

Planning, Design and Access Statement: Drilling of six temporary boreholes to support the selection of an in-ground testing area.

Prepared by Sellafield Ltd

Document Reference: PLC BCC 2219

1.0 Introduction

This combined Planning, Design and Access Statement has been produced to support a full planning application for the drilling of six small temporary boreholes to support the selection of an in-ground testing area on two farms to the west of the Sellafield site.

The document provides an overview of the development and how the proposal complies with national and local planning policy. This document forms part of a full suite of documents and drawings submitted in support of a full planning application, including the following:

- Covering letter
- Completed application form, including certificates of ownership
- Planning fee
- Location Plan
- Block plans showing details of the layout
- Topographic Plan
- Ecological Impact Assessment
- Contaminated Land Risk Assessments for Tarn Head Farm and Mid Tarn Farm

1.1 Pre-application consultation

Sellafield Ltd has engaged with Cumberland Council through several pre-application discussions, which have confirmed which documents would be required by Cumberland Council to validate the planning application. This has been reflected in this submission.

1.2 Site description

The site is located on two existing farms to the west of the Sellafield site. Tarn Head Farm (NY 02041 04372) is located approximately 250m west of the Sellafield boundary and Mid Tarn Farm (NY 02141 04053) is located approximately 200m west of the Sellafield boundary.

The total area of the two sites, including access, is 0.97ha.

2.0 Proposed Development (Incorporating Design and Access Considerations)

2.1 Description of Development

The proposed development is for the drilling and installation of 6 temporary groundwater monitoring wells. Three wells will be located on Mid Tarn Farm and three wells will be located on Tarn Head Farm. These wells will be used to collect groundwater samples and measure groundwater levels for ground investigation works. These investigations will support the identification of a suitable test site for the undertaking of in- ground trials to support possible ground remediation works on the Sellafield Ltd operational site. We anticipate the submission of a further planning application once we have identified the most suitable location for further trial works.

There will be a working area in use during the drilling works which will measure approximately 5x10m and will be surrounded by temporary Heras fencing. Only one working area will be used at any one time for the duration of the works (up to 6 weeks). A small mobile temporary welfare unit will be in place at the working area, which will measure approximately 5m x 2m x 2m.

2.2 Scale and layout

Each borehole will be drilled at a maximum diameter of 200mm to a maximum depth of 30m. Boreholes will be installed with a 90mm pipe. At the surface the plastic pipe will be protected by a metal cover which will be no more than 300mm in height and 200mm in diameter. This cover will then be protected by a small wooden fence that is no more than 0.5m in width and 1.5m in height. The proposed location of each borehole has been provided on the layout plan.

The layout has been chosen to gain groundwater and soil data over a good coverage of the site. The boreholes are placed in a triangular shape to allow for calculations of groundwater flow. The boreholes have been placed to avoid existing buildings, sensitive habitats, sensitive receptors and to allow access to working areas for the drill rig and for future monitoring works.

2.3 Appearance and landscaping

The boreholes will be very small and discreet. They will have limited impact on the appearance of the site. An example photo of the likely appearance of the boreholes, including the borehole cover and protective fence can be seen below.



Image 1: Indicative image of proposed boreholes

During the drilling works track matting will be placed down to protect the ground from damage. Heras fencing will be erected around the drilling area (5x10m area). The protective matting, drill rig and working area will all be removed once the drilling works are completed. Drilling works are anticipated to take 3-5 days at each location. There will be no permanent changes to the landscape or area around the boreholes as a consequence of the development.

The images below show an example of the working area that will be required and the drilling equipment that will be used.

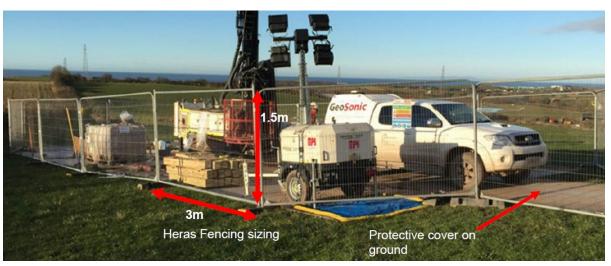


Image 2: Example working area

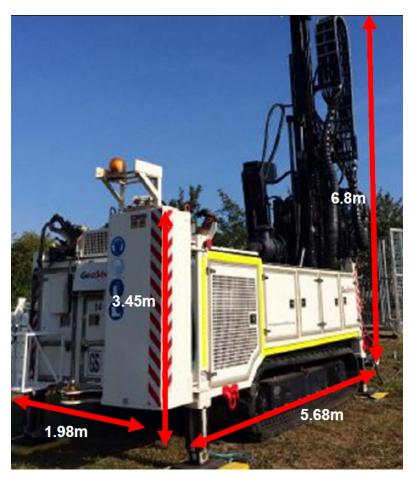


Image 3: Drill rig dimensions

2.4 Transport and accessibility

The sites will be accessed by the existing farm road as shown on the layout plan. This road will be used to deliver the drilling rig by low loader (lorry) from each of the sites. A telehandler will also be present on site and will use this road as access. The drill rig is a tracked machine which will be moved between borehole locations on each site by remote control. Track matting will be placed down when then drill rig is moved to prevent damage to any surface.

Additionally, it is likely that up to 5 site vehicles will regularly access the site during the drilling works. These site vehicles will likely be small vans or Hilux type 4x4 vehicles. Vehicles will adhere to all local speed restrictions and rules when accessing the sites.

After site works are completed sampling works will be undertaken. The personnel who will take the samples will access the farm sites with a small van that will be parked at the farm sites on hard standing. The boreholes will then be accessed by foot.

2.5 Flood risk and drainage details

The site is in Flood Zone 1 according to the Environment Agency flood maps and is therefore at a low risk of flooding from rivers and the sea. The risk of groundwater flooding is also identified as low. The proposed works will not impact upon the existing drainage arrangements.

There will be no increase to flood risk outside of the proposal site due to the small scale nature of the works and the drainage systems associated with the proposed development.

2.6 Contaminated land assessment

A Contaminated Land Risk Assessment has been carried out for both Tarn Head Farm and Mid Tarn Farm. Both assessments have concluded that there is no unacceptable risk of land contamination impacts and that the sites are suitable for the proposed use in accordance with the National Planning Policy Framework (NPPF).

2.7 Ecology assessment

An Ecological Assessment has been carried out to support this proposal, consisting of a desk study and site visit information. The work concludes that there is not anticipated to be any significant impacts on ecology, however avoidance and mitigation measures have been proposed where necessary.

There will be no harm to existing trees in the area and therefore a Tree Survey is not required for this application.

Mandatory Biodiversity Net Gain (BNG) was implemented on the 12th February 2024. We do not consider that BNG is applicable to this development and subsequently have not carried out a BNG assessment. This is based on the understanding that the proposed scheme is exempt from BNG based on Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024, as it is below the minimum size threshold of 25m². More detail surrounding this position has been provided in the Ecological Assessment that supports the Planning Application.

2.8 Noise Considerations

Works will take place only within the hours of 7am and 5pm, with no works to be carried out at the weekend. Drilling works will only be carried out for 3-5 days at each location and therefore noise pollution impacts outside of the development area are considered to be minimal.

A noise assessment has been carried out by the manufacturer of the drill equipment, who states that when operating in an outdoor environment, hearing protection is not required at a distance of 10m from the drill rig, based on the Health and Safety Executive (HSE) guidelines. Given this, it is not anticipated that any significant noise impacts will be experienced outside of the development sites.

2.9 Site decommissioning and restoration

We will aim to decommission the boreholes at the earliest opportunity. This may be up to 2 years at each location to allow the collection of groundwater samples.

The area around the boreholes will not be changed after the works are completed. Given the small scale of the works, it is not anticipated that any restoration measures will be required.

3.0 Planning Statement

This section will assess the extent to which the proposal conforms to national and local planning policy.

National Planning Policy Framework

The latest iteration of the National Planning Policy Framework (NPPF) was published in December 2023 and consolidates all national planning policy guidance. At the heart of the NPPF is a presumption in favour of sustainable development. The borehole size and locations have been designed to be as sympathetic as possible to the local environment and community whilst carrying out vital monitoring work. Drilling works will be carried out in a minimal timeframe and normal working hours will be adopted to ensure as little harm is caused as possible.

Copeland Core Strategy and Development Management Policies (2013-2028)

The Core Strategy is the main document setting out local planning policy in the former Copeland Borough area. It is considered that the proposed development conforms with local planning policy, in particular the proposal:

- Conforms with Policy ST1 Strategic Development Principles, which highlights that development should be on areas of previously developed land wherever possible.
 Both development sites are existing farmyards and therefore the selected location is preventing harm to greenfield land.
- Conforms with Policy DM5 Nuclear Sector Development at Sellafield and the LLWR at Drigg, which requires that "Operations (other than monitoring, maintenance and investigatory work necessarily done off site) will be retained within the existing boundaries at Sellafield." This work is essential monitoring work that needs to be carried out off site.
- Is not in a flood risk area and therefore meets the requirements or Policy ENV1 Flood Risk and Risk Management

Emerging Copeland Local Plan (2021-2038)

Cumberland Council are in the final stages of producing a new Local Plan (2021-2038) for the former Copeland Borough area which, once adopted, will replace the existing Core Strategy. The proposed development conforms with policies within the emerging Local Plan, in particular:

- Policy NU4, which reiterates that development will be enabled offsite where it is monitoring or investigatory work which is required in an offsite location.
- Policy NU4 also states that all proposals must include measures to adequately mitigate any adverse effects of the proposed development. We have designed the proposal to reduce adverse environmental and community impacts wherever possible, including keeping drilling works to normal working hours, and designing the borehole locations and protective equipment to be as sensitive to the local environment as possible. The ecological and contamination studies make recommendations, wherever required, to reduce the impact of development.

4.0 Conclusion

In conclusion, this planning application is in line with relevant national and local planning policy.

Section 38 (6) of the *Planning and Compulsory Purchase Act 2004* sets out that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated in paragraph 11 (c) of the NPPF which states proposals that accord with an up-to-date development plan should be approved without delay.

As highlighted throughout this document, the proposed development is deemed to comply with relevant national and local planning policies. The proposed development will not cause any undue harm to the environment and demonstrates a sustainable approach to ground investigation work to support the vital work carried out by Sellafield Ltd. Therefore, this planning application should be positively determined and approved without delay.