



Combined Heat and Power Plant Modular Buildings: Planning, Design and Access Statement

Introduction

Sellafield Ltd obtained planning permission for the construction of the New Steam Generation Plant (NSGP) in 2017. Planning permission for the project was split across separate consents:

1. 4/17/9011 – Construction of temporary access road, siting of temporary contractor welfare/office building, re-profiling of landscape mound and reinstatement works for a temporary period of 8 years in connection with the construction of a New Steam Generation Plant (consent granted by Cumbria County Council on 20 September 2017).
2. 4/17/2256/0F1 – New Steam Generation Plant and demolition of existing Combined Heat and Power Plant (CHP) (consent granted by Copeland Borough Council on 23 November 2017).
3. 4/20/2044/0F1 – New Steam Generation Plant (Amended Scheme of 4/17/2256/0F1 above) (consent granted by Copeland Borough Council on 10 July 2020).

Following a review of Sellafield Ltd's future energy demand, existing assets and generation capacity, and in response to HMG's Net Zero 2050 Policy, Sellafield Ltd took the decision in mid-2021 not to continue with building the NSGP. Therefore, the Combined Heat and Power Plant (CHP), located on the Fellside site, will continue to operate until approximately 2030.

Prior to the cancellation of the NSGP, new fuel oil storage tanks were built, and some other minor works were carried out. A temporary contractor welfare/office building was also erected on land adjacent to the approach road to the Landscaped Spoil Mound Area D1, in support of the NSGP construction activities, under permitted development rights. Instead of removing the temporary welfare/office building, Sellafield Ltd wishes to re-purpose the facility in its existing location for the use of the contracting personnel who are responsible for the operation, maintenance and monitoring of CHP, who need to be relocated out of their current facilities for safety reasons (please see the Use Section below for more detail). The proposal to re-use an existing facility offers a more sustainable solution as it will avoid the need to demolish an otherwise useable building and construct a new one somewhere else nearby.

This Planning, Design and Access Statement has therefore been prepared in support of a full minor planning application, submitted to Copeland Borough Council, for the:

Retention of a temporary welfare/office building and erection of an additional temporary modular building for use in association with the Combined Heat and Power Plant (CHP) for a temporary period until 2032.

Pre-Application Consultation

Sellafield Ltd has engaged with Copeland Borough Council through pre-application discussions over the last year and has hosted a visit to the existing temporary contractor welfare/office building and the site of the proposed new modular building.

The positive pre-application discussions with the Planning Officer confirmed that it would be sensible to re-use the existing facility for a temporary period rather than demolishing it, as this would be a more sustainable approach aligning with the National Planning Policy Framework (NPPF) in terms of the presumption in favour of sustainable development.

In addition, the discussions with the Planning Officer confirmed what documents are required by Copeland Borough Council to support the planning application in order for it to be validated, and so the results of the pre-application engagement have resulted in the planning application documents submitted with this proposal.

Site Description

The application site is located to the east of the wider Sellafield nuclear licensed site and is adjacent to the Fellside site where the Combined Heat and Power Plant (CHP) is located. It is part of the operational Sellafield site. It is located on land which is owned by the Nuclear Decommissioning Authority (NDA) and which is leased to Sellafield Ltd, thus forming part of the single planning unit operated by Sellafield Ltd, although it falls outside the nuclear licensed site boundary. The application site is shown in drawing 1 BE 3108828. The site is accessed via the B5344, U4465 and the access road to the Area D1 spoil storage mound.

The layout of the existing and proposed developments, set out in the context of the wider Fellside site, is shown in drawing 1 BE 3108829. The planning application covers a total area of 0.0364 hectares.

Proposed Development (incorporating Design and Access Considerations)

Use

The Sellafield Site is of national importance in its responsibility to ensure the safe and secure management of nuclear materials and to remediate the site. In order to fulfil its responsibility, an uninterrupted supply of electricity and steam must be maintained. The electricity and steam requirements are provided by the Combined Heat and Power Plant (CHP) which is operated and maintained by a specialist contractor. The contractor is contractually obliged to guarantee the supply of electricity and steam to the Sellafield site, so therefore needs to ensure that they have enough suitably qualified and experienced personnel available, with ready access to the Fellside site at all times, in order to safely operate CHP. This means that personnel may need to be brought in from other sites around the country if there are not enough locally based operatives available. Hence, the Fellside site is managed separately from the main Sellafield site and it has its own security arrangements. Therefore, the contractor's operators and subcontractors do not have access to the Sellafield site and therefore cannot be based inside the main Sellafield site security fence.

The CHP contractor's workforce is currently located in a number of facilities on and very close to the Fellside site, and their subcontractors are housed in some old cabins, just outside the Fellside site, which need to be removed because they were put there on a temporary basis to support construction activities. The emergency response to a Fellside incident is to evacuate the site and muster for a roll call outside on the car park at the Calder gate.

Sellafield is an upper tier COMAH (Control of Major Accident Hazards) establishment and CHP Fellside is within the boundary of the COMAH establishment. The COMAH Regulations require that 'all measures necessary' are taken to reduce the consequence of a Major Accident to As Low As Reasonably Practicable (ALARP). As part of these measures, the COMAH Operator should minimise the number of people who would be affected by a Major Accident if it should occur. In order to do this, an Occupied Buildings Risk Assessment has been undertaken which has demonstrated that locating welfare and office-based activities further away from the hazardous substances, which could give rise to a Major Accident, is ALARP. Also, the new chemical incident emergency state which would be enacted following a COMAH incident either on the Sellafield site or at the Fellside site requires everyone to shelter indoors.

This means that the location of the current workforce facilities and the emergency response arrangements are sub-optimal from a safety perspective. Hence, welfare/office accommodation for the contractor's workforce needs to be moved far enough away from the Fellside site to minimise the COMAH consequence and to provide a suitable emergency shelter but near enough to be able to expediently access and safely operate the site.

Given the safety, security and land constraints around the Fellside site, it has been challenging to identify a suitable location to relocate the contractor's workforce to. Several options have been considered:

- Option 1: consolidate the contractor's and subcontractor's personnel together in one new facility within the Fellside site. However, by adopting this approach it would be difficult to demonstrate that risk reduction measures have been considered against a hierarchy of control. The use of such hierarchy should focus on inherent safety i.e. wherever possible, locate people away from chemical processing and storage unless their presence is required for safe, effective operations'. Hence, this option is not preferred.
- Option 2: consolidate the contractor's and subcontractor's personnel together in one new facility off the Fellside site. However, a suitable location has not been identified.
- Option 3: consolidate all the contractor's and subcontractor's personnel in an existing facility close to the Fellside site. However, a facility that is large enough is not available.
- Option 4: consolidate all the contractor's personnel in the temporary welfare/office building that was provided near to Area D1 as construction welfare facilities for the NSGP project (which has now been vacated) and provide an additional small mess cabin building for the subcontractor's personnel.

Option 4 is preferred because it would provide a more sustainable solution as relatively new, good quality cabins, which have a Building Regulations Completion Certificate, could be re-used and only a small new modular building would need to be provided for the personnel that would not fit into the existing building. The proposed new modular building has been sized

such that it will only provide the additional facilities that cannot be accommodated in the existing NSGP building.

When CHP reaches the end of its operating life and has been decommissioned, the sets of temporary modular buildings, which are the subject of this planning application, will be demolished.

Scale

The existing welfare/office building has a footprint of approximately 24.132 x 12.249m and is 6.5m in height. The proposed new modular building will have dimensions of 6.87 x 9.832 x 7.024. Both buildings will be 2 storeys high and their designs will complement each other.

The existing welfare/office building will be used to provide approximately 25 - 35 personnel with changerooms, toilets, a mess area, an open plan office space and several meeting rooms plus space for additional personnel to use the building as a shelter in the event of an emergency.

The proposed new modular building has been designed to accommodate up to approximately 36 subcontractors who currently use 4 x 4 stacked cabins located in a small car park opposite the Fellside Lodge (see drawing 1 BE 3108829). The new modular building will provide mess rooms, a locker room and a drying room, noting that the subcontractors will use the welfare facilities in the existing welfare/office building. The old cabins opposite the Fellside Lodge will be removed once the new cabin building has been built.

Appearance

The existing temporary welfare/office building is formed of a 2-storey lightweight structure. The building is constructed out of insulated wall and roof cladding panel and is white in colour with blue external doors. Please see drawings S106388-301, S160388-101 and S160388-102 and the photo below.



The proposed new 2-storey modular building will be of a similar modular construction type and colour (light grey) (see drawing HD/12889/01). New concrete footings (9 in total) will be required to support the building and they will be constructed on the existing compacted hardcore.

The colour scheme for the proposed new modular building is:

- Walls, fascia's and trims - Goosewing Grey (nearest BS ref 10 A 05) and White (nearest BS ref 00 E 55)
- Columns and external corners - Grey (BS 4800 00 A 05)
- External doors - Slate Grey (nearest BS 18 B 25)

Both buildings are located adjacent to a car park.

The existing and proposed buildings are standard fit-for-purpose modular cabins supplied by commercial modular building providers. The colour schemes suit the industrial purpose of the buildings and fit into the nearby industrial setting of the Fellside site. No new external lighting is proposed to be installed in the vicinity of the development.

Given the location and setting, it is not anticipated that the retention of the existing building and the proposed new modular building would result in any significant negative landscape or visual impact, particularly given the nearby industrial Fellside and Sellafield sites. An appropriate number of tree saplings will be planted, to act as screening, along the south side of the car park, to fill a gap in an existing line of trees (as shown in drawing 1 BE 3108829) and in the photo below.



Landscaping

Landscaping within the area of the proposed site is generally hard, comprising compacted hard standing surfaces. There will be no soft landscaping within the development boundary owing to the industrial nature of the site. Some appropriate tree planting will be carried out to provide some screening between the car park and the public highway (as described above).

Ecology/Habitat Survey

In support of this proposal, an ecological walk down was undertaken, on 30 September 2022 by a Sellafeld Ltd Environmental Advisor, to assess if there are any potential ecological impacts from the proposed development.

The wider development site comprises a fenced compound engineered car park and other hard standing. The compound is located to the south of the Sellafeld site between the Fellside site and the D1 spoil repository. To the immediate north and south west of the compound are wooded areas comprising broad leaved trees (plantation) and scrub, to the west a vegetated bank bordering the county highway comprises scrub and improved grassland and to the south east is hard standing and an access road. The north east boundary comprises an immature hedge row between the building and access road, this feature is adjacent to the area of hard standing proposed as the location for the modular buildings and is demarked from it by a concrete path and chain-link fence.

The location identified for placement of the new modular building does not displace any habitat, but being located on hard standing, there is potential for ground nesting birds to utilise the area. Similarly, nesting birds could occupy the immature hedgerow and could be

vulnerable to disturbance during the construction works. If the works were to occur between August and February inclusive it is considered that there would be negligible ecological risk. The months of March through to July inclusive are considered bird nesting season, so a pre-works walk down by an ecologically competent person is recommended if the construction works are to be undertaken at this time to ensure there is no risk of disturbance to nesting birds and they will advise on mitigations accordingly.

Access

The construction of the new modular building should take approximately three weeks during which time there will be approximately five HGV deliveries, and one crane will be used. Less than 10 people will work on the construction and they will travel to/from the site in a minimal number of vans.

The majority of routine vehicle movements to the development site, including personnel and deliveries, will be made via the B5344, U4465 and Area D1 access roads. There should be no change in the number and type of vehicle movements as a consequence of this development because the personnel will be relocating from existing cabins on the Fellside site and no additional materials/equipment deliveries are anticipated. Hence, there should be no impact on the local road network during the construction and operational phases of the development.

The proposed development connects into the Fellside site via an internal road which is not part of the adopted highway. Adequate visibility will be maintained for all road users and there are clear road markings and signage to allow personnel and vehicles to access/egress the site safely.

The existing welfare/office building has a Building Regulations Completion Certificate and was therefore designed to provide adequate provisions for disabled access requirements. The proposed new cabin building will have a ramp and will also comply with these requirements.

Two disabled parking spaces are provided adjacent to the accommodation building. The car park is compacted gravel retained in plastic stabilisation grids with white marker studs outlining each parking space.

Planning Policy

Planning Assessment

The proposal conforms with national and local planning policies. At the heart of the National Planning Policy Framework (NPPF) is the presumption in favour of sustainable development. The proposal to re-use an existing building and thereby minimise the size of an additional new building supports the environmental objectives of the NPPF and will minimise waste by avoiding the need to demolish an existing facility and build a replacement somewhere else close by [Paragraph 89(c)].

The proposed development needs to be located in close proximity to the Fellside site in order to support the on-going operations of the Combined Heat and Power Plant (CHP) and to

provide safe shelter in the unlikely event of an emergency (as described above in the Use Section). The proposal uses land which was previously developed for temporary purposes.

At the local planning policy level, the proposed development conforms with policies as set out in the Copeland Core Strategy and Development Management Policies 2013-2028, in particular the proposal:

- Meets environmental sustainability requirements as set out in ST1 B iv) by re-using previously developed land.
- Is not in a flood risk area and therefore meets the requirements in Policy ENV1 Flood Risk and Risk Management.
- Conforms with Policy DM 5 – Nuclear Sector Development at Sellafield and the LLWR at Drigg which requires “Operations (other than monitoring, maintenance and investigatory work necessarily done off site) will be retained within the existing boundaries at Sellafield. The development will be on land which has been designated by the NDA as operational land and has therefore been leased to Sellafield Ltd to form part of the wider operational Sellafield site.

Copeland Borough Council are in the process of producing a new Local Plan (2021-2038), which will replace the existing Core Strategy upon adoption. The proposed development conforms with policies included within the emerging Local Plan, in particular:

- Strategic Policy DS2PU, which encourages the reuse and refurbishment of the existing building stock and previously developed land.
- Policy DS6PU, which requires development to make effective use of land. The policy also requires development to provide landscape screening where appropriate, which will be provided through tree planting.
- Policy NU4PU, which reiterates the requirement in Core Strategy policy DM5 for development to be sited within the existing boundaries at Sellafield.

Conclusion

This Planning, Design and Access Statement is submitted in support of a planning application for the retention of a temporary welfare/office building and erection of an additional temporary modular building for use in association with the Combined Heat and Power Plant (CHP) for a temporary period until 2032.

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.

For the reasons set out in earlier sections of the Planning, Design and Access Statement, the proposed development is deemed to comply with relevant national and local planning policies. A justification has been set out in the Use Section as to why the development needs to be located near to the Fellside site on land which has been designated by the NDA and is operated by Sellafield Ltd. This is a material consideration which needs to be taken into account when determining the planning application.

The proposed development will not cause any undue harm to the environment in terms of ground stability, contamination, air quality, noise, flood risk and drainage, ecology, landscape character and visual amenity, or transport.

Ultimately, the proposal accords with adopting a sustainable approach to providing temporary facilities for a limited period of time. Thus, the planning application should be positively determined and approved without delay.

DRAWINGREGISTER

Drawing no.	Drawing title	Revision
1 BE 3108828	Location Plan	Rev A
1 BE 3108829	Block Plan	Rev A
S160388-301	Elevations	Rev C
S160388-101	Ground Floor Plan	Rev F
S160388-102	First Floor Plan	Rev D
HD/12889	2 on 2 UK 093 Ultima Modular Building	Rev 01