

What is an HRA Evidence Plan?

Sizewell C is a Nationally Significant Infrastructure Project (NSIP). Since September 2012, applicants of NSIPs located in England, or both England and Wales, have been able to agree Evidence Plans with relevant Statutory Nature Conservation Bodies (SNCBs).

An Evidence Plan is a mechanism to agree upfront what information applicants should provide to the Planning Inspectorate and Environment Agency, respectively, when submitting applications for Development Consent Orders and/or Environmental Permits (following further public consultation, EDF Energy will submit an application for Development Consent for Sizewell C to the Planning Inspectorate).

The purpose of the Evidence Plan is to help ensure that Competent Authorities have sufficient information to undertake Habitats Regulations Assessment (HRA) in accordance with the strict rules that apply. As such, their focus is on potential effects on 'Natura 2000' sites (Special Areas of Conservation (SACs); Special Protection Areas (SPAs) and Ramsar Sites).

By agreeing the evidence-needs of the project at an early stage, well ahead of the submission of an application for Development Consent, the Evidence Plan will help reduce the risk of NSIPs being delayed once planning and permit applications have been submitted by:

- Giving greater certainty to all parties on the amount and range of evidence an applicant should collect;
- Helping address and agree issues earlier on in pre-application so robust, streamlined decisions can be taken; and
- Focusing the evidence requirements so they are proportionate to the NSIP's potential effects and costs to applicants are minimised.

Evidence Plans are voluntary, developer-led and are not legally binding on any party.

Once approved by the lead SNCB (in this case Natural England) Evidence Plans are published by the Planning Inspectorate on its website. However, they are not published for consultation and do not form part of the statutory pre-application public consultation process for NSIPs.

HRA Evidence Plan for Sizewell C

The Evidence Plan for Sizewell C was prepared by EDF Energy in consultation with Natural England (as lead SNCB), the Environment Agency, Suffolk Coastal District Council, Suffolk County Council, the Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust. The Evidence Plan has been approved by Natural England.

The Evidence Plan:

- Identifies the potential environmental effects of Sizewell C on relevant sites;
- Aims to ensure that evidence gathering targets areas of potential effects;
- Describes the types and nature of evidence that need to be provided;
- Sets an indicative programme of workshops with technical stakeholders for more detailed consideration of evidence requirements and impact assessment methods;
- Defines the roles, responsibilities and working arrangements of EDF Energy and participating technical stakeholders; and
- Sets out an approach (amongst other things) for in-combination assessment to consider the effects of Sizewell C in combination with other plans and projects.

The Evidence Plan comprises two volumes, as follows:

- Volume I – Evidence Plan; and
- Volume II – Case Studies.

The Evidence Plan considers all possible types of environmental effect on designated features and their supporting habitats, including alteration of coastal processes and effects on marine water quality; alteration of local hydrology, hydrogeology and air quality; radiological effects; and disturbance effects on species and populations.

At the heart of the Evidence Plan, in Volume I, are a set of 'Likely Significant Effect' (LSE) Scoping tables, which represent an agreed position with technical stakeholders on areas of potential environmental effect arising from Sizewell C, acting alone. Potential in-combination effects with other plans and projects have yet to be considered.

The Evidence Plan also includes a 'Route Map', which identifies an indicative forward programme of more detailed 'Topic group' meetings with technical stakeholders.

The Evidence Plan process for Sizewell C will end when EDF Energy submits its application for a Development Consent Order to the Planning Inspectorate and its applications for operational-phase Environmental Permits to the Environment Agency.