permanent development would be acceptable. The site has limited environmental impacts, and the site has potential for acceptable access onto the B1119. However, it is acknowledged that the transport from this site to the construction site could have an impact on Leiston town centre. Alternative transport routes exist and impact could be managed. The Town Council and District Council have confirmed that residential development is acceptable in this area. Overall, it is considered that this site would be a good option for a potential accommodation campus, either as a full or split site depending on the size of the actual site and depending on whether the railway running through the centre of the site is proposed for expansion. It is considered that, if the accommodation site was to be split, (either into two or three separate sites), this site would be suitable to accommodate part of the residential element or, alternatively, a temporary caravan site. The site fits within EDF's criteria of being located in close proximity to the construction access, with the ability to get their workers to and from site quickly. Therefore this site should be genuinely considered as an alternative option for the accommodation campus.	Good Potential for this site to be brought forward for development.

Criteria	Qualitative Assessment
Policy Designations	
1.1 Policy designations	The site lies outside of the physical boundary of the town. Leiston allocated as a town in SCDC Core Strategy.
(SCDC/ SCC/ Neighbourhood Plan)	SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states: In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the

	<p>following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities. <p>Part of the site was promoted in the most recent SHLAA.</p> <p>Part of the site is located within an allocated site with a planning application pending determination for 187 dwellings.</p> <p>Within Leiston Neighbourhood Plan area.</p> <p>Within Haven Gateway.</p>
1.2 Neighbourhood Plan	<p>The site lies within the Leiston Neighbourhood Plan boundary. This plan's vision is to increase affordable housing provision within its boundary. The Plan makes reference to previous inadequate legacy facilities and provision and states that there is a need to address historic deficits in provision. This Plan also states the need for increased tourist accommodation to encourage growth of the tourism economy within Leiston, it is also of note that the Plan also mentions the potential need to house the construction workers on a temporary accommodation campus and states "in any event, further provision of good quality affordable visitor accommodation will be encouraged to meet increasing needs". This suggests that an accommodation campus in this location would be supported by Leiston Town Council.</p> <p>The cemetery in the east of this site is set for expansion, however, this is unlikely to prevent an accommodation site come forward on this site. Part of this site has been allocated within the Neighbourhood Plan for development SA1. There is a planning application on this site for the development of "an outline planning application for up to 187 dwellings to include car parking, open space provision with associated infrastructure and access." This application is recommended for approval and is being decided at the next SDCD committee. However, due to the size of this site, this may not impact the potential for an accommodation campus to be suitable on the part of the site further to the west.</p> <p>Furthermore, the Neighbourhood Plan also considers this site to relate well to the settlement of Leiston.</p>
Emergency Planning Zone	The site lies within Emergency Planning zone L5 and is therefore approximately 5km from Sizewell.
Environmental Impacts	
2.1 Impact on Internationally Protected Sites <i>e.g. SSSI, Ramsar sites etc.</i>	Site is not located within an SSSI.
2.2 Impact on Nationally Protected Sites <i>e.g. AONB, SPA</i>	Site is not located within an AONB.
2.3 Impact on Local Wildlife Sites	A desktop study identifies that this site does not seem to impact on Local Wildlife Sites. However, a detailed ecology study would need to be undertaken to determine this. An ecology survey was submitted for the application on the eastern part of the site (ref: 16/1951/OUT) which suggested that the site is of limited value to wildlife with arable farmland and poor, semi-improved grassland. This report also stated that the majority of the application site was thought to be of low value to foraging or commuting bats, as it was mostly open farmland with very little cover. As such, impact on wildlife more generally is considered to be relatively limited.
2.4 Flood Risk	Site lies entirely within Flood Zone 1.
2.5 Impact on Heritage Assets	Leiston House Farmhouse to the west of the site (Grade II*).
2.6 Impact on Archaeology	Site does not appear to lie within an area of Archaeological Importance; however, further research would need to be undertaken. Trial trenching likely to be required.
2.7 Impact on Views	The site is well contained and cannot be seen from Saxmundham Road to the south.
2.8 PROW	There is a PROW which runs from north to south along the centre of this site. This will need to be considered if this site was to come forward for an accommodation site.
Community Effects	
3.1 Distance to local amenities	The site is located on the edge of the settlement of Leiston.
3.2 Distance to nearest bus stop	There is a bus stop located adjacent to the site which provides direct links to Ipswich.
3.3 Distance to nearest GP surgery	There is a medical centre within 750m of the site.
3.4 Distance from employment site (<i>Sizewell C construction site</i>)	The site is located approximately 3.5km from the Sizewell Site.
3.5 Distance to nearest settlement	There is a pavement which lies just outside of the site and links the site to the centre of Leiston.
3.6 Impact on neighbouring residents (noise/floodlights)	The site would be adjacent to existing dwellings along the edge of Leiston. Potential for noise and lighting impacts.
Physical Constraints	
4.1 Brownfield / Greenfield land	This site is greenfield.
4.2 Impact on agricultural land	Developing this site would result in the loss of agricultural land. Land is registered as Grade 5.
4.3 Landscape sensitivity	Given the site's contained nature, there should be limited impact on the surrounding landscape.
4.4 Topography constraints	The site has relatively flat topography.
4.5 Distance to oil and gas pipelines / power lines	There appear to be no powerlines on this site.
4.6 Access to utilities	Utilities should be provided on site.
4.7 Contamination constraints	Unlikely due to its greenfield nature.
Transport Impacts	
5.1 Transport impacts – route to construction site	<p>Routes to the construction site would need to be via Abbey Lane or through Leiston, neither of which are ideal. Abbey Lane is a narrow, rural carriageway which would need upgrading to accommodate bus traffic to the construction site. Routing via Leiston would have a big impact on the town. Commute time for construction workers would be increased.</p> <p>The traffic movements associated with the construction campus may not be compatible with movement's associated with the recently approved adjacent residential use which has e.g. late night shift traffic may disturb residents.</p> <p>Leiston Neighbourhood Plan also makes reference to highway capacity under Policy TM2 and states that, any moderately sized development would need to consider the cumulative impacts on the following junctions:</p> <ul style="list-style-type: none"> • Waterloo Avenue/ B1122; • B1122/Cross Street; • Cross Street / Sizewell Road / High Street.
5.2 Transport impacts – route to local facilities	Within cycling distance of Leiston but on the limits of walking distance.
5.3 Access	<p>Multiple potential access locations. Vehicular access would be best located so as to direct traffic away from Leiston e.g. on Abbey Lane. Pedestrian and cycle access would be best located on Saxmundham Road to be most convenient for trips to Leiston. Access would need to consider the planning application to the east of this site.</p> <p>There may be potential to incorporate a dedicated busway adjacent to the proposed railway line to transport workers from the accommodation campus direct to the construction site. This would require further investigation.</p>

5.4 Walking and Cycling (Local Connections)	<p>A pavement on Saxmundham Road terminates to the east of the site, however this could be extended.</p> <p>There may be potential to incorporate a dedicated footway/cycleway adjacent to the proposed railway line for construction workers to access the construction site.</p>
Transport Legacy (NPPF)	<p>The site is reasonably well located in terms of access to Leiston if the site was to have an alternative sustained use after the construction period. However the site access strategy for an accommodation campus is likely to be different from that of a residential development for example.</p>
Legacy Potential	
7.1 Opportunities for continued use of buildings	<p>Given the sites proximity to the settlement of Leiston, this site has very good legacy potential.</p>
7.2 Opportunities for continued use of infrastructure	<p>It is likely that any infrastructure developed on this site could benefit by Leiston.</p>

APPENDIX C 5 - SOUTH SIZEWELL GAP (EDF OPTION 2) SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site: 5 EDF Stage 1, Option 2

Site Size (ha): Approximately 44 ha

Site Address: Land north of Sizewell Gap,
Leiston



Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

Boyer

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	The site's location within the "Suffolk Coast and Heaths AONB" and its proximity to Sizewell Marshes SSSI to the north and Leiston-Aldeburgh SSSI to the south, would mean there would be severe impacts in developing on this site. The site is also identified as being within the "Sizewell Gap", which tries to keep a degree of separation between the construction site, the town of Leiston, and the surrounding countryside, which is used by tourists and dog walkers. Impacts on views could potentially be relatively minimal considering the contained nature of the site. In line with comments from the Stage 1 Consultation, it is agreed that development in this location would amount to inappropriate development within the AONB. It is also noted within the Stage 2 consultation material that "reptile mitigation and a landscape enhancement scheme are currently being implemented", so any development would be detrimental to this work. Further, the site also lies within an area of Archaeological Importance.	Severe
Community Effects	The site is well related to the town of Leiston, and offers good potential opportunities to local businesses and the overall economy of the town. It is however, acknowledged that there are equally potential negative aspects associated with housing a significant number of construction workers in such close proximity to the town, as has been experienced with Sizewell A and B. It is hoped that lessons have been learned from these previous experiences, and that EDF would take some form of responsibility for the conduct and behaviour of their workers.	Limited
Amenity Impacts	The site is located a little distance from the built residential form of the town, therefore direct lighting and noise impacts from any potential development would likely be limited. Concerns were raised during the Stage 1 Consultation with regards to anti-social behaviour increasing in Leiston as a result of the proximity of this site to the settlement, as was experienced during Sizewell A and B.	Limited
Physical Constraints	Despite the environmental designations, the site is relatively flat and benefits from good natural screening from the road to the south. There are overhead power lines to the east which could prevent some of the site to come forward.	Limited
Transport Impacts	There is good access to the construction site, including footpaths and cycleways. There is equally good connectivity to Leiston which is much closer to this site. There are multiple locations for potential access into the site. Traffic impacts would be confined to routes to the construction site. The proximity of the site to the EDF proposed construction site access is good, commute time would be short. For an off-site location it is assumed that the EDF proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day. There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with HPC proposals this might generate up to 400 vehicle movements per day. In terms of NPPF, the site is reasonably well located to Leiston if it was to be used for other uses after the construction period.	Limited
SHLAA/ Neighbourhood Plan / Planning Applications / SCDC Assessment	The site has not been included in any previous SHLAAs, nor has the site been identified within Leiston Neighbourhood Plan. There is no relevant planning history on this specific site, however there has been a planning application for Galloper Offshore Wind Farm on land to the east of the site (ref: DC/16/4810/DRC). This site was not assessed by SCDC in their recent consideration of alternative accommodation sites. In their Stage 1 Consultation Response, SCC and SCDC noted that this site should be eliminated immediately due to its prominence in the Area of Outstanding Natural Beauty. In their response, SCC and SCDC also considered the need for EDF to formulate an Accommodation Strategy which meets the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts.	
Legacy Potential	Although the site is slightly detached from Leiston itself, there is genuine potential for some form of legacy planning on this site. The site could benefit from being split, with any sports and recreation being provided close to the town near to other sports and recreation sites. The campus accommodation could therefore be returned to a 'greenfield' site at some point in the future.	Good
Overall Assessment	Whilst this site scores highly in relation to potential for some form of legacy, this site is within a specific AONB designation. It is therefore unlikely that any permanent development will come forward on this site. The site is also located within the 2km radius of the Emergency Planning Zone and there is a need to keep this part of Sizewell free from construction. There may be potential for this site to have a "partial legacy" ideology (i.e. part of the site will leave a legacy), whereby the site facilities are provided within Leiston itself to be benefited from existing residents. As such, there may be potential to reduce the storeys of the development and thus reduce the impact of the development site on the AONB. In their Stage 2 Consultation Document, EDF suggested that this site was discounted on the basis that the site was in an exposed setting and within the AONB. It is also noted that Suffolk County and Suffolk Coastal also considered that this site should be discounted based on its wider environmental impacts. Whilst transport impacts would be higher, given EDF's proposal to use buses for all work related trips and the low nature of non-work related trips results in the overall impact being low. Comments: Arable land to the east has been avoided as this area has been identified as potential land site for landscaping as associated within the proposed Galloper Offshore Wind Farm. It is suggested that this site should therefore be kept free from development.	Low potential

Criteria	Assessment
Policy Designations	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	<p>The site lies outside of the physical boundary of the town. Leiston allocated as a town in SCDC Core Strategy.</p> <p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>"In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities. <p>Site not promoted in most recent SHLAA.</p>

	<p>Within Haven Gateway.</p> <p>The site lies within the Emergency Planning Zone for Sizewell.</p>
Neighbourhood Plan	Within Leiston Neighbourhood Plan area however there are no designations.
Emergency Planning Zone	Site lies within zones L2, K2 and J2 and within 2km of Sizewell.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	<p>Sizewell Marshes SSSI 50m of the north-eastern boundary and within 20m of the Leiston-Aldeburgh SSSI to the south beyond residential properties.</p> <p>Ecological area to the south is a designated SPA.</p>
Impact on Nationally Protected Sites e.g. AONB, SPA	The site lies within an AONB.
Impact on Local Wildlife Sites	Rare birds (nightjar and woodlark) sensitive to disturbance in the site to the south.
Flood Risk	The site is not crossed by any watercourses.
Impact on Heritage Assets	The site lies within an area of Archaeological Importance and trial trenching is likely to be required.
Impact on Archaeology	Archaeological remains relating to the medieval period found to the east of the site during investigations for Greater Gabbard Windfarm project.
Impact on Views	<p>Visual impacts could be experienced by local residents, users of trails and PROW.</p> <p>Semi-mature woodland planting on the southern and western boundaries of the site which would assist in creating a buffer/screen between the campus and nearby properties and Sizewell Gap.</p>
PROW	A number of PROW surround the site, which are popular among dog walkers and tourists.
Community Effects	
Distance to local amenities	Within 350m from the outskirts of Leiston
Distance to nearest bus stop	Approximately 1.5km from nearest bus stop in Leiston (bus stop adjacent library)
Distance to nearest GP surgery	Approximately 1.5km from Leiston Doctors Surgery.
Distance from employment site (Sizewell C construction site)	Within walking distance from the construction site.
Distance to nearest settlement	Within 350m from the outskirts of Leiston
Impact on neighbouring residents (noise/floodlights)	Farm located on land adjacent however generally impact is limited given the distance of the site from the nearest settlement.
Physical Constraints	
Brownfield / Greenfield land	Greenfield Land.
Impact on agricultural land	Predominantly arable land (Grade 4)
Landscape sensitivity	Immediately to the north-east – higher value semi-natural grassland and open heathland (sought to exclude this from the proposal)
Topography constraints	Generally flat with a slope from West to East of approximately 5m and a slope in the north-south direction.
Distance to oil and gas pipelines / power lines	Overhead power lines to the south east of the sites.
Access to utilities	EDF Energy to provide own utilities.
Contamination constraints	Unlikely – greenfield land.
Transport Impacts	
Transport impacts – route to construction site	<p>Good proximity to construction site - within 7.5mile radius. Route to the construction site via Lovers Lane and Abbey Road which is suitable for buses. Minimal impact on Leiston.</p> <p>Alternatively, if the existing Sizewell A/B access could be used for construction workers then Sizewell Gap could be used to transport workers by bus the construction site. This would contain all Sizewell related traffic to the roads predominantly used to access Sizewell thus minimising impact on the surrounding roads.</p> <p>Will increase journey time to the campus compared to the preferred site and will require buses to shuttle workers to/from the site.</p>
Transport impacts - route to local facilities	Good access into Leiston. Location is likely to focus construction workers into Leiston and away from Eastbridge and Theberton for non-work activities.
Access	There are multiple locations for potential access. Pedestrian and cycle access would be best located as close to King George's Avenue as possible in order for it to be most convenient. Vehicular access could either be located on Lovers Lane or Sizewell Gap depending on the route to the construction site (e.g. via the existing Sizewell A/B access road or via the proposed construction access).
Walking and Cycling (Local Connections)	There is an existing footpath which runs along the southern side of King George's Road. This could be enhanced to provide a footway/cycleway into Leiston.
Transport Legacy (NPPF)	Reasonably well located in relation to Leiston if the site were to sustain a use after the construction period. Leiston is within walking and cycling distance of the site.
Legacy Potential	
Opportunities for continued use of buildings	The site is relatively detached from Leiston and it is therefore unlikely that Leiston would naturally expand to this location.
Opportunities for continued use of infrastructure	The site is relatively detached from Leiston and it is therefore unlikely that Leiston would naturally expand to this location.

APPENDIX C 6 - LEISTON EAST SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 6: Leiston East

Site Size (ha): Approximately 33 ha

Site Address: Land east of Leiston.



Boyer

Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	The eastern part of the site abuts the Suffolk Coast and Heath AONB, however it is considered that development could be contained to the west. The Leiston-Aldeburgh SSSI is within 200m to the south of the site, Sandlings SPA also lies to the south of this site. The site is relatively well contained, and there are several PROW within and around the site which would need to be considered if any development was to come forward on this site.	Limited
Community Effects	The proximity of the site to the Leiston and good access to facilities offers the potential for positive integration with the town. There would be potential benefits to the local economy if an accommodation campus was to be located on this site, although the existing concerns from experiences with Sizewell A and B will still need to be managed. It is expected that EDF would take a responsibility for assisting in managing this process.	Very Good
Amenity Impacts	Development on this site would have some impact on surrounding town, which could be preieved to be either positive or negative. It is clear the site would need to consider the proposed development at Red House Lane (ref: 16/1684/FUL) for 188 dwellings submitted by Hopkins Homes as Phase 2 of their existing development.	Good
Physical Constraints	This site is relatively contained and has some good natural screening. There are overhead powerlines to the south-eastern part of site would limit any potential development in this area.	Limited
Transport Impacts	The site has good potential links to the existing Sizewell entrance, and is also within easy walking and cycling distance of Leiston. The site is therefore considered to have limited transport impacts in relation to accommodation campus traffic. Non-work related off site activities (e.g. involving access to shops, services and facilities from the surrounding area) will require off site trips. These will have a direct impact off-site. Non work is presented in the Stage 1 & 2 consultation as to the number of potential off-site trips but comparison with Hinkley Point accommodation campus trip generation would suggest that the overall campus of 2,400 staff might generate some 400 car trips on a daily basis	Good
SHLAA / Neighbourhood Plan / Planning Application / SDCD Assessment	This site was not considered within Suffolk Coastal's most recent SHLAA, however, land to the west of the site and west of Hawse's Farm was considered capable of accommodating up to 295 units (SHLAA ref: 1004). The site lies within the Leiston Neighbourhood Plan area, but has not been specifically identified for any form of development. There is no relevant planning history directly on this site. A planning application for 188 dwellings was submitted on land to the west of Hawse's Farm (ref: 16/1684/FUL). This planning application was recommended for approval by the Case Officer given the development's sustainable location and that its impact could be adequately mitigated in respect of impact on designated habitats and the combination of effects on traffic and air quality. This was supported by Natural England who stated that, whilst the development was likely to have some form of impact on disturbance to bird at designated sites, this impact could be mitigated with financial contributions. It is also of note that Emergency Planning considered that the proposed development would not impact on the ability to implement emergency arrangements for a Sizewell radiation emergency based upon a reasonably foreseeable accident. However, the application was refused by SDCD Members in December 2016. This site does not appear to have been assessed by SDCD beyond the original Option 3 presented by EDF at the Stage 1 consultation. The land to the west was assessed by SDCD, and it was considered that traffic impacts would be too severe on Leiston and its existing residents. The site was also considered to have limited legacy potential as the site is greenfield and, according to SDCD, the site is unlikely to require any unusual mitigation that would enable future development. In their Stage 1 Consultation Response, SCC and SDCD noted that this site should be considered further and requires additional work to be undertaken to determine the merits of the site, it is unclear whether this additional work has yet to be undertaken by EDF. In their response, SCC and SDCD also considered the need for EDF to formulate an Accommodation Strategy which meets the requirements of the development, but also the future needs of the local community, including possible future housing and tourism functions and minimising overall traffic impacts.	
Legacy Potential	Development of this site could result in a genuine legacy potential. The accommodation aspect could be reused for future housing (either the buildings directly, or more probably the site), whilst the infrastructure and sports and recreation facilities could add the strong sports offer of the town. There is also a genuine business legacy that could be generated through the development of this site. Overall, the site could be considered as a genuine long-term opportunity for the Neighbourhood Plan.	Very Good
Overall Assessment	It is considered this site has very good potential as an accommodation site. It has good links with Leiston and good genuine legacy potential. The existing facilities in the areas may reduce construction costs whilst enhancing integration between the residents and the construction workers. There is also lots of potential for this site to have a cyclical benefit for local businesses and the town's economy. There are existing facilities within the area to support an accommodation campus. Access to and from the site could be to the east of the site, which would look to reduce any impact on Leiston itself for work related transport by bus. Accordingly the proximity to Leiston for non-work related trips is good for access by foot, cycle and bus is good. The site lies in close proximity to the 2km Emergency Planning Buffer Zone and therefore mitigation measures may be required. Comments on the recent application to a neighbouring site are interesting to note, and may be equally applied to this site. The site is detached from the proposed Sizewell Construction Site access, but access via the existing social/leisure site entrance would alleviate this problem. It is also important to note that, at a later stage in the construction period, the secondary access to Lover's Lane would give this site good access to the Construction Site. It is also noted that, in their Stage 2 Consultation Document, EDF considered that this site was "on par" with the EDF Preferred Option at Theberton and Eastbridge. Overall, this is considered to be favourable site that should be considered further, either as a full or split site depending on the size of the actual site. The site lies next to the existing Sizewell Sports facilities as well as a school and leisure centre. The opportunity for the creation of a future "sports hub" therefore exists. Future development of the site for housing would appear to present a natural organic extension of Leiston associated with the recently proposed development site to the west.	Very Good Potential for the site to come forward for development.

Criteria	Assessment
Policy Designations	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	<p>Whilst the site is not allocated, land to the west of this site is allocated within the Leiston Neighbourhood Plan. Hopkins Homes have submitted an application for 188 dwellings on land to the west along Red House Lane.</p> <p>The site lies outside of the physical boundary of the town. Leiston allocated as a town in SCDC Core Strategy.</p> <p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>'In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction;

	<p>m) Site decommissioning, and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities.</p> <p>Site not promoted in most recent SHLAA.</p> <p>Adjacent to AONB.</p> <p>Within Leiston Neighbourhood Plan area.</p> <p>Within Haven Gateway.</p>
Neighbourhood Plan	<p>The site lies within the Leiston Neighbourhood Plan boundary. This plan's vision is to increase affordable housing provision within its boundary. The Plan makes reference to previous inadequate legacy facilities and provision and states that there is a need to address historic deficits in provision. This Plan also states the need for increased tourist accommodation to encourage growth of the tourism economy within Leiston, it is also of note that the Plan also mentions the potential need to house the construction workers on a temporary accommodation campus and states "in any event, further provision of good quality affordable visitor accommodation will be encouraged to meet increasing needs". This suggests that an accommodation campus in this location would be supported by Leiston Town Council.</p> <p>The Neighbourhood Plan considers the site to relate well to the existing settlement, however does note that the development would be slightly into the countryside. It is also stated that the site can be considered to provide a separate pedestrian footpath.</p>
Emergency Planning Zone (Sizewell)	<p>The site lies approximately 3km from the Sizewell site and within Zone K3/J3.</p> <p>The Hopkins Home application lies between 3 and 4km from the site within Zones K3 and K4. This application was considered within the DEPZ zone but outside of the area where urgent countermeasures might be advised during any radiation emergency, as such, the application was suggested not to impact on the ability to implement detailed emergency arrangements for a Sizewell Radiation emergency.</p>
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	SSSI within 200-250m of the site to the north.
Impact on Nationally Protected Sites e.g. AONB, SPA	Eastern part of the site is within an AONB.
Impact on Local Wildlife Sites	Nighthar and Woodlark to the south. Further research of ecological habitats within hedgerows will need to be investigated.
Flood Risk	No watercourses within close proximity of the site.
Impact on Heritage Assets	None within close proximity to the site.
Impact on Archaeology	The sites does not lie within an area of Archaeological Importance, however, given the need for Hopkins Homes to undertake trial trenching on their site to the east, it is likely that this site will also require further research prior to development.
Impact on Views	Limited – due to the contained nature of the site.
PROW	Bridleway running through the site east to west. This would need to be protecting if the site were to be brought forward for development.
Community Effects	
Distance to local amenities	The development borders Leiston and lies behind the Sizewell Sports and Social Club.
Distance to nearest bus stop	Approximately 830m from the site (on Aldeburgh Road)
Distance to nearest GP surgery	Approximately 1.2km to Leiston Doctors Surgery on Main Street.
Distance from employment site (Sizewell C construction site)	Approximately 1.4km from the Sizewell C construction site.
Distance to nearest settlement	The site borders the settlement boundary for Leiston.
Impact on neighbouring residents (noise/floodlights)	The site is located to the south of Leiston and, as such, impact on neighbouring properties should be limited but will still need to be assessed.
Physical Constraints	
Brownfield / Greenfield land	Greenfield land.
Impact on agricultural land	The site is considered as Grade 3 Arable land.
Landscape sensitivity	Limited due to the contained nature of the site.
Topography constraints	Relatively flat relief - good basis for development.
Distance to oil and gas pipelines / power lines	Southern end of the plot – existing high voltage power lines, however this is unlikely to be an issue as the site is big enough to ensure that development remains in the northern part of the site.
Access to utilities	Utilities likely to be provided on site. Access to utilities should not be a problem due to the proximity of this site to the settlement of Leiston.
Contamination constraints	Unlikely – this is a greenfield land.
Transport Impacts	
Transport impacts – route to construction site	<p>Limited – the site is in the southern part of Leiston so should not require construction vehicles to travel through the Leiston. Route to the construction site would involve buses along Lovers Lane and Abbey Rd. Would add to workers commute time.</p> <p>Leiston Neighbourhood Plan also makes reference to highway capacity under Policy TM2 and states that, any moderately sized development would need to consider the cumulative impacts on the following junctions:</p> <ul style="list-style-type: none"> • Waterloo Avenue/ B1122; • B1122/Cross Street; • Cross Street / Sizewell Road / High Street.
Transport impacts – route to local facilities	The site is very well located in relation to Leiston and the amenities and facilities on offer, although direct links would need to be provided.
Access	<p>Good – lots of potential opportunities to open an access to the east of the site onto Sizewell Gap for vehicular access.</p> <p>Potential for a wider southern "bypass" from Aldeburgh Road to Sizewell Gap to be investigated.</p>
Walking and Cycling (Local Connections)	Good – direct links would need to be provided.
Transport Legacy (NPPF)	Good opportunity for transport legacy to open up access into the site. Very well located to the school and sports facilities.
Legacy Potential	
Opportunities for continued use of buildings	Very good – the site would be a natural extension of Leiston.
Opportunities for continued use of infrastructure	Very good – due to its proximity to Leiston.

APPENDIX C 7 - LOVERS LANE WEST / BIG FIELD SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 7: Lovers Lane West / "Big Field"

Site Size (ha): Approximately 31 ha

Site Address: Lovers Lane West



Boyer

Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	<p>This site is relatively contained and benefits from good natural screening. However, site is located in close proximity to a Sizewell Marshes SSSI to the north and Suffolk Coast and Heaths AONB to the east. Overall, given the site's relatively contained nature, there are limited environmental impacts associated with this site.</p> <p>It is noted that the parcel of land to the north (DC/15/3954/AME) is subject to an approved application for the creation of approximately 6ha of wetland development to mitigate the loss of SSSI on the Sizewell C Construction Site. Whilst this area of wetland is not given the weighting associated with SSSI designations, any development on "Big Field" would need to consider its impact on this wetland area to the north.</p>	Limited
Community Effects	The site is well related to Leiston and development on this site could provide a natural extension to the settlement.	Good
Amenity Impacts	It is considered there would be limited impacts on neighbouring residents given that the site has good natural screening from hedgerows and abuts employment land rather than residential development.	Limited
Physical Constraints	There is existing employment land to the south of the site, and there is also a railway constraining to the south. It is also noted that the site lies within 2km of the Emergency Planning Zone for Sizewell and is therefore is within a relatively vulnerable area.	Limited
Transport Impacts	<p>It is considered there would be limited transport impacts on the settlement of Leiston from this site. Transport to the construction site should not impact on Leiston itself given that access routes would be in a north-easterly direction. Short commute time to the construction site.</p> <p>Traffic impacts would be confined to routes to the construction site. The proximity of the site to the EDF proposed construction site access is good, commute time would be short. For an off-site location it is assumed that the EDF proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day.</p> <p>There is opportunity for walking and cycling to/from the site for non-work related trips. Based on comparison with HPC proposals this might generate up to 400 vehicle movements per day.</p> <p>In terms of NPPF, the site is reasonably well located to Leiston if it was to be used for others uses after the construction period.</p>	Limited
SHLAA / Neighbourhood Plan / Planning Application / Assessment by SCDC	<p>The site has not been assessed in Suffolk Coastal's most recent SHLAA. Although the site lies within Leiston's Neighbourhood Plan area, the site has not been identified for any future development. There are no relevant planning applications on the site, and the site was not assessed by SCDC as a potential for an alternative accommodation campus. A planning application was however submitted by EDF Energy for the site to the north to be an area of wetland habitat including grassland, heathland, scrub and scattered trees (ref: DC/14/4224/FUL).</p> <p>The site has been promoted by EDF Energy in their Stage 2 Consultation Document to be used for the following uses:</p> <ul style="list-style-type: none"> Storage of materials; Short-term part and ride area to allow workers to be shuttled by mini-bus to the power station platform; A HGV holding area to regulate flow into Sizewell; and A space in the north part of the site for worker's caravan accommodation. 	
Legacy Potential	The site could be utilised by Leiston and would have the potential for either long-term residential or employment use.	Good
Overall Assessment	This site scores highly although it is unlikely to come forward for development as an accommodation site given that EDF have chosen to utilise this site for rail heads and as this site provides flexibility for EDF.	Very Good Option

Criteria	Assessment
Planning Policy	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	<p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>'In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ol style="list-style-type: none"> Proposed layout and design; Grid connection / power line changes; Landscape/visual character assessment including cumulative effects; Coastal erosion/coast protection issues; Coastal access including the Heritage Coastal Walk; Ecological impacts on nearby designated sites; Construction management; A sustainable procurement policy; Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; Social issues – local community issues during long construction period and the housing of workers in the local area; Economic impacts upon the area (including tourism) during and after construction; The off-site need for associated land, notably during construction; Site decommissioning; and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities.'
Neighbourhood Plan	The site lies within the Leiston Neighbourhood Plan boundary but is not allocated for development.
Emergency Planning Zone	The site partly lies within 2km radius of Sizewell and therefore lies within the Emergency Planning Zone and is therefore considered of high risk.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	The site abuts an SSSI to the north.
Impact on Nationally Protected Sites e.g. AONB, SPA	Part of the site abuts an AONB to the east.
Impact on Local Wildlife Sites	Further research required.
Flood Risk	The site lies within Flood Zone 1.

Impact on Heritage Assets	There are no heritage assets within or in close proximity to the site.
Impact on Archaeology	The site is currently under-going trial trenching.
Impact on Views	The site is relatively well contained with good natural screening and as a result views should not be significantly impacted upon.
PROW	There are no PROW on this site.
Community Effects	
Distance to local amenities	The site is very well related to the settlement of Leiston and abuts an employment area to the south west.
Distance to nearest bus stop	The site is approximately 830m from the nearest bus stop.
Distance to nearest GP surgery	The site is approximately 800m from the nearest doctor's surgeries in Leiston.
Distance from employment site (Sizewell C construction site)	The site is approximately 1.7km from the Construction Site (southern part).
Distance to nearest settlement	The site abuts Leiston to the south.
Impact on neighbouring residents (noise/floodlights)	Whilst the site is well related to Leiston, given that the site does not abut any significant residential areas, amenity impacts is considered to be relatively low.
Physical Constraints	
Brownfield / Greenfield land	The site is Greenfield Land.
Impact on agricultural land	The site is considered as Grade 3b agricultural land.
Landscape sensitivity	Given the site's contained nature, landscape sensitivity is considered minimal.
Topography constraints	From an initial desktop study, the site appears to have relatively flat relief.
Distance to oil and gas pipelines / power lines	There does not appear to be any power lines on the site.
Access to utilities	It is anticipated that utilities will be provided on site.
Contamination constraints	Limited given the Greenfield nature of this site.
Transport Impacts	
Transport impacts – route to construction	Route to construction site via Lovers Lane and Abbey Road. Suitable for buses to transport workers. Commute time to the construction site is short.
Transport impacts – route to local facilities	Well located in relation to walk and cycle trips into Leiston.
Access	Vehicular access could be located on Lovers Lane. There is considered to sufficient site frontage and good visibility. Pedestrian and cycle access could be located on King George's Ave for maximum convenience for trips to Leiston.
Walking and Cycling (Local Connections)	There is an existing footway on the southern side of King George's Ave which could be upgraded to a footway/cycleway into Leiston.
Transport Legacy (NPPF)	The site is well located in relation to the amenities and facilities on offer in Leiston if the site was to be used for alternative uses beyond the construction period.
Legacy Potential	
Opportunities for continued use of buildings	Given the proximity of the site to Leiston, it is considered that the buildings could be developed into a residential extension of the town or alternatively, an employment extension to the industrial estate to the south west of the site.
Opportunities for continued use of infrastructure	It is likely that any infrastructure on this site could be used for the benefit of Leiston.

APPENDIX C 8 - SOUTH SIZEWELL GAP / COAST SITE SUITABILITY ASSESSMENT

SITE SUITABILITY ASSESSMENT

Site Reference: Site 8: South Sizewell Gap / Sizewell Coast

Site Size (ha): Approximately 16 ha

Site Address: Land south of Sizewell Gap



Boyer

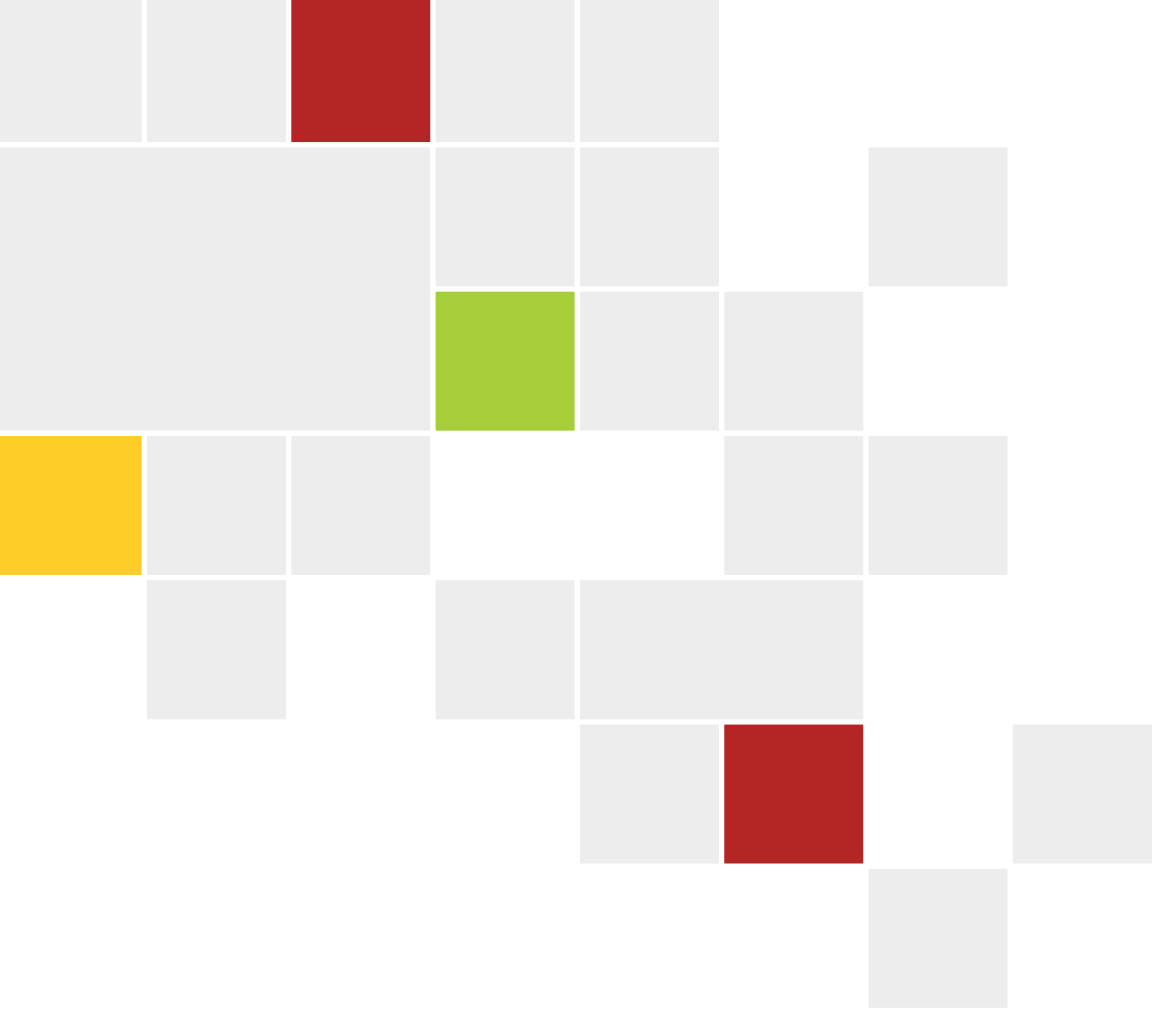
Client: Suffolk County Council

Job Title: Sizewell C Accommodation Campus Review 2016

CRITERIA	COMMENT	ASSESSMENT
Environmental Impacts	This site is located in a very prominent position with high landscape sensitivity. This is due to the cliff-top location in the landscape, and any development of a significant height will be clearly visible. The site is located within Suffolk Coast and Heaths AONB and partly within Leiston-Aldburgh SSSI. Views to and from the site will be significantly affected if an accommodation campus were to be delivered on this site. There are also several PROW on and around the site which will need to be considered.	Moderate
Community Effects	The site is considered to be very detached from Leiston, although it benefits from good access via road and footpath links.	Average
Amenity Impacts	Any amenity impacts from this site are considered to be relatively low given the remote location of the site. However, there would need to be due consideration given to both the owners of the mobile homes and tourists on the existing campsite.	Relatively Low
Physical Constraints	The site is considered to have very high landscape sensitivity given its location on the cliff top. It is also possible that this site is not big enough to accommodate a temporary accommodation campus site.	Moderate
Transport Impacts	The site is considered to have very good access to main site entrance and any development related to Sizewell C construction would therefore likely have limited impact on the local transport network for construction traffic. However, given the remote location of this site, non-shift traffic flows are likely to have a wider impact on the local area as the construction workers will need to travel to nearby settlements for facilities and services. For an off-site location it is assumed that the EDF proposal would be for a direct bus service shuttling workers to/from the accommodation. This is the same proposal as that developed for Hinkley Point C. At peak construction when the accommodation would be full, the direct bus service would require up to 12 buses in a peak hour, and some 60 bus trips per day.	Limited/moderate
SHLAA / Neighbourhood Plan / Planning Applications / SCD C Assessment	This site was not assessed in the most recent Suffolk Coastal SHLAA, nor does the site feature within the emerging Leiston Neighbourhood Plan. There have been a number of planning applications submitted in relation to this site, mainly relating to infrastructure for the existing Caravan Park. The site was also subject to an assessment of light emissions from the proposed Galloper Wind Farm on an adjacent parcel of land. It does not appear that the site has been previously been assessed by SCD C.	
Legacy Potential	Whilst the site has limited legacy potential as a genuine option for the accommodation campus, there is a real possibility of some form of legacy being achieved if the site was considered for the "Temporary Caravan" site. Part of the site is currently used as a caravan park and therefore some infrastructure is already available. An extension to this caravan park, although needing to be carefully managed, could accommodate the temporary caravan park EDF have introduced at the Stage 2 consultation.	Good
Overall Assessment	The site is considered to be too small for a genuine accommodation campus site. The site is also located in a sensitive location whereby views are likely to be severely impacted upon. Given the existing location of a caravan campus in this location, the site may be able to accommodate the proposed temporary caravan site for construction workers, which has been introduced in the Stage 2 Consultation. This in turn would have good legacy potential given that the potential improved infrastructure could provide for an additional permanent caravan park. There is potential that the caravan park in this location could be seen as competition to the existing caravan park, however, we would consider that this should not be necessarily viewed unfavourably. This temporary caravan park could also be a natural extension to the existing caravan park. Utilities and improvements to infrastructure could benefit the existing business and provide a year round income. It is unclear what, if any, alternative sites for the temporary caravan park have been assessed by EDF during the Stage 2 Consultation. It is strongly advised that this site is considered further for this specific aspect of Sizewell C.	Very Limited

Criteria	Assessment
Policy Designations	
Policy designations (SCDC/ SCC/ Neighbourhood Plan)	<p>SP13 – Nuclear Energy relates specifically to the possibility of additional nuclear power stations at Sizewell and states:</p> <p>In respect of the possibility of additional nuclear power stations at Sizewell, the Council considers the local issues that need to be adequately addressed consist of at least the following:</p> <ul style="list-style-type: none"> a) Proposed layout and design; b) Grid connection / power line changes; c) Landscape/visual character assessment including cumulative effects; d) Coastal erosion/coast protection issues; e) Coastal access including the Heritage Coastal Walk; f) Ecological impacts on nearby designated sites; g) Construction management; h) A sustainable procurement policy; i) Transport issues such as the routing of vehicles during construction, improvements to the road system (including the A12), and use of rail and sea for access all having regard to such factors as residential amenity; j) Social issues – local community issues during long construction period and the housing of workers in the local area; k) Economic impacts upon the area (including tourism) during and after construction; l) The off-site need for associated land, notably during construction; m) Site decommissioning, and (n) On-site storage of nuclear waste. While recognizing that there will be disbenefits, were development to take place, the Council has the opportunity to maximise the potential benefits, notably in respect of: (o) Opportunities to achieve renown with its associated economic benefits, e.g. a reputation as a 'centre of nuclear excellence'; (p) The long term implications for housing, both temporary and permanent; and (q) The benefits (including financial contributions) to be made available to local communities. <p>Site not promoted in most recent SHLAA.</p> <p>Within Haven Gateway.</p> <p>The site is within a designated AONB.</p> <p>The site is designated as Heritage Coast.</p>
Neighbourhood Plan	Within Leiston Neighbourhood Plan area but is not allocated.
Emergency Planning Zone	This site lies entirely within 2km of the Sizewell Site and is considered to lie within a DEPZ Vulnerable zone.
Environmental Impacts	
Impact on Internationally Protected Sites e.g. SSSI, Ramsar sites etc.	Very proximate to SSSI Leiston-Aldburgh – within SSSI Impact Risk Zone ; Heritage Coasts
Impact on Nationally Protected Sites e.g. AONB, SPA	The site lies within the AONB and is highly visible due to its cliff top location / within National Character Area (Suffolk Coast and Heaths).
Impact on Local Wildlife Sites	Further research required.

Flood Risk	No – due to the cliff top location of this site.
Impact on Heritage Assets	Within designated Heritage Coast.
Impact on Archaeology	The site does partly lie within an area of Archaeological Importance and, as such, trial trenching is likely to be required.
Impact on Views	Severe – due to its high level location.
PROW	A number of PROW across the site leading to Sizewell Beach.
Community Effects	
Distance to local amenities	Approximately 1.6km to the edge of Leiston.
Distance to nearest bus stop	Approximately 2.6km from bus stop on High Street in Leiston.
Distance to nearest GP surgery	Approximately 2.6km from Leiston Doctors Surgery.
Distance from employment site (Sizewell C construction site)	The site abuts the Sizewell Construction Site.
Distance to nearest settlement	Approximately 1.6km to the edge of Leiston.
Impact on neighbouring residents (noise/floodlights)	Limited given that the location of the site is detached from Leiston.
Physical Constraints	
Brownfield / Greenfield land	Greenfield land.
Impact on agricultural land	Land is Grade 4 agricultural land and therefore impact should be limited.
Landscape sensitivity	Severe due to its location.
Topography constraints	Small site – may not be large enough for the accommodation campus.
Distance to oil and gas pipelines / power lines	No powerlines available to view from Google Maps.
Access to utilities	Utilities likely to be provided on site.
Contamination constraints	Limited – Greenfield land
Transport	
Transport impacts – route to construction site	Located in close proximity to the Construction site. Construction workers could be transported through the existing Sizewell A/B access if this is permitted. Alternatively the route to the construction access would be via Sizewell Gap, Lovers Lane, Abbey Road. This would add to commute times. Shift times may not be compatible with adjacent holiday accommodation.
Transport impacts - route to local facilities	Remote from Leiston, however within cycling distance and there is a cycleway along Sizewell Gap.
Access	Good proximity to the Sizewell Gap road (single carriage road). It is considered access can be achieved.
Walking and Cycling (Local Connections)	Limited. The construction site is within walking/cycling distance. There is a footway/cycleway along Sizewell Gap but it is not II so likely to be undesirable at certain times of the day.
Transport Legacy (NPPF)	Poor location in terms of accessibility to amenities and facilities if the site was to sustain a use after the construction period.
Legacy Potential	
Opportunities for continued use of buildings	As an existing caravan park - yes
Opportunities for continued use of infrastructure	As an existing caravan park - yes



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