

Suffolk Principles for the Management of the Sizewell Estate

The production of these estate principles has been led by Suffolk County Council & Suffolk Coastal District Council in collaboration and discussion with Suffolk Coast & Heaths AONB and Suffolk Wildlife Trust.

January 2014

Introduction and summary

- a. The future management of the EDF Sizewell Estate should be an environmental exemplar in order to mitigate long lasting adverse direct and indirect impacts on landscape character, cultural heritage and ecology. This will require an estate management strategy that balances the moderation of visual impacts, enhancement of natural and cultural heritage, strengthening of landscape character and improvement of public access both on and off the existing estate.
- b. The Sizewell estate occupies an area of great strategic significance in terms of landscape and wildlife. It is located at the narrowest point of the Suffolk Coast & Heaths AONB, comprises an interface between wetland and heathland rich in biodiversity and is traversed by numerous ecological networks. The sensitivity of the site is reflected in the host of landscape, heritage and ecological designations within or adjacent to the estate.
- c. NPS EN-1 calls for applicants to '*show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests*' (Section 5.3.4). It also states that projects should '*minimise harm to the landscape, providing reasonable mitigation where possible and appropriate*' (Section 5.9.8) and '*avoid or minimise conflict between conservation [of heritage assets] ... and proposals for development*' (Section 5.8.12). Therefore, we would expect EDF to ensure that the Sizewell Estate is a resilient, accessible and ecologically functioning environment, in the context of the wider Suffolk Coast, that preserves buried and built heritage and compliments and enhances and the surrounding landscape character.
- d. The creation of a mosaic of heathland, scrub, woodland and wetland, managed by a variety of methods that reflect the variety of habitats, within and around the estate is recommended by this group as a means of helping to compensate and mitigate the impacts of the development and an opportunity to sustainably enhance landscape character and ecological networks with areas adjoining the estate. Such a heterogeneous and sustainable mosaic of habitats is appropriate in the context of the surrounding landscape and wildlife networks. This approach would also maximise the capacity of our wildlife and landscape to cope with climate change in line with the recommendations of the Lawton Report (2010)¹.
- e. In the Initial Proposals and Options Environmental Report (2012: 45), EDF state that the emerging landscape strategy for the EDF Energy estate '*provides an opportunity for significant improvement in the landscape and establishment of habitats in the Estate including the provision of new heathland habitat and landscape character links with the Minsmere and Sandlings estates to the north*

¹ Making Space for Nature: A review of England's Wildlife Sites and Ecological Network (2010)

and south respectively. Furthermore, EN-6 (Vol II, C.8.71) states that *'the nominator of the site has noted that there is some potential for landscape and nature conservation benefits through the creation of habitats such as heath land on land surrounding the site, which it believes could help offset the impacts of additional development in the AONB and provide landscape continuity with those heath land areas adjoining the Sizewell Estate to the north and south'*.

- f. Public access across the EDF Sizewell estate should also be maintained and enhanced. An area near Leiston south of Sandy Lane should be made available for the public to walk their dogs off their leads in order to reduce the impacts on more sensitive habitat areas that already exist or are created through the landscape strategy. NPS EN-1 (Section 5.10.24) states that rights of way, National Trails and areas of access to land are *'important recreational facilities'* and that measures to mitigate temporary or permanent loss of rights of way should be considered by the applicant or the IPC (now PINS) as necessary. It emphasises the importance of maintaining and enhancing coastal recreation and access to the coast in particular.
- g. The mitigation hierarchy must be adhered to throughout the development, meaning that adverse impacts should be avoided before mitigation, compensation and offsets are considered.

Principles

1. **Post-construction, the Sizewell estate should be managed as a mosaic of grass, heath, scrub, woodland and wetland.**
2. **The estate management strategy should form part of a broader strategy that comprises the '*integrated landscape, heritage and architectural plan*', as suggested by the Appraisal of Sustainability (NPS EN-6 Vol. II, C.8.82), in addition to the necessary '*ecological mitigation and management plan*' (NPS EN-6 Vol. II, C.8.63). The overall plan should be agreed by the Local Authorities and other relevant organisations in advance and be informed (but not exclusively) by the Suffolk County Council Landscape Character Assessment (2008), Suffolk Coast & Heaths 2013 – 2018 Management Plan and the LDA Design Suffolk Coast and Heaths AONB Review and Analysis Report (2011).**
3. **Parts of the existing estate are of high ecological and landscape value already and must form the building blocks for the future post-construction vision; therefore sufficient investment and resource should be made available to ensure that current features of value are protected throughout the construction phase and subsequently enhanced through the estate management strategy.**
4. **To maximise biodiversity gain, habitat restoration and recreation will need to be achieved via a number of different management approaches. The scrub and woodland mosaic can be achieved via natural regeneration rather than translocating top-soil and seeding. Management of this habitat could be via extensive grazing (although pressure from deer browsing will need to be determined and appropriate mitigation provided if necessary), with appropriately sized grazing units, using cattle grids as necessary. However, elsewhere for heathland and acid grassland creation more intensive management to create the right conditions will be needed, especially in areas of former arable land, where soil fertility will be high. These methods include artificial acidification, topsoil removal, ongoing vegetation control (especially bracken, bramble, rhododendron and silver birch) and bare soil creation (for ant lion and other rare invertebrates and woodlark feeding). The use of local ecological expertise in these methods is strongly advised.**
5. **Where species specific conservation is required then correspondingly appropriate management will be needed. This will certainly be needed for stone curlew management (where the only successfully breeding stone curlew on the Suffolk coast are in areas specifically managed for them). Again, the use of local ecological expertise in these methods is strongly advised.**
6. **New semi-natural habitat, created to compensate or offset residual impacts, should prioritise the improvement of ecological networks in order to ensure the maximum potential for functioning ecological connectivity across and adjacent to the estate whilst maintaining and enhancing landscape character.**
7. **Adverse land/seascape and visual impacts should be effectively minimised throughout construction and operation, and opportunities to**

enhance the existing qualities of the environment maximised in line with the Suffolk Design Principles for Sizewell C.

8. **Any adverse impacts upon existing archaeological remains within the estate should be avoided and potential historic finds discovered should be appropriately preserved.** The Appraisal of Sustainability notes that that a significant '*unknown archaeological buried resource*' could potentially be present at the proposed site (EN-6 Vol II, C.8.77). Any mitigation strategy for dealing with archaeological remains identified must be agreed with Suffolk County Council Archaeological Service and English Heritage.
9. **Appropriate permissive public access (for cyclists, pedestrians and horse-riders) across the Sizewell Estate should be maintained as far as reasonably possible during construction and appropriately enhanced post-construction. Any temporary or permanent changes to the public rights of way network across the estate must follow due legal process.**
 - a. Potential temporary or permanent closures and/or diversions affecting public access to and across the estate arising from construction should be minimised to reduce disruption, particularly the long distance routes such as the Suffolk Coast Path.
 - b. Post-construction access should be managed to ensure gradual transitions in access ranging from a robust (country park style) open area south of Sandy Lane (with enhanced access from Leiston and available for dogs off leads as appropriate) through to more restricted access north of Ash Wood, particularly adjacent to the Minsmere Levels, which would be managed primarily for the benefit of wildlife. The RSPB at Minsmere have, over the years, developed a carefully planned and designed zoning for the reserve with a gradation from a 'family zone' through to a 'wilderness zone'.

ANNEX 1:

Ecology and the National Policy Statements EN-1 & EN-6 (quotes identified in italics)

Section 4.1.4 of EN-1 states that the IPC [now PINS] '*will need to take ...into account environmental ... benefits and adverse impacts, at national, regional and local levels*'.

Section 5.3.7 of EN-1 states that '*development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives*' and that '*where significant harm cannot be avoided, then appropriate compensation measures should be sought*'.

Section 5.3.15 of EN-1 states that good design should include the inclusion of beneficial biodiversity features to protect and enhance biodiversity in and around the development.

Section 5.3.18 of EN-1 outlines a range of mitigation principles that developers should follow which are relevant to the proposed Sizewell C development:

- i. '*During construction, they [the developer] will seek to ensure that activities will be confined to the minimum areas required for the works;*
- ii. '*During construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised;*
- iii. '*Habitats will, where practicable, be restored after construction works have finished; and*
- iv. '*Opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals*'.

Section 3.9.6 of EN-6 (Volume I) supports the mitigation measures highlighted in EN-1 to avoid or minimise impacts on biodiversity. En-6 specifically highlights the need to:

- i. Vary '*building layout to avoid ecologically sensitive areas*';
- ii. Provide '*on-site measures to protect habitats and species and to avoid or minimise pollution and the disturbance of wildlife*'.

Section C.8.63 of EN-6 (Volume II) states that the Appraisal of Sustainability identified the '*potential for the mitigation of biodiversity effects on sites of UK wide conservation importance (Sizewell Marshes SSSI), including the creation of replacement habitat*' and found that there is '*potential for habitat creation within the wider area in order to replace lost 'wet meadows' habitats of the Sizewell Marshes SSSI, but also finds that it may not be possible to fully compensate for losses of this habitat*'.

Section C.8.63 of EN-6 (Volume II) stipulates that the '*applicant will need to submit an ecological mitigation and management plan to minimise the [ecological] impacts*' arising from construction of a new nuclear power station at Sizewell.

ANNEX 2

Landscape and the National Policy Statements EN-1 & EN-6 (quotes identified in italics)

Section 5.9.8 of EN-1 states that the following factors need to be considered in judging the impact of a project on landscape: *'the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change'*. It states that *'projects need to be designed carefully, taking account of the potential impact on the landscape'* and that the *'aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate'*.

Section 5.9.9 of EN-1 states that the *'conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC [now PINS]'* in deciding on applications for development consent in AONBs. Furthermore, Section 5.9.11 suggests that the any projects consented in areas designated as AONB *'should be carried out to high environmental standards'*.

Section 3.10.3 of EN-6 (Volume I) asserts that there is the potential at Sizewell in particular for *'long-term effects on visual amenity'*, due to the location within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.

Section 3.10.8 of EN-6 (Volume I) states that *'mitigation should ... be designed to reduce the visual intrusion of the project as far as reasonably practicable'*.

Section C.8.72 of EN-6 (Volume II) suggests that *'given the likely scale of the development, there are likely to be some long lasting adverse direct and indirect effects on landscape character and visual impacts on the AONB'*. In addition, the Appraisal of Sustainability (Section C.8.73 EN-6 Volume II) considers that *'some impacts could be potentially mitigated for over time, for example by new planting and potentially through compensatory planting in the surrounding area'* and that *'the decommissioning of the facilities may allow some landscape restoration of previously developed areas in the long term'*. However, in this section it is noted that *'long term land uses for the restored areas are difficult to predict at this stage'*.

The Appraisal of Sustainability (EN-6 Volume II, C.8.74) also notes that *'in-combination adverse effects on landscape are likely to arise from new raised roadways and access connections to the rail head and potentially new associated transmission lines/grid connectivity'*.

Section C.8.82 of EN-6 (Volume II) states that in order to further understand the effects of long lasting adverse direct and indirect effects on landscape character and visual impacts on the Suffolk Coast and Heaths AONB, an *'integrated landscape, heritage and architectural plan'* should be submitted by the applicant. It states that *'given the limited scope for mitigation, a level of impact is likely to remain'*.

ANNEX 3

Access and the National Policy Statements EN-1 & EN-6 (quotes identified in italics)

Section 5.10.16 of EN-1 states that the IPC (now PINS) *'should expect applicants to have taken advantage of opportunities to maintain and enhance access to the coast'*, including the *'implications for development of the creation of a continuous signed and managed route around the coast'*.

Section 5.10.20 of EN-1 notes that where green infrastructure is affected, *'the IPC [now PINS] should consider imposing requirements to ensure the connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to new coastal access routes'*.

Section 5.10.24 of EN-1 recognises the recreational importance of *'rights of way, National Trails and other rights of access to land'* and states that the *'IPC [now PINS] should expect applicants to take appropriate mitigation measures to address adverse effects'* upon such features.

Section C.8.78 of EN-6 (Volume II) suggests that *'possible mitigation measures might include siting certain elements of a station away from public footpaths and/or the provision of realignments to existing or planned rights of way'*.

ANNEX 4

Cultural heritage and the National Policy Statements EN-1 & EN-6 (quotes identified in italics)

Section 5.8.14 of EN-1 states that there *'should be a presumption in favour of the conservation of designated heritage assets'*, whilst Section 5.8.5 states that *'the absence of designation for ... heritage assets does not indicate lower significance'*.

Section 5.8.11 of EN-1 stipulates that when considering applications, *'the IPC [now PINS] should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development'*.

Section 5.8.13 of EN-1 states that the *'IPC [now PINS] should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality'*. Furthermore, it suggests that the IPC (now PINS) should *'take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment'*.

Section 5.8.22 of EN-1 states that *'where the IPC [now PINS] considers there to be a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the IPC [now PINS] should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction'*.

The Appraisal of Sustainability (C.8.76 OF EN-6 Volume II) has *'identified potential for adverse impacts on the setting of Scheduled Monuments, Conservation Areas and Listed Buildings in the area'*.

The Appraisal of Sustainability (Section C.8.77 of EN-6 Volume II) suggests that there is *'potential for adverse physical impacts upon significant buried archaeology'* at the proposed power station site at Sizewell due to previous evidence of *'Prehistoric, Roman and Medieval activity is evident from an earlier investigation within the existing nuclear power station site boundary'*.