



## Progress Power

### Environmental Report

**Non-Material Change - Extension of time for  
commencement of authorised development  
(DCO Requirement 1)**

On behalf of **Drax Group PLC**



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## Executive Summary

### The Progress Power (Gas Fired Power Station) Order 2015

Progress Power Limited (PPL) submitted an application for a Development Consent Order for the Progress Power Generating Station in March 2014. The Progress Power (Gas Fired Power Station) Order 2015 (the DCO) was made on 23<sup>rd</sup> July 2015 and came into force on 14<sup>th</sup> August 2015 and grants consent for a gas-fired peaking plant on land at the former Eye-Airfield located at Eye, Mid-Suffolk. The authorised development would operate as a Simple Cycle Gas Turbine peaking plant and would be designed to provide an electrical output of up to 299 Megawatts (MW). Construction of the authorised development must commence no later than the expiration of 5 years from the date on which the Order came into force.

### Non-material changes 2016 (2016 NMC)

Following the grant of the DCO, PPL identified, in 2016, a set of non-material changes (NMC) to the parameters which were assessed and presented in the certified Environmental Statement (ES). These comprised minor amendments to the:

- size of the Gas Turbine Generator;
- width of the flue stack;
- permitted number of black start diesel generators;
- permitted natural gas receiving station and gas treatment compound;
- incorporation of an external fin fan cooler; and
- dimensions of the black start diesel generator.

The 2016 NMC concluded that the proposed changes would not give rise to any new or different likely significant effects, and the Secretary of State for Department for Business, Energy and Industrial Strategy (BEIS) confirmed that under the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011, the proposed changes constituted a non-material change. This process completed with The Progress Power (Gas Fired Power Station) (Amendment) Order 2016 (SI 2016/1086), which was made on 11th November 2016.

### Further planning applications (Town and Country Planning Act)

During the ongoing design process, PPL identified constructability issues regarding temporary access for construction of the electrical connection and the routing of the connection in the vicinity of the main power plant. Two separate Town and Country Planning Act applications were therefore progressed to secure planning permission for alternative solutions for works that comprised 'associated development' to the original Nationally Significant Infrastructure Project:

- Realignment of high voltage cable and new water pipeline (LPA reference DC/19/02268). Submitted 2nd May 2019, approved 6th December 2019.
- Temporary access road (LPA reference DC/19/02267). Submitted 2nd May 2019, approved 6th December 2019.

### Proposed non-material change 2020 (2020 NMC)

Since the 2016 NMC, PPL has progressed its plans to commence construction in accordance with the DCO, including the discharge of DCO requirements and engagement with EPC (engineer, procure, construct) contractors. However, PPL has serious concerns that the restrictions imposed by the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 (as amended) and future uncertainties posed by the current COVID-19 pandemic will frustrate PPL's ability to commence the authorised development prior to the

expiry of the DCO on 13 August 2020. Therefore, a further NMC is being sought (the '2020 NMC') which seeks to extend the deadline for formal commencement of the authorised development by 12 months to 13 August 2021. No other changes are being sought to the DCO as part of the 2020 NMC.

### Appraisal activities and findings

In this exercise the following technical environmental disciplines, which are the same as those addressed in the certified ES, were considered:

- Air Quality;
- Noise and Vibration;
- Ecology and Nature Conservation;
- Water Quality and Resources;
- Geology, Ground Conditions and Agriculture;
- Landscape and Visual Impact;
- Traffic, Transport and Access;
- Cultural Heritage and Archaeology;
- Socio-economics; and
- Human Health and Waste.

In order to determine likely new or different significant environmental effects arising from the 2020 NMC, the following activities were undertaken:

- i. site reconnaissance survey to determine any changes to the site generally and to the ecological value of the site;
- ii. review of current baseline environmental conditions;
- iii. review of latest planning policies together with any updates to committed developments in the vicinity of the application site, since the granting of the DCO;
- iv. review of new receptors in vicinity of the application site, since the granting of the DCO; and
- v. the effects of the 2020 NMC have then been considered qualitatively using professional judgement and compared to the findings presented in the certified ES and the 2016 NMC (taking into account the changes permitted by the Town and Country Planning Permissions) and the measures set out in discharged documents.

No changes were identified from this appraisal that would give rise to any new or different likely significant effects compared to findings presented in the certified ES or the 2016 NMC, or that would not have ordinarily been addressed in subsequent planning consents in the surrounding locality.

The proposed 2020 NMC would not alter any previously agreed mitigation measures, and the same commitments in the DCO to limit effects on receptors would continue to apply in the event of an extension to the time period for the commencement of the authorised development.

The appraisal of the proposed 2020 NMC did not identify any new or different likely significant effects compared to previous assessment findings and it is therefore considered that the proposed 2020 NMC would constitute a change which is not material for the purposes of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011.

## Terms & Definitions

Term/Acronym	Definition
authorised development	The development authorised by the DCO
CA	Compulsory Acquisition
Certified ES	The Environmental Statement as defined in the DCO and certified in accordance with Article 37 of the DCO
DCO	The Progress Power (Gas Fired Generating Station) Order 2015 (as corrected by the Progress Power (Gas Fired Power Station) (Correction) Order 2016 and as amended by the Progress Power (Gas Fired Power Station) (Amendment) Order 2016)
Environmental Permit	The Environmental Permit, granted in 2018 for the authorised development
ES	Environmental Statement
MW	Megawatts
2016 NMC	The Non-Material Change application submitted in 2016 and which was approved under The Progress Power (Gas Fired Power Station) (Amendment) Order 2016 (SI 2016/1086)
2020 NMC	The proposed Non-Material Change application to which this Environmental Report relates
NPPF	National Planning Policy Framework
NPS	National Policy Statements
Order Limits	The land within which the authorised development may be carried out and as defined in the DCO.
PPG	Planning Practice Guidance
PPL	Progress Power Limited
TCPA	Town and Country Planning Act 1990

# 1 Introduction

## 1.1 Overview

- 1.1.1 Progress Power Limited (PPL) submitted an application for a Development Consent Order for the Progress Power Generating Station in March 2014. The Progress Power (Gas Fired Power Station) Order 2015 (the 'DCO') was made by the Secretary of State for Business, Energy and Industrial Strategy on 23<sup>rd</sup> July 2015 and came into force on 14<sup>th</sup> August 2015. This was corrected in 2016 by The Progress Power (Gas Fired Power Station) (Correction) Order 2016 (SI 2016/736), made on 11<sup>th</sup> July 2016.
- 1.1.2 The DCO grants development consent for the construction, operation and maintenance of a simple cycle gas fired power generating station and associated electricity and gas connections, the 'authorised development', on the site of the former Eye airfield at Eye, Mid Suffolk, comprising:
- Up to five gas turbine generators and emission flue stacks;
  - Switchyard and banking compound;
  - Security infrastructure;
  - Maintenance compound;
  - Above ground installation;
  - Access;
  - Underground gas pipeline connection;
  - Substation;
  - Electrical cable circuit; and
  - Ancillary infrastructure.
- 1.1.3 Following the making of the DCO, Drax Group plc acquired Progress Power Limited (PPL).
- 1.1.4 In order to secure a more appropriate consent, a Non-Material Change (NMC) was sought in relation to the number of gas turbines and other assets permitted. This process completed with The Progress Power (Gas Fired Power Station) (Amendment) Order 2016 (SI 2016/1086), which was made on 11<sup>th</sup> November 2016, hereafter referred to as the 2016 NMC.
- 1.1.5 Following the grant of the 2016 NMC, PPL commenced the process to discharge the Requirements set out in Schedule 2 to the DCO in 2017, including the initiation of regular meetings with the relevant local authorities (Mid Suffolk District Council and Suffolk County Council). In addition to engagement with stakeholders, a comprehensive Design Principles process was held in accordance with the DCO. In this respect the following events were held:
- Pre-meeting: 15<sup>th</sup> January 2018;
  - First Design Workshop - Electrical Connection Compound: 29<sup>th</sup> January 2018;
  - Independent Design Review site visit: 30<sup>th</sup> January 2018;
  - First Design Workshop – Power Plant and Above Ground Installation: 19<sup>th</sup> March 2018;
  - Independent Design Review (London): 23<sup>rd</sup> March 2018 by the Design Council; and
  - Second Design Workshop – all relevant works: 9<sup>th</sup> April 2018.



- 1.1.6 Following the Second Design Workshop in April 2018, PPL progressed its applications for the discharge of pre-commencement Requirements through the development of sufficient design information, discussions with relevant stakeholders and site investigation / visits completed over the period 2017-2020.
- 1.1.7 During the ongoing design process, PPL identified constructability issues relating to two aspects of the authorised development in the DCO, namely temporary access for construction of the electrical connection and the routing of the connection in the vicinity of the main power plant. PPL therefore progressed two separate Town and Country Planning Act (TCPA) applications to secure planning permission for alternative solutions for works that comprised 'associated development' to the original Nationally Significant Infrastructure Project:
- Realignment of high voltage cable and new water pipeline (LPA reference DC/19/02268). Submitted 2nd May 2019, approved 6th December 2019.
  - Temporary access road (LPA reference DC/19/02267). Submitted 2nd May 2019, approved 6th December 2019.
- 1.1.8 However, PPL has serious concerns that the restrictions imposed by the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 (as amended) and future uncertainties posed by the current COVID-19 pandemic will frustrate PPL's ability to commence the authorised development prior to the expiry of the DCO on 13 August 2020. PPL is therefore applying for a further NMC (the '2020 NMC') which seeks to extend the deadline for formal commencement of the authorised development by 12 months to 13 August 2021. No other changes are being sought to the DCO as part of the 2020 NMC. The 2020 NMC is described in detail in **Chapter 2**.
- 1.1.9 This Environmental Report is submitted to accompany the 2020 NMC application under the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 ('the Regulations'). It has been prepared with reference to the Department of Communities and Local Government's 'Guidance on Changes to Development Consent Orders' (December 2015) in respect of environmental matters. The guidance states that neither the 2008 Act nor the Regulations provide any definition of a material, or non-material change but does, however, provide four areas under which a proposed change should be considered, which are:
- i. Environmental Statement;
  - ii. Habitats and Protected Species;
  - iii. Compulsory Acquisition (CA); and
  - iv. Impacts on businesses and residents.
- 1.1.10 Taking each of these in turn:
- i. **Chapter 4** of this Environmental Report considers whether extending the timeframe for commencing the authorised development in the DCO by 12 months would be *likely* to give rise to any new or different likely significant environmental effects for each environmental topic in the certified ES, when compared to previous assessments presented in both the certified ES and subsequent 2016 NMC;
  - ii. From a Habitat Regulations perspective, the quantum and location of development remains the same as the authorised development. It is unlikely that the 2020 NMC would result in any new or different effects on habitats and protected species, nor on any sites of European importance. Therefore, it is not considered that a Habitats Regulation Assessment would be required;
  - iii. No changes are being sought in respect of the powers contained in the DCO in relation to CA and the time limits for exercising CA or temporary possession powers remains as set out in Article 20 of the DCO;

- iv. **Chapter 3** below confirms that, due to there being no change to construction, operational and decommissioning processes as a result of the 2020 NMC, impacts on businesses and residents will remain the same. Given that the DCO was made in 2015, subsequent planning permission for any new sensitive residential receptors should have taken account of the potential effects of the construction, operation and decommissioning of the authorised development.
- 1.1.11 This Environmental Report provides an overview of the potential for new or different likely significant environmental effects of the 2020 NMC, compared to the certified ES (Parsons Brinckerhoff 2014) submitted to accompany the application for the Order and the environmental information supplied with the 2016 NMC (WSP/Parsons Brinckerhoff).

## **2 Proposed Non-Material Change (2020 NMC)**

### **2.1 Extension of time**

2.1.1 The 2020 NMC seeks to extend the deadline for the commencement of construction of the authorised development by 12 months to 13 August 2021. The 2020 NMC is therefore applying to amend Requirement 1 of Schedule 2 to the DCO to:

"The authorised development must commence no later than 13 August 2021".

2.1.2 Although this change may delay the date of final commissioning (as defined in the DCO), the anticipated operational life of the authorised development (as assessed in the certified ES) remains the same.

2.1.3 The 2020 NMC relates solely to the extension of time for commencement of the authorised development, as outlined above, no other element of the DCO is proposed to be amended.

## 3 Basis of Appraisal

### 3.1 Introduction

- 3.1.1 Topic based environmental assessments in the certified ES were undertaken in 2014/2015 and informed by desktop and site-based survey work to define a suitable baseline.
- 3.1.2 An update of the baseline was prepared for the 2016 NMC which included a search of the National Infrastructure Planning register of applications and a search of Mid Suffolk District Council/Suffolk County Council's planning applications register. The searches revealed no new applications for development which needed to be considered in the appraisal of cumulative effects. As such, the 2016 NMC concluded that there were no significant changes to the baseline for any environmental topic when compared against the certified ES.
- 3.1.3 As there is the potential for change to the baseline conditions since the time of publication of the certified ES and the search carried out for the 2016 NMC, the following work has been undertaken in 2020:
- i. A site reconnaissance survey to determine any changes to the site generally and to the ecological value of the site;
  - ii. A review of committed developments in vicinity of the application site, since the granting of the DCO;
  - iii. A review of new receptors in vicinity of the application site, since the granting of the DCO; and
  - iv. A review of updates to planning policies.

### 3.2 Reconnaissance Survey

- 3.2.1 A site reconnaissance survey was undertaken by a qualified ecologist on 6th May 2020, with the aim of establishing whether there had been any significant changes to the environmental baseline conditions compared to previous assessments. The visit was undertaken in good weather with clear visibility both within and immediately adjacent to the Order Limits from publicly accessible locations. Given the travel restrictions imposed by COVID-19, and to safeguard the health and safety of the technical team, members of the technical team 'dialled in' to a live video link of the reconnaissance survey at strategic locations to assist in determining changes to baseline conditions. The surveyor was able to move around publicly accessible areas of the site freely and had good quality phone signal throughout.
- 3.2.2 It was identified that an area within the centre of the site (to the immediate west of the north/south runway) had altered from arable land to disturbed bare ground with large vegetated earth spoil mounds and small scattered patches of ruderal vegetation. In addition, two trees and a small area of scattered scrub towards the southern end of the north/south runway had been removed. New areas of industry (B1-B8 uses) were identified in the centre of the site adjacent to the north/south runway, however this was anticipated through the Eye Airfield Development Framework (see the **Section 3.5** below), which was assessed within the certified ES.
- 3.2.3 No material differences from the Phase 1 habitat map of the certified ES (Figure 8.3, Volume B) were evident.
- 3.2.4 The reconnaissance survey therefore confirmed that baseline conditions were not significantly different from those presented in the certified ES the 2016 NMC.

### 3.3 New Committed Developments

#### Previous assessments

- 3.3.1 The likelihood of significant cumulative effects was considered in the certified ES and Section 3.5 therein identified that cumulative effects were reported within each technical chapter. No 'general' methodology, search area or single overarching list of committed developments was provided. However, each assessment presented in the certified ES did consider the impacts of the anticipated works to be undertaken by National Grid to connect the Electrical Connection Compound into the National Grid Transmission System, alongside works for the power generation plant.
- 3.3.2 As no 'general' methodology was applied, Chapters 6 (Air Quality), 7 (Noise and Vibration), 8 (Ecology and Nature Conservation), 9 (Water Quality and Resources), 10 (Geology, Ground Conditions and Agriculture), 11 (Landscape and Visual) and Chapter 13 (Cultural Heritage and Archaeology) of the certified ES considered potential cumulative effects from a combination of the electrical connection works, the interaction with the operational wind turbines on site, or a small number of identified operational developments immediately adjacent to the Order Limits. Cumulative effects were identified as being 'Not Significant'.
- 3.3.3 Cumulative assessments in Chapter 12 (Traffic and Transport) of the certified ES considered a broader geographical scope than those outlined above. The cumulative transport assessment identified five developments of varying status, however paragraphs 12.4.15 to 12.4.19 indicated that none of these sites required cumulative assessment. Transport related cumulative effects were, as identified in Table 12.29 of the certified ES, the same as the 'project' impacts, and were 'Not Significant'.
- 3.3.4 Cumulative effects in Chapter 14 (Socio-economics) of the certified ES also considered a broader scope than those outlined above, with Table 14.30 identifying eight schemes. A cumulative absorption capacity assessment was undertaken, assuming a worst-case scenario (i.e. all projects being constructed simultaneously), with paragraph 14.15.12 of the certified ES concluding that there was sufficient construction capacity at a regional level to accommodate all identified developments. A cumulative Tourism and Recreation and Community Infrastructure assessment was undertaken which identified, at paragraph 14.16.6, that impacts would be negligible and therefore 'Not Significant'.
- 3.3.5 Chapter 15 (Health and Waste) of the certified ES considered combined effects from the preceding technical chapters, rather than a review of surrounding developments. Paragraph 15.11.1 identified that all regulatory limits related to impacts on public health would be complied with.
- 3.3.6 The 2016 NMC conducted a search of National Infrastructure Planning register of applications, the Mid-Suffolk District Council website and Suffolk County Council's planning application register. Paragraph 4.4.1 confirmed that no new applications had been registered that would require consideration in the assessment of cumulative effects. Therefore, the assessment of cumulative effects set out in the certified ES remained valid and were not amended.

#### Potential cumulative effects

- 3.3.7 Given that the 2020 NMC has no bearing upon the construction, operational or decommissioning activities of the authorised development, cumulative effects on sensitive receptors identified within the certified ES would remain the same.
- 3.3.8 Development consent was granted in 2015, and from that point forward the authorised development (based upon the certified ES) would have been a material consideration for new planning applications at the local, regional and national levels.

- 3.3.9 The interrelationship of effects between the authorised development and surrounding development was considered in the certified ES and thereafter, as part of the determination of neighbouring planning applications made following the approval of the 2016 NMC. Given the lack of material change to the authorised development, arising from the 2020 NMC, such considerations within the certified ES or individual planning application assessments would remain valid.
- 3.3.10 Notwithstanding the above, in order to provide a robust appraisal, and for consistency with the approach in the 2016 NMC, a review of National Infrastructure Planning register of applications, the Mid-Suffolk District Council website and Suffolk County Council's planning application register was undertaken in May 2020. The aim was to identify committed development coming forward after the 2016 NMC which could have potential for likely significant cumulative effects with the authorised development.
- 3.3.11 The review undertaken for this report identified one development which could have the potential for new or differently likely significant cumulative effects, above those considered in the certified ES. A planning application for the 'Eye Airfield Junction Improvement Works' was submitted to Suffolk County Council in December 2018 (reference SCC/0110/18MS) and granted consent in April 2019. The authorised development was identified as committed development #1 in Table 16.4 of the 'Eye Airfield Junction Improvement Works' ES (hereafter referred to as the Eye Airfield Junction ES), and Paragraph 16.5.2 of the cumulative assessment within the Eye Airfield Junction ES identified "*no significant inter-scheme effects from the combination of the Proposed Scheme with the other committed developments*". Paragraph 7.1.4 of the Transport Assessment (Appendix 13.1) of the Eye Airfield Junction ES identified that the proposals would likely improve transport conditions within the locality of the airfield site. A small number of increases in delay, due to the introduction of new junctions, would be outweighed by the benefits associated with accident savings and the potential for economic growth.
- 3.3.12 Although the 'Eye Airfield Junction Improvement Works' development has commenced, the construction timescales are delayed from those assessed within the Eye Airfield Junction ES<sup>1</sup> (which at Paragraph 3.4.4 was identified as July 2019 to March 2020), with the main body of construction work now due to be undertaken between March 2020 and September 2020. However, as the 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development, the assessments within the Eye Airfield Junction ES remain valid.

### Summary

- 3.3.13 The potential for additional cumulative effects to arise since the DCO was made has been considered and it has been found that there are no new or different likely significant effects compared to those reported in the certified ES or the 2016 NMC. The cumulative assessment of committed developments presented in the certified ES remains valid.

## 3.4 Desktop Review for New Residential Receptors

- 3.4.1 This section considers the potential for new residential receptors to be introduced since the DCO was made in 2015 and the 2016 NMC. Before these dates, all relevant receptors would have been considered and reported in the certified ES or the 2016 NMC. Given that the 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development, the assessment of potential effects on receptors set out in the certified ES and 2016 NMC remains valid.
- 3.4.2 The mitigation measures set out in technical chapters of the certified ES, and the requirements of Schedule 2 to the DCO to limit environmental effects to receptors during construction, operation and decommissioning would continue to apply. Through these

<sup>1</sup> <https://www.edp24.co.uk/news/politics/work-to-start-on-eye-a140-roundabouts-1-6256247>

measures, such as the CEMP which will limit environmental effects during construction (secured by Requirement 11 of Schedule 2 to the 2015 DCO (as amended), discharged on 14<sup>th</sup> September 2018 [Ref DC/18/02693]), receptors established subsequent to the 2016 NMC would be afforded the same protection against potential adverse effects as receptors considered in the certified ES or the 2016 NMC.

- 3.4.3 A review of the Mid-Suffolk District Council and Suffolk County Council planning registers identified that new receptors (evident since the certified ES and 2016 NMC), surround the authorised development. However, any planning consent relating to the introduction of new, potentially sensitive, residential receptors in the area, following the DCO (made in 2015) and the 2016 NMC, should have considered and addressed the potential effects of the construction, operation and decommissioning of the authorised development.

### 3.5 Planning Policy Review

#### Background

- 3.5.1 As part of the 2014 application, a review of the relevant planning policy documents and guidance was undertaken and reported in the submitted Planning Statement (2014). Section 4 of that Statement sets out the planning context for the authorised development and Section 5 provides an assessment of the authorised development against the principles contained in the planning policy documents.
- 3.5.2 The Statement identifies the following relevant planning policy documents and guidance relevant to the authorised development:
- National Policy Statements (NPSs) EN-1 for Overarching Energy, EN-2 for Fossil Fuels, EN-4 for Oil and Gas Supply and Storage and EN-5 for Electricity Networks;
  - National Planning Policy Framework (NPPF);
  - National Planning Practice Guidance (PPG);
  - Suffolk County Waste Core Strategy (2011);
  - Mid-Suffolk Local Plan (1998) 'Saved' Policies;
  - Mid-Suffolk District Council Core Strategy (2008);
  - Mid-Suffolk District Council Core Strategy Focused Review (2011); and
  - Eye Airfield Planning Position Statement (2013).
- 3.5.3 The Statement concludes that *"there are no relevant adverse impacts or disbenefits sufficient to outweigh the likely benefits of the Project including the local and regional economic benefits, and the considerable public benefit to meeting the national need for flexible gas generation"*.
- 3.5.4 Additionally, a further review of relevant planning policy documents and guidance was undertaken in 2019 to accompany the planning applications for amendments to the electrical connection and temporary access road (see paragraph 1.1.7 above). The submitted Planning and Design and Access Statements for these applications confirmed that planning policy documents and guidance documented in the 2014 Planning Statement were still relevant and valid. Consideration was also given to the Draft Babergh and Mid Suffolk Joint Local Plan – Issues and Options Stage (2017).

## Planning Policy update for 2020 NMC

### Policy Documents

- 3.5.5 For this 2020 NMC, a review of the planning policy documents and guidance has been undertaken to identify any relevant updates to planning documents.
- 3.5.6 The planning policy documents and guidance identified in the 2014 Planning Statement remain valid for consideration against this 2020 NMC. In addition to this, and in line with paragraph 48 of the NPPF, consideration has also been given to the following emerging local planning documents:
- Babergh and Mid Suffolk Joint Local Plan – Preferred Options (July 2019) ('the draft Joint Local Plan'); and
  - Draft Eye Neighbourhood Development Plan – Consultation Submission (May 2019) ('the draft Eye NDP')
- 3.5.7 The Application and the surrounding areas of Eye Airfield are subject to the following strategic designations in these draft planning documents.
- Policy SP05 – Employment Land in the draft Joint Local Plan recognises Eye Airfield as a strategic employment site that must be protected, and its proposed expansion supported.
  - Policy Eye 1, Eye 3 and Eye 8 of the draft Eye NDP recognise development potential for housing growth to the south of Eye Airfield. Policy Eye 1 confirms that land north of Castleton Way and south of Eye Airfield has been allocated for around 280 homes and a reserve site has been identified for around 174 dwellings south of the Eye Airfield. The allocated site for 280 homes was granted outline consent in 2018 (MSDC reference 3563/15).
- 3.5.8 In light of the above, it is considered that the relevant planning authorities will have taken account of the authorised development in preparing the draft plans, particularly in designating these new land allocations and in granting consent for the dwellings south of Eye Airfield.

## 3.6 Summary

- 3.6.1 This exercise has been undertaken to identify material changes to baseline conditions, committed developments, residential receptors or planning policy which would require consideration in this Environmental Report. No material changes to baseline conditions have been identified nor has the potential been identified for new or different likely significant effects to arise as a result of the proposed 2020 NMC.



## 4 Environmental Appraisal

### 4.1 Introduction

4.1.1 This chapter sets out the appraisal work undertaken to consider whether the 2020 NMC has the potential to give rise to new or different likely significant effects compared to those reported in the certified ES and the 2016 NMC, taking into account the changes permitted by the Town and Country Planning Permissions.

### 4.2 Scope & Methodology

#### Scope

4.2.1 A formal EIA scoping exercise was undertaken at the outset of the pre-application work for the DCO. A Scoping Opinion, confirming, inter alia, the technical topics for inclusion in the certified ES was issued in June 2013. For ease of reference, these topics are:

- Air Quality;
- Noise and Vibration;
- Ecology and Nature Conservation;
- Water Quality and Resources;
- Geology, Ground Conditions and Agriculture;
- Landscape and Visual Impact;
- Traffic, Transport and Access;
- Cultural heritage and Archaeology;
- Socio-economics; and
- Human Health and Waste.

4.2.2 Based on the above, qualitative appraisals have been undertaken (see **Table 4.1**) for all the technical disciplines considered in both the certified ES and 2016 NMC to identify the potential for new or different likely significant effects to arise from the 2020 NMC. Given the lack of a material change to baseline conditions (see **Chapter 3**) or the construction, operation or decommissioning processes required for the authorised development, no additional environmental topics were considered likely to give rise to new or different significant effects.

4.2.3 As past EIA work for the authorised development has been undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, in accordance with Regulation 37 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended), this Environmental Report has been prepared in line with the requirements of the 2011 Regulations.

#### 2016 NMC

4.2.4 Whilst the 2016 NMC updated the assessment contained in the certified ES, it concluded:

*“...the outcome of this screening and updated assessments confirmed that the conclusions in the ES remain valid for the proposed changes. The significance of impact would be unchanged or reduces. It is therefore considered that the proposed changes are non-material amendments....”*

4.2.5 Therefore, whilst the 2016 NMC updated the description of development within Schedule 1 of the DCO, it had no material implications for the assessment findings presented in the certified ES.

#### TCPA applications

4.2.6 Neither of the two Town and Country Planning Act applications were required to undertake formal Environmental Impact Assessments (see Screening Opinion references DC/18/05606 and DC/18/05578), however consideration was given to environmental disciplines relevant for the changes sought. Neither of the submitted 'Planning, Design and Access Statements' concluded that there were material changes to environmental conditions as identified through the certified ES or the 2016 NMC, and both concluded that the applications were acceptable. It is noted that these applications were for minor works and covered a small area of the Order Limits.

#### Appraisal methodology

4.2.7 The premise of the 2020 NMC relates to the ability to extend the deadline for the commencement of construction of the authorised development by 12 months to 13 August 2021. The anticipated operational phase for the purposes of the environmental assessment remains unchanged (25 years).

4.2.8 Within the certified ES, effects during decommissioning were generally considered to be similar or of a lesser extent to those associated with construction and were therefore assessed in the same way. The same approach has been undertaken for the technical appraisals set out in **Table 4.1**, with construction and decommissioning considered together.

4.2.9 The general approach undertaken for the technical appraisals in this report is as follows:

- i. Consideration of findings and conclusions presented in the certified ES and 2016 NMC;
- ii. Consideration of relevant changes to baseline, receptors and committed developments specific for that discipline;
- iii. Consideration of existing mitigation measures and how they are secured;
- iv. Consideration of the likelihood for new or different significant effects, compared to previous assessment results, specific for that discipline; and
- v. Conclusion – is the change considered material?

4.2.10 Potential additional cumulative effects and interactions arising from the 2020 NMC have been considered as part of this exercise. Due to the relatively minor nature of the 2020 NMC and related effects, no additional cumulative effects or interactions above those reported in the certified ES and 2016 NMC are anticipated. Potential interactions and cumulative effects are referred to the socio-economics section of the following table however, other than this, this topic has not been considered further.

Table 4.1 – Screening and Summary of Potential Likely Significant Effects

Topic	New or different likely significant environmental effects?	Environmental appraisal
Air Quality	No	<p><u>Construction and Decommissioning</u></p> <p>Chapter 6 (Air Quality) of the certified ES considered the likely significant effects arising from construction and decommissioning of the authorised development. The certified ES concluded that effects were ‘Not Significant’. The 2016 NMC concluded that the proposed changes would have no material impact on the conclusions of the certified ES and so would also be ‘Not Significant’.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would give rise to new or different likely significant effects when compared to those previously identified. It is therefore considered that assessments presented in the certified ES and 2016 NMC remain valid. The review of committed developments and potential new receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>Furthermore, the mitigation measures outlined in the CEMP (secured by Requirement 11 of Schedule 2 to the DCO, successfully discharged on 14<sup>th</sup> September 2018 [Ref DC/18/02693]), to limit dust generation during construction would continue to apply in the event of an extension of time for the commencement of the authorised development.</p> <p>As outlined below in this table, there are no new or different likely significant effects in relation to transport. Therefore, there would be no new or different likely significant transport-related air quality effects arising from construction or decommissioning.</p> <p>The 2020 NMC has no bearing on the construction or decommissioning processes for the authorised development. Given this, and the lack of significant changes to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects when compared to previous assessments.</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p><u>Operation</u></p> <p>The certified ES (and subsequent 2016 NMC) concluded that air quality effects from operation of the DCO were 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would result in new or different likely significant effects when compared to those previously identified. It is therefore considered that assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed through the granting of planning applications subsequent to the DCO.</p> <p>The Power Generation Plant would remain subject to the same operational emission limits as set out within the Environmental Statement, 2016 NMC and the Environmental Permit (granted in 2018).</p> <p>As outlined below in this table, there are no new or different likely significant effects in relation to transport. Therefore, there would be no new or different likely significant transport related air quality effects arising from operation.</p> <p>The 2020 NMC has no bearing on the operational processes of the authorised development. Given this, and the lack of any significant change to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects when compared to previous assessments.</p> <p><u>Conclusion</u></p> <p>There would be no new or different likely significant construction, operational or decommissioning effects in relation to air quality, compared to previous assessments, as a result of the 2020 NMC. No changes are being sought to the Environmental Permit.</p>
Noise and Vibration	No	<p><u>Construction and Decommissioning</u></p> <p>Chapter 7 (Noise and Vibration) of the certified ES considered the likely effects from construction and decommissioning of the authorised development. The certified ES concluded that effects were 'Not</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>Significant'. The 2016 NMC concluded that the changes would have no material impact on the conclusions of the certified ES and so would also be 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify changes that would result in new or different likely significant effects when compared to those previously identified. It is therefore considered that the assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>Furthermore, the mitigation measures outlined in the CEMP (secured by Requirement 11 of Schedule 2 to the DCO, successfully discharged on 14<sup>th</sup> September 2018 [Ref DC/18/02693]), to limit noise generation during construction would continue to apply in the event of an extension of time to the commencement of the authorised development.</p> <p>As outlined below in this table, there are no new or different likely significant effects in relation to transport. Therefore, there would be no new or different likely significant transport-related noise and vibration effects arising during the construction or decommissioning phases.</p> <p>The 2020 NMC has no bearing on the construction or decommissioning processes for the authorised development. Given this, and the lack of any significant change to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects when compared to previous assessments.</p> <p><u>Operation</u></p> <p>The certified ES (and subsequent 2016 NMC) concluded that noise and vibration effects from operation of the authorised development were 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would result in new or different likely significant effects compared to those</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>previously identified. It is therefore considered that the assessments and findings presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would result in new or different likely significant that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made</p> <p>Furthermore, the mitigation regarding operational noise levels (secured by Requirement 17 of Schedule 2 to the DCO, yet to be discharged), limiting noise generation during operation would continue to apply in the event of an extension of time for the commencement of the authorised development.</p> <p>As outlined below in this table, there are no new or different likely significant effects in relation to transport. Therefore, there would be no new or different likely significant transport related noise and vibration effects arising from construction or decommissioning.</p> <p>The 2020 NMC has no bearing on the operational processes of the authorised development. Given this, and the lack of changes to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects compared to previous assessments.</p> <p><u>Conclusion</u></p> <p>There would be no new or different likely significant construction, operational or decommissioning effects in relation to noise or vibration, compared to previous assessments, as a result of the 2020 NMC.</p>
Ecology and Nature Conservation	No	<p><u>Construction and decommissioning</u></p> <p>Chapter 8 (Ecology) of the certified ES identified (at Paragraph 8.7.1) that significant changes between the baseline conditions (2013-2014) and the proposed commencement of construction (2018) were considered unlikely due to the relatively short time between the two. However, it was noted that changes in agricultural practices in the fields could influence the ecological diversity of the site. The certified ES identified no significant adverse effects, with some permanent positive effects which are significant at the</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>local level. The 2016 NMC concluded that the proposed changes would have no material impact on the conclusions in the certified ES and so would also be 'Not Significant'.</p> <p>The 2020 site reconnaissance survey, undertaken by a qualified ecologist, confirmed that no significantly different baseline conditions were evident from those considered in the certified ES or the 2016 NMA. The two small areas of change (alteration of arable land to disturbed bare ground and removal of two trees and scattered scrub) are not significant changes compared to findings from previous surveys. It is therefore considered that the assessments and findings presented in the certified ES and 2016 NMC remain valid. Furthermore, the update of committed developments and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The same mitigation measures and commitments set out in the Ecological Management Plan, CEMP and further work, prior to commencement, relating to European protected Species (secured by Requirements 10, 11 and 19 of Schedule 2 to the DCO, discharged on 1<sup>st</sup> May 2019 [ref DC/18/05639], 14<sup>th</sup> September 2018 [Ref DC/18/02693] and 24<sup>th</sup> January 2018 [ref DC/17/06019] respectively) would be implemented. These include the requirement for ecological checks and walkover surveys to be undertaken prior to construction, and for an Ecological Clerk of Works to be appointed during the main construction activities. These measures would confirm the ecological status of the site at that time and identify any changes in baseline since consent was granted. These measures would also take into account any changes between 2020 and 2021.</p> <p>The NMC has no bearing on the construction/decommissioning processes of the authorised development. Given this, and the lack of significant changes to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects compared to previous assessments.</p> <p><u>Operation</u></p> <p>The certified ES (and subsequent 2016 NMC) concluded that ecological effects from operation of the authorised development were 'Not Significant'.</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey, undertaken by a qualified ecologist, confirmed that agricultural practices had not materially altered since the DCO was made. The two small areas of change (alteration of arable land to disturbed bare ground and removal of two trees and scattered scrub) are not significant changes compared to findings from previous surveys. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. Furthermore, the update of committed developments and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The NMC would not alter the design of the authorised development or the requirement for landscape and ecological mitigation as delivered in the Landscape Plan and Ecological Management Plan (secured by Requirements 4 and 10 of Schedule 2 to the DCO, partially discharged on 17<sup>th</sup> May 2019 [ref DC/18/05638], and fully discharged on 1<sup>st</sup> May 2019 [ref DC/18/05639] respectively). The only outstanding element of Requirement 4 relates to bunds and proposed finished ground levels which is not considered relevant for ecology.</p> <p>The 2020 NMC has no bearing on the operational processes of the authorised development. Given this, and the lack of any significant change to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects when compared to previous assessments.</p> <p><u>Conclusion</u></p> <p>There would be no new or different likely significant construction, operational or decommissioning effects in relation to ecology, compared to previous assessments, as a result of the 2020 NMC.</p>
Water Quality and Resource	No	<p><u>Construction, operation and decommissioning</u></p> <p>Chapter 9 (Water Quality and Resource) of the certified ES considered the likely effects from construction, operation and decommissioning of the authorised development.</p>



Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>At Table 9.21 of the certified ES, effects are identified as 'Not Significant'. The 2016 NMC concluded that the changes would have no material impact on the conclusions reported in the certified ES and so would also be 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes in the form of new watercourses that would give rise to new or different likely significant effects compared to those previously identified. Given this, and that the authorised development remains within Flood Zone 1 (as identified at Paragraph 9.8.15 of the certified ES), it is considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The 2020 NMC would not alter the mitigation already embedded into the authorised development to minimise water requirements, interaction with water courses, reduce contamination and avoid surface water runoff. Furthermore, the same mitigation measures set out in the surface and foul water drainage strategy and the CEMP (secured by Requirements 8 and 11 of Schedule 2 to the DCO, discharged on 10<sup>th</sup> May 2018 [ref DC/18/01515] and 14<sup>th</sup> September 2018 [Ref DC/18/02693], respectively), requiring details of surface and foul water drainage, and measures protect controlled waters during construction, would continue to apply in the event of an extension to the time period for the commencement of the authorised development. The requirements of the Environmental Permit relating to water quality and resource would also continue to apply in the event of an extension to the time period for the commencement of the authorised development. The 2020 NMC has no bearing on the operational processes of the authorised development.</p> <p>The 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development. Given this, and the lack of any significant change to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects, compared to previous assessments.</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p><u>Conclusion</u></p> <p>There would be no new or different likely significant construction, operation or decommissioning effects in relation to water quality and resource, compared to previous assessments, as a result of the 2020 NMC.</p>
Geology, Ground Conditions and Agriculture	No	<p><u>Construction, operation and decommissioning</u></p> <p>Chapter 10 (Geology, Ground Conditions and Agriculture) of the certified ES considered the likely effects arising from construction, operation and decommissioning of the authorised development.</p> <p>At Table 10.26 of the certified ES, effects are identified as 'Not Significant' with the exception of effects on agricultural land, which would be 'large' for both construction and operational phases. The 2016 NMC concluded that the changes would have no material impact on the conclusions presented in the certified ES and so would also be 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would result in new or different likely significant effects to those previously identified. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>In 2017, a site investigation was undertaken to accompany the discharge of Requirement 12 of the DCO (confirmation of land contamination measures, successfully discharged on 12<sup>th</sup> December 2017 [ref DC17/05338]), which did not record any levels of contamination or issues with ground stability which could give rise to likely significant effects.</p> <p>Furthermore, the same measures set out in the CEMP (secured by Requirement 11 of Schedule 2 to the DCO, successfully discharged 14<sup>th</sup> September 2018 [Ref DC/18/02693]), requiring details to control unexploded ordnance and unexpected contamination during construction, would continue to apply in the event of an extension to the time period for commencement of the authorised development.</p> <p>The 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development. Given this, and the lack of any significant change to baseline conditions,</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u></p> <p>There would be no new or different likely significant construction, operation or decommissioning effects in relation to ground conditions or agricultural land compared to previous assessments as a result of the NMC.</p>
Landscape and Visual	No	<p><u>Construction, operation and decommissioning</u></p> <p>Chapter 11 (Landscape and Visual) of the certified ES considered the likely effects from construction, operation and decommissioning of the authorised development.</p> <p>At Table 11.8 of the certified ES, effects are identified as ‘Not Significant’ with the exception of operational activities associated with new industrial structures and perimeter fencing and traffic movement, which would be moderate adverse (medium term) and significant. Cumulatively there would be large adverse (short term) effects from construction of the electrical connection and new connection to overhead lines, which would be significant, along with moderate adverse (medium term) operational effects from infrastructure being in place. The 2016 NMC concluded that the changes would have no new or different likely significant effects when compared to those presented in the certified ES.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would result in new or different likely significant effects when compared to those previously identified. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>Furthermore, the 2020 NMC would not alter the design of the authorised development or the requirement for landscape mitigation as delivered in the Landscape Plan (secured by Requirement 4 of Schedule 2 to the DCO, partially discharged on 17<sup>th</sup> May 2019 [ref DC/18/05638]), nor the requirement to implement and maintain landscaping mitigation (secured by Requirement 5 of Schedule 2 to the DCO). The only</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>outstanding element of Requirement 4 relates to bunds and proposed finished ground levels, however this is not affected by the 2020 NMC. Therefore, no changes to landscape and visual effects are anticipated as a consequence of the 2020 NMC.</p> <p>The 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development. Given this, and the lack of significant changes to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not give rise to new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u> There would be no new or different likely significant construction, operation decommissioning effects in relation to landscape and visual, compared to previous assessments, as a result of the 2020 NMC.</p>
Traffic, Transport and Access	No	<p><u>Construction and decommissioning</u></p> <p>Chapter 12 (Traffic, Transport and Access) of the certified ES identified, at Table 12.29, that construction, operation and decommissioning effects would be 'Not Significant' with the exception of construction related temporary traffic works and decommissioning related worker traffic to site. The 2016 NMC concluded that the changes would have no material impact on the conclusions presented in the certified ES.</p> <p>Chapter 12 of the certified ES identified a peak construction year of 2018, however Requirement 1 of the DCO allows the commencement of construction to take place up until August 2020. The potential for the commencement of construction of the authorised development to take place after the peak assessments presented in the certified ES had therefore already been taken into account in the Secretary of State's decision to grant the DCO.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would result in new or different likely significant effects to those previously identified. The review of committed development and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made. It is noted however, that the Eye Airfield Junction Improvement Works would result in an improvement to traffic conditions in the locality of the airfield site (see <b>Paragraph 3.3.11</b> above). Therefore, the transport</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>baseline at the point of construction of the Proposed Development would be improved when compared against the baseline as used in assessments within the certified ES and 2016 NMC. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid.</p> <p>Furthermore, the 2020 NMC would not alter the associated construction traffic flows nor the mitigation measures to limit transport related impacts as delivered in the Construction Traffic Management Plan (CTMP) and Construction Travel Plan (secured by Requirement 13 and 14 of Schedule 2 to the DCO, discharged on 28<sup>th</sup> September 2018 [ref DC/18/02574]).</p> <p>The 2020 NMC has no bearing on the construction and/or decommissioning processes of the authorised development, and the potential for a delay to the peak construction year has already been considered in the DCO. Given that the same traffic would be generated to the network, the mitigation measures identified in the CTMP and Construction Travel Plan would remain, and <b>Chapter 3</b> does not identify significant change to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not result in new or different likely significant effects, compared to previous assessments.</p> <p><u>Operation</u> The certified ES (and subsequent 2016 NMC) concluded that traffic and transport effects arising from operation of the authorised development were 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would give rise to new or different likely significant effects, compared to those previously identified. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>Furthermore, the 2020 NMC would not alter the operational traffic movements associated with the authorised development, nor the requirement for an operational travel plan (secured by Requirement 15 of Schedule 2 to the DCO, yet to be discharged).</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>The 2020 NMC has no bearing on the operational processes of the authorised development. Given this, and the lack of significant changes to baseline conditions, extending the time period within which the construction of the authorised development could commence by 12 months will not give rise to new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u> There would be no new or different likely significant construction, operation decommissioning effects in relation to traffic and transport-related effects, compared to previous assessments, as a result of the 2020 NMC.</p>
Cultural Heritage and Archaeology	No	<p><u>Construction, Operation and Decommissioning</u> Chapter 13 (Cultural Heritage and Archaeology) of the certified ES considered the likely effects from construction, operation and decommissioning of the authorised development.</p> <p>At Table 13.31 of the certified ES, effects were identified as 'Not Significant'. The 2016 NMC concluded that the changes would have no material impact on the assessment findings presented in the certified ES and so would also be 'Not Significant'.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify any changes that would give rise to new or different likely significant effects, compared to those previously identified. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would result in new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The provision for relevant archaeological investigation (secured through Requirement 9 of Schedule 2 to the DCO, discharged on 6<sup>th</sup> December 2017 [ref: DC/17/05674]) would remain unchanged.</p> <p>The 2020 NMC has no bearing on the construction, operational or decommissioning processes of the authorised development. Given this, and the lack of any significant change to baseline conditions,</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>extending the time period within which the construction of the authorised development could commence by 12 months will not give rise to new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u> There would be no new or different likely significant construction, operation or decommissioning effects in relation to cultural heritage and archaeology, compared to previous assessments, as a result of the 2020 NMC.</p>
Socioeconomics	No	<p><u>Construction, Operation and Decommissioning</u></p> <p>Chapter 14 (Socioeconomics) of the certified ES identified, at Table 14.41, that the magnitude of construction, operation and decommissioning impacts would be Minor which, when considered against the receptor sensitivity (all considered to be Low) assessed effects to be Slight and 'Not Significant'. The assessment therefore demonstrated that the effects identified were well below the threshold of significance. The 2016 NMC concluded that the changes would have no material impact on the conclusions presented in the certified ES and so would also be 'Not Significant'.</p> <p>Chapter 14 of the certified ES identified a construction period of between 2016 – 2018, however Requirement 1 of the DCO allows the commencement of construction to take place up until August 2020. The potential for the commencement of construction of the authorised development to take place after the time period assessed in the certified ES had therefore already been taken into account in the Secretary of State's decision to grant the DCO.</p> <p>The authorised development is very unlikely to be a contributor to local population levels and thus would not contribute to population stress on local services, nor is it considered to affect local tourism features or provide substantial numbers of permanent employment.</p> <p>A detailed update to baseline population statistics has not been undertaken for this exercise. However in consideration of the likely low level impact, the scale of significance identified in past assessments and the minor contribution made by the authorised development to elements such as tourism or population increase, it is not considered that baseline conditions would have changed to a degree which would result in new or different likely significant effects arising from the 2020 NMC, compared to previous assessments. Should the consented DCO expire and the Proposed Development not be commenced, associated</p>

Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>benefits of both the contribution to socio-economics (Slight, positive) and to energy security would not be realised. This consequence would be heightened given the current detrimental impact to the economy resulting from the COVID-19 pandemic.</p> <p>Furthermore, the 2020 site reconnaissance survey did not identify any baseline changes that would be considered to give rise to new or different likely significant effects, compared to those previously identified. It is therefore considered that the findings and assessments presented in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The 2020 NMC would not alter the construction or operational phase of the authorised development in terms of potential socio-economic impacts (e.g. staff numbers or project spend). Potential interactions and cumulative impacts related to socio-economic effects - on noise, air quality, traffic and views from the proposed changes - are considered individually in this table and are not significant. No interactions of these effects, which would give rise to significant socio-economic effects, are anticipated.</p> <p>The 2020 NMC has no bearing on the construction and/or decommissioning processes of the authorised development. Given this, and the minor magnitude of impact of baseline conditions to previous assessments (appraised as remaining so for the 2020 NMC), extending the time period within which the construction of the authorised development could commence by 12 months will not give rise to new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u> There would be no new or different likely significant construction, operation or decommissioning effects in relation to socioeconomics, compared to previous assessments, as a result of the 2020 NMC.</p>
Human Health and Waste	No	<u>Construction, Operation and Decommissioning</u>



Topic	New or different likely significant environmental effects?	Environmental appraisal
		<p>Chapter 15 (Health and Waste) of the certified ES identified, at paragraph 15.1.2, that <i>“the main potential impacts to human health arising from the Project will result from changes to local air quality during the construction, operation and demolition stages.</i></p> <p><i>However, as with any project of this magnitude, there are also potential impacts arising from pollution incidents, site surface water run-off, electro-magnetic fields, and noise.</i></p> <p><i>The main potential impacts regarding waste management will be from site preparation during construction”.</i></p> <p>Paragraph 15.10.17 of chapter 15 concluded that construction, operation and decommissioning effects would be ‘Not Significant’. The 2016 NMC concluded that the changes would have no material impact on the findings and assessment presented in the certified ES and so would also be ‘Not Significant’.</p> <p>As detailed in <b>Chapter 3</b> above, the 2020 site reconnaissance survey and update of baseline conditions did not identify changes that would result in new or different likely significant effects to those previously identified. It is therefore considered that assessments in the certified ES and 2016 NMC remain valid. The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed in the planning application and consent process for these developments subsequent to the DCO being made.</p> <p>The level of dust arising from construction and decommissioning activities would not change from the assessments reported in the certified ES or in the 2020 NMC, nor would the requirement to ensure suitable controls for waste management through the measures set out in the CEMP (secured by Requirement 11 of Schedule 2 to the DCO, successfully discharged 14<sup>th</sup> September 2018 [Ref DC/18/02693]).</p> <p>In light of the above factors, extending the time period within which the construction of the authorised development could commence by 12 months will not give rise to new or different likely significant effects, compared to previous assessments.</p> <p><u>Conclusion</u>                  There would be no new or different likely significant construction, operation decommissioning effects in relation to health and waste, compared to previous assessments, as a result of the 2020 NMC.</p>

## 5 Conclusion

- 5.1.1 PPL has serious concerns that the restrictions imposed by the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 (as amended) and the future uncertainties posed by the current COVID-19 pandemic will frustrate PPL's ability to commence the authorised development prior to the expiry of the DCO on 13 August 2020. PPL is therefore applying for the 2020 NMC which seeks to extend the deadline for formal commencement of the authorised development by 12 months to 13 August 2021. No other changes are being sought to the DCO as part of the 2020 NMC.
- 5.1.2 This report considers the same environmental disciplines as those presented in the certified ES, which are:
- Air Quality;
  - Noise and Vibration;
  - Ecology and Nature Conservation;
  - Water Quality and Resources;
  - Geology, Ground Conditions and Agriculture;
  - Landscape and Visual Impact;
  - Traffic, Transport and Access;
  - Cultural Heritage and Archaeology;
  - Socio-economics; and
  - Human Health and Waste.
- 5.1.3 In order to determine the potential for likely new or different significant environmental effects to arise as a result of the 2020 NMC, the following activities were undertaken:
- i. site reconnaissance survey to determine any changes to the site generally and to the ecological value of the site;
  - ii. review of current baseline environmental conditions;
  - iii. review of latest planning policies together with any updates to committed developments in the vicinity of the application site, since the granting of the DCO;
  - iv. review of new receptors in vicinity of the application site, since the granting of the DCO; and
  - v. the effects of the 2020 NMC have then been considered qualitatively using professional judgement and compared to the findings presented in the certified ES and the 2016 NMC (taking into account the changes permitted by the Town and Country Planning Permissions) and the measures set out in discharged documents.

### 5.2 Conclusions

- 5.2.1 No changes were identified from this appraisal that would give rise to any new or different likely significant effects compared to findings presented in the certified ES or the 2016 NMC, or that would not ordinarily have been addressed in subsequent planning consents in the locality.

- 5.2.2 The proposed 2020 NMC would not alter any previously agreed mitigation measures and the same commitments in the DCO to limit effects on receptors would continue to apply in the event of an extension of the time period for the commencement of the authorised development.
- 5.2.3 The appraisal of the proposed 2020 NMC identified no new or different likely significant effects compared to previous assessment findings and therefore it is considered that the proposed 2020 NMC would constitute a non-material change under part 1 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011.

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