From:
To: SizewellC

Subject: Submission by interested party Deadline B

Date: 03 April 2021 15:39:15

Attachments: The Sizewell C Project Deadline B.docx

Please find attached a submission by IP on Preliminary Meeting by Deadline B

The Sizewell C Project - EN010012

Written Submission on Preliminary Meeting by Deadline B Submitted by Interested Party Ref: 20026143

Concerning Changes necessary to the draft Examination timetable and agenda Items

Agenda C

Initial Assessment of Principle Issues

DCO

Points 5 & 6:

- 5. Adequacy of the dDCO Requirements, and associated provisions and documents, their status and enforceability to secure the proposed mitigation (primary, secondary and tertiary) and monitoring.
- 6. Whether any additional Requirements are necessary.

Monitoring and mitigation of the project was raised throughout the separate Principle Issues listed by the ExA. The importance of both monitoring and mitigation need to be recognised sufficiently in the terms laid out in the DCO .

This needs to be done through the status and enforceability accorded to monitoring and mitigation in the DCO requirements.

Issues around monitoring and mitigation could be characterised as follows:

Which aspects of the project will be monitored How will this monitoring take place
Who will be carrying out the monitoring
How will the monitoring be funded
Agreement on baseline data
Agreement on timetable entry and exit
Agreed levels to secure mitigation

I would like to propose that the DCO includes the requirement of an independent body to manage the work of monitoring the project. This independent body should be given the jurisdiction to secure mitigations up to and including suspension of operations should the data require this. The body should comprise experts and representative from among the Interested Parties and should report back to them. It could have links to the expertise available through Universities to undertake compilation of data. It should continue to have jurisdiction into the heritage phase of the project. The requirement to recognise and fund such an independent body should apply to whoever undertakes the funding of the project. This would include the government should they undertake part of the funding.

Following the virtual Preliminary Meeting I would like to make this further submission under the terms set out in the rule 6 letter:

People who have not made a request to participate will still be able to access the livestream and/ or the recording of the Preliminary Meeting Part 1 and then make a written submission to the Examination by Procedural Deadline B on Wednesday 7 April 2021.

With reference to oral submissions concerning item 5:

Oral submissions from many interested parties on subjects such as: freight, water, air quality, and the marine environment, state that these areas will be affected by the changes made to the proposals by EDF. They state that the changes proposed do not give sufficient time for adequate scrutiny. Nor do they give time to gather sufficient data on individual and cumulative effects. Moreover they question the deliverability of EDF on matters of mitigation.

Given these concerns the formation of the proposed independent monitoring and mitigation body becomes even more vital.

I would propose that the DCO require an agreed sum for the sole purpose of monitoring and mitigation and that this be guaranteed and underwritten from the beginning of the project through to the project's decommissioning and heritage elements. This guarantee should apply to whoever undertakes backing of the project.

Eleanor Jenkin