

Suffolk Coastal District Council

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Katy McGuinness
Senior Environment Planner
Project Development Directorate
EDF Energy – Nuclear New Build
The Qube,
90 Whitfield Street,
London
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12th November 2014

Dear Ms McGuinness,

Aldhurst Farm Habitat Creation Scheme – Request for an EIA Screening Opinion

I am writing with reference to your letter and attached document received on the 23rd October 2014 requesting a screening opinion on proposals for habitat creation at Aldhurst Farm, Leiston.

I can confirm that the following decision has been made having regard to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011: Regs 5 & 23: Screening Opinion. In reaching this decision consultations have been undertaken with Suffolk County Council, Suffolk Wildlife Trust, Natural England and the Environment Agency.

In this instance the development is **not** listed in Schedule 1. However, it is considered to be listed in Schedule 2: 10 (i) Dams and other installations designed to hold water or store it on a long-term basis (unless included in Schedule 1); and 10 (n) Groundwater abstraction and artificial recharge schemes not included in Schedule 1, in addition, the site is within and adjacent to a number of sensitive areas, namely:

- Sizewell Marshes Site of Special Scientific Interest (SSSI);
- Minsmere – Walberswick Heaths and Marshes SSSI;
- Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC);
- Minsmere – Walberswick Special Protection Area (SPA);
- Minsmere – Walberswick Ramsar Site;
- Suffolk Coasts and Heaths AONB; and
- Suffolk Heritage Coast.

In both instances the area of the works in question exceeds 1 hectare and therefore meets the relevant criteria in Schedule 2.

Matters of principle

The Screening Report states (paragraph 2.1.1) that the purpose of the scheme is, *inter alia*, to



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"Create lowland ditches, reedbed and open water habitat which has been designed to ensure that, with appropriate management, high quality reedbed and lowland ditch habitats will develop that are of similar quality and composition to those within the adjacent Sizewell Marshes Site of Special Scientific Interest (SSSI), and will also support comparable invertebrate and rare vascular plant communities"

The purpose of the Scheme includes re-use of excavated materials within the wider site to help create various terrestrial habitats and through this deliver landscape character enhancements to the existing arable land that extends from Leiston to the boundary of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

Any application for habitat creation at Aldhurst Farm will be determined in accordance with the Local Plan and National Planning Policy Framework.

Works at Aldhurst Farm

As has been stated previously the development proposed is considered to fall within Schedule 2 10 (n) and 10 (i) of the Regulations and therefore the following is to be taken into consideration with regard to its location, characteristics and potential impact (in accordance with Schedule 3):

Potential impact on Sizewell Marshes SSSI

Activities that may have an impact include: groundwater abstraction, natural variations in hydrological regime between basins and construction related activities and associated discharge. Any significant negative change in water quality or flow on-site could have an impact to the downstream SSSI and its associated ecology. Based on the information provided and the mitigation measures proposed which will ensure that flows downstream of the Leiston STW (and the Aldhurst Farm site), would remain unaltered into the SSSI – the potential for significant adverse environmental effects to water flow and quality downstream resulting from this site would appear to be minimal. This is assuming mitigation measures proposed are incorporated in the scheme and that detailed Construction Management Strategy and Environmental Management Plans are provided and adhered to throughout the construction works.

Ecology

The site lies in close proximity to a number of 'sensitive sites', as defined in the EIA Regulations 2011, in addition to the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast, it is imperative that robust mitigation measures are in place to ensure that impacts are reduced to the absolute minimum.

Landscape

The development would likely have a positive effect on landscape character, reinstating what would have historically been a valley bottom wetland – and therefore potentially enhance the setting of the AONB. However, in re-establishing this landscape form, there will be impacts on the fabric of the underlying historic landscape.

Archaeology

Water retention schemes, where the local hydrology necessitates an excavate-down rather than a flood option, are likely to have adverse effects on the historic environment, which need to be fully understood and minimised through appropriate mitigation measures (including avoidance, wherever possible). This proposal affects a large area with significant archaeological interest and potential.

The screening report sufficiently recognises the archaeological significance of Aldhurst Farm and the impact that the scheme would have on palaeoenvironmental remains and any potential below ground heritage assets.

The geo-archaeological and palaeoenvironmental assessments currently being conducted will serve to model, characterise and provide range-finder dates for the peat horizons and other buried deposits along the small stream. A recent site walkover has also identified places along the dryland margins of the floodplain within this scheme suitable for trial trenching. The scope of this trenching will need to be discussed, agreed and executed prior to the determination of any planning application, enabling an appropriate mitigation plan to be designed.

Flooding

Suffolk County Council (SCC), as the Local Lead Flood Authority has been for the last two years investigating some serious surface water flooding to properties in Leiston.

The main area identified as being at most risk of surface water flooding are properties on Valley Road. The issue is that the surface water drainage system for the whole of the town eventually discharges at the eastern boundary of the Anglian Water treatment works into an ordinary watercourse (Leiston Beck) which flows from west to east under Lovers Lane via a SCC owned culvert and into main river (Minsmere Old River) and out through Minsmere Sluice.

SCC has been working with their consultants, AECOM in developing a surface water management plan for the town, which also includes hydraulic modelling of the surface water drainage system and the watercourses. This modelling work has been used to simulate and estimate the level of flooding to properties in Valley road for rainfall events as frequent as a 1 in 5 year event.

The ongoing concern with the development is the potential increase in the likelihood for surface water flooding, if these proposals significantly alter the flow and impoundment of water downstream of the Anglian Water treatment works. This would in turn potentially increase the flood risk to a high number of properties in Valley Road and to the Anglian Water treatment works, resulting in not only surface water flooding, but also of untreated water being discharged in to an ordinary watercourse and back towards domestic properties.

It will be important that this issue is satisfactorily assessed through the Flood Risk Assessment.

Summary

As set out above, based on the submitted details and proposals, the proposed development is not considered to have a direct or significant impact upon a SSSI or the wider landscape which is of considerable ecological importance and therefore in this instance having regard to the selection criteria set out in Schedule 3 of the EIA Regulations, it is considered that an Environmental Statement is not required to accompany an application for planning permission.

However, notwithstanding this screening opinion, an application for planning permission will need to be accompanied by a robust set of materials covering the following subjects – of which detailed assessment will be required (some of these have been identified in the submitted documents):

- Groundwater and surface water construction management strategy/assessment;

- Water Framework Directive (WFD) assessment;
- Materials management plan;
- Contaminated land assessment;
- Flood risk assessment;
- Detailed ecological, biodiversity and landscape assessment of the potential impacts of the proposal and surveys (by appropriate and suitably qualified persons) to detail impact on the above mentioned protected species and any others identified through research at appropriate bodies – local records centre, local wildlife trust etc. and monitoring and management;
- The proposal is in close proximity to Leiston Abbey and therefore a heritage assessment will be required in relation to the impact of the proposal on the setting of this important Grade I Listed building.
- There is potential for archaeological findings within the site and this would need to be fully assessed and an appropriate scheme of investigation proposed. A prior field investigation will be needed for the valley floor excavations and this should include palaeo-environmental work (new boreholes and collation with existing) along with trial trenching pre-determination (not strip and excavate archaeology during the development because of the risks associated with such an approach).

I trust that this clarifies the Local Authority's position in this matter. Please contact me on the numbers given above if you wish to discuss any further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a long, sweeping horizontal stroke extending to the right.

Philip Ridley,

Head of Planning & Coastal Management

Suffolk Coastal and Waveney District Councils