

Our reference: 5200094

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18 November 2020

Dear Mr Burton

### **Proposed Combwich to Hinkley Point C (HPC) Cycle Route, Somerset – Request for an EIA Screening Opinion**

On behalf of NNB Genco HPC Ltd (NNB), Atkins request an EIA Screening Opinion from both Sedgemoor District Council (SDC) and Somerset West and Taunton Council (SW&TC) under Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to an application for full planning permission for the proposed cycle route between Combwich to Hinkley Point C (HPC) in Somerset (hereafter referred to as 'the proposed route' or 'the proposed scheme'). A location plan accompanies this letter.

As the proposed scheme lies across the two administrative boundaries of SDC and SW&TC, an EIA Screening Opinion must be sought from both Local Planning Authorities (LPA). However, it has been agreed with the LPAs that a combined EIA Screening Opinion will be prepared for the proposed scheme.

#### **Description of the Site**

The start of the proposed route is located approximately 192m to the north of the village of Combwich which is a rural village on the west bank of the River Parrett in Somerset, located approximately 6 miles from Bridgwater. The end of the proposed route follows the northern perimeter of the Hinkley Point complex along the England Coast Path National Trail, to where the Hinkley Point C construction site starts.

The proposed route crosses agricultural and coastal land, covering a variety of existing rural land uses including a bridleway, a section of rural highway (Stern Drove), Common Land, the England Coast Path National Trail, and the northern perimeter of the Hinkley Point complex which includes a short section of wooded/scrubland.

#### **Description of the Proposed Scheme**

The primary purpose of the proposed scheme is to take primarily commuter cyclists away from the main highway between Combwich and the Hinkley Point complex, which will then connect to the existing cycle route along the C182 from Combwich towards Cannington and Bridgwater. The proposed scheme will also provide value to the local area and offer an alternative cycle route between the two locations for leisure as well as commuting purposes.

The proposed route is divided into 5 areas; Areas C – G covering approximately 9.3km of ground, as shown on the accompanying location plan. The site area of the route is 11.2ha. Areas A and B from the Cannington Bypass and through Combwich have been excluded from the project as these have already been constructed/were already in situ. Areas H and J will be delivered by Somerset County Council (SCC) in the future to link in with the Southern Bund public realm project (the indicative alignments of Areas H and J have been shown on the accompanying location plan for information).

It is important to note that the proposed route follows an existing rural highway and Public Rights of Way (PWoW), and that no new routes are required.

Table 1 shows the approximate distances for each area.

**Table 1: Proposed Cycle Route Areas and Distances**

Area Designation	Route Description	Approximate Distance (km)
Area C	Environment Agency Bridleway to Steart Drove	2.30
Area D	Stert Drove	1.08
Area E	Stert Drove to Gorpit Lane Car Park	2.96
Area F	Gorpit Lane Carpark to the approach to Hinkley Point Complex	1.70
Area G	Hinkley Point Northern Perimeter	1.25

Land ownership along the proposed route varies and includes land within the local highway boundary (therefore Somerset County Council owned land); land owned by the Environment Agency, EDF Energy and the Nuclear Decommissioning Authority; third party owned land; and Common Land along the existing PRoW. The start of the proposed route on the edge of Combwich is adjacent to land owned by Otterhampton Parish Council.

Parts of the proposed route follow what is currently a public footpath along the coast, these being Areas E, F and G. In order for these areas to be used by cyclists, an Order has been prepared by and submitted to SCC to extinguish the footpath and create a bridleway which will, amongst other things, help facilitate this proposed cycle route. This Order also covers areas outside of the proposed scheme and does not cover Area G which is on land owned by EDF Energy and the Nuclear Decommissioning Authority as part of the Hinkley Point complex. The proposed route along Area G will need to have permissive cycle route status for use only by cyclists associated with Hinkley Point.

The proposed works along the route are small scale with limited development (non-built development) and are of a minimally invasive nature. These proposed works include minor surfacing, minimal widening in certain areas, signage and wayfinding, and the creation of three cattle grids with bridle gates alongside (one cattle grid is on the route at the junction of Area D and E, one is just off the route at Stolford and the other is off the route to the north east of Steart).

The following section provides further details on the proposed works within each area of the proposed route:

- **Area C: The Environment Agency Bridleway to Steart Drove**

This area of the proposed route covers a shared use bridleway through the wetland area of Steart Marshes, which is owned by the Environment Agency. The bridleway is currently a semi-bound surface consisting of loose gravel and tarmac.

Proposals for this area are for minor surfacing works with a permeable material to provide an appropriate surface for all users. The proposed material is known as 'Flexipave', a mixture of loose ground rubber (derived from recycled vehicle tyres) and stone aggregate. This is a porous material and drains naturally. The type of Flexipave used will be an enhanced version to accommodate the use of the Environment Agency's maintenance access vehicles.

Direction and shared use route signing will be provided at agreed locations to inform users of their destination options and shared use status. Cyclists re-join carriageway signing will also be provided for cyclists heading towards the Steart Peninsular. The width of the proposed route along Area C will be approximately 3m. There may be some slight widening of the bridleway in Area C.

The users of Area C are expected to be horse riders, cyclists and walkers.

- **Area D: Steart Drove**

This area of the proposed route follows the existing highway; the road generally has low traffic levels, has good visibility due to the straight alignment of the road and is seen to be suitable for cyclists. A risk workshop has taken place specifically regarding this section of the route and a Road Safety Audit will be part of the planning application.

The proposals include signage additions to accommodate cyclists, within the highway boundary. These will include cyclist crossing warning signs, along with cycle symbols and SLOW road markings on the approaches to the interface of the road with the bridleway and bund sections, to increase driver awareness as to the presence of cyclists on and crossing the highway. Wayfinding is also proposed to inform users of their destination options, again within the highway boundary.

The users of Area D are expected to be cyclists along what is an existing highway.

A cattle grid with a bridle gate alongside is proposed where Area D and Area E meet at the junction of Stert Drove and the earth bund.

- **Area E: Stert Drove to Gorpit Lane Car Park**

This area of the proposed route passes over Common Land, which is off road, onto what is currently a grass path along the top of an earth bund leading to the coastal path which is a semi-bound surface consisting of loose gravel and tarmac. The England Coast Path National Trail proceeds west, parallel to the coastline and leads directly to a small informal car parking area at the end of Gorpit Lane, north of the village of Stolford. This area of the proposed scheme is included in the Bridleway Creation Order to enable use by cyclists.

As this part of the proposed route passes through Common Land where upgraded hard surfacing is proposed and a temporary site compound may be located, a Common Land Consent application will be prepared and submitted to the Planning Inspectorate on behalf of the Secretary of State.

Proposals for the earth bund section of Area E are for minor surfacing works using 'Flexipave', a permeable material which drains naturally, to provide an appropriate surface for all users. The standard version of 'Flexipave' will be used here as no vehicle access will be required along the earth bund. Tarmac is proposed along the coastal path section of Area E to accommodate maintenance vehicles accessing this area at points and to provide an appropriate surface for all users.

Fencing is proposed either side of the route following the earth bund for safety reasons. A 0.5m wide verge will be required between the fence and the edge of the proposed bridleway. Therefore, the route here will be a minimum of 3.5m wide to accommodate this. The width of the proposed route along the section of Area E which follows the current England Coast Path National Trail will be approximately 3m (the existing coast path is marginally narrower). Direction and shared use route signing will also be provided at agreed locations to inform users of their destination options and shared use status.

The users of Area E are expected to be horse riders, cyclists, walkers and agricultural / maintenance vehicles in some sections.

A cattle grid with a bridle gate alongside is proposed just off the proposed route along Gorpit Lane, where Area E and Area F meet (this is currently outside the planning boundary).

- **Area F: Gorpit Lane Car Park to the approach to Hinkley Point Complex**

Area F passes over land owned by a third party, as well as Common Land, and follows the England Coast Path National Trail. The first half of the area consists of concrete slabs and the second half is a semi-bound surface consisting of loose gravel and tarmac. As with Area E, this section of the proposed scheme is included in the Bridleway Creation Order to enable use by cyclists and will be included in the Common Land Consent application previously mentioned.

This area can benefit from the re-surfaced Gorpit Lane car park to prevent the route from getting muddy during times of inclement weather and provide a useful access point from Gorpit Lane.

Tarmac is proposed along the whole stretch of Area F to accommodate emergency vehicles using this area and to provide an appropriate surface for all users.

Direction and shared use route signing will also be provided at agreed locations to inform users of their destination options and shared use status. The width of the proposed route along Area F will be approximately 3m (the existing coast path is marginally narrower).

The users of Area F are expected to be horse riders, cyclists and walkers. This area of the route will also continue to serve as the emergency access road for Hinkley Point B, therefore vehicle traffic will need to be catered for along this section.

### **Area G: Hinkley Point Northern Perimeter**

Area G follows the northern perimeter of the Hinkley Point complex along the England Coast Path National Trail, in which this section is owned by EDF Energy and the Nuclear Decommissioning Authority. The start of the proposed route within Area G follows an existing track with a mixture of scrubland and trees either side, before joining up with the existing coast path to the north of the Hinkley Point complex, made up of concrete slabs.

Minor surfacing maintenance works are proposed along the section of Area G which follows the sea wall; these will include patch repairs in the existing concrete slabs.

The section through the wooded/scrub area will be constructed from 'Flexipave' in order to minimise any impact on tree roots here. The type of 'Flexipave' used here will be an enhanced version to accommodate the use of vehicles currently using this track. The 'Flexipave' will be hand laid, using small plant for excavation works, include tree protection fencing and a watching brief will be carried out during the construction phase. All of these measures will mitigate any potential impacts to tree roots.

Direction and shared use route signing will also be provided at agreed locations to inform users of their destination options.

The existing sea wall is located to the north of the proposed route. The initial section of guardrail is likely to require extending and replacing with a 1.4m high guard railing to ensure user safety. The sea wall itself does not meet the required 1.4m minimum height. However, as noted by the Planner Officer at SW&TC's in their pre-application response, an increase in height here would have significant visual impacts. The design currently does not include fencing to accommodate this height requirement, however further measures are being investigated.

As previously noted, Area G is not part of the Bridleway Creation Order and will remain as a public footpath. Therefore, agreement is required with EDF Energy and the Nuclear Decommissioning Authority in order for this to become a permissive cycle route for use only by cyclists associated with Hinkley Point. Runners and walkers may also use this section of the route.

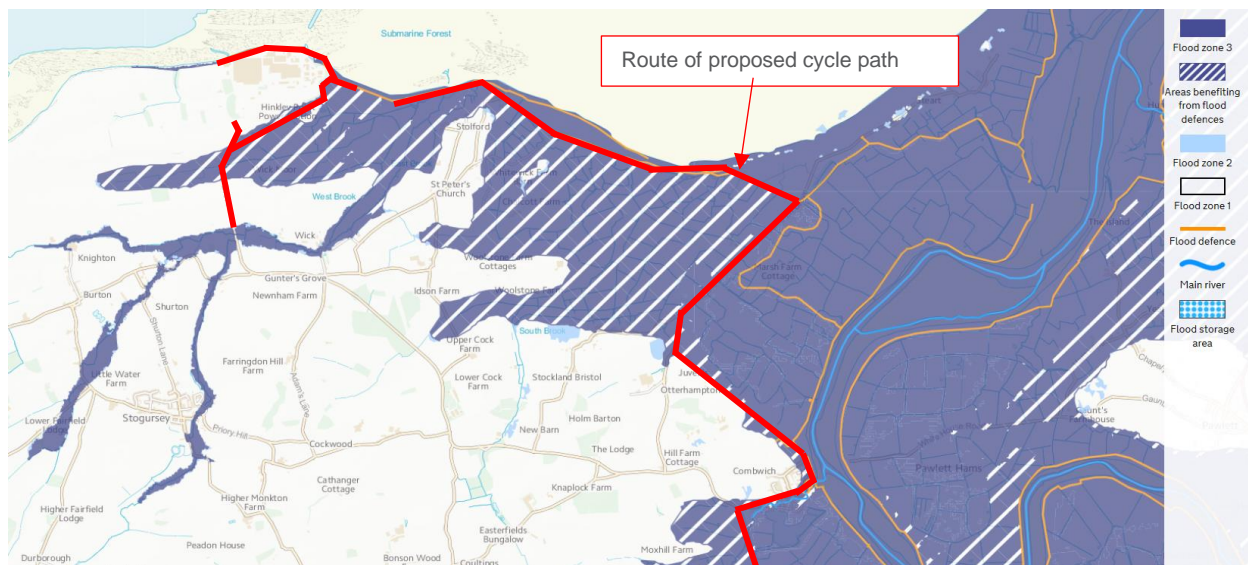
### **Environmental Profile**

A review of the statutory and non-statutory designated sites within the locality has been undertaken using the online Multi Agency Geographic Information for the Countryside (MAGIC) database operated by Natural England.

#### ***Flood Risk***

The proposed cycle route is located within Flood Zone 3 with a high risk of flooding, as identified on the Environment Agency's (EA) on-line flood mapping service (extract provided in Figure 1). The majority of the proposed route is aligned along the boundary between areas benefiting from flood defences and undefended areas. Steart Managed Realignment Scheme is located to the east of Areas C & D of the proposed route. Two key aspects of flood risk will be considered as part of the Flood Risk Assessment (FRA) supporting the planning application; flood risk to the proposed development and change in flood risk arising from the proposed development, which may impact third party land.

**Figure 1: Environment Agency Flood Risk Map**



### **Biodiversity**

There are a number of statutory ecological designated sites within and in close proximity to the proposed route as detailed below:

- **Severn Estuary Special Area of Conservation (SAC)** – the proposed route runs through this SAC Wall Common and along the north coast; it is also 60m from the site at Combwich (where it follows the River Parrett).
- **Severn Estuary Special Protection Area (SPA)** – the proposed route runs through this SPA at Wall Common, along the north coast and around Hinkley Point at North Moor; it also runs along the edge of this SPA at Combwich Common.
- **Severn Estuary Ramsar Site** – the proposed route runs through this site at Wall Common, along the north coast and around Hinkley Point at North Moor; it also runs along the edge of this site at Combwich Common.
- **Bridgwater Bay Site of Special Scientific Interest (SSSI)** – the proposed route runs through this SSSI at Wall Common, along the north coast and around Hinkley Point at North Moor; it also runs along the edge of the SSSI at Combwich Common.
- **Bridgwater Bay National Nature Reserve (NNR)** - the NNR runs along the coastline within 1m of the proposed route at the closest points; it also runs along the western bank of the River Parrett, 122m from the proposed scheme near Combwich.
- **Blue Anchor to Lilstock Coast SSSI** - the SSSI is 1.3km west of the western end of the proposed route.

There are a number of non-statutory ecological designated sites within and in close proximity to the proposed route as detailed below:

- **Hinkley Local Wildlife Site (LWS)** – the Western end of the proposed route is adjacent to the LWS (now part of HPC site).
- **Wall Common West LWS** - this LWS is 10m south of Area E, comprising of a species-rich marshy grassland and pond.
- **Otterhampton Heronry LWS** - this LWS is 420m west of Area C.
- **Combwich Wharf LWS** - this LWS is 425m south east of the southern end of the cycle proposed route.
- **Combwich Brick Pit LWS** - this LWS is 620m south of the southern end of the cycle route.
- **Putnell Moor LWS** - this LWS is 965m south west of southern end of the cycle route.

### **Historic Environment**

The heritage receptors in relation to the proposed scheme consist of listed buildings set away from the alignment of the proposed route and a single Scheduled Monument 'Pixie's Mound', located to

the south of the Hinkley Point complex a distance from the cycle route. Within the administrative area of Somerset West & Taunton, there are three listed buildings (a late 16<sup>th</sup> to early 17<sup>th</sup> century farmhouse, a 17<sup>th</sup> century house and an 18<sup>th</sup> century cottage) close to the route in Stolford, at the junction of Area E and Area F. There are three listed buildings in Stockland Bristol, within the administrative area of Sedgemoor, to the west of Area C.

### EIA Screening

The proposed scheme does not fall into any of the development work categories under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and could potentially be seen as highway improvement works under the Highways Act 1980. However, the proposed route crosses a number of 'environmentally sensitive areas', therefore it falls into Schedule 2 development under Regulation 2(1) of the 2017 Regulations. The proposed scheme is therefore considered to be Schedule 2 development and requires screening for EIA.

Planning Practice Guidance for Environmental Impact Assessments states that, *'it should not be presumed that development above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its own merits'*.

This EIA Screening considers the merits of the proposed scheme and the need for screening against the criteria set out in Schedule 3 of the 2017 EIA Regulations:

- characteristics of the development;
- location of the development; and
- type and characteristics of the potential impact.

### Environmental Assessment

#### BIODIVERSITY

##### Baseline Conditions

The following ecological baseline information was collected by Atkins in June 2020 to inform assessment of the proposed scheme. The information was obtained from a desk study and walkover of the proposed route, as well as great crested newt (GCN) habitat suitability and eDNA surveys of accessible waterbodies within 500m of the proposed scheme.

##### Designated Sites

The following statutory designated sites have been identified within 2km of the proposed route (these are listed in detail in the Environmental Profile section above):

- Severn Estuary Special Area of Conservation (SAC).
- Severn Estuary Special Protection Area (SPA).
- Severn Estuary Ramsar Site.
- Bridgwater Bay Site of Special Scientific Interest (SSSI).
- Bridgwater Bay National Nature Reserve (NNR).
- Blue Anchor to Lillstock Coast SSSI.

The following non-statutory designated sites have been identified within 1km of the proposed scheme (these are listed in detail in the Environmental Profile section above):

- Hinkley Local Wildlife Site (LWS).
- Wall Common West LWS.
- Otterhampton Heronry LWS.
- Comwich Wharf LWS.
- Comwich Brick Pit LWS.
- Putnell Moor LWS.

## *Habitats*

### Area C

Adjacent grassland, which is up to 1m on each side of the existing bridleway, consists of short amenity grassland dominated by perennial rye-grass. This is of negligible ecological value. However, surrounding habitats of higher ecological value may be affected by construction, therefore there may be a need to maintain a short grassland strip on each side of the proposed route to accommodate these habitats. The surrounding habitats are predominantly classed as coastal and floodplain grazing marsh (priority habitat<sup>1</sup>). There are also areas of good quality semi-improved grassland, wet ditches and hedgerows.

### Area D

This section of the proposed route follows Stert Drove, an existing tarmac road with negligible ecological value.

### Area E

700m of the eastern end of this section follows a path along a grassy embankment on the south west edge of Wall Common (part of the Severn Estuary SAC/SPA/Ramsar and Bridgwater Bay SSSI). The grassy embankment itself is of limited ecological value, but grazing marsh immediately adjacent to it on the north east side is of high ecological value (due it being a priority habitat and part of a designated site). There is also a ditch and hedgerow on the south west side of the embankment.

The remaining section of the proposed route in Area E follows an existing wide track along the route of the England Coast Path National Trail. The track itself is of negligible ecological value, but the adjacent habitats which may be affected by construction are of higher value, including coastal saltmarsh, coastal grazing marsh and scrub. These habitats also lie within the Severn Estuary SAC/SPA/Ramsar and Bridgwater Bay SSSI.

### Area F

This section runs adjacent to and within designated sites of ecological value (Severn Estuary SAC, SPA & Ramsar Site, as well as the Bridgwater Bay SSSI), along the England Coast Path National Trail.

### Area G

At the eastern end of Area G, the proposed route crosses a section of grassland and cuts through an existing gap in a block of woodland/scrub to link up with the track to the north of the Hinkley complex. This area could not be accessed during the June 2020 walkover, but was accessed and surveyed in October 2020. This is a suboptimal time of year for habitat survey but it was possible to ascertain that the grassland at the eastern end of Area G comprises a diverse coastal grassland habitat. This connects to a grassy track of limited ecological value, which then becomes a hard standing path continuing west along the northern boundary of Hinkley Point B. The habitats in the eastern part of Area G are within the Severn Estuary SAC/SPA/Ramsar and Bridgwater Bay SSSI. However, they do not include any of the qualifying habitat features and are considered unlikely to support any significant part of the qualifying species populations associated with those designations.

## *Species*

Somerset Environmental Records Centre provided records of the following protected and notable (e.g. Red List, Section 41, Local Biodiversity Action Plan) species within 1km of the proposed scheme:

- Badger;
- Fourteen species of bat (including barbastelle, Bechstein's, greater horseshoe and lesser horseshoe, which are listed in Annex II of the Habitats Directive and which are considered most in need of conservation at a European level);
- Brown hare (also recorded during great crested newt (GCN) surveys);
- Otter;

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<sup>1</sup> Also known as 'habitats of principal importance for conservation of biodiversity in England', which are those habitats listed in accordance with Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

- Water vole (signs also recorded during GCN surveys);
- One hundred and nine Red and Amber List species of bird;
- Grass snake (also recorded during GCN surveys);
- Slow worm;
- Eight notable species of invertebrate (two beetle, two butterfly, three moth, one true fly); and
- One protected species of plant (pennyroyal – also recorded during GCN surveys) and 14 notable species of plant.

Records of GCN within 1km were found on the MAGIC website and in monitoring reports provided by the Wildfowl and Wetlands Trust. The eDNA survey confirmed GCN presence in three ponds, at distances of 21m, 155m and 431m from the proposed route respectively.

### **Potential Biodiversity Impacts and Mitigation**

Of those potential ecological receptors that have been identified above, it is considered that there is potential for adverse effects on the following:

- Severn Estuary SAC/SPA/Ramsar and Bridgwater Bay SSSI;
- Bridgwater Bay NNR;
- Wall Common West LWS;
- Priority grassland and wetland habitats;
- Notable bird species;
- Reptiles; and
- GCN.

Effects on the other potential receptors are anticipated to be negligible, given the location and nature of the proposed works.

It is anticipated that the identified potential adverse effects could all be mitigated to a non-significant level by implementing a combination of the following mitigation measures:

- Minimisation of the proposed route footprint and micro-siting of the route to avoid sensitive habitats wherever practicable;
- Demarcation of sensitive habitats in the vicinity of the proposed scheme to establish 'no go' areas;
- Adoption of standard good practice pollution control measures;
- Timing of works to avoid most sensitive seasons for protected species, and/or high tide where working in or close to sensitive bird habitats;
- Pre-construction checks of the working area for badger setts, nesting birds, reptiles, GCN and invasive non-native species of plant;
- Use of sensitive methods for the removal of vegetation (e.g. two-stage cut of potential reptile habitat using hand tools); and
- Provision of an Ecological Clerk of Works (ECoW) to ensure mitigation measures are implemented appropriately and provide on-site advice to contractors.

Therefore, it is considered that the potential effects of the proposed route with regards to biodiversity can be appropriately mitigated and therefore do not trigger the proposed scheme to be EIA development. An Ecology Report is proposed to support the planning application which will provide more detail on the baseline, impacts and effects (both positive and negative) and the mitigation, compensation and enhancement measures proposed.

## **FLOOD RISK**

### **Baseline Conditions and Potential Impacts**

#### *Coastal flood risk*

The proposed route is located in or adjacent to Flood Zone 3 (Environment Agency flood maps) and is at risk of >0.5% (1 in 200) annual probability of coastal flooding. The majority of the route alignment follows the boundary between areas benefiting from flood defences and undefended



areas. The cycle route is proposed to use existing roads and Public Rights of Way, some of which are in fact located upon or adjacent to Environment Agency (EA) flood defence assets.

Due to its location, the proposed route will be at risk of coastal flooding and it is anticipated that sections of the route will flood and be inundated by extreme sea levels and wave overtopping. Details of the existing coastal defences have been made available by the EA. These will be reviewed in conjunction with ground levels derived from LiDAR datasets and areas at risk of inundation at the 0.5% (1 in 200) annual probability and wave overtopping identified from analysis of extreme sea levels using the EA Coastal Flood Boundary dataset (2018)<sup>2</sup>. The impact of future climate change on extreme sea levels over the design life of the development will be central to this assessment and sea level rise allowances will be applied based upon the current EA guidance<sup>3</sup>.

#### *Fluvial flood risk*

There are a number of land drains (rhynes) in the Steart marshes which potentially interact with the proposed cycle route. There are no proposals to replace, alter or upgrade any of the existing watercourse crossings nor are any new crossings proposed. As a result, there will be no impact on flow conveyance or water levels associated with these. Again, as the proposed route is to be constructed at existing ground level then no impacts on floodplain storage volumes, flood levels or flow pathways are anticipated.

A Flood Risk Assessment (FRA) will undertake a high-level assessment of flood levels and extents at the 50% (1 in 2), 3.33% (1 in 30) and 1% (1 in 100) annual probabilities that are associated with the rhynes to identify any sections of the proposed route that may be at risk of flooding from this source. A precautionary approach is to be adopted for this assessment and the assumptions used for tidal discharge cycles and outfall capacity will be subject to sensitivity tests to ensure the analysis is robust.

#### *Surface water flood risk*

The EA surface water flood map indicates that some sections of the proposed route through Area C have an existing risk of surface water flooding ranging from Low risk (1% or 1 in 100) to High risk (3.33% or 1 in 30). This in particular relates to sections of the route that are currently formed by an existing impermeable surface around Combwich. In these areas with an existing risk of surface water flooding no significant changes to surface water management or drainage are proposed.

For Area E (coastal path section) and Area F of the route, it is proposed that the existing surface will be replaced with tarmac. This will result in an increase in impermeable area thereby generating increased surface water runoff volumes which will be required to be managed and discharged from the development without increasing the risk of flooding to third party land.

#### **Potential Flood Risk Mitigation**

As the proposed route is to be constructed at existing ground levels it is expected that there will be no impacts on third-party land arising from volumetric losses of floodplain that would lead to increased risk from either coastal or fluvial flooding. On this basis therefore, there will be no requirement for compensatory flood storage.

Due to the nature of the proposed scheme, it is considered that the flood risk to the proposed cycle way infrastructure from extreme sea levels and overtopping, and from fluvial flooding arising from the rhynes are acceptable and will not require mitigation. The FRA will quantify the level of flood risk along the route and it is anticipated that flood risk to the users of the proposed route will be controlled through signage and operational management. This will recognise the distribution of any areas of flood risk along the route with the aim of ensuring safe access and egress to cycle route users.

In addition, it is recognised that as sections of the proposed route are to be located on the crest of EA coastal flood defence assets, the method and form of construction of the surface including hardstanding and drainage will not adversely impact the integrity of the defences in terms of height, stability or maintenance access.

Due to the location of the proposed route within Flood Zone 3, locating drainage infrastructure within an area at risk of fluvial or tidal flooding is unavoidable though adequate performance of the drainage system and wider flood conditions will be considered. It is proposed that a drainage

<sup>2</sup> Coastal Flood Boundary conditions for the UK: update 2018, Environment Agency

<sup>3</sup> Flood Risk Assessments: climate change allowances. Available at:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#table-3>

strategy proportionate to the scale and extent of the development is implemented. This will be based on calculated runoff rates and volumes. Where there is a change from impermeable to permeable surface proposed, the intention is to match the existing cross falls of the ground and to intercept runoff where required using one level of SUDS in the form of filter drains to treat and attenuate runoff prior to discharge to existing watercourses. The development will seek to replicate existing catchments and discharge locations wherever possible and where there is a change from permeable to impermeable surface type proposed, limit the discharge to the greenfield runoff rate. Surface water flooding will be prevented up to and including the 3.33% (1 in 30) annual probability along sections of new hardstanding and managed and retained within the site boundary up to the 1% (1 in 100) annual probability plus climate change allowance. The use of a permeable hardstanding surface, therefore 'Flexipave', along sections of the route will mitigate against increases in runoff and minimise the requirement for additional drainage techniques.

Therefore, it is considered that the potential effects of the proposed route with regards to flood risk can be appropriately mitigated and therefore do not trigger the proposed scheme to be EIA development. A FRA is proposed to support the planning application which will quantify the level of flood risk along the route and will undertake a high-level assessment of flood levels.

## LANDSCAPE

### Baseline Conditions

#### *Landscape Character*

The study area lies predominantly within National Character Area (NCA) 142 'Somerset Levels and Moors' which is a flat open landscape of rivers and wetlands, artificially drained, irrigated and modified to allow productive farming. Key elements of this NCA, which are to be found within the study area, are often treeless within the open areas, with graduation to an increasingly 'bushy' appearance towards the edges created by occasional hedgerows and lines of pollard willows associated with ditches and rhynes.

The study area has been assessed and described within SW&TC and SDC Landscape Character Areas. The proposed route and a substantial proportion of the study area lie within Quantock Vale and the Levels and Moors.

The area around the proposed scheme is low lying and flat with some areas below the level of the high tide in the adjacent Bristol channel. The Quantocks to the south west define the outer limit of this flat landscape. The extent of tree cover is limited, and it is often a very open landscape. The rhynes can serve as "wet fences" so hedgerows are not always necessary. Rural roads are located within the study area leading to farmsteads and small settlement villages.

#### *Landscape Designations*

There are no Areas of Outstanding Natural Beauty (AONBs) or National Parks in the study area. An AONB (Quantock Hills) lies approximately 6km to the south west of the study area.

### Potential Visual Receptors

The following types of receptors have the potential to experience visual impacts as a result of the proposed scheme:

- Residential properties;
- Users of Public Rights of Way (PRoW); and
- Users of the existing highway network in the area.

### Potential Landscape and Visual Impacts

During the construction works the potential sources of landscape and visual effects will be from the on-site work activities such as; construction machinery, site preparation and earthworks and the evolving development. There will be minimal disruption to the site's land cover, landform and localised alteration to landscape character through the gradual transformation of the proposed scheme.

Once completed, the potential landscape effects from the proposed scheme will be minor compared to the existing conditions with the presence of a new surface along the route.

### Potential Landscape and Visual Related Mitigation Measures

The proposed scheme will predominantly follow existing PRoW, consisting of minor surfacing works, minimal widening in certain areas and signage and wayfinding in required locations. There will be limited potential to mitigate the landscape and visual impacts of the proposed scheme

because of the tight boundary. Some areas may be able to incorporate the use of linear hedgerows with hedgerow trees alongside the proposed route. These landscape elements would be in keeping with the surrounding landscape character and would help to screen views of the proposed scheme from sensitive receptors.

It is considered that potential landscape and visual effects can be mitigated to a level whereby there should not be any perceived significant adverse effects on the existing receiving landscape and visual receptors. Therefore, the proposed scheme is not considered to be EIA development in regard to landscape.

An appropriate Landscape and Visual Appraisal (LVA) is proposed to support the planning application. The appraisal will consider the main landscape conditions including designations, landscape character and potential visual receptors, along with the likely impacts on these with mitigation measures proposed.

## HISTORIC ENVIRONMENT

### Baseline Conditions

The heritage receptors in relation to the proposed scheme consist of listed buildings and a single Scheduled Monument 'Pixie's Mound', which is set away from the proposed route to the south of Area F. Within the administrative area of SW&TC, there are three listed buildings (a late 16<sup>th</sup> to early 17<sup>th</sup> century farmhouse, a 17<sup>th</sup> century house and an 18<sup>th</sup> century cottage) close to the route in Stolford. There are three listed buildings in Stockland Bristol, within the administrative area of SDC, to the West of Area C.

A foreshore survey north of Hinkley Point recorded no archaeological evidence here on the HER. Further east, along the route, there is evidence of some archaeology. For example to the south of Stolford, south of Area F and the western part of Area E, a coin hoard was found in 1999, there is an undated earthwork enclosure that was found by Lidar survey east of Yearmoor Lane, in advance of habitat creation, and there have been a number of finds and surviving early post medieval buildings, suggesting that there may be evidence of historic land use. Similarly, in the vicinity of Steart and Steart Marshes, the HER records indicate that there is potential for archaeology mostly dating to the medieval and post-medieval periods. Significant archaeology, including a rare Anglo-Saxon burial ground was identified during archaeological investigations undertaken ahead of the current expansion works at Hinkley Point power station.

However, where the proposed route follows existing paths and where it runs on bunded areas and raised banks there is likely to be no disturbance of archaeology. Only where undisturbed ground is to be included in the proposed route, is there a possibility that archaeological evidence will be disturbed, although to a shallow depth. Sections of the proposed route (particularly Area C) follow a historic bridleway which has a potential to be an ancient feature of the local landscape. Sections by the coastline may also lie in areas where historic sea defences have previously existed or currently exist. There may also be potential for palaeoenvironmental evidence and waterlogged deposition to be present in local alluvium; although likely to be at some depth beyond the shallow impact depth that is proposed.

### Potential Archaeological Impacts and Mitigation

There are unlikely to any significant impacts on the heritage receptors mentioned above.

In the few areas where there may be archaeology that could be slightly truncated or revealed by the shallow foundations of the proposed route, some mitigation, in the form of recording, the scope of which would be agreed with the County Archaeologist through a Written Scheme of Investigation, may be appropriate as a condition. Overall, however, there is unlikely to be significant harm to the historic environment from the proposed route. Therefore, it is considered that any potential effects of the proposed route with regard to the historic environment, do not trigger the proposed scheme to be EIA development and therefore it is considered that an Environmental Statement (ES) is not required on archaeological grounds.

It is proposed that the potential for archaeology, in the areas where paths are proposed to be widened on ground that has not been subject to embankment and landscaping, is identified through a targeted Desk Based Assessment (DBA). This will form part of the planning application.

## ARBORICULTURE

### Baseline Conditions

The only section of the proposed scheme where trees are identified close to the route is an area of trees along the eastern side of Area G to the north east of Hinkley Point B. This area currently consists of a grass track with a mixture of trees and scrubland either side. There is a lack of mature tree presence here and the predominant type of tree is sycamore. There is no requirement to remove mature or semi mature trees.

### Potential Arboricultural Impacts and Mitigation

Potential arboricultural impacts arising from the proposed scheme consist of disturbance to tree roots within the scrubland section of Area G.

To minimise impact on these tree roots, the section through the wooded/scrub area will be constructed from 'Flexipave'. The type of 'Flexipave' used here will be an enhanced version to accommodate the use of vehicles currently using this track. The 'Flexipave' will be hand laid, using small plant for excavation works, include tree protection fencing and a watching brief will be carried out during the construction phase. All of these measures will mitigate any potential impacts to tree roots.

This section is not part of the proposed bridleway and therefore is only for permissive cycle use rather than a dedicated shared use route for cyclists, pedestrians and equestrian users. Therefore, the width of the surfacing can be kept to a minimum to reduce any impact on tree roots.

It is considered that any potential effects of the proposed route with regards to tree root disturbance can be appropriately mitigated and therefore does not trigger the proposed scheme to be EIA development. We would suggest that a tree protection condition is included in a planning permission as a form of mitigation.

## NOISE

### Operational Phase

As the proposed route will not change the number of motorised vehicles using Stert Drove, there would be no operational noise impacts as a result of the proposed scheme.

### Construction Phase

#### Baseline Conditions

Baseline noise monitoring has not been undertaken as part of this screening assessment. However, given the rural nature of the location, it has been assumed that existing noise levels would be below 65dB  $L_{Aeq,12hour}$  and therefore all receptors would be classified as 'Category A' when using BS 5228 Part 1 ABC method for construction noise assessment.

#### Potential Noise Impacts

At this stage it is assumed that all construction works for the proposed route would take place during daytime hours (0700-1900) and it is known that works would be limited to clearance works and laying of new surfaces. Based on this assumption and known information, a potentially significant effect would occur when noise levels exceed 65dB  $L_{Aeq}$  (BS 5228 Part 1 ABC method Category A) for a period of 10 or more days in a consecutive 15 day period or 40 days in a consecutive 6 month period. Where works last for shorter periods of time but still exceed 65dB  $L_{Aeq}$ , this would be an indication of an adverse effect. Additionally, WHO Guidelines for Community Noise give 50dB  $L_{Aeq}$  as the level above which where moderate annoyance may be perceived in outdoor spaces. Therefore, it is considered that where noise levels from the works exceed 50dB  $L_{Aeq}$  for any period of time, this would be an indication of a potentially adverse effect.

Given the nature of the works, it is anticipated that noise levels would have potential to exceed 65dB  $L_{Aeq}$  within a distance of approximately 50m of the proposed route and exceed 50dB  $L_{Aeq}$  within 200m. There are four locations where there are noise sensitive receptors within these distances of the proposed route. Given the nature of the works being undertaken, it is considered unlikely that works would be within 50m of noise sensitive receptors for more than 10 days in a 15 day period. Therefore, potentially significant effects are not expected.

There are 21 receptors where noise levels from works are anticipated to exceed 50dB  $L_{Aeq}$ . It is considered unlikely that works would be within 200m of noise sensitive receptors for extended periods of time and, therefore, any adverse effects would be short term.

It is noted that there is potential for impacts on natural receptors such as birds. Impacts at these receptors would be dependent on the time of year that works take place and efforts should be made to avoid works close to nesting or other similar sensitive sites during the appropriate season(s).

### **Mitigation Measures**

Throughout any construction programme, the intention should always be to minimise site noise levels whilst having due regard to the practicability and economic implication of any control or mitigation measure. Best Practicable Means should be applied during the construction works to minimise noise at neighboring residential properties and other sensitive receptors arising from the works.

Best Practicable Means are defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environment Protection Act 1990 as those measures which are 'reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to financial implications'.

Therefore, it is considered that the potential effects of the proposed route with regard to noise can be appropriately mitigated and therefore do not trigger the proposed scheme to be EIA development.

## **LAND QUALITY**

### **Baseline Conditions**

The geology underlying the proposed scheme is indicated to comprise superficial Tidal Flat Deposits, Storm Beach Deposits and Head Deposits (sand, gravel, silt and clay) overlying the Charmouth Mudstone Formation bedrock. The area is not located within a Source Protection Zone and the geology underlying the proposed route is classified as a Secondary (undifferentiated) aquifer and a Secondary A aquifer. The Bristol Channel and several surface watercourses, marshes, ponds and drains are present within the area surrounding the proposed route.

### **Potential Contaminated Land Impacts and Mitigation**

There are limited sources of potential contamination identified to be present along the proposed route and limited sensitive receptors. Potential on-site sources of contamination include agricultural activities and potential Made Ground and activities associated with the construction and operation of existing tracks and roads. Potential off-site contamination sources include Hinkley Point Power Station. Sensitive receptors include human health receptors (existing on-site users, future users of the cycle route and occupants of adjacent residential areas); Controlled Waters receptors (Secondary undifferentiated and Secondary A aquifers); property receptors (on-site and off-site services and structures); and ecological receptors (Severn Estuary and Bridgwater Bay).

With best practice mitigation measures implemented during the construction works, such as appropriate working methods to manage earthworks, material re-use, surface water, groundwater and pollution incident control, the proposed scheme is not anticipated to have significant effects on land quality. Therefore, the proposed scheme is not considered to be EIA development with regard to land quality.

## Conclusions and Recommendations

The proposed cycle route connecting Combwich to Hinkley Point C predominantly follows Public Rights of Way (PRoW) as well as a small section of existing rural highway. The proposed scheme is considered to be Schedule 2 development as it crosses a number of 'environmentally sensitive areas' under Regulation 2(1) of the 2017 EIA Regulations.

The screening exercise undertaken here has identified potential impacts likely to arise from the proposed scheme and the potential mitigation measures which would address these in relation to all relevant environmental considerations. Given the proposed mitigation measures (particularly in relation to biodiversity), the lack of significant effects identified through this screening exercise for other environmental considerations, and the small scale and minimally invasive nature of the proposed works, we do not consider that the proposed scheme is EIA development. The application for full planning permission will be supported by the relevant environmental assessments, as identified in this letter, providing further details on any potential impacts and resulting mitigation measures.

Yours sincerely (for and on behalf of Atkins Ltd)

*K. H. Rhodes*

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Senior Planner

cc'd Charlotte Rushmere, Sedgemoor District Council