

# Suffolk Access Principles for Sizewell C

December 2014

## 1. Purpose

1.1. The Access Principles set out the local authorities' views on the range of access-related issues associated with the proposed development of Sizewell C and highlight the objectives that should be satisfied in the resolution of these issues. The objectives are grounded in the requirements of the National Policy Statements – relevant extracts from which are attached.

1.2. There are key points that must be addressed, and these are reflected in the principles below. It is important that these principles are read alongside the existing Design, Estate and Ecological Principles and the associated references to the National Policy Statements therein due to the inherent overlap in these topic areas.

## 2. Background

2.1. The extent of the existing access network within a 10km x 4km area based on Sizewell (stretching north to south from Minsmere to South Warren and inland to Leiston) comprises 87km of public rights of way, of which 18.2km are higher than footpath rights, approximately 6km of unofficial linear access and 243Ha of open access. It is recognised that the EDF Sizewell Estate itself makes a valuable contribution to access in the locality.

2.2. The extent and quality of this access is significantly greater than the county average (160% in the case of public rights of way) and this availability of countryside access is a significant attraction for visitors and residents alike. Its value is enhanced by removing users from the network of local roads, some of which are unsuitable for non-motorised users.

2.3. Sitting as it does in close proximity to nationally and internationally designated wildlife sites, there is a risk that changes to the quality and quantity of access rights during the construction of Sizewell C (and even beyond) may have long term and significant negative ecological implications by altering existing patterns of recreation and deflecting recreational users to environmentally sensitive locations elsewhere in the area (for example if dog walkers excluded from Kenton Hills instead went to the Sandlings SPA).

2.4. It is important to also consider the wider issue of sustainable access to the development site for both construction and operational workers and how, through affecting traffic flows, the development will affect the experiences of non-motorised users more generally.

## 3. Objectives

3.1. To minimise the direct impact of the development on linear and non-linear, formal and informal access users<sup>1</sup> in the vicinity of the development during the construction phase, particularly by ensuring any necessary diversions meet the best interests of access users in respect of directness and quality, and ensure any closures of linear and non linear access, whether formal or informal are kept to a minimum

3.2. To address the indirect construction phase impacts of the development on access in the vicinity of the development, associated with;

- Deflection of existing users to environmentally sensitive sites
- Increase in use of remaining access by the temporary workforce
- Redistribution of use in the locality increasing pressure on currently lesser used access routes

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<sup>1</sup> Linear meaning rights of way or permissive paths; non-linear meaning open space, including beaches; formal meaning access with a statutory basis; informal meaning permissive access granted by landowners

- Conflicts between non-motorised users and vehicular traffic, including the impacts on the safety and amenity of those users

3.3. To ensure Sizewell C workers can access the main site safely using sustainable modes of travel

3.4. To ensure that Sizewell C leaves a positive legacy of improved access in the local and wider area

## **4. Principles**

### 4.1. Mitigating direct impacts

- The MOLF and its construction, and the intake and outfall pipes and their construction, should be delivered in such a way to keep to an absolute minimum impacts on the Suffolk Coast Path. Closure of this path must be the exception during the construction phase as there is no realistic alternative.
- Bridleway 19 provides a similarly strategic inland north-south route for non-motorised users and equally provides important ecological connectivity. Closure of, and physical interference with, the bridleway would therefore have multiple consequences which need to be mitigated. In terms of access, a replacement link of commensurate quality will be needed to maintain linkages along this axis.
- It is recognised that the Sandlings Walk, which crosses the development site from Fiscal Policy to the northern mound would need to be closed. Again, a replacement link of commensurate quality will be needed to maintain linkages along a west-east axis.
- Where any rail link bisects public rights of way, they should be retained on existing alignments as far as is possible with level crossings, suitably signed and constructed to a specification to be agreed, subject to confirmation of the expected number of trains per day, sight lines and train speeds, and that no trains will either be parked or expected to stop in a position which will obstruct the public right of way. The local authorities would consider diversions to nearby grade separated crossings if appropriate.

### 4.2. Mitigating indirect impacts

- A full analysis of the likely effects associated with the deflection of recreational users to other environmentally sensitive sites should be undertaken as part of the Habitats Regulation Assessment and EIA (for non EU sites) processes. Appropriate mitigation should be provided in those locations, or compensatory measures to enhance/create access elsewhere secured and monitoring for unforeseen impacts put in place.
- A full analysis of the anticipated usage of the local access network by the Sizewell C workforce during construction (particularly those residing at the campus) should be presented and mitigation provided as necessary.
- A full analysis of the likely effects associated with the redistribution of recreational users in the locality should be presented so that the surrounding network is enhanced, as necessary, to ensure its standard is commensurate with its likely future use, and furthermore to discourage deflection further afield as far is possible.
- In considering the impact of increased levels of vehicular traffic, especially of HGVs, full consideration needs to be given to the corresponding deterioration in environmental quality experienced by non-motorised users, the impacts on their safety, the severance caused within communities and consequently the overall influence the development will have on travel/recreational habits of local communities.

### 4.3. Ensuring sustainable access

- Where safe and reasonable to do so, travel to work by means of non-motorised access should be encouraged. Accordingly, an audit of the network for this purpose

should be presented and any improvements which would contribute to this goal provided. Off-road access parallel to Lovers Lane is one such example that should be explored.

#### 4.4. Leaving a positive legacy

- The local authorities strive for a positive legacy, meaning; access within the Sizewell Estate (including Aldhurst Farm) should be enhanced so that it continues to provide an important resource for decades to come. Furthermore, improvements in the wider area should be provided to ensure that the quality of recreational experiences are sustained and enhanced in a manner consistent with the vision for the AONB and the aspirations of the local community.
- Any offsite enhancements provided during the construction phase should be retained where they contribute to an overall improvement in access standards.
- Any rights of way affected directly or indirectly by the development should be restored to their original, or an agreed enhanced, state after construction is completed.
- There should be safe and attractive access to the Sizewell power plants for non-motorised users which encourages greater travel by these modes.

## **Annex Requirements of the National Policy Statements**

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 5.13.4 of EN-1 notes that where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.

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'.