

## ExQ1

### G.1.10

The Planning Statement, section 3.8, considers whether there has been a change in circumstances since the EN-6 site specific assessment. Please identify and list all changes to the site area/circumstances for the Sizewell C Project application compared to what was considered by EN-6.

In answering G.1.10 the Applicant makes a number of statements that seem to question whether they have fully addressed the requirement on them to demonstrate they can accommodate the proposed development within the nomination site boundary. For example;

a) "...the main platform is almost entirely contained within the original nomination site boundary..."

b) "to the south of the main platform where its boundary marginally extends beyond the nomination site boundary;"

c) "The majority of the other permanent development within the main development site is also contained within the extent of the nomination site boundary..."

d) "The majority of land within the application site boundary for the main development site, but outside the nomination site boundary, is required for construction."

It seems to me that the proposed SZC does not sit within the nomination site boundary....period! Or am I missing something?

In a similar connection, is it reasonable for the products of mitigating actions required as part of the permission process for Sizewell B, to be removed by SZC in order to obtain sufficient space for the current proposed development?

If it is indeed reasonable (and permissible), what value do mitigations really carry for a project with an operational lifetime in excess of 60 years?

### G.1.24

The Planning Statement, paragraph 7.2.18, states home-based jobs generated by the project would equate to around 1% of all employment in Suffolk.

Does 'Home Based' in this context imply 'Suffolk resident' or resident in the area identified in the gravity model? If the latter, benefit may not be contributing to the implied 1% of all employment in Suffolk, let alone the immediate area.

The Applicant identifies "Evidence of strong home-based (HB) recruitment at Hinkley Point C" and extrapolates that this enables the SZC Project to be confident of the reliability of its peak estimates.

The Applicant seemingly overlooks the vital role of the M5 in providing fast access to the HPC site by workers from distant conurbations.

The A12, A14 and lesser roads hardly provide the same capability.

The Applicant in making their response identifies that "Whilst construction employment is often short-term and peripatetic, the length of this particular construction project provides valuable opportunities for people to cycle through different roles on the Project (using the SZC Jobs Service), gain long-term skills and develop genuine long-term sustainable careers".

However, so far as I can establish there is no evidence provided to support this assertion, despite their HPC experience. Why not?

## G.1.25

The Planning Statement, paragraph 7.2.20, states that the project would also create extensive supply chain opportunities

In their response the Applicant states “Overall, reliance can be placed on upon the experience of development at Hinkley Point C by way of a comparator for such opportunities for the following reasons:

a) Sizewell C is essentially a replication of Hinkley Point C (with the exception of some differences in ground conditions and site preparation) and as such will have the same spending profile on supply chain as Hinkley Point C, which has (so far) spent £2.7bn on goods and services procured from local and regional suppliers;

Is the Applicant expecting the significant and obvious differences of the HPC site and the potential SZC site to be dismissed with the ill-considered comment that “...with the exception of some differences in ground conditions and site preparation...Sizewell C is essentially a replication of Hinkley Point C”. It beggars belief that the Applicant can so crudely dismiss the huge differences between; the sites, the requirements for safeguarding the sites themselves, the surrounding coastlines, the landscape settings, the pre-existing infrastructure, ease of accessibility and egress, materials requirements, etc.

This perfunctory response lays bare the contempt the Applicant has for the; Planning Inspectorate, DCO process, people of Coastal Suffolk, the coastline, landscape, wildlife and exposes once again the lack of understanding they have of the immediate area and the region in which the site sits.

Moreover, the Applicant continues at point d) that, “Local and regional firms have a competitive advantage in winning work (even without the proposed measures in the **Draft Deed of Obligation** (Doc Ref. 8.17(C)) – they have shorter travel times, smaller carbon footprints, and logistical benefits that translate into economic advantages.

Again, the Applicant makes a very simplistic assertion, provides no evidence and in some industry sectors confounds logic applicable to some of the most easterly and rural points of England (i.e. accessibility to raw material/components, lead times, inbound transport costs, etc.).

Finally, in expanding further the Applicant engages in a facile ‘numbers game’ quoting the Sizewell C Supply Chain Portal as having 1,385 businesses registered, of which 747 (54%) are in Suffolk, with another 575 (41%) outside Suffolk but within the ‘Region’. Presumably the remaining 63 (5%) are based elsewhere (UK or otherwise).

What is not provided is; any quantification of the relative weighting (in either potential contract values or additional employment opportunities) of the commercial opportunity these entities might be able to compete for.

Consequently, there is little hard evidence, even at this early stage as to what on the surface appear healthy numbers might mean in terms of local businesses and over what timescale.

For example, if the 63 have 80% of the potential contract value opportunity across the piece, the most the Regional businesses might be able to compete for in contract value might only be 20%!

#### G.1.45

The CoCP [AS 273] sub heading m) indicates SZC Co. would hope to lead on complaints.

There being a significant issue of Public Interest in respect to the behaviour of the Applicant, their agents and suppliers in respect to; the proposed programme of construction, operation and subsequent decommissioning of a power station, the question has to be asked as to whether Public Safeguards and interests are best served by the Applicant taking the lead on complaints.

It is suggested that at the very least; an independent audit of complaints made in respect of the Applicant, their agents, suppliers and contractors is conducted on a continuous basis and that the Applicants Complaints Handling Capabilities, Processes, Procedures and Reporting are similarly open to audit from time to time.

Alternatively, a totally discrete complaints management environment would be preferable providing total transparency and independence from the day to day influence of the Applicant, its management and their operational priorities which may not always align with public interests.

#### G.1.46

In the event the Saxmundham to Leiston branch line is modified as proposed and both the LEEIE and Green Rail Route are established could they both be operational at the same time?

It is noted the Applicant does not totally discount both being operational simultaneously. An unequivocal answer is sought, whether yes (i.e. during a short changeover period.) or no, simultaneous use will not occur.

If the former rather than the latter, it is suggested that an estimate of; occurrences, duration and time of day, etc. be sought from the Applicant.

#### G.1.47

Please will the Applicant confirm that the Main Development Site as defined in the ES glossary [APP-005] is exactly the same as the Main Development Site as defined in the dDCO (both the original [APP-059] and the current version).

It remains unclear what the Applicant is saying insofar as *"In the context of the ES, the 'main development site' comprises five main components.."* (listed as items 1-5), yet *"In the context of the Draft DCO(Doc Ref. 3.1(C)), the 'main development site' is limited to Work Nos. 1A-1E, which comprises the five main components except for the offshore works area..."*

It seems to the casual observer that an unequivocal answer was sought (whether yes or no, with a suitable and unambiguous explanation), but the Applicant is unable (or unwilling) to provide one.

#### G.1.53

The CoCP would be an important part of the mitigation strategy for dealing with and controlling potentially adverse effects from the various construction activities. Do you consider that as drafted it is sufficiently robust and precise and consequently enforceable?

It is noted that despite *"...The CoCP (Doc Ref. 8.11(B)) includes precise controls that provide clarity on the measure, scope and timing for each commitment relied on by the ES."* even at this early stage, the Applicant is reversing out of total commitment to the authority of the CoCP, citing *"...scale and complexity..."* as legitimate justification for needing *"minor derogations"* and the requirement for *"...a degree of flexibility is therefore both necessary and appropriate."*

Frankly, this continual blurring of the edges and the writing in of 'exceptions' does little credit to the Applicant and further erodes any trust Coastal Suffolk residents have in any provision or undertaking the Applicant makes.

### G.1.55

Please provide a breakdown of the numbers of staff anticipated to be arriving and leaving the site during each of the construction phases of the project. Linking this information to the indicative working patterns identified in Table 3.1[APP-184] would assist in the understanding of movements on and off the site.(ii) Please include the mode of travel you have assumed for them to arrive and leave by with assumed numbers by each mode.

The ExA are asked to use all endeavours to ensure commitments made by the Applicant are clear, unambiguous and fully enforceable throughout; the construction, operation, and decommissioning phases of the SZC Project, should it obtain consent.

The unremitting use of ineffective tables and inadequate data has continued throughout Pre-Application Consultation and is now evidenced in the Examination Phase.

In my view, the answer(?) provided by the Applicant in response to the relatively simple questions asked a G.1.55 is ambiguous, overcomplicated and open to misinterpretation.

My understanding is the answer(?) is more easily understood as:

#### **Early Years Only Shift Pattern**

1 x day shift of 1,100 workers (07:00 - 08:30 start)  
(16:30 - 18:30 finish)

1 x night shift of 400 workers (20:30 - 22:00 start)  
(06:00 - 08:00 finish)

#### **of which:**

600 workers will use shuttle buses from the campsite (LEEIE)  
[attributable shuttlebus movements unquantified]

300 workers will drive (or car-share) to Main Site in 242 vehicles  
[484 car movements at 1.2 persons per vehicle]

65 workers will cycle or walk  
[Zero vehicle movements]

535 workers will drive to LEEIE Park and Ride in 435 vehicles for  
shuttle buses to Main Site [870 car movements at 1.2 persons per  
vehicle] plus [attributable shuttlebus movements unquantified]

#### **Peak Construction Only Shift Pattern**

1 x early shift of 4,148 workers (06:00 - 08:30 start)  
(14:00 - 18:30 finish)

1 x late shift of 2,031 workers (13:30 - 15:00 start)  
(22:00 - 00:00 finish)

1 x Office shift of 1,185 workers (07:30 - 09:00 start)  
(17:30 - 19:00 finish)

1 x night shift of 536 workers (20:30 - 22:00 start)  
(06:00 - 08:00 finish)

#### **of which:**

1,361 workers will drive (or car-share) to Main Site in 935 vehicles  
[1,870 car movements at 1.45 persons per vehicle]

Zero workers will cycle or walk  
[Zero vehicle movements]

1,086 workers will drive to Southern Park and Ride in 907 vehicles for shuttle buses to Main Site [2,172 car movements at 1.2 persons per vehicle] plus [attributable shuttlebus movements unquantified]

1,270 workers will drive to Northern Park and Ride in 1,010 vehicles for shuttle buses to Main Site [2,540 car movements at 1.26 persons per vehicle] plus [attributable shuttlebus movements unquantified]

1,183 workers will catch SZC buses to Main Site [attributable bus routes and movements unquantified]

It is my contention that, shown this way the data is 'linked' as requested, describes the impact on local infrastructure more clearly and also demonstrates the gaps in the data presented (i.e. no one walks or cycles at 'Peak'(?), Bus movement volumes aren't presented, etc.)

#### AQ.1.67

Is it really fair to say these movements would be minimised when to date neither the rail nor sea alternatives are confirmed, or to what degree they could operate?

In response the Applicant makes the case that they have demonstrated "...why approximately 40% of construction materials require HGV transport." rather than addressing the singular issue of 'are the movements minimised'.

At Para 2.1.12 [AS-280] the Applicant infers part of the lower limit being at 40% is because "SZC Co. has been working with the Suffolk Chamber of Commerce to develop the local supply chain. Where materials can be sourced locally, it is unlikely that it would be economic to use rail or marine transport."

I am of course supportive of the use of the local supply chain and would suggest that a challenge for both the Applicant, the Local Supply Chain and Suffolk CoC (working collaboratively) is to improve the sustainability and attractiveness of 'local' by formulating a 'load aggregation arrangement', thereby reducing vehicle movements (and potentially supplier costs) across a broad range of non-bulk supplies.

Moreover, as the Applicant contends 40% of materials being transported by HGV constitutes minimisation, it is perhaps appropriate to remember 'minimised' is broadly accepted as meaning "reduced (something, especially something undesirable) to the smallest possible amount or degree."

At Para 2.1.13 [AS-280] the Applicant implies the impact of a larger number of 3.5 to 7.5 tonne vehicles is desirable, as opposed to a single larger HGV. It is my contention that this is not always the case and would look to the Applicant to provide persuasive evidence that it is so.

At Para 2.1.14 the Applicant argues that continuous concrete production cannot be sustained at peak without the additional capacity provided by the temporary BLF or increased HGV movements.

This precarious arrangement for materials critical to the safety of a power station seems untenable. Consequently, it is my contention that without confirmed arrangements for the optimal rail solution, the reality must be that the Applicant only has recourse to HGV, as the combined vagaries of the sea and weather could not necessarily be relied upon to 'deliver the goods'!

#### AQ.1.72

The CoCP contains general phrases such as 'where possible' and 'will seek to ensure'. In such circumstances how would the local authorities be able to enforce compliance?

In their response the Applicant emphasises the role of contractors (i.e. "...a range of targets and measures that would be defined and measured by contractors...", "...Environmental Management Plans that each contractor would prepare for a relevant stage of the construction..." etc.).

For the sake of clarity can the Applicant confirm that irrespective of the phrasing and terminology (above) they, (the Applicant), remain responsible and accountable for all actions, inactions and acts of omission by contracted parties?

If this is not the case, can the Applicant describe and document all the responsible and accountable parties enjoined in the design, execution, performance and conduct of the proposed power-station construction project and associated works.

#### AQ.1.74

Is the bus fleet proposed to operate to and from the main development site and associated sites intended to be electric, zero emission or ultra low emission?

It is highly regrettable that the Applicant's direct association with a company espousing their virtue as a 'low carbon' energy provider cannot commit to any more than "Use of a low emissions fleet is being considered by SZC Co." and then continuing "However, conservatively the impact of bus emissions on air quality has been included in the assessment of HGVs within the transport emissions assessment based on the assumption that they are not low emission vehicles. No significant air quality effects were predicted on this basis."

This response is depressingly familiar of large multinational companies who impose themselves on communities who are active in trying to take individual actions that will improve the lot for many.

Rather than considering issues of "No significant air quality effects...", it would be refreshing for the Applicant to regard any detrimental impacts arising from their Project as one that would not have occurred were they not there, and take all necessary steps to neutralise them.

Such initiatives might see parking at the Main Site, Campus, etc. only available to "electric, zero emission or ultra low emission" vehicles", promoting their use by the workforce with high density 'free to use' charging facilities at all sites.

#### AQ.1.74

It is not clear from the information provided how the conveyor system on the BLF would be powered. Please explain where this is set out in the ES.

It is noted at [AS-202] para 3.5.16 et seq. that the estimated time for works necessary to bring a mains electricity supply to the Main Development Site (and for the provision of power to the conveyor system on the BLF) is nine months.

It is currently unclear where this places an effective BLF and associated conveyor within the overall construction programme. Could the Applicant provide reference (or details) for the description of this element in the context of all the concomitant dependencies and inter-dependencies of the Project?

### **AQ.1.77**

The latest information provided with the ES Addendum appears to prefer the provision of a water supply which does not form part of the dDCO.

Apart from the obvious risks of reliance on a water strategy that lays entirely outside of the DCO (as identified by the ExA) it is noted the Applicant intends to source “non-potable demand ...met using treated domestic (foul) effluent from Sizewell B power station and the Sizewell C construction site, combined with winter storage of treated effluent within the proposed 16,000m<sup>3</sup> non-potable and temporary Water Resource Storage Area (WRSA).

It is presumed that there has been a rigorous risk analysis undertaken regarding the sourcing, securing and storing of this effluent cocktail? Assuming that it has all the measures to safeguard adjacent land, nearby residents, livestock and the environment at large; should seepage or significant loss(es) occur, what remediation provisions are being made for emergencies ?

The Applicant states “winter storage” in their reply, is this term rigorous enough? Moreover, should a holding remain at the time “winter storage” expires, what proposals does the Applicant have for dealing with it.

### **AI.1.1**

Please identify all elements including any associated development for which alternatives have not been considered, providing reasons for each element in that category.

Whilst it is true that the Applicant brought forward other seemingly random options for the proposed SLR; it is my contention that their starting point for the whole SLR was predicated on the basis that irrespective of traffic origin the only route on which it would arrive would be the B1122 (i.e. the experience gained at Sizewell B construction where significant quantities of materials were largely landed via the sea for a considerably smaller and less complex Power Station.

This contrasts sharply with an approach that should have recognised (including earlier experience from their SZB and HPC construction) that; in the absence of existing motorways, trunk roads, other significant ‘A Roads’ or a viable lesser road network, it was fundamental to the projects success that they would need at least one direct route to site avoiding the A12 as much as possible, and that consideration of a second route might be sensibly considered for resilience should rail and sea options be confirmed as impracticable.

Irrespective of this, despite strong local concern about taking the bulk of the proposed road traffic north of Saxmundham, EDF via a somewhat arcane process; elected to back the most northerly route that they had allegedly examined thoroughly.

To compound this wanton ignoring of local opinions, the Applicant then, after significant delay, provided (to a limited audience) what many regard as a hastily; conceived, commissioned and executed lightweight Peer Review of their processes and route selection work. It is noted for seemingly being conducted by; a significant supplier to them, largely desk based and referencing much of the historic work undertaken in the 1980’s. It is however noted that a ‘drive by’ locality inspection was also undertaken by the author.

### **AI.1.5**

Site specific assessment – change in circumstances The Planning Statement, paragraph 3.8.9, indicates that further details of the evolution of the main development site boundary and the alternatives considered by SCZ Co. are provided at Volume 2, Chapter 6 of the ES

In their response the Applicant helpfully advises that “The AoS and SSA established the principle of the location, based on the assessment of a ‘base-case’ to provide a standardised approach to the appraisal of the nominated sites.”

It is noted that the Applicant (or their forerunner nominator) actively sought to make a change to the 'standardised approach' of the 'Base Case'; effectively seeking a change that was only applicable to the Sizewell Site.

Consequently, a change was made (at the insistence of the Sizewell Site nominator) so that unlike all other sites, Sizewell was assessed on the basis of "At Least 1 Reactor", contrasting with the 'Base Case' standard "1 Nuclear Reactor".

Please see my Written Submission '**The Sizewell Site – AoS' (Para 2. Sizewell Site AoS Base Case)** for more details.

#### AI.1.32

Please explain in further detail the assessment of the consultation responses on this topic which led to the decision to permanently retain the SLR and how that reflects the Stage 4 consultation responses.

In their response the Applicant asserts; "A total of 161 responses were received to this question, of which, 41 responses gave a view on whether the Sizewell link road should be removed and land restored. Of these responses, 68% opposed the removal of the Sizewell link road after Peak Construction and 32% supported the removal of the Sizewell link road."

This paragraph lays bare the paucity of information shared during the Pre-Application Consultation and the narrow margins by which hugely impactful decisions have been made by the Applicant and doesn't clarify if written responses (i.e. not just questionnaire answers) were included in 'the count'.

Equally it exposes the duplicity of the Applicant whose leading public advocate is known to have quoted on more than one occasion that "...this is not a vote...".

Taking their own statistics, the Applicant seems to be saying that; their Pre-Application Consultation occasioned just 161 responses to questions pertaining to the retention or removal of the proposed SLR.

What we also ascertain from this is that a Parish Council acting on behalf of their residents (some of whom did resident research, held exhibitions, held Parish Meetings, etc.) only counts as one respondent to the question.

In summary, if these figures are to be believed; then less than 28 people (68% of 41 people that expressed a view) decided that the SLR should be retained (at least in the mind of the Applicant).

Moreover, as we know more than one Parish Council and the County Council expressed the view that the SLR should be removed, these 27.88 people (the actual percentage product of 68% of 41) were instrumental in subverting widely held views at individual, Parish Council and County Council level...a good thing it isn't a vote then!

Incidentally, the inappropriate quoting of percentages by the Applicant is wholly typical of their presentation of data throughout the Pre-Application Consultation phase.

Surely a better representation would be: A total of 161 responses, of which 41 expressed a view as to whether the SLR should be retained, split: Retain SLR - 28 respondents (68.3%),  
Remove SLR - 13 respondents (31.7%)

### AI.1.33

(iii) Please identify and explain the advantages and disadvantages of retention of the road versus its removal?

It is not contested that a relatively small number of people residing along the B1122 could potentially benefit from lower traffic levels during; construction, operation, outages and presumably the decommissioning of Sizewell A, B and C/D.

What is contested is whether the Applicant should effectively have a 'private road' to their front door, that after completion of SZC construction, Suffolk residents will become obliged to pay for the maintenance of, presumably through local taxation.

Moreover, the Applicant cheerfully points out that there will be an estimated 1,000 people required during outages.

With potentially three reactors active, outages become the new 'normal' with no Park and Rides, no bus transfers, no passenger rail services, no active management of HGV/LGV, fly-parking patrols long disbanded, defined traffic routing but a fading memory, the picture looks bleak!

The reality is, in the words of Mr Bull; "...it is a free world..." and SZC outage workers and regular SZC employees can and will route themselves wherever, however, whenever they want.

Consequently, whilst the Applicant opines a post SZC construction 'brave new world' for Yoxford, Middleton Moor and Theberton, the reality is they can make no guarantees, and perhaps more importantly have largely shown little desire to go the 'extra mile' to engage and work with local communities prior to submitting the dDCO – 'Plus sa change'!

### AI.1.34

Please respond specifically to the criticisms made by Ward Farming Ltd including of the Aecom report commissioned by EDF.

I am not a Planning Professional, nor familiar with the particular disciplines of Infrastructure Engineering. I am however, a retired independent Consultant across disciplines in the Telecommunications, Government, Local Government, Financial Services and IT sectors.

In this connection I have been fortunate enough to commission as well as undertake Peer Reviews on behalf of clients.

It would appear from my standpoint that there may be different interpretations of 'independent' as well as differing expectations of Peer Reviews.

For this reason I would not wish to make any immutable claim as to the rights or wrongs of what seems to qualify as an Independent Peer Review in this particular case.

I would however ask the ExA to have regard to the; who, what, how, when where and why of this particular case and formulate their own opinion of the work, its efficacy and substance.

Moreover, I would suggest that they also fully consider whether the outlined scoring matrix provides a suitable basis for deriving the optimal route, paying particular attention to other stakeholder viewpoints.

It maybe that differing stakeholder groups have irreconcilable points of view. However, the Applicant has never shared the richness of their model and/or their weighted priorities.

In this regard the ExA might also wish to elicit the characteristics of each option and understand how the preferred option fulfils its role as the Applicants "...most appropriate route."

Finally, the ExA may wish to probe the weighted importance of 'cost' within the decision matrix, relative to other considerations.

#### **AR.1.8**

The AONB Partnership set out detailed concern [RR-1170] with regard to the assessment of and significance of effects on the AONB and its statutory purpose

In the light of UNESCO's recent decisions in respect to The Great Barrier Reef and Liverpool what consideration has been (or is to be) given to the potential for Coastal Suffolk designations (of all types) to be threatened or removed as a consequence of the construction, operation, decommissioning and subsequent storage roles for Sizewell A, B and C?

#### **CI.1.12**

Whether the increased workforce could be supported by existing GPs

In its response the Applicant avows "The health needs of the NHB workforce have been internalised through occupational health care provision and therefore the increased workforce will not need to be supported by existing GPs." However, with all NHS dentistry now having closed in Leiston and residents having to travel up to 30 miles for dental treatment, is the Applicant still confident that a SZC Health care provision will be capable of coping?