

**NOT PROTECTIVELY MARKED**

Ms McKay  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
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Bristol BS1 6PN

8 January 2021

Copied to Ms Gregory, Case Manager (sizewellc@planninginspectorate.gov.uk)

Dear Ms McKay

**Application EN010012 for The Sizewell C Project by NNB Generation Company (SZC) Limited ("SZC Co.")**

We write further to your letter, dated 22 December 2020, regarding your request for further clarifications and documents from SZC Co., as well as the email from your case manager, dated 5 January 2021.

***Confidential documents***

The Procedural Decision letter of 22 December 2020 [\[PD-009\]](#) notes that in its 16 November 2020 response letter [\[AS-006\]](#), SZC Co. requested the withdrawal of certain documents [APP-292 to APP-295]. The Examining Authority ("ExA") has requested a further explanation in relation to:

- (i) the extent and nature of the commercially sensitive aspect of these documents and why this could not be redacted without rendering them incomprehensible; and
- (ii) the justification for them not being required in order for the ExA to satisfactorily examine the Application and to properly assess the basis for the related conclusions and findings in the main parts of the Environmental Statement ("ES").

With regard to query (i), the documents that SZC Co. seeks to withdraw are historical reports. These reports were redacted because they contain commercially sensitive information that was not deemed suitable for public circulation. Due to the reports being of a historic nature, SZC Co. has been unable to make contact with either the Project Manager or consultancies who produced the reports. Therefore, SZC Co. is unable to amend the protective marking on documents and ultimately requests their withdrawal from the Application.

With regard to query (ii), the information provided in each of these historical reports has been used to interpret the ground conditions at the main development site and is summarised in the Phase 2 report provided in Appendix 18A which is an appendix to Volume 2, Chapter 18 Geology and Land Quality of the ES [APP-281 to APP-291]. Furthermore, the historical reports that are requested to be withdrawn from the Application contain information that has since been surpassed by more recent ground investigation data that has been provided within Volume 2, Chapter 18, Appendix 18A [APP-281 to APP-291].

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### ***Part 6 'Harbour Powers' of the draft Development Consent Order***

The Procedural Decision letter of 22 December 2020 [\[PD-009\]](#) requested that SZC Co. provide a response to paragraphs 2.2.7 and 2.2.8 of the Marine Management Organisation's Relevant Representation [\[RR-0744\]](#) regarding consultation with the UK Major Ports Group, Chamber of Shipping, the British Ports Association and users of local recreational and fishing vessels in relation to Part 6 'Harbour Powers' of the draft Development Consent Order.

The UK Major Ports Group, Chamber of Shipping and the British Ports Association were invited to a briefing held by SZC Co. on 11 September 2020. The Chamber of Shipping and the British Ports Association both attended this briefing, in addition to a number of other attendees such as the Marine Management Organisation, however the UK Major Ports Group was not available to attend. The briefing provided a description of the Sizewell C Project, the need for a harbour authority and the proposed harbour limits. High level, positive feedback was received at the briefing session and points of clarity were discussed.

SZC Co. is in the process of engaging with the UK Major Ports Group to find a convenient time for a briefing to be held and is confident that this will take place in due course.

With regard to users of local recreational and fishing vessels, SZC Co. has engaged during navigation hazards workshops with the commercial fisherman that fishes the sea area in front of the proposed Sizewell C power station, at which the proposed harbour authority was discussed. Further interaction is planned.

### ***Accommodation Campus***

The Procedural Decision letter of 22 December 2020 [\[PD-009\]](#) requested that SZC Co. confirm whether the proposed accommodation campus and land east of Eastlands Industrial Estate ("LEEIE") have been included within the soils and agriculture assessment and to signpost to the relevant documentation.

Volume 2, Chapter 17 of the ES (Doc Ref. 6.3) [\[APP-277\]](#) assesses the soils and agricultural effects of the main development site, including the accommodation campus and LEEIE. The chapter assesses both the effects on agricultural land as well as effects on land holding. Further information regarding the methodology can be found in Volume 1, Chapter 6, Appendix 6M (Doc Ref. 6.3) [\[APP-171\]](#).

The main development site is assessed as a whole when regarding impacts on agricultural land. Therefore, both the accommodation campus and LEEIE are included within the overarching assessment. Figure 17.3.1 (Doc Ref. 6.3) [\[APP-279\]](#) provides a summary of the ALC survey locations within the proposed development. It shows that Figure 17.3.6 (Doc Ref. 6.3) [\[APP-279\]](#) includes survey locations within the LEEIE locality and Figure 17.3.2 (Doc Ref. 6.3) [\[APP-279\]](#) includes survey locations within the accommodation campus locality. The LEEIE is shown as predominately Grade 4 land with small areas of Grade 3b and Grade 3a. The accommodation campus is predominately grade 4 land. The loss of areas of Best and Most Versatile land (Grades 2 and 3a) is considered to be major adverse, therefore a small area within LEEIE will be major adverse (significant). The other areas within LEEIE and the accommodation campus are considered to be minor adverse and therefore not significant. The land take in both areas will be temporary and will be restored to agricultural use following the construction phase, soil handling, storage and re-use and as detailed in the outline Soil Management Plan [\[APP-278\]](#) will ensure that soils can be reused.

The chapter sets out the effects on land holdings within the proposed development. The LEEIE is assessed under the land holding Crown Farm/LEEIE and the accommodation campus is assessed under the land holding EDF Energy Nuclear Generation Limited. The effects on EDF Energy Nuclear Generation Limited are considered to be major

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adverse under the assessment criteria in section 17.3, but are not considered to result in a significant adverse effect as the entity is not an agricultural business and is not dependent on the revenue created through estate management. The residual effects will be minor adverse and therefore not significant. Table 17.7 shows that the effects on LEEIE/Crown Farm are assessed as major adverse (significant) during the construction phase and minor adverse and not significant during operation and following additional mitigation.

### *Photomontages and wireframe imagery*

The Procedural Decision letter of 22 December 2020 [\[PD-009\]](#) also asked SZC Co. to provide detailed photomontages and wireframe visualisations of the accommodation campus and LEEIE. These have now been provided at **Part 1 of Appendix A** of this letter.

As requested, the approach has been consulted upon and agreed with East Suffolk Council and Natural England. Following receipt of the Procedural Decision letter of 22 December 2020 [\[PD-009\]](#), SZC Co. contacted both parties to set out the proposed approach to meeting the requirements. Full details of this engagement can be found in **Part 2 of Appendix A**. Upon receipt of the letter, a follow up meeting was arranged on 4 January 2021 with the relevant parties upon which the approach set out in Part 2 of Appendix A was agreed. Note that that Natural England deferred to East Suffolk Council on this matter, please see **Part 3 of Appendix A** for further information.

The agreed approach has selected representative viewpoints from the landscape and visual impact assessment ("LVIA") for consistency with the Application and further details are provided below. These viewpoint locations were previously agreed with East Suffolk Council, Suffolk County Council, Natural England and Suffolk Coast and Heaths AONB Partnership as part of the LVIA for the main development site. Given the timescales and current situation with the coronavirus pandemic, it was agreed that this approach would be acceptable by East Suffolk Council and new viewpoint locations would not be necessary. Further information regarding consultation pursuant to the LVIA can be found in Volume 2, Chapter 13 of the ES [\[APP-216\]](#).

The selected viewpoints provide a range of views from locations illustrating the nature of effect for different receptors including residential areas/communities; local amenity areas; and public rights of way. The views illustrate open views into the site areas and those where screening occurs. All of the photographs meet the necessary standards for the production of photowire and photomontage visualisations.

The locations of the viewpoints used for the production of visualisations are illustrated on Figure 1 in Part 1 of Appendix A.

### Accommodation campus:

SZC Co. has prepared an annotated 3D massing model of the illustrative accommodation campus design extracted from the Design and Access Statement to support interpretation (Figure 2 in Part 1 of Appendix A).

A rendered photomontage and photowire visualisation from these locations has been prepared to meet the requirements of the ExA. The views illustrate the campus only and exclude the wider construction phase activity. For each location, the existing view is presented, followed by a wireline overlay. A photomontage is presented for Viewpoint 8, Footpath North of Leiston Abbey (Figure 7 in Part 1 of Appendix A). The photomontage also includes the adjacent access road arrangements, associated lighting columns and modifications to vegetation.

It was originally agreed that a photomontage would be prepared for Viewpoint 7 Sandlings Walk/Sustrans Route South of Eastbridge. However, a photowire visualisation has been prepared from this location as the accommodation campus is largely screened in the view.

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The views are as follows:

- Representative Viewpoint 7 Sandlings Walk/Sustrans Route South of Eastbridge (Figures 3-4 in Part 1 of Appendix A).  
A photowire has been produced at this location. This viewpoint is located on the Eastbridge Road south of Eastbridge. It occupies the route of the Sandlings Walk, Sustrans Regional Cycle Route 41/42 and Suffolk Coastal Cycle Route. The original representative viewpoint presented in the ES was orientated towards the main power station structures. The view presented is orientated towards the campus. The visualisation illustrates the wireframe model of the campus. It is based upon the design proposals set out in the Design and Access Statement so the final design may vary from that shown.  
The DCO LVIA presents an operational phase parameters photowire and operational phase photowires (year 1 and year 15) from this viewpoint (Figures 13.10.25-13.10.28 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)).
- Representative Viewpoint 8, Footpath North of Leiston Abbey (Figures 5-7 in Part 1 of Appendix A).  
A photowire and year 1 photomontage has been produced at this location. This viewpoint is located within an arable field on the public footpath (E-363/010/0) to the north of Leiston Abbey (between the Leiston Abbey/Pro Corda car park and the B1122 Abbey Road). The wireframe and photomontage is based upon the illustrative design proposals set out in the Design and Access Statement so the final design may vary from that shown.  
The DCO LVIA presents an operational phase parameters based photo, operational phase photomontages (year 1 and year 15) and construction phase parameters based photowires from this viewpoint (Figures 13.10.29-13.10.33 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)).
- Viewpoint 28, Footpath South of Theberton (Figures 8-9 in Part 1 of Appendix A).  
A photowire has been produced at this location. This viewpoint is located on the footpath south of Theberton (E-515/007/0). The visualisation illustrates the wireframe model of the campus. It is based upon the illustrative design proposals set out in the Design and Access Statement so the final design may vary from that shown.  
The DCO LVIA presents an operational phase parameters based photowire, operational phase photowires (year 1 and year 15) and construction phase parameters based photowires from this viewpoint (Figures 13.10.93-13.10.97 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)).

### LEEIE:

Four photowire visualisations have been prepared illustrating the construction phase parameters for LEEIE to meet the requirements of the ExA. SZC Co. has also prepared a schematic view to support interpretation (Figure 10 in Part 1 of Appendix A). This illustrates simple parameter areas as colours blocks to match line colours in the photowires. As agreed previously, the assessment is based upon a parameters approach and this will continue as SZC Co. cannot be certain of the actual representations at any given time during the construction phase.

The views are as follows:

- Representative Viewpoint 3, King George's Avenue, Leiston (Figures 11-12 in Part 1 of Appendix A).  
This viewpoint is located on the footway north of King George's Avenue on the eastern edge of Leiston and provides a view into LEEIE. The original representative viewpoint presented in the ES was orientated towards the main power station structures. The view presented is now orientated to capture more of LEEIE.  
The DCO LVIA presents an operational phase parameters based photowire and operational phase photowires (year 1 and year 15) from this viewpoint (Figures 13.10.9-13.10.12 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)).

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- Viewpoint 11, Junction of Footpaths South West of Halfway Cottages (Figures 13-14 in Part 1 of Appendix A).  
This viewpoint is located at the junction of footpaths/bridleways to the south west of Halfway Cottages, east of Grimsey's Lane (east of Leiston). The original representative view has been reorientated towards LEEIE.  
The DCO LVIA presents an operational phase parameters based photowire and operational phase photowires (year 1 and year 15) from this viewpoint (Figures 13.10.42-13.10.45 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)).
- Viewpoint 27, Footpath, Valley Road Allotments, Leiston (Figures 15-16 in Part 1 of Appendix A).  
This viewpoint is located within the Valley Road Allotments, a short distance north and east of a public footpath (E-363/017/0) and provides a view into LEEIE to the west.
- Viewpoint 32, Footway Adjacent to Valley Road, North of Railway Overbridge (Figures 17-18 in Part 1 of Appendix A).  
This viewpoint is located adjacent to Valley Road, Leiston, a short distance north of the railway overbridge. The original viewpoint was used to present construction phase parameters.  
The DCO LVIA presents a construction phase parameters based photowire from this viewpoint (Figures 13.10.106-13.10.107 in Volume 2, Chapter 13 of the ES (Doc Ref 6.3)). In preparing the construction phase parameters based photowire, an error with the insertion height of one of the parameter blocks was identified. This has been corrected in the visualisation provided.

SZC Co. considers that the agreed approach set out above meets the requirements of the Procedural Decision letter of 22 December 2020 [\[PD-009\]](#).

### ***Project Description, Environmental Statement and draft Development Consent Order***

**Appendix B** to this letter sets out SZC Co.'s responses to each of the ExA's observations at Annex A of the 22 December 2020 Procedural Decision letter [\[PD-009\]](#).

A revised **Draft Development Consent Order (Draft DCO)** (Doc Ref. 3.1(A)) is submitted with this letter in clean and tracked changes versions to incorporate the required amendments. A **Second Draft Development Consent Order Addendum: Proposed Work No.s Changes** (Doc Ref. 3.1 Ad2) is also submitted to explain the changes that have been made.

### ***Observations on the draft Section 106 Agreement***

SZC Co. would like to thank the ExA for their observations on the draft Section 106 Agreement. Regard will be had to these in the drafting of the next version of the document, which will be submitted at the end of March 2021.

### ***Sizewell B Relocated Facilities***

In an email from the Planning Inspectorate case manager to SZC Co. on 5 January 2021, SZC Co. was informed that the ExA has requested submission of Appendices 6.1 (Terrestrial Ecology and Ornithology Appendix) and 6.2 (Badger Technical Report) of Appendix 2A of the Sizewell B Relocated Facilities ES (Part 2 of 4) of Volume 1 Introduction to the ES, Chapter 2 Overview of the Sizewell C Project [\[APP-163\]](#).

As requested, these are now submitted at **Appendix C** (Appendix 6.1) and **Appendix D** (Appendix 6.2) to this letter. Please note that the information contained within these documents is historic and has been superseded by the Terrestrial Ecology and Ornithology Appendices (to Volume 2, Chapter 14 of the ES (Doc Ref. 6.3) and Chapter 2,

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Section 9 of the ES Addendum) and the additional baseline survey information that was issued to the ExA in November 2020 [[AS-021](#) – [AS-022](#)] or December 2020 [[AS-036](#) – [AS-037](#)] or will shortly be issued to the ExA as part of the ‘Proposed Changes to the DCO Application – January 2021 submission’.

Additionally, it is noted that Appendix 6.2 contains confidential information relating to badger setts. In accordance with Annex 1 of Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping, dated June 2020 (version 7), this document has been labelled and watermarked as ‘Confidential’, and Appendix D to this letter (which contains Appendix 6.2) is submitted in a separate file to the rest of this letter and its appendices.

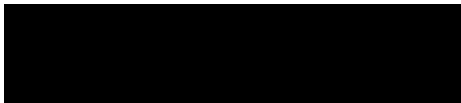
### ***Navigation Document***

Attached is a revised version of the **Navigation Document** (Doc Ref. 1.3(C)).

### ***Taking matters forward***

We trust that the provision of the above information and clarifications addresses the comments raised in your letter, dated 22 December 2020 [[PD-009](#)]. Please do not hesitate to contact me if I can help in any way to further clarify any matters associated with this letter.

Yours sincerely



Carly Vince  
Chief Planning Officer  
Department, Business Unit

### **List of appendices:**

Appendix A Part 1: Photomontages and wireframe imagery  
Appendix A Part 2: Details of engagement and agreed approach  
Appendix A Part 3: Natural England response to consultation  
Appendix B: Schedule of responses  
Appendix C: Sizewell B Relocated Facilities Documents (Appendix 6.1)  
Appendix D: Sizewell B Relocated Facilities Documents (Appendix 6.2) – CONFIDENTIAL

### **List of supporting documents:**

Draft Development Consent Order (Draft DCO) in clean and tracked changes (Doc Ref. 3.1(A))  
Second Draft Development Consent Order Addendum: Proposed Work No.s Changes (Doc Ref. 3.1 Ad2)  
Revised Navigation Document (Doc Ref. 1.3(C))

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**Appendix A: Part 1: Photomontages and wireframe imagery**

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**Appendix A: Part 2: Details of engagement and agreed approach**



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**Appendix A: Part 3: Natural England response to consultation**

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**Appendix B: Schedule of responses**

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**Appendix C: Sizewell B Relocated Facilities Documents (Appendix 6.1)**

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**Appendix D: Sizewell B Relocated Facilities Documents (Appendix 6.2) - CONFIDENTIAL**

To be provided separately due to confidential nature