



The Sizewell C Project

9.29 Comments on Councils' Local Impact Report

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1. INTRODUCTION

1.1 Purpose of this document

1.1.1 This response provides comments from SZC Co. (the Applicant) on the Local Impact Report (LIR) [REP1-045] prepared jointly by East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils). The Applicant has provided comments on each section of the LIR, adopting the same section numbers to aid the reader. The sections largely follow the same sequence of issues for each topic and where relevant provide a response to the technical appendices to the LIR which are relevant to those sections.

1.1.2 This document is shorter than the LIR to which it responds. The Applicant recognises the importance of the LIR but also that the Planning Act 2008 provides that it is responsibility of the local authorities to provide '*a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)*'.

1.1.3 The Applicant is given the opportunity to set out its assessment of these matters in the application documents. The LIR, of course, is different from Written Representations, to which the Applicant can also respond, and much of its content can be factual, ensuring that relevant matters are drawn to the attention of the Examining authority and the Secretary of State. The Applicant respects the intended role of the LIR.

1.1.4 The Applicant is also aware that it has multiple opportunities to set out its view on relevant and important issues in response to questions from the Examining authority, at hearings etc. and that there would be little benefit in this document in setting out at length matters which are already set out elsewhere.

1.1.5 Accordingly, this response takes a proportionate approach, with the following characteristics:

- it does not attempt to provide a comprehensive commentary on the detailed contents of the LIR;
- silence, therefore, cannot be interpreted as agreement – simply a recognition that the LIR has a role to play in setting out the views of the local authorities on the likely impacts of the proposed development;
- where matters have moved on from those described in the LIR, this document provides or signposts to relevant updated information;

- where there is concern that matters may not have been set out in the LIR fully or fairly – or that assertions of impact may not be consistent with or supported by evidence, this document summarises the Applicant’s concern; and
- this document does not repeat matters which are already set out in documents available to the examination – rather it summarises them at a high level and provides reference to where that information can be found, including in the Applicant’s response to questions from the Examining Authority or Statements of Common Ground submitted to the examination.

1.1.6 Each section of this response addresses a corresponding section in the LIR. The structure of each section varies depending on the nature of the way in which the LIR deals with that topic area. In principle, however, each section:

- starts with an overview, responding at a high level to the matters raised in the LIR; and
- then addresses any key issues specifically.

1.1.7 For some response sections, SZC Co.’s position is set out in narrative form, particularly where strategic issues are raised. Other sections adopt a tabular format if that is the most effective way of responding to a range of more technical points raised in the LIR.

2. DESCRIPTION OF THE AREA

2.1 Overview

2.1.1 It is for the Councils to set out their description of the area. The following short table may be helpful to read, however, alongside the characterisation of the economy of the area.

Table 2.1: Commentary on the economy of the area

Paragraph number	Comment
2.6: Leiston	Leiston’s population is estimated by ONS to have grown by about 1,000 residents since 2011, based on Census Mid-Year Estimates (ONS, 2019)
2.10: business profile	East Suffolk doesn’t appear to have a high rate of self-employment based on review of the Annual Population Survey (ONS, 2020), or a high incidence of small/micro-businesses, based on UK Business Counts (DWP,

Paragraph number	Comment
	2020) data, compared with the regional or national average.
2.11: agriculture	East Suffolk has twice the rate of employment in agriculture than the national average – but it still only makes up 1.9% of all jobs in the district, so it's influence is relatively small compared to its land-take, and the sector hasn't grown over the last decade (Tables 9.10, 11 and 12 in Volume 2, Chapter 9 of the Environmental Statement) [APP195].
2.28: comparison with Hinkley	<p>It is noted that Leiston, Saxmundham and Aldeburgh combined have a lower population than Bridgwater, with the area's larger settlements (Ipswich and Lowestoft) further from Sizewell C than Bridgwater is from Hinkley Point C.</p> <p>However – it may be more appropriate to consider similar travel areas, in the context of the Project's effects on transport and the labour market.</p> <p>The area within 45 mins of both Sizewell C and Hinkley Point C (the latter has Bridgwater at but within its limit) is almost identical in terms of the number of households and their tenure characteristics, and population (2011 Census – ONS). Hinkley Point C's urban geography is sparse around the site, with population concentrated in Bridgwater. Sizewell C's is characterised by more settlements, of a smaller size than Bridgwater but with a similar combined scale, closer to the site.</p>

3. NATIONAL POLICY AND THE PRINCIPLE OF DEVELOPMENT

3.1 Overview

3.1.1 Policy issues relating to the principle of development are not principally a matter for the LIR and the issues are explored more fully in other documents. However, there are some matters raised in Section 3 of the LIR to which SZC Co. wishes to respond.

3.1.2 In particular, the summary set out in the LIR [[REP1-045](#)] of national policy is materially incomplete. It omits reference to the Government's most up to date statement of national policy of relevance to this examination: namely, the Energy White Paper. These matters are comprehensively reviewed in the Applicant's **Planning Statement Update** [[REP2-043](#)].

3.1.3 Since the submission of the LIR, the Applicant has shared the **Planning Statement Update** [[REP2-043](#)] with the Councils and worked with the Councils by also sharing draft responses to **ExQ1 G.1.16** and other policy

related questions. The respective answers to **ExQ1 G.1.16** from SZC Co. and ESC record that there is no disagreement between the parties that the **Planning Statement Update** [REP2-043] correctly sets out the relationship between national policy and, for example, local planning policy.

3.1.4 Section 4 of the **Planning Statement Update** [REP2-043] reviews all relevant policy to conclude that:

“NPS EN-1 and EN-6 continue to provide the appropriate policy tests and guidance for the examination and determination of new nuclear DCO applications.”

3.1.5 Similarly, SZC Co.'s response to **ExQ1 G.1.16** [REP2-100] explains that the NPPF is clear that it does not provide policies for NSIPs and that the same applies to local plans prepared to be consistent with the NPPF. SZC Co.'s response to **ExQ1 G.1.12** [REP2-100] explains that local plans are not prepared on the basis that they can or should set tests for determining the acceptability of NSIPs. That is the role of National Policy Statements (NPS), a matter which is addressed in more detail in the **Planning Statement Update** [REP2-043] by reference to recent decisions of the Planning Court and Court of Appeal.

3.1.6 Consequently, SZC Co. disagrees with the statement at paragraph 3.2 of the LIR that the NPSs are material considerations *“but not the only policy that the proposal needs to comply with.”*

3.2 Energy White Paper

3.2.1 The policies of the White Paper are not acknowledged in **Section 3** of the LIR. They are reviewed, however, in **Chapters 2** and **4** of the **Planning Statement Update** [REP2-043]. They are not repeated in full here, but it would clearly be wrong to consider national policy for a new nuclear DCO application without recognising that this most up to date statement of national policy establishes:

- that the suite of Energy NPS establish the need for new energy infrastructure and that *“the need for the energy infrastructure set out in the NPS remains”*¹;
- that the Government has made a key commitment expressed as:

¹ Energy White Paper page 55

“Aiming to bring at least one large scale nuclear project to the point of Final Investment Decision by the end of this Parliament, subject to clear value for money and all relevant approvals”²; and

- that the current NPS *“will continue to provide a proper basis on which the Planning Inspectorate can examine and the Secretary of State can make decisions on applications for development consent.”³*

4. STATUTORY DEVELOPMENT PLAN

4.1.1 Chapter 4 of the LIR [[REP1-045](#)] helpfully sets out details of the Statutory Development Plan. The chapter is substantially factual.

4.1.2 For reference, SZC. Co.'s **Planning Statement** [[APP-590](#)] identifies regional and local plan policy in Section 3.10 and an update is provided in the **Planning Statement Update** [[REP2-043](#)] at Appendix B.

4.1.3 In addition, the Applicant has set out its views on the relationship of local policy to national policy in response to first set of questions from the Examining Authority (ExQ1) (please see particularly responses to **ExQ1 G.1.12, G.1.15 and G.1.16** [[REP2-100](#)]). **ExQ1 G.1.16** asked specifically about the primacy of the NPSs in relation to local policy. Draft answers were shared with ESC and both parties' responses to the question include the following text:

*“There is no disagreement between the applicant and ESC. The **Planning Statement Update** has been shared with ESC and there is no disagreement about the position which it sets out on these issues.”*

4.1.4 The Inspector's report on the Suffolk Coastal Local Plan is also relevant in this context (please see particularly paragraph B.1.14 of the **Planning Statement Update** [[REP2-043](#)]).

4.1.5 Perhaps the only difference in emphasis between the Applicant's review of the principles of local policy and that set out in the LIR relates to the economic importance of and support for large-scale infrastructure projects (and particularly Sizewell C) in the Local Plan. This is summarised at paragraph 3.10.10 of the **Planning Statement** [[APP-590](#)].

4.1.6 SZC. Co. recognises that the Statutory Development Plan is both important and relevant. Both the LIR and the **Planning Statement** [[APP-590](#)]

² Energy White Paper pages 16 and 48

³ Energy White Paper page 55.

(together with the **Planning Statement Update** [[REP2-043](#)]) set out the terms of policy SCLP3.4, which identifies a number of matters which the Council “*will take into consideration*” in its role as a consultee on an application for Sizewell C. The matters listed are all important and have substantially informed the agenda for close joint working between SZC. Co. and the Local Authorities from the early pre-application discussions through to the present day.

5. OTHER RELEVANT POLICY

- 5.1.1 SZC. Co. has no substantive comments on Chapter 5 of the LIR [[REP1-045](#)] which identifies other relevant local policy together with other matters such as the Accent study.
- 5.1.2 The chapter helpfully identifies the Vision for Sizewell C agreed as part of the Planning Performance Agreement in November 2010, together with the Principles included in Annexes D-H. That background attests to the close joint working which has characterised the relationship between the Applicant, ESC and SCC over a number of years and for which SZC. Co. is very grateful. Discussions through JLAG and multiple other channels have greatly assisted SZC Co. in understanding local issues, concerns and perspectives. That engagement has been supplemented by multiple rounds of consultation on emerging proposals, options and strategies, the results of which have closely informed the evolution of the Project and proposals for mitigation.
- 5.1.3 The background in the Chapter also demonstrates that SZC. Co. and the authorities are working towards the same objectives. The principle of Sizewell C, the need for the Project and the benefits which it can bring to the local area are agreed but the parties recognise that the Project needs to be designed and regulated so that it has limited its impacts as far as reasonably practical, whilst securing and delivering its inherent benefits.
- 5.1.4 The Accent Study from 2016 forms a helpful example. It usefully sets out the concerns of the community, particularly with regard to traffic issues, with a particular focus on the B1122. The summary provided in the LIR can act as a useful checklist of the extent to which SZC Co. has listened to and responded to local issues. For example:
- Clear concerns about the long-term effect of construction traffic and traffic congestion have been met by a series of measures, including:

- the Sizewell Link Road, to bypass the affected communities, thereby removing the concern as soon as practical and providing a substantial, lasting legacy benefit;
- interim measures to mitigate short term impacts (please see SZC Co.'s response to ExQ1 **TT.1.119** [\[REP2-100\]](#));
- the suite of transport measures is such that modelling forecasts negligible effects on local journey times (please see Chapter 15 of this document);
- proposed Changes to the DCO to reinstate the local connection from the B1122 along Pretty Road, in direct response to local engagement and feedback.
- Concerns about the scale of HGV movements and their noise and vibration movements have been met with limits on HGV movements, which were strengthened by the Accepted Changes to the DCO application (the limits are set out in the **Construction Traffic Management Plan (CTMP)** [\[REP2-054\]](#) and by a **Noise Mitigation Scheme** [\[REP2-034\]](#)).
- Night time and weekend restrictions on HGV movements, set out in the **CTMP** [\[REP2-054\]](#).
- Limits on on-site car parking and comprehensive investment in bus strategies and in measures to address the risk of fly-parking locally, set out in the **Construction Worker Travel Plan (CWTP)** [\[REP2-055\]](#).

5.1.5 These measures (and others such as the commitment to local cycle and pedestrian enhancements – see **Chapter 17** of this document) comprehensively address the feedback in the study and will successfully address the principal concerns raised. Whilst the LIR documents these concerns, they have been addressed in the Application.

5.1.6 In relation to the duration of construction, the Accent survey found concerns about the length of construction but also that the majority of respondents preferred longer construction works with lower traffic flows, less on-site parking and higher bus traffic (rather than quicker construction with higher lows) (LIR paragraph 5.33). SZC Co. believes that this balance has been struck in the Application – it has set out a construction programme which responds to the urgent need for new nuclear, whilst committing to measures which limit and mitigate its impacts locally. SZC Co. has also been careful to ensure that mitigation strategies stay in place for the duration of construction in the **Draft Deed of Obligation** (Doc Ref. 8.17(D)).

- 5.1.7 Through engagement with the authorities since at least 2012, each potential impact of the Project has been understood and, where practical, mitigation strategies to address those impacts have been discussed, refined and committed to. SZC Co. recognises that, no matter how comprehensive the mitigation, there will be residual impacts on the local quality of life over the construction period and to help address those residual impacts, a Community Fund has been proposed – a Fund which as far as practical would be run by and administered on behalf of the community please see Schedule 14 of the **Draft Deed of Obligation** (Doc Ref. 8.17(D)).

6. LANDSCAPE AND VISUAL IMPACT ASSESSMENT

6.1 Overview

- 6.1.1 SZC Co. has reviewed Chapter 6 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 6.1** below provides a summary response to the LIR's Summary of Impacts table and then provides a response to some of the principal points raised where a response is appropriate.
- 6.1.2 SZC Co. notes that the Councils recognise that the scope for additional embedded mitigation to reduce the adverse landscape and visual effects during construction and operation is limited. However, SCC requests that alterations that may reduce harm are made to the proposed development, specifically to the power export solution and the location of the outage car park at Goose Hill. SZC Co. considers that these are matters which cannot be changed but continues to discuss them with SCC in order to establish whether SCC can accept the reasoning for this. SZC Co. will provide an update in the Statement of Common Ground at Deadline 5.
- 6.1.3 SZC Co. notes that the Councils agree with the principle of mitigating the residual landscape and visual effects of the proposed development through a Natural Environment Fund. The LIR suggests (paragraph 6.2) that the scale of the Fund needs to reflect the significance of the harm. SZC Co. sees the Fund as a means of mitigating the residual landscape and visual impacts, in accordance with the NPS, rather than as some form of tax and that the scale of it should be based on what can beneficially and appropriately be achieved. In this respect, its approach is consistent with the NPS which contains no requirement for compensation but does call for mitigation to be “*designed to reduce the visual intrusion of the project as far as reasonably practical.*” (NPS EN-6 3.10.8).
- 6.1.4 Discussions are ongoing with the Councils about the scale and detail of the Natural Environment Fund, although the governance and structure of the Fund has been substantially agreed.

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- 6.1.5 Separately, SZC Co. is seeking to explore additional legacy and enhancement measures beyond those to be secured in the DCO through an environment trust. Please refer to SZC Co.'s response to question **ExAQ1 LI.1.49** for details.
- 6.1.6 The detailed comments made in the LIR regarding the landscape and visual impact assessment are addressed further below, although this chapter does not repeat matters which are already set out in documents available to the examination.
- 6.2 **Response to issues: summary**
- 6.2.1 Chapter 6 of the LIR helpfully presents the Council's summary of landscape and visual impacts. The table presents a description of the impact; whether the impact is related to the construction or operation phase of the proposed development; the mitigation judged to be required and how this could be secured; and the relevant policy context.
- 6.2.2 The approach provides a convenient basis for providing SZC Co.'s high level responses (refer to **Table 6.1**), whilst certain matters are set out in more detail in **Section 6.3**.

Table 6.1: Response to summary of landscape and visual impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
1a	Significant adverse impacts on landscape character and visual amenity of AONB and wider landscape through introduction of significant construction activity at Main Development Site, with limited screening opportunities.	<p>Negative</p> <p>Reduce: External lighting plan - Requirement</p> <p>Mitigate: Secure embedded landscape mitigation via the Landscape and Ecology Master Plan (LEMP) – Requirement</p> <p>Compensate: Residual mitigation funding through Natural Environment Fund – Obligation.</p>	<p>The landscape and visual impacts of Sizewell C during the construction phase are comprehensively assessed in the application.</p> <p>The characterisation of a small number of negative effects developed in the LIR, however, is not agreed – see further below.</p> <p>Residual negative effects are also anticipated and recognised in the NPS.</p> <p>There is no in principle disagreement about the approach to mitigation and the measures listed in the LIR are those proposed by SZC Co.</p>
1b.	Significant impacts on the AONB and its special qualities, which could have an effect on the purpose of the designation.	<p>Negative</p> <p>Compensate: Residual mitigation funding through Natural Environment Fund - Obligation</p>	<p>The nature, extent and significance of effects of the proposals during construction and operation on the natural beauty and special qualities indicators of the Suffolk Coast and Heaths AONB is described in the LVIA and is informed by a full appreciation of the AONB's documented natural beauty and special qualities.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			<p>The potential for Sizewell C to have an effect on the purpose of the AONB designation is addressed in Section 7 below.</p> <p>SZC Co. acknowledges the important role of the Natural Environment Fund to mitigate the residual landscape and visual impacts of Sizewell C and continues to engage with the Councils about the scale and detail of the Natural Environment Fund, although the governance and structure of the fund has been substantially agreed.</p>
1c.	<p>Significant permanent adverse impact on the AONB landscape from the operational buildings and structures on the Sizewell C platform, particularly of the concrete nuclear domes.</p>	<p>Negative</p> <p>SCC: Avoid: Reduce impact by implementing alternative power export solution that does not require pylons and overhead lines (unless proven to be impossible within the site constraints) - Change</p> <p>ESC/SCC: Reduce: Secure design commitments of non-nuclear buildings by requirement - Requirement</p> <p>ESC/SCC: Compensate: Residual mitigation funding through Natural Environment Fund - Obligation</p>	<p>The landscape and visual impacts of Sizewell C during the operational phase are comprehensively assessed in the application.</p> <p>SZC Co.'s response to matters regarding design (including the concrete nuclear domes) in the LIR is set out in Chapter 14 of this response.</p> <p>SZC Co. has provided comprehensive justification for the selected power export option – see further below.</p> <p>SZC Co. fully accepts and is committed to requirements to ensure the delivery of the agreed Design Principles. Please refer to SZC Co.'s response to ExA G.1.58 for details.</p> <p>SZC Co. acknowledges the important role of the Natural Environment Fund to mitigate the residual landscape and visual impacts of Sizewell C and continues to engage with</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			the Councils about the scale and detail of the Natural Environment Fund, although the governance and structure of the fund has been substantially agreed.
1d	Permanent land take within the AONB.	Negative SCC: Avoid: Remove outage car park from its location within the AONB (unless proven to be operationally impossible) - Change ESC/SCC: Compensate: Residual mitigation funding through Natural Environment Fund – Obligation.	The outage car park is essential to the operation of the power station and cannot be located elsewhere – see further below.
1e.	Conversion of formerly arable land at the Main Development Site to heathland.	Positive Mitigate: Secure landscape restoration through LEMP - Requirement	SZC Co. agrees that the oLEMP has an important role in mitigating landscape and ecological effects and creating long term benefit. The LIR could do more to fairly recognise the quality and scale of the oLEMP and SZC Co.'s proposals for long term landscape restoration, which are acknowledged in ESC's response to EXQ LI.1.15 as providing a " <i>substantial and significant positive benefit</i> " – see further below.
1f.	Landscape impact of temporary Associated Development sites (Park and Ride sites, Freight Management Facility, LEEIE)	Negative Mitigate: Secure landscape planting at Associated Development sites - Requirement Removal and	In principle this is agreed, although each component is necessary in order to provide a sustainable transport strategy, which the authorities support – and there is no disagreement about site selection, design or the principles of mitigation.

Ref no.	Impact	Summary of LIR	SZC Co. response
		reinstatement of the Associated Development sites – Requirement.	
1g.	Landscape impacts of permanent transport infrastructure (Two Village Bypass, Sizewell Link Road, other transport infrastructure as required)	Negative Compensate: Secure landscape planting at Associated Development sites Requirement Compensate: Residual mitigation funding through Natural Environment Fund – Obligation.	As above – the significant benefits of and need for the transport infrastructure is accepted by the Councils and close working has taken place to inform their design. Landscape planting is proposed as part of the application proposals (not as compensation) and a Natural Environment Fund is proposed to mitigate residual landscape and visual impacts.

6.3 Detailed comments

6.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and there would be little benefit repeating it here. There are, however, a limited number of matters raised in the LIR to which SZC Co. wishes to respond, either because they raise additional issues or because SZC Co. does not accept the way in which they are characterised in the LIR. These are:

- the design of the application;
- specific findings of the landscape and visual impact assessment and whether they are too “narrow” or underplayed;
- the restoration proposals – the need for an estate wide approach and the benefits proposed;
- pylons; and
- outage car park (Goose Hill).

6.3.2 Chapter 7 of the LIR is concerned with the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast. SZC Co.'s response to the LIR on those issues is set out in the next chapter.

6.3.3 Chapter 14 of the LIR is concerned with the design aspects of the application. Further detail on SZC Co.'s response to the design aspects of the LIR is set out in **Chapter 14** of this response.

a) Design

6.3.4 The design approach for the project is set out in two documents submitted as part of the DCO submission: The **Main Development Site Design and Access Statement** [[APP-586](#)] including additional updates at the Additional Submission in relation to the Applicant's request for changes to the application and Additional Information - **8.1 Main Development Site Design and Access Statement Addendum - Revision 1.0** [[AS-261](#)] and Deadline 1 Submission - **8.1 Main Development Site Design and Access Statement Second Addendum - Revision 1.0** [[REP1-005](#)] which includes the Project Design Principles; and the **Associated Development Site Design Principles document** [[APP-589](#)]. Further detail on the approach to design and governance is presented in the response to **EXQ1 LI.1.0** and **EXQ1 LI.1.1**.

6.3.5 There is acknowledgement in the LIR that SZC Co. has made considerable efforts to minimise the visual and landscape impact of the design through

landscape design measures and in delivering good building design (including references at LIR paragraph 6.64 to 6.45, and extensive commentary on building design in Chapter 14). The LIR highlights the particular concern that the design has been constrained in its ability to respond to the sensitive setting of the development as a result of the generic design agreed with the Office of Nuclear Regulation.

6.3.6 Specific reference is made to the bare concrete structures of the domes of the nuclear reactor being of “...*significantly inferior quality to the iconic design of the existing dome of Sizewell B...*” which “...*significantly influences the overall visual impact, despite the more sympathetic design of the non-nuclear buildings*”. The LIR also records that a secondary adverse impact is that “...*the poor design of Sizewell C’s domes will reduce the effectiveness of Sizewell B’s design*” (LIR paragraph 6.45). The LIR also records the Council’s concerns regarding the ability of SZC Co. to provide a consistent colour tone to the bare concrete structures (LIR paragraph 6.45).

6.3.7 SZC Co. provided a response in ExQ1 at **LI.1.21** [\[REP2-100\]](#) regarding the use of concrete for the reactor domes. SZC Co notes that one of the Detailed Built Development Principles – No 63, records SZC Co.’s commitment to control concrete to “*have a consistent pale grey finish as far as reasonably practicable.... [and] ensure a consistent even finish can be achieved, subject to operational requirements [DAS 7.5.30]*”. A commitment to an agreed colour range for the concrete is also provided at DAS 7.7.3 and Figure 7.17. These commitments are made following significant exploration of approaches to control the concrete mix, pouring, joints and weathering characteristics from precedent projects including Flamanville and Hinkley Point C where these commitments have not been made.

6.3.8 SZC Co. note the Councils’ response at paragraph 14.12 of the LIR regarding the relationship of the turbine hall design to the concrete domes, which indicates a positive response to the overall language of materials excepting the concrete requirement. “*The choice of cladding for the turbine halls is a sophisticated one, combining multiple considerations in respect of materiality, colour, shading, the dynamic interplay of changing daylight and climatic conditions, the landscape, and seascape context, in one modelled material.*” At paragraph 14.14 of the LIR the Councils continue that the “*thinness and visual lightness of the turbine hall material....will form an intriguing contrast with the certainty and inertia of the concrete nuclear island*”.

b) Quality of the LVIA

6.3.9 The LIR raises the concern that SZC Co. has taken a narrow perspective when presenting its conclusion in the **Non-Technical Summary** of the **ES**

[[APP-159](#)], with the Non-Technical Summary presenting effects on the AONB and Heritage Coast as a whole. The LIR acknowledges within the same paragraph (paragraph 6.27) that the landscape and visual assessment at **Volume 2, Chapter 13** of the **ES** [[APP-216](#)] contains a more comprehensive assessment of effects on these landscape designations, but highlights only the overall summary paragraph at 13.6.150 of the **ES** which relates to non-significant effects relating to a limited extent of the wider AONB during construction. SZC Co. considers that the landscape and visual assessment clearly sets out and acknowledges the more localised significant effects on the AONB and a number of its special qualities and natural beauty indicators in the paragraphs proceeding this summary and updated by the **ES Addendum** at **Volume 1, Chapter 2** [[AS-181](#)] and **Volume 3, Appendix 2.8.A** [[AS-206](#)].

- 6.3.10 Paragraphs 6.30 to 6.31 of the LIR make reference to the downplaying of effects on the **Nearshore Waters Seascape Character Type (SCT)** at paragraph 13.6.72 **Volume 2, Chapter 13** of the **ES** [[APP-216](#)]. The LIR makes reference to the final bullet point of paragraph 13.6.72, which records the non-significant effects in areas of the SCT that would experience small scale effects. However, the proceeding bullet point identifies major–moderate (significant) and adverse effects across a wide extent of the SCT during construction which appears to have been missed in the LIR. SZC Co. does not consider that this downplays effects on seascape character.

c) Restoration Proposals

- 6.3.11 The LIR records that whilst the construction works would be generally disruptive in nature and not expected to provide any positive impacts on the landscape and AONB during this phase the Council's state that the construction works may provide the basis for future benefits "*..if the restoration objectives are clearly understood, and the methods of achieving them are properly embedded into the construction programme...*" (LIR paragraph 6.18).

- 6.3.12 In accordance with Design Principle 39 contained within the Design and Access Statement, SZC Co. is committed to establishing new planting and landform at the earliest practicable opportunity. SZC Co. will provide further information on the phasing of landscape restoration works in alignment with the construction programme at Deadline 4.

d) Pylons

- 6.3.13 The LIR acknowledges that SZC Co. has sought to address the Councils' previously detailed concerns with regard to the use of overhead pylons at

Sizewell C by reducing in height some of the proposals (LIR paragraph 6.47).

- 6.3.14 Whilst ESC has accepted the evidence presented by SZC Co. that there is no acceptable alternative to the use of pylons (LIR paragraph 6.49), SCC considers that SZC Co. has not sufficiently demonstrated the necessity for the use of pylons compared to less impactful alternatives, and references the work undertaken by consultants AFRY, commissioned by SCC, which records that gas insulated lines could be viable (LIR paragraph 6.51).
- 6.3.15 SZC Co. has provided comprehensive details of the alternative power export options considered and justification for the use of pylons as the preferred option. Details are provided in its response to **EXQ1 AI.1.36** which refers to the Power Export connection Technical Recommendation Report, which is presented in Appendix 5E of its response to the ExA's first written questions [[REP2-108](#)].
- 6.3.16 SZC Co. recognises that design solutions that minimise the visibility of pylons would be preferable and has selected a configuration that has the least visual impact from locations along the coast of the options considered.
- 6.3.17 Power transmission lines are a standard feature of views of electricity generating stations, and form part of the baseline situation at Sizewell. At Sizewell, existing transmission lines traverse the Suffolk Coast and Heaths AONB to connect to Sizewell B power station. An important aspect of the proposed development is that no additional lines would be required to support the addition of Sizewell C – the pylons included in the proposals would simply connect Sizewell C to the end of the existing transmission route. The four pylons required for this would all be located within the operational footprint of the proposed power station.
- 6.3.18 SZC Co. acknowledges that SCC agrees with ESC, that if pylons are to be used to export power to the national grid, residual landscape and visual impacts should be mitigated. SZC Co. continues to engage with the Councils on the scope, geographic coverage, governance and magnitude of the Natural Environment Fund which has been designed to mitigate the residual landscape and visual impacts of Sizewell C, including pylons.

e) **Outage Car Park (Goose Hill)**

- 6.3.19 SZC Co. acknowledges that the Councils welcome changes to the proposals that incorporate the training centre within the Operational Service Centre, reducing the need for additional buildings on Goose Hill (LIR paragraph 6.5). It also notes that whilst ESC considers the evidence provided to be acceptable, and that good design could ensure that the car park can have a minimal impact on the AONB and wider landscape views

when not in use (LIR paragraph 6.57), it acknowledges that SCC considers that the proposed 600 space car park for use during outages at Goose Hill is not justifiable in the context of the AONB and states that conclusive evidence has not been provided that no alternative arrangements are possible/practical that would avoid permanent land take within the Suffolk Coast and Heaths AONB (LIR paragraph 6.56).

- 6.3.20 SZC Co. has provided a comprehensive justification for the provision of the outage car park at Goose Hill in its response to **ExAQ1 LI.1.45**. This highlights the acknowledged impact on the AONB, albeit in an area already generally impacted by the power station and access to it, and the measures that have been deployed to mitigate its landscape and visual impact by the approach to design and siting through the extension of existing woodland planting extending from existing perimeter planting and by breaking up the extent of hard standing with planting, different surface materials and walking routes.
- 6.3.21 Further, in the scenario put forward by SCC for an off-site parking facility with bus transfer facility (Park and Ride), the practicality of that means substantial built development would still be required on the Goose Hill site to provide a bus terminus and transfer facility for outage staff, as well as retained spaces for outage staff that need to bring specific equipment to site that could not feasibly be loaded onto a bus. Compared with the landscaped grass-crete type parking currently proposed, it is considered that the introduction of an on-site bus terminus with full hard landscaping, plus parking for vans, would actually be a more harmful form of development in the AONB.
- 6.3.22 The real potential for an outage clash between SZB and either of the two Units at SZC means that a shared outage car park for both power stations, as suggested by SCC, is also not appropriate. Once a clash occurs, which would typically be due to a forced/unplanned outage, clashes would continue to occur until there is another forced/unplanned outage. Due to the unplanned nature of outages, their duration cannot be known, but in likelihood it would mean ongoing clashes over many years. Breaking the cycle of that clash by planning an outage sooner than it would otherwise be needed would result in the inefficient use of nuclear fuel and would increase the generation of active waste, which is not considered environmentally or commercially appropriate. The loss of electricity generation from the inefficient use of the fuel would ultimately increase costs to the consumer, which should be avoided.

7. IMPACTS ON THE AREA OF OUTSTANDING NATURAL BEAUTY

7.1 Overview

7.1.1 SZC Co. has reviewed Chapter 7 of the Local Impact Report [[REP1-045](#)] and **Table 7.1** below provides a summary response to the principal points, with more detail developed further below, where a response is appropriate.

7.1.2 Specific comments made in the Local Impact Report regarding impacts on the Suffolk Coast and Heaths AONB are addressed below. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

7.1.3 Particular attention is drawn to responses by SZC Co. to the first set of Examining Authority questions (ExQ1): **LI.1.2** (AONB – Adverse Effects); **LI.1.3** (AONB and Heritage Coast); and **LI.1.54** (Changes to Proposed Development – AONB Characteristics) [[REP2-100](#)].

7.2 Response to issues: summary

7.2.1 Chapter 7 of the LIR helpfully sets out a Table (Table 7: Summary of Impacts on the AONB), which contains a summary of the Councils' views of the impacts drawn out in that Chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 7.1: Response to summary of AONB impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
2a	<p>Significant impacts on the AONB and its special qualities during construction and operation:</p> <p>Landscape quality</p> <p>Scenic quality</p> <p>Relative wildness</p> <p>Relative tranquillity</p> <p>Natural Heritage features</p> <p>Health and wellbeing</p> <p>This could have an effect on the purpose of the designation</p>	<p>Negative</p> <p>(1) SCC: Avoid: Reduce impact by implementing alternative power export solution that does not require pylons and overhead lines (unless proven to be impossible within the site constraints) as set out in section 6 above.</p> <p>(2) ESC/SCC: Reduce: Secure design commitments of non-nuclear buildings by requirement as set out in section 6 above.</p> <p>(3) ESC/SCC: Reduce: Reduce ecology impacts as set out in section 8 below.</p>	<p><u>Context</u></p> <p>SZC Co. acknowledges that AONBs have been confirmed by Government as having the highest status of protection in relation to landscape and scenic beauty and SZC Co. has given substantial weight to that statutory purpose throughout the project's development, design and assessment stages.</p> <p>The potential for long-term effects on visual amenity given the location of the Sizewell C site within the Suffolk Coast and Heaths AONB is also acknowledged and the sensitive and designated context of the site has been an important consideration in the design and mitigation proposed.</p> <p>The landscape and visual impacts of Sizewell C during construction and operation are comprehensively assessed in the application.</p> <p>The nature, extent and significance of effects of the proposals during construction and operation on the Suffolk Coast and Heaths AONB is described and is informed by a full appreciation of the AONB's documented natural beauty and special qualities.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
		<p>(4) ESC/SCC: Mitigate: Secure landscape restoration through LEMP – Requirement.</p> <p>(5) ESC/SCC:</p> <p>Compensate: Residual mitigation funding through Natural Environment Fund - Obligation</p>	<p>The potential for Sizewell C to have an effect on the purpose of the AONB designation is addressed below.</p> <p>(1) SZC Co. notes that ESC does not share SCC's position on this issue [LIR paragraph 6.49]. SZC Co. does not agree with SCC in relation to alternatives to the pylons – see Section 6.3 (above)</p> <p>(2) SZC Co. fully accepts and is committed to requirements to ensure the delivery of the agreed Design Principles. Please refer to SZC Co.'s response to ExQ1 G.1.58 [REP2-100] for details.</p> <p>(3) SZC Co.'s responses to the Council's comments on ecological impact and measures to mitigate effects are presented in Section 8 (below).</p> <p>(4) SZC Co. agrees that the oLEMP has an important role in mitigating landscape and ecological effects. The LIR could do more to fairly recognise the quality and scale of the oLEMP and SZC Co.'s proposals for long term landscape restoration, which are acknowledged in ESC's response to ExQ1 LI.1.15 as providing a "<i>substantial and significant positive benefit</i>".</p> <p>(5) SZC Co. acknowledges the important role of the Natural Environment Fund to mitigate the residual landscape and visual impacts of Sizewell C and continues to engage with the Councils about the scale and detail of the Natural Environment Fund,</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			although the governance and structure of the fund has been substantially agreed.
2b	Permanent land take within the AONB	<p>Negative</p> <p>(1) SCC: Avoid: Remove outage car park from its location within the AONB (unless proven to be operationally impossible) – Change.</p> <p>(2) ESC/SCC: Compensate: Residual mitigation funding through Natural Environment Fund - Obligation</p>	<p>(1) SZC Co. notes that ESC does not share SCC's position on this issue. The outage car park is essential operationally and cannot be located elsewhere – see Section 6.3 (above).</p> <p>(2) SZC Co. acknowledges the important role of the Natural Environment Fund to mitigate the residual landscape and visual impacts of Sizewell C – see above.</p>

7.3 Detailed comments

7.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and there would be little benefit repeating it here. There are, however, a limited number of matters raised in the LIR to which SZC Co. wishes to respond, either because they raise additional issues or because SZC Co. does not accept the way in which they are characterised in the LIR. These are set out below.

Impacts on the Suffolk Coast and Heaths AONB and Purpose of Designation

7.3.2 The LIR highlights the findings of NPS EN-6 and its Appendix EN-6 Vol II and states that that the Councils consider that the proposed development presents a significant challenge to the purpose of the AONB designation which is to conserve and enhance the natural beauty of the area, as articulated by the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators document (LIR paragraphs 7.3 and 7.4).

7.3.3 SZC Co. acknowledges that AONBs have been confirmed by Government as having the highest status of protection in relation to landscape and scenic beauty and it has given substantial weight to its statutory purpose throughout the project's development, design and assessment stages.

7.3.4 As defined by S82(1) of the Countryside and Rights of Way Act 2000, the statutory purpose of the AONB designation is to conserve and enhance the natural beauty of the area. It follows that the assessment of effects of the Sizewell C project on the Suffolk Coast and Heaths AONB should therefore consider the characteristics, elements and features that contribute to its natural beauty.

7.3.5 As part of SZC Co's pre-application engagement, discussions between the Suffolk Coast and Heaths AONB Partnership, Suffolk County Council, Suffolk Coastal District Council (now East Suffolk Council) and SZC Co., were held in order to understand and document what constitutes the natural beauty and special qualities of the Suffolk Coast and Heaths AONB. This was to ensure that a comprehensive assessment and an informed design process would be possible. The final and agreed version of the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators document is presented at **Volume 2, Appendix 13C** of the **ES** [[APP-217](#)].

7.3.6 With regard to the effects of Sizewell C, the Councils assert that the proposed development would have a "...*considerable adverse impact on the statutory purpose of this designation, both during construction and operation*", and that whilst "...*impacts on landscape and scenic quality are*

a key concern in relation to the AONB, the AONBs Special Qualities are more broadly defined than that" (LIR paragraph 7.7). The LIR then goes on to report the Councils' view that "...large and medium scale effects" are likely for all of the indicators of natural beauty and special qualities (LIR paragraph 7.8).

- 7.3.7 The landscape and visual impacts of Sizewell C during construction and operation are comprehensively assessed in the application, and the nature, extent and significance of effects of the proposals during construction and operation on the Suffolk Coast and Heaths AONB is described and is informed by a full appreciation of the AONB's documented natural beauty and special qualities and the scale and extent of effects on these during both construction and operation (refer to Tables 13.14 and 13.17 within **Volume 2, Chapter 13** of the **ES** [APP-216], and updated by the **ES Addendum** in **Volume 1, Chapter 2** [AS-181] and **Volume 3, Appendix 2.8.A** [AS-206].
- 7.3.8 SZC Co. acknowledges that during construction, the scale and extent of effects on natural beauty and special qualities indicators would be large to medium scale for the extents described (refer to Table 13.4 within **Volume 2, Chapter 13** of the **ES** [APP-216]). However, it disagrees with the Councils' judgement regarding large and medium scale effects arising during the operational phase for all of the natural beauty and special qualities indicators. The assessment presented at Table 13.17 within **Volume 2, Chapter 13** of the **ES** [APP-216] records large and large - medium scale adverse effects to the landscape quality and scenic quality natural beauty indicators for the extents described, and medium-small adverse and negligible effects on several other natural beauty and special qualities indicators. Several positive effects are also identified, including a major positive effect to the natural heritage features natural beauty indicator as a result of the creation of new areas of dry Sandlings grassland and other habitats that are characteristic of the AONB.
- 7.3.9 The LIR records that the Applicant's assessment does not identify far views of the power station during construction and operation as being significant and records that the Councils consider that changes to views from key locations including Southwold, Walberswick and Dunwich may have an "...important detrimental impact on the nature of the AONB and Heritage Coast" (LIR paragraph 7.10).
- 7.3.10 SZC Co. acknowledges that the construction phase and the operational power station would be visible from coastal locations such as within/adjacent to Southwold, Walberswick and Dunwich Heath.

- 7.3.11 SZC Co. notes the Councils' concern that Sizewell C is a "...*significant challenge to the purpose of the AONB*" (LIR paragraph 6.10) and that the effects on the AONB's special qualities "...*suggest a risk of significant impacts on the AONB and the purpose of the designation, a risk that has been identified in the site nomination material within EN-6 Vol II*".
- 7.3.12 SZC Co. acknowledges that the project will significantly and adversely affect the immediate portion of the AONB during construction and operation and the application describes the geographic area over which effects, including those considered to be significant, would be experienced. It is noted that the effects on the AONB arising from construction are temporary and reversible and in landscape and visual terms have a physical and visual limit of extent.
- 7.3.13 SZC Co. does not agree that the effect of the power station during operation, would compromise the purpose of the designated area as a whole. SZC Co. notes that nuclear infrastructure has been a feature of the Suffolk Coast and Heaths AONB since its designation with Sizewell A being in-situ before the AONB itself was formally designated and Sizewell B being consented post-designation. As such, nuclear energy infrastructure has and will continue to be, a feature of this part of the Suffolk Coast and Heaths AONB but the AONB would not be 'overwhelmed' by it with the wider designated landscape dominating the area and prevailing.
- 7.3.14 SZC Co. is confident that, whilst significant effects are identified, the AONB as a whole will continue to perform its statutory purpose.
- 7.3.15 Any consideration of this issue also needs to recognise the exceptional circumstances inherent in the national need for new low carbon energy and the comprehensive nature of the site selection exercise that lies behind the development of NPS EN-6 and its identification of Sizewell C as one of a very few locations potentially suitable for a new nuclear power station. In reaching that conclusion, the Government was fully aware of the designated status of the Suffolk Coast and Heaths Area AONB and the purpose of that designation. It was also aware that a new nuclear power station could not be developed here without the potential for some long lasting adverse effects on the AONB (NPS EN-6 C.8.73) and that the decision maker should not expect the visual impacts to be eliminated with mitigation (EN-6 3.10.8).
- 7.3.16 These matters are addressed in the **Planning Statement** [[APP-590](#)] in Section 8.8.
- The Applicant has applied an exemplary approach to the design of the power station and to the short and long-term mitigation of its effects. NPS EN-1 at paragraph 5.9.10 identifies the applicable policy test in these

circumstances and the Applicant considers that those policy requirements have been fully met.

8. ECOLOGY AND BIODIVERSITY

8.1 Overview

8.1.1 SZC Co. has reviewed Chapter 8 of the Local Impact Report [[REP1-045](#)] and **Table 8.1** below provides a response to the principal points raised where a response is appropriate.

8.1.2 SZC Co. notes that the Councils consider that *“in many cases mitigation and/or compensation measures are proposed to address these impacts, the Councils consider that in a number of cases these measures are either inadequate, too vaguely defined or inadequately secured by the proposed DCO to give certainty that all ecological impacts can be satisfactorily addressed as part of the development proposal.”*

8.1.3 SZC Co. disagrees with this characterisation and addresses the specific matters raised in the LIR below.

8.1.4 SZC Co. notes further that the Councils *“consider that a number of ecological assessments are not fully comprehensive and do not allow for clear conclusions on the level of impact expected and the suitability of the mitigation proposals. In such cases, the Councils have used their specialists' professional judgement to indicate what the expected impact might be. In any event, there remain residual impacts which are not adequately mitigated or avoided as part of the design.”*

8.1.5 Again, SZC Co. disagrees with this characterisation and addresses the specific matters raised in the LIR below.

8.1.6 The detailed comments made in the Local Impact Report regarding matters relating to ecology and biodiversity, are addressed below. It should be noted that this section does not repeat matters which are already set out in documents available to the examination but does provide cross-references to where that information can be found.

8.2 Response to issues; summary

8.2.1 Chapter 8 of the LIR helpfully sets out a Table (Table 3), which contains a summary of the impacts drawn out in that Chapter. That approach also provides a convenient basis for providing SZC Co.'s response, in summary whilst certain matters are set out in more detail further below.

Table 8.1: Responses to LIR summary of ecology impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
3a	Habitats Regulations Assessment (HRA) - potential impacts on European designated sites.	Negative. Defer to Natural England for specific avoidance, mitigation and compensation needs	SZC Co. continues the ongoing dialogue with Natural England. SZC Co. is in the process of developing a Statement of Common Ground with Natural England [REP2-071] and responding to Natural England's Written Representation, which includes matters relating to European sites.
3b	Increased recreational disturbance pressure at nearby European designated sites. This potential impact may arise as a result of displacing existing users and as a result of temporary increase in population as a result of construction.	Negative The LIR refers to a number of measures to reduce and mitigate this potential impact.	SZC Co. has committed to delivering the measures to reduce and mitigate this potential impact, namely: <ul style="list-style-type: none"> - Provision of recreational access and improvements at Aldhurst Farm and Kenton Hills. - European Sites Access Contingency Fund. - Monitoring and Mitigation Plans for the Minsmere European sites, Sandlings Special Protection Area (SPA) and the Alde-Ore Estuary [REP2-118]. - Payment of a Recreational Avoidance Mitigation Contribution. <p>The shadow HRA [APP-145 - APP-149] conclusion is that with these measures in place there would be no adverse effect on integrity arising from recreational amenity at the nearby European sites.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
3c	Loss of part of Sizewell Marshes SSSI.	<p>Negative.</p> <p>The LIR refers to the reduction of impacts to the SSSI during <u>construction</u> through the provision of a SSSI crossing using a full open span bridge structure.</p> <p>In addition, the LIR refers to a number of compensatory and monitoring measures which the councils consider should be provided.</p>	<p>In the May 2020 DCO application, the design of the SSSI crossing was a 6m wide culvert combined with embankments. This proposal was replaced in January 2021 with a 40m long, 30m wide single span bridge combined with similar embankments.</p> <p>The SSSI crossing structure has been further redesigned and now includes the removal of the eastern bridge deck in the operational phase to reduce the bridge width from 40m to 15m. This will further reduce the potential for ecological fragmentation of habitats along the Leiston Drain during operation. However, SZC Co. does not consider that 'a full open span bridge' (e.g. triple span) as proposed by SCC to be appropriate given the delays to construction that this would entail.</p> <p>The compensatory measures stated in the LIR have been incorporated into the proposals as follows:</p> <ul style="list-style-type: none"> • At least 4.5ha of compensatory fen meadow habitats, secured via way of the Fen Meadow Strategy [AS-209] (which requires the preparation of Fen Meadow Plans) at the Benhall, Halesworth and Pakenham sites. The councils have reviewed a draft of this document and it has been updated following this review. • At least 3.06ha of compensatory wet woodland habitats secured via way of the Wet Woodland Strategy [REP1-020], at the Halesworth and Pakenham sites (with 0.7ha delivered on the main development site).

Ref no.	Impact	Summary of LIR	SZC Co. response
			<ul style="list-style-type: none"> 6ha of compensatory open water, reedbed and ditch habitats, already delivered from 2016 at Aldhurst Farm (so no requirement is necessary). The compensatory and mitigation functions of Aldhurst Farm are covered in a response to ExQ1 Bio.1.51 at Deadline 2 [REP2-100]. The Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP) [REP1-016] which is secured by requirement to ensure monitoring of the Sizewell Marshes SSSI, its habitats and species. The councils have reviewed a draft of this document and it has been updated following this review.
3d	Potential permanent loss of fen meadow land, wet woodland, reedbed and ditches as a result of loss of part of Sizewell Marshes SSSI if insufficiently mitigated off-site or mitigation fails.	<p>Negative</p> <p>Refer to 3c above.</p> <p>[Note 3d relates to the <u>operational phase</u>]</p>	Refer to 3c above.
3e	Loss/reduction of ecological connectivity between parts of Sizewell Marshes SSSI, and between the Sizewell Marshes	Negative	As stated in section 3c above, the SSSI crossing structure has been redesigned to reduce the potential for fragmentation.

Ref no.	Impact	Summary of LIR	SZC Co. response
	SSSI and Minsmere, for some species groups.	<p>The LIR refers to the further reduction of impact through redesign of the SSSI crossing.</p> <p>Mitigation in the form of noise and lighting control measures are listed as a requirement as well as a Compensation Fund particularly in the construction phase.</p>	<p>SZC Co. has undertaken further lighting modelling which demonstrates that dark corridors, including the SSSI crossing area, can be maintained to facilitate the movements of bats.</p> <p>Sections 1.3 and 1.4 of the Lighting Management Plan (Doc Ref. 6.3 2B (A)) will be secured by requirement.</p> <p>Monitoring and adaptive mitigations measures for noise and light during construction, in relation to bats, are secured via way of the TEMMP [REP1-016]. The Councils have reviewed a draft of this document and it has been updated following this review.</p> <p>SZC Co. does not consider any loss of connectivity or fragmentation at the SSSI Crossing as being likely to result in a significant adverse effect.</p> <p>The use of the Natural Environment Fund as 'compensator' is not proposed.</p> <p>Compensatory habitat is proposed for Marsh Harriers but otherwise SZC Co. believes the project impacts are appropriately mitigated.</p>
3f	Loss of part of Sizewell Levels and Associated Areas CWS	<p>Negative.</p> <p>The LIR states a requirement or obligation for compensatory habitat creation across the</p>	<p>New habitats will be created on what is currently arable land within the proposed order limits, once the temporary construction areas has been removed, in accordance with the oLEMP [REP1-010], secured by requirement. The councils have reviewed a draft of this document and it</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
		<p>wider Sizewell estate upon completion of construction.</p> <p>In addition, the LIR considers that Natural Environment Fund funding is required to compensate for residual impact, particularly in construction phase.</p>	<p>has been updated following this review. It is understood that the oLEMP [REP1-010] is supported.</p> <p>Across the wider EDF Energy estate habitats have been or are being established in accordance with the Aldhurst Farm Management Plan, the Marsh Harrier Habitat Report [REP2-119] and the Reptile Mitigation Strategy. In addition, an Estate-wide management Plan (EWMP) is being developed which will further explain the habitats across the EDF Energy estate, including those defined in all of the named plans and explains how these will be managed. The EWMP will be submitted to examination.</p>
3g	<p>Temporary loss of part of Suffolk Shingle Beaches CWS, and Potential loss of part of Suffolk Shingle Beaches CWS in the longerterm during operation, including if beach recharge is required in the future Noting that vegetated shingle habitat being of national importance.</p>	<p>Negative.</p> <p>The LIR is seeking clarification / commitments to long-term mitigation/ compensatory obligations.</p>	<p>The ES, in Volume 2, Chapter 14 [AS-033], explained that the shingle habitats will be removed during the construction phase and the sediments stockpiled. Once the coastal defence works have been completed, the shingle habitats will be reinstated and the vegetation allowed to re-establish naturally using a similar approach to that used successfully for the Sizewell B defences.</p> <p>Monitoring of the coastal defences will be undertaken in accordance with the Coastal Processes Monitoring and Mitigation Plan (CPMMP), secured by requirement.</p> <p>The TEMMP [REP1-016] is secured by requirement and sets out the long-term monitoring approaches of vegetation to be implemented to ensure the successful establishment of these habitats. Habitats within</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			<p>Suffolk Shingle Beaches CWS, particularly the vegetated shingle, are considered on national importance.</p> <p>Beach recharge will be undertaken as necessary in accordance with the CPMP and this will maintain the substrates necessary for these habitats. Modelling to date shows up to seven recharge events over the lifetime of Sizewell C and whilst these would be at fairly regular intervals, given that erosion is storm driven, these events could be somewhat erratic. Recharge would happen in sections along the frontage and would not be for the entire length of the sea defence.</p> <p>Given that species characteristic of shingle beach vegetation communities are adapted to what is a naturally dynamic environment, it is considered that recharge events of this type and frequency would not lead to a substantive loss of shingle beach vegetation. The species present immediately after an area has been subject to recharge would simply be the early colonisers, characteristic of the early stages of vegetation establishment.</p> <p>The effect of land take on this CWS remains moderate adverse as stated in the ES, which is considered to be significant</p>
3h	Fragmentation and possible local extinction of populations of some bat species, including the nationally rare barbastelle bats. If proposed measures fail, Councils consider an adverse	<p>Negative.</p> <p>The LIR refers to the implementation of mitigation measures during the construction phase in relation to</p>	<p>SZC Co. has undertaken further lighting modelling which demonstrates that dark corridors, including the SSSI crossing area, can be maintained to facilitate the movements of bats.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
	impact on all bat IEFs of at least Moderate Adverse, Significant level could occur, and impact on barbastelle could be Major Adverse, Significant.	noise and lighting, compensatory measures in the form of Natural Environment Funding and the provision of the Terrestrial Ecological Monitoring Plan.	<p>Section 1.3 of the Lighting Management Plan (Doc Ref. 6.3 2B(A)) will be secured. An update to the LMP has been submitted at Deadline 3 (Doc Ref. 6.3 2B(A)).</p> <p>Monitoring and adaptive mitigations measures for noise and light during construction, in relation to bats, are secured via way of the TEMMP [REP1-016].</p> <p>In addition, any development licence issued by Natural England will also stipulate monitoring requirements which would then be a licence condition.</p> <p>SZC Co. does not consider that the Council's conclusions in relation to the potential for adverse effects on all bats IEFs is supportable, given the assessment presented in the Appendix 2B of the ES Addendum [AS-208]. Further detailed consideration is given to bats to address the detailed points made in the LIR in the section following this table.</p>
3i	Potential significant adverse impact on natterjack toad terrestrial habitat.	<p>Negative.</p> <p>The LIR makes reference to the WMZ1 which is located within Retsoms Field and requests a change to the WMZ design to avoid a portion of the terrestrial habitat present.</p>	<p>A design review has developed a WMZ footprint which is substantially smaller than previously, so reducing the temporary land take of terrestrial habitats and avoids the rabbit warrens which are used by the natterjack toads as hibernation sites (see also 3f above). The design will be submitted to examination at Deadline 5 and would be secured by an appropriate mechanism.</p> <p>The proposed mitigation associated with construction includes the creation of more hibernation/resting site opportunities and the creation</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
		<p>In addition, a number of mitigation, monitoring and compensatory measures are referred to and there is further reference to a Natural Environment Fund in relation to residual impacts for this species.</p>	<p>of an additional breeding pond as well as a translocating any toads which are found within the reduced footprint of the WMZ.</p> <p>All works will be carried out under licence with only Natural England approved working methods.</p> <p>No significant adverse effects on this species are expected and Natural Environment Fund funding to compensate for residual impacts for this species would be unwarranted.</p>
3j	<p>Adverse impacts on otter, water vole, badgers, and reptiles – assessed by Applicant as nonsignificant – but subject to proposed mitigation being successful.</p>	<p>Negative.</p> <p>The LIR refers to a series of control documents identified as requirements.</p> <p>This is in relation of mitigation, monitoring and compensatory measures.</p>	<p>SZC Co. has produced and issued the Code of Construction Practice (CoCP) [REP2-056], an oLEMP [REP1-010] as well as the TEMMP [REP1-016] referred to in the LIR for the agreed purpose of limiting and mitigating impacts on these species. All are secured by requirement.</p> <p>The councils have reviewed drafts of these documents and they have been updated following these reviews.</p> <p>In addition, any works in relation to badger, water vole and otter will be subject to licensing by Natural England. A detailed reptile mitigation strategy is currently in the process of being updated and will be submitted to the relevant consultees and the examination.</p> <p>The impacts of concern in the LIR have been understood and addressed. No significant adverse effects on these species are</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			expected and Natural Environment Fund funding to compensate for residual impacts would be unwarranted.
3k	Residual, cumulative non-significant adverse impacts represent cumulatively an erosion of biodiversity (particularly UK Priority habitats and species) in the area and are not fully addressed.	Negative. The LIR refers to funding as a potential option to compensate for residual impacts and to the requirements of the Terrestrial Ecology Monitoring Plan.	SZC Co. has produced and issued an oLEMP [REP1-010] as well as the TEMMP [REP1-016] both of which are subject to requirement. Other than in a few cases, such as the moderate adverse effect on Barbastelle during construction, no significant adverse effects on these species or habitats are predicted in the ES or ES Addendum. A Natural Environment Fund specifically to compensate for residual impacts would be unwarranted.
3l	Conversion of formerly agricultural land on the Sizewell Estate seminatural habitats/ heathland.	Positive	New habitats will be created on what is currently arable land within the proposed order limits, once the temporary construction areas has been removed, in accordance with the oLEMP [REP1-010]. Across the wider EDF Energy Estate habitats have been or are being established on what was formerly arable land with the Aldhurst Farm Management Plan, the Marsh Harrier Habitat Report [REP2-119] and the Reptile Mitigation Strategy. In addition, an Estate-wide management Plan (EWMP) is being developed which will further explain the habitats across the EDF Energy estate, including those defined in all of the named plans and explains how these will be managed.

Ref no.	Impact	Summary of LIR	SZC Co. response
3m	Impacts on nearby European, nationally and locally designated sites as a result of changes in coastal processes.	<p>Negative.</p> <p>The LIR refers to further assessment being required to determine the extent of likely impacts and the need for mitigation and monitoring.</p>	<p>The CPMMP includes monitoring and management actions for potential impacts to ensure that no significant effects on coastal processes occur throughout the life of Sizewell C. An updated version of the CPMMP will be provided to key stakeholders for comment and submission to the ExA at Deadline 5 to reflect the latest monitoring and modelling outputs and comments from stakeholders.</p> <p>Ecological monitoring and mitigation will also be secured via the TE MMP [REP1-016].</p> <p>The effects on coastal habitats, including the CWS, arising as a result of the new coastal defences are discussed further at 3g above.</p> <p>No significant adverse effects on coastal habitats are expected as a result of changes in coastal processes alone and Natural Environment Fund funding to compensate for residual impacts would be unwarranted.</p>
3n	Northern and Southern Park and Rides, Freight Management Facility: Loss of habitat for breeding and wintering birds – this will continue until operation ceases and the site is restored to its former condition.	<p>Negative</p> <p>The LIR refers to the use of Natural Environment Funding for compensation.</p>	<p>No significant adverse effects on these sites, the habitats or species are expected – due in part to the quality of the site selection and design process but also to the mitigation proposed.</p> <p>Natural Environment Fund funding to compensate for (unidentified) residual impacts would be unwarranted.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
3o	<p>Two Village Bypass and Sizewell Link Road: Loss of connectivity for foraging and commuting bats due to hedgerow loss/re-orientation.</p> <p>Loss of habitat for breeding birds.</p>	<p>Negative.</p> <p>The LIR refers to Mitigation works such as habitat creation and the provision of a LEMP. Compensatory measures referred to for residual impacts.</p>	<p>SZC Co. has already produced oLEMPs [REP1-010] for the two roads and drafts were provided for review and comment to stakeholders before being included in the January 2021 change application. These are secured by requirement.</p> <p>The oLEMPs [REP1-010] are aligned with the site Masterplans, which include woodland and hedgerow habitats and crossing point mitigations, where feasible, to reduce fragmentation for birds and bats.</p> <p>Ecological monitoring and mitigation will also be secured via the TEMMP [REP1-016] which covers the two roads.</p> <p>No significant adverse effects on these sites, their habitats or species are expected and Natural Environment Fund funding to compensate for residual impacts would be unwarranted.</p>
3p	<p>Two Village Bypass: Impact on Foxburrow Wood County Wildlife Site.</p> <p>Loss of veteran trees</p>	<p>Negative.</p> <p>The LIR refers to the avoidance of veteran trees and details Mitigation, Compensation and Monitoring requirements.</p>	<p>A review of the Ancient Tree Inventory identified one ancient and two veteran trees within the proposed vegetation removal zone of Two Village Bypass and two veteran trees within the vegetation removal zone of Sizewell link road.</p> <p>An arboriculture survey to the British Standard BS 5837 2012 will be undertaken of both roads and the survey results reported to examination.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			<p>The results of the survey will then inform appropriate replanting compensation packages where required.</p> <p>See response 3o above in relation to the oLEMP [REP1-010], the TEMMP [REP1-016] and the Natural Environment Fund.</p>
3q	Two Village Bypass: Loss of floodplain grazing marsh (a UK Priority habitat)	<p>Negative.</p> <p>The LIR refers to mitigation works including habitat creation and the requirement for several documents detailing the mitigation measures as well as monitoring and funding.</p>	<p>Some permanent loss of floodplain grassland is recognised in the ES. However, in locations where floodplain compensation habitats are proposed, some excavations will be required to create wetland channels and both these and the grasslands would be subject to enhancement to maximise their ecological benefit. The existing floodplain grasslands are of low value.</p> <p>See response 3o above in relation to the oLEMP [AS-263] for the Two Village Bypass, the TEMMP [REP1-016] and the Natural Environment Fund.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
3r	Sizewell Link Road: Small amount of woodland lost to construction. Loss of ponds (one permanently). Loss of habitat and habitat fragmentation impacts on great crested newts.	<p>Negative.</p> <p>The LIR refers to mitigation works including habitat creation and the requirement for several documents detailing the mitigation measures as well as monitoring.</p> <p>Compensatory measures in the form of funding identified.</p>	<p>The landscape design for the Sizewell Link Road includes replacement woodland habitat planting as well as the creation of replacements for breeding ponds and additional ponds for enhancement. All works in relation to great crested newts along the Sizewell Link Road scheme corridor will be subject to an approved development licence from Natural England. SZC Co. is continuing engagement with Natural England on licensing.</p> <p>See response 3o above in relation to the oLEMP [REP1-010], the TEMMP [REP1-016] and the Natural Environment Fund.</p>
3s	Northern and Southern Park and Ride, Freight Management Facility: Bat assemblage – subject to implementation of the identified mitigation measures.	<p>Neutral</p> <p>The LIR refers to the securing of mitigation through the CoCP and that a Terrestrial Ecology Monitoring Plan is required.</p>	<p>SZC Co. has produced and issued a CoCP [REP2-056] which was first issued to stakeholders for review and comment.</p> <p>Any works in relation to bats requiring a licence will be discussed and obtained from Natural England. As part of the licensing process, monitoring conditions will be stipulated.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
			Ecological monitoring will be secured via the TEMMP [REP1-016]. The Councils have reviewed a draft of this document and it has been updated following this review. At present, the TEMMP [REP1-016] scope does not extend to these three sites. The TEMMP [REP1-016] will be revised to address the habitats and species which should be monitored at these sites. The updated TEMMP will be submitted to the examination at a suitable deadline.
3t	Northern Park and Ride: Great crested newts – no significant impacts subject to identified mitigation measures being implemented.	Neutral The LIR refers to the need to secure mitigation measures through the provision of several documents.	All works in relation to great crested newts at this site will be subject to an approved development licence from Natural England. SZC Co. are continuing engagement with Natural England on licensing. See 3s above in respect of monitoring.
3u	Two Village Bypass: Design and mitigation measures avoid any direct impacts on the River Alde. Inclusion of mammal access(es) where embankment and bridge cross Alde River valley.	Neutral The LIR refers to the need for the CoCP and LEMP to be used to secure and detail avoidance / mitigation measures required as well as the provision of a Terrestrial Ecology Monitoring Plan.	Safe crossing point mitigation in the form of ledges have been included within the scheme design. The River Alde crossing includes the provision of otter ledges thereby permitting mammal access. See response 3o above in relation to the oLEMP [REP1-010] and the TEMMP [REP1-016].

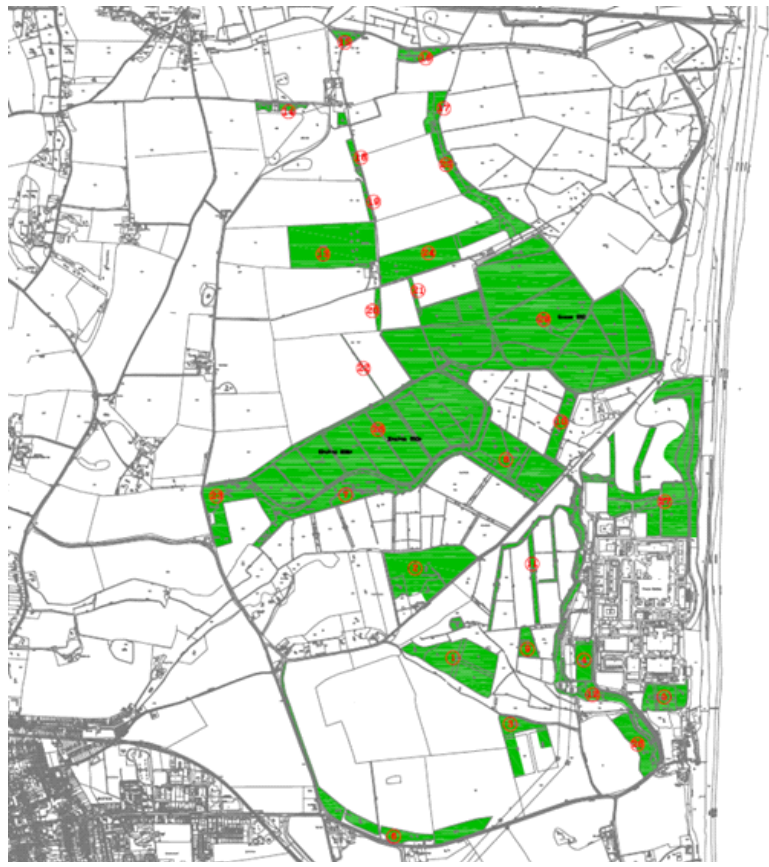
Ref no.	Impact	Summary of LIR	SZC Co. response
3v	Sizewell Link Road: Inclusion of suitably sized and located mammal culverts will maintain connectivity for otters.	Neutral The LIR refers to the need for the CoCP and LEMP to be used to secure and detail avoidance / mitigation measures required.	Safe crossing point mitigation in the form of ledges are included within the scheme design. The measures to be implemented include ledges in culverts and portal culverts to retain natural banks, where topography permits. See response 3o above in relation to the oLEMP [REP1-010] and the TEMMP [REP1-016].
3w	Yoxford Roundabout: Roadside Nature Reserve (RNR) 197 is retained outside of the development boundary.	Neutral The LIR refers to the avoidance of RNR 197.	RNR 197 is not located within of the application boundary for the Yoxford Roundabout (it is located adjacent to the south of the site boundary) and will not be directly impacted by the proposed development. Part C of the CoCP [REP2-056] details a series of ecological mitigation measures to be implemented at each of the associated development sites which would reduce indirect impacts to the RNR.
3x	Two Village Bypass and Sizewell Link Road: SuDS ponds/basins may provide new aquatic habitats (dependent on design)	Positive The LIR refers to the securing of suitable drainage including SuDS ponds/ basins.	SZC Co. agrees that the use of SUDS as shown in the design will be positive. The SUDS measures in the design are subject to a further approval under requirement 5 and must be in accordance with the Outline Drainage Strategy [REP2-033].

Ref no.	Impact	Summary of LIR	SZC Co. response
3y	Sizewell Link Road: Considerable amounts of new woodland and hedgerow planting are proposed as part of the scheme	Positive The LIR refers to the need for a LEMP to be used to secure and detail the habitat creation measures being implemented as well as the provision of a Terrestrial Ecology Monitoring Plan.	SZC Co. agrees that the habitat creation of an increase in the provision of woodland and hedgerow planting will be positive. See response 3o above in relation to the oLEMP [REP1-010] and the TEMMP [REP1-016] .
3z	Two Village Bypass: New woodland planting will provide some new habitats as it matures, which will eventually be greater than that lost (although loss of any veteran trees will not be mitigated/compensated). Improvements to retained floodplain grazing marsh may compensate for the net loss of habitat area	Neutral The LIR refers to the need for a LEMP to be used to secure and detail the habitat creation measures being implemented as well as the provision of a Terrestrial Ecology Monitoring Plan.	See response 3o above in relation to the oLEMP [REP1-010] and the TEMMP [REP1-016] . Veteran trees are addressed at 3p above.

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- 8.2.2 SZC Co.'s detailed case in relation to these issues raised is extensively set out within SZC Co.'s **Responses to the Examining Authority's First Written Questions** (ExQ1) [[REP2-100](#)] and SZC Co.'s **Comments on Responses to ExA's First Written Questions** (ExQ1) (Doc Ref. 9.30) and there would be little benefit repeating it here. However, there is one matter raised in the LIR to which SZC Co. wishes to respond. This is in relation to the detailed points made in the LIR on bats.
- 8.2.3 SZC Co. has prepared **Table 8.2** below to address points raised on bats in the LIR. The left-hand column provides a direct quote from the LIR and the right-hand column provides the SZC Co. response.

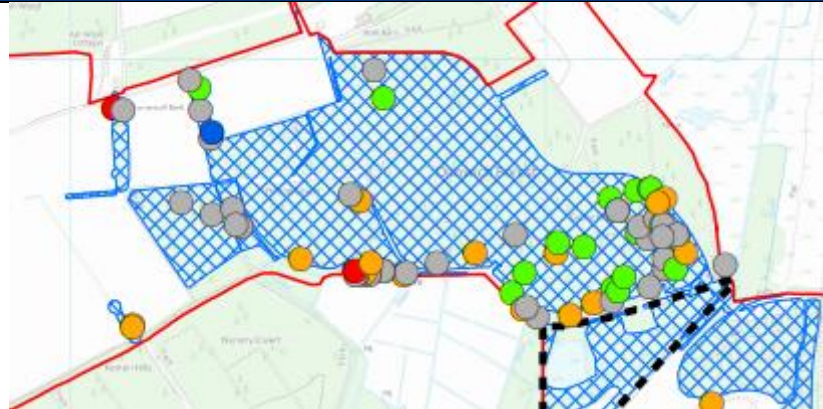
Table 8.2: Responses in relation to LIR issues raised on Bats


LIR Comment	SZC Co. Response
<p>Construction - Habitat Loss (Roosts): <i>It is understood that the assessment of impacts on bat roosts as a result of direct loss of habitat during construction is based on consideration of the total roost resource available vs that which will be lost during construction. Whilst the Councils understand the principle of this approach, we are concerned that no quantification of the total roost resource available on the wider Sizewell Estate is included. In the absence of this we do not consider that the assertion that, following mitigation, the loss of roosting habitat will only result in a Minor Adverse, Not Significant impact on all bat IEFs can be evidenced. Even with the implementation of mitigation measures (primarily the installation of bat boxes) there is no demonstration that an equal or greater roosting resources is available to all bat species roosting on or adjacent to the development area.</i></p> <p><i>With regard to Goose Hill, the area of greatest woodland loss, the conclusions on roost resource presented in the ES and Updated Bat Impact Assessment appears contradictory. Section 5.3.5 of the Updated Bat Impact Assessment [AS-208] notes that potential roosts of barbastelle (and noctule) have been recorded in Goose Hill. It is additionally noted that Section 8.7.13 of the assessment suggests that there were thought to have been pipistrelle roosts within Goose Hill plantation in 2020. Section 5.3.6 then states that, "Several locations on and close to the site boundary have significant numbers of trees with roosting potential for bats, including (...) Goose Hill (...)". The paragraph notes the principal</i></p>	<p>A roost resource approach to the assessment of roost loss has been taken within the assessment. This is outlined in Volume 2, Chapter 14 of the ES [AS-033] and Appendix 2B of the ES Addendum [AS-208].</p> <p>This recognises the fission/fusion roosting ecology (frequent roost switching) demonstrated by many woodland bat species, in particular barbastelle bat.</p> <p>Overall, the amount of roosting resource to be lost is a small percentage of the resource within the Sizewell Estate. Within the estate, 165.65ha of woodland managed (the location of the managed woodlands in the baseline state are presented in the image below) and 70.23ha of vegetation is to be removed. The 70.23 ha includes scrub vegetation, scattered trees and hedgerows which are not included within the figure of 165.65ha for the managed woodlands.</p>

LIR Comment	SZC Co. Response
<p><i>locations of trees with potential for roosting within the plantation and comments on the lack of suitability of large parts of it due to the (young) age of the trees. This is restated (in part) in Section 8.3.13. In 5.3.7, however, it is stated that Goose Hill offers “minimal roosting resource for bats.” The 2020 reports are cross referred in providing an evidence base for this assertion, which is not subject to qualification. Section 8.3.9 further notes that conifer plantation, such as that principally present within Goose Hill, is sub optimal for roosting barbastelle, providing, “limited availability of roost features.”. Figure 2.9.B.1 appears to show a barbastelle roost in Hilltop Covert, which forms the western block of the Goose Hill plantation (this is separated from Kenton Hills by an access track). However, this location is referred to as being in Kenton Hills in 8.3.50 of the bat assessment, and as being in Nursery Covert (Nursery Covert is the eastern part of Kenton Hills, so these references are not necessarily incompatible. It is less apparent why the roost is shown north of the track, and where Kenton Hills is considered to extend to if the roost is considered to be in Kenton Hills) in Table 8.21</i></p> <p><i>The ground level tree roost assessment completed by Arcadis in 2020 concluded that there were 104 trees within Goose Hill that offered medium roosting potential for bats, and a further seven with high roosting potential. The statement in Section 5.3.7 (that there is minimal roosting resource for bats) does not therefore appear to accord with this finding, particularly in the absence of details of the wider roosting resource available in the area, and it is unclear what the quoted statement in 8.3.9 means in this context. Overall, the Councils consider that there is insufficient</i></p>	 <p>The map displays a complex layout of land parcels, likely agricultural or plantation land. Several areas are highlighted in green, indicating specific zones of interest. Numerous red circular markers are scattered across the map, particularly within the green-shaded areas, representing individual trees or specific roosting sites identified in the assessment. The map also shows roads, tracks, and other infrastructure elements.</p>

LIR Comment	SZC Co. Response
<p><i>evidence to support the ES conclusion that roost loss (following mitigation) will result in only a Minor Adverse, Not Significant adverse impact on all bat IEFs. Dependent on the roost resource available in the wider area and the actual number of known roosts or suitable roost trees to be lost, the actual impact for some bat IEFs may be significantly greater (even up to Moderate Adverse, Significant dependent on the particular IEF).</i></p> <p><i>Overall, the Councils consider that there is insufficient evidence presented to support the ES conclusion that roost loss (following mitigation) will result in only a Minor Adverse, Not Significant adverse impact on all bat IEFs. Dependent on the roost resource available in the wider area and the actual number of known roosts or suitable roost trees to be lost, the actual impact for some bat IEFs may be significantly greater (even up to Moderate Adverse, Significant dependent on the particular IEF).</i></p>	<p>Of the 70.23ha of vegetation to be removed, the majority is in Goose Hill plantation woodland, a largely coniferous plantation with homogenous area of managed pines. These offer limited roosting resource, as stated in Volume 2, Chapter 14 of the ES [AS-033] and Appendix 2B of the ES Addendum [AS-208]. Conifer plantations generally have fewer potential roost features compared to broadleaved woodland and the vast majority of trees within the Goose Hill Plantation Woodland area are of negligible or low value to tree roosting bats.</p> <p>Taking the habitat approach to bat roosting habitat and the quantification of the available roosting resource, the mitigation will ensure no detrimental effect to favourable conservation status of barbastelle and other species that rely on tree roosts. Taking this approach into context with the roost resource available in retained areas of woodland and areas outside the development areas (e.g. Minsmere), it is considered that the roost loss impact following mitigation is minor adverse.</p> <p>With regards to the statement in the relation to the roost resource in Goose Hill:</p> <p><i>“The ground level tree roost assessment completed by Arcadis in 2020 concluded that there were 104 trees within Goose Hill that offered medium roosting potential for bats, and a further seven with high roosting potential. The statement in Section 5.3.7 (that there is minimal roosting resource for bats) does not therefore appear to accord with this finding, particularly in the absence of details of the wider roosting resource available in the area, and it is unclear what the quoted statement in 8.3.9 means in this context.”</i></p> <p>The ES does not state that there is no roosting potential in Goose Hill. Moreover, the surveys conducted to date were not intended to identify every feature that a bat has ever or will ever roost in, this would show a misunderstanding of the ecology of woodland roosting bats. The assessments identified “104 trees within Goose Hill that</p>

LIR Comment	SZC Co. Response
	<p><i>offered medium roosting potential for bats, and a further seven with high roosting potential”, and it is the word potential that is important. These trees are in an area with thousands of trees, and the proportion of trees within this area that have any roosting potential is extremely low.</i></p> <p>Furthermore, additional quantification of the available bat roosting resource being affected by the scheme has subsequently been established through ground and aerial inspections of trees in 2021, building on previous datasets. Within this assessment, all trees with moderate or high roosting potential were climbed and inspected (with the exception of the trees in the SSSI triangle that could not be accessed and trees that were not possible to climb) to positively ascertain the number and value of the roosting features to be lost. It was ascertained that, of the trees initially identified from the ground as having roosting potential, once climbed many of these features were not suitable for bats. In total, within Goose Hill Plantation woodland, only 14 trees were found when climbed with moderate roosting potential and 1 tree with high roosting potential (within the areas of woodland to be removed). The location of these trees is presented in the image below (red dots are high roosting potential, orange dots are moderate roosting potential, green dots are low roosting potential, and grey dots are negligible roosting potential).</p>

LIR Comment	SZC Co. Response
	 <p>The replacement of roost resource under the mitigation proposals can be guaranteed as the placement of bat boxes is tied to the features to be lost and secured via way of the protected species licence. Appropriate replacement ratios for mitigation potential roost features will be agreed with a minimum of 1:1 replacement, with up to 3:1 replacement for high potential roost features. The mitigation approach will include a combination of bat boxes (cavity and crevice designs), reclaimed potential roost features from felled trees and veteranisation of retained trees.</p>
<p><i>In addition to the above, a number of tree roosts have been identified along the northern edge of Kenton Hills. Whilst it is stated in the assessment that these are retained, some figures appear to show them conflicting with the bund to be constructed along this edge. It therefore appears that these trees may also be</i></p>	<p>Within the DCO application, no woodland removal along the north of Kenton Hills is required. The bund can be constructed without the need to remove trees (tree removal presented below in blue).</p>

LIR Comment	SZC Co. Response
<p><i>at risk and that these roosts could potentially be lost which would further increase the impact on bat IEFs.</i></p>	 <p>The presentation of the bund within this area is likely due to the indicative nature of the plans referred to showing the approximate locations of bunds etc. These plans do not have the same spatial accuracy as the drawings used to inform the required vegetation removal.</p>
<p><i>The geographical location and importance of Goose Hill to foraging and commuting barbastelle and Natterer's bat, and the impact of the loss of much of the area will have been a consideration in concluding a significant adverse effect on barbastelle as a result of habitat fragmentation. However, the evidence provided with regard to both species indicates it may well also comprise a locally important foraging area for the respective populations, particularly breeding female barbastelles. In the absence of definitive evidence of how the area is used by different bat species throughout the year, but following the</i></p>	<p>It is recognised that all woodland habitat provides a foraging resource to barbastelle and other bat species. Goose Hill is also considered a commuting corridor for barbastelle bats. It is considered that the most significant impact will occur during the construction period.</p> <p>To address these impacts further foraging habitat will be created in the retained woodland areas in particular conifer plantations where glades, and rides will be created (in Kenton Hills) to provide edge habitats which is selected by barbastelle and other bat species. This approach will be explained further in an Estate-wide management Plan (EWMP) which is being developed which will further explain the</p>




LIR Comment	SZC Co. Response
<p><i>evidence which is available, a precautionary approach needs to be taken. This should be that the area does form an important foraging area of barbastelle and Natterer's bats for at least part of the year. The Councils consider that this is particularly around the breeding season when female bats will be foraging closer to their maternity roosts, and the area may also be important for newly-volant bats (those just beginning to fly).</i></p>	<p>habitats across the EDF Energy estate and explains how these will be managed. The EWMP will be submitted to examination.</p> <p>Three large dark corridors will also be retained within development area during construction as shown on the indicative lighting plans appended to updated Lighting Management Plan at Deadline 3 (Doc Ref. 6.3 2B (A)). These corridors will ensure bats have the ability to commute from roosting grounds in the north and foraging areas to the south, whilst dark boundaries will also ensure bats can move around the boundaries of the development.</p>
<p><i>Following this precautionary approach, it is not clear that there is robust data presented in the application to confirm that habitat creation has (or will) offset the reduction in foraging resource currently available. As a result, it would be more robust to conclude a residual significant effect on both species rather than conclude a Minor Adverse, Not Significant effect.</i></p> <p><i>Construction - Habitat Fragmentation: The ES concludes that, with the exception of barbastelle, subject to the implementation of the identified mitigation measures the impact on bat IEFs from habitat fragmentation will be Minor Adverse, Not Significant. For barbastelle the conclusion is that there will be a Moderate Adverse, Significant impact. It is noted that the changes to the project (including the revised SSSI Crossing design and the proposed inclusion of a vegetation link across the Temporary Construction Area between Kenton Hills and Ash Wood) have not altered the applicant's conclusion in relation to this.</i></p>	<p>Bats are mobile species and will seek out new roosting and foraging and roosting area where they are created. There are numerous examples of recently created habitats being used by barbastelle bats in fragmented agricultural landscapes.</p> <p>As stated above, in the construction phase there will be loss of 70.23 ha of woodland and scrub vegetation.</p> <p>As stated in Appendix 2B of the ES Addendum [AS-208], once the construction phase is complete, there will be a significant increase in the availability of foraging habitats of bats. Approximately 250 ha of arable land is being or has been repurposed– the majority of which will be used for creation of habitat types suitable for foraging bats. This will include dry sandlings grassland (a mosaic of grassland, trees and heathland), heathland and shrub, and wetland and woodland habitats. Table 8.6 in the chapter presents the habitat availability for each of the habitats of value for the species present.</p> <p>The most important element of the mitigation approach to bats will be to ensure these new habitats are available to bats from the earliest opportunity. Some habitats of value</p>

LIR Comment	SZC Co. Response
	<p>have already been created. In addition, where practicable there will be some transplantation of existing trees where this is viable, the planting of new tree lines of fast growing native species and an acceptance that such mitigation is aimed at the short term with longer term mitigation such as planting of other species of tree as a second phase of mitigation. This approach will be defined explained in the EWMP which is being developed which will further explain the habitats across the EDF Energy estate and explains how these will be managed. The EWMP will be submitted to examination.</p>
<p><i>Whilst the Councils agree with the conclusion in relation to the significant impact on barbastelle, we are concerned about the limited detail currently available on a number of the strategic mitigation measures proposed. In particular, there is a lack of detail on the parameters of the retained and created habitat corridors along Bridleway 19; across the Temporary Construction Area between Kenton Hills and Ash Wood and in the SSSI Crossing area (in addition linked concerns related to noise and light are set out below). In the absence of knowing how these corridors will be retained, established and managed (including for example widths, vegetation type, vegetation structure) it is not possible to be certain that they will be adequate to maintain the required linkages to prevent significant adverse impacts not just on barbastelle but on other species, particularly Natterer's bat, as well. It is essential that this detail is provided so that stakeholders can be confident that the parameters set will be adequate to provide the commuting habitats required. The lack of a figure</i></p>	<p>As stated above, three large dark corridors will be retained within development area during construction as shown on the indicative lighting plans appended to updated Lighting Management Plan at Deadline 3 (Doc Ref. 6.3 2B (A)). These corridors will ensure bats have the ability to commute from roosting grounds in the north and foraging areas to the south, whilst dark boundaries will also ensure bats can move around the boundaries of the development.</p> <p>One of these corridors is centred on two realigned water management zones with retained and new tree plantings, which will provide a connection between Kenton Hills and the Ash Wood cottages area. This new corridor is shown on the indicative lighting plans appended to updated Lighting Management Plan at Deadline 3 (Doc Ref. 6.3 2B (A)).</p> <p>Further commentary is provided in the rows below and long-term habitat proposals are covered in the row above.</p>

LIR Comment	SZC Co. Response
<p><i>showing the proposed link between Kenton Hills and Ash Wood is considered particularly limiting in this respect.</i></p>	
<p><i>In addition to the above, the Councils do not consider the cumulative impacts from the Main Development Site (including the Temporary Construction Area) and the Sizewell Link Road have been adequately considered (please also see the ecology section of the Sizewell Link Road chapter). Both developments will require the removal of habitats suitable for foraging and commuting bats and, as the two developments connect, it is highly likely that it will be the same bat population which will experience this impact. Given that the species most likely to suffer from this impact is barbastelle (and to lesser extent maybe Natterer's bat as well), this will compound the existing conclusion of a Moderate Adverse, Significant level impact and may even give rise to a Major Adverse, Significant level impact</i></p>	<p>Further consideration will be given to this point and a response provided at Deadline 5 if relevant.</p>
<p><i>Construction - Disturbance (Noise): The Updated Bat Impact Assessment [AS-208] provides detail of noise modelling undertaken at 8kHz and 22kHz and assesses the likely impact on roosting and foraging/commuting bats using 8kHz for roosting and 22kHz for foraging/commuting. However, it is noted that the conclusions on construction noise impacts presented in the ES and ES Addendum only refer to 8kHz and this is used for assessing both roosting and foraging/commuting impacts. The Councils consider that this is a significant discrepancy given that the ES chapter sets out the conclusions in relation to the</i></p>	<p>The following figures in the ES Addendum show where noise at both 8khz and 22khz was assessed:</p> <ul style="list-style-type: none"> ● Figure 2.9.B.5 Barbastelle roosts overlaid onto projected construction noise at 8khz in Phase 1 [AS-208]; ● Figure 2.9.B.6 Natterer's roosts overlaid onto projected construction noise at 8khz in Phase 1 [AS-208];

LIR Comment	SZC Co. Response
<p><i>significance of impact. The Councils agree with the noise assessment methodology set out in the Updated Bat Impact Assessment and the use of the two different frequencies. This should form the basis for the assessment presented in the ES, not the sole use of 8kHz as currently included.</i></p>	<ul style="list-style-type: none"> ● Figure 2.9.B.7 Brown long-eared and other bat roosts overlaid onto projected construction noise at 8kHz in Phase 1 [AS-208]; ● Figure 2.9.B.8 Barbastelle roosts overlaid onto projected construction noise at 8kHz in Phase 2 [AS-208]; ● Figure 2.9.B.9 Natterer's roosts overlaid onto projected construction noise at 8kHz in Phase 2 [AS-208]; ● Figure 2.9.B.10 Brown long-eared and other bat roosts overlaid onto projected construction noise at 8kHz in Phase 2 [AS-208]; ● Figure 2.9.B.11 Barbastelle roosts overlaid onto projected construction noise at 8kHz in Phase 3/4 [AS-208]; ● Figure 2.9.B.12 Natterer's roosts overlaid onto projected construction noise at 8kHz in Phase 3/4 [AS-208]; ● Figure 2.9.B.13 Brown long-eared and other bat roosts overlaid onto projected construction noise at 8kHz in Phase 3/4 [AS-208]; ● Figure 2.9.B.14 Key bat commuting and foraging areas (summary) overlaid onto construction noise contours at 22kHz or above at Phase 1 [AS-208];

LIR Comment	SZC Co. Response
	<ul style="list-style-type: none"> • Figure 2.9.B.15 Key bat commuting and foraging areas (summary) overlaid onto construction noise contours at 22khz or above during Phase 2 [AS-208]; and • Figure 2.9.B.16 Key bat commuting and foraging areas (summary) overlaid onto construction noise contours at 22khz or above at Phase 3/4 [AS-208]. <p>Foraging and commuting impacts from noise at 22khz was assessed, within the Appendix 2B of the ES Addendum [AS-208], as shown below:</p>

LIR Comment	SZC Co. Response						
	<p>8.3.50 → Table 8.22 below presents potential key commuting and foraging areas (for barbastelle) where modelling of potential high frequency noise is at 65 dB and above at 22kHz (noise modelling data and results presented the Bat Mitigation Strategy (Volume 2, Appendix 14C1A of the ES (Doc Ref 6.3) [APP-253])). In this table the peak noise at any Phase of the development is presented. ¶</p> <p>Table 8.22: Barbastelle foraging/ commuting areas with predicted noise levels¶</p> <table border="1"> <thead> <tr> <th data-bbox="1144 692 1211 794">dB at 22k Hz¶</th> <th data-bbox="1211 692 1588 794">Within Site Boundary¶</th> <th data-bbox="1588 692 1935 794">Outside Site Boundary¶</th> </tr> </thead> <tbody> <tr> <td data-bbox="1144 794 1211 1219">Below 65 dB¶</td> <td data-bbox="1211 794 1588 1219"> Retained area of Goose Hill to the east of the SSSI crossing¶ NOISE LEVEL Lmax (dB) ≤ 30 30 - 35 35 - 40 40 - 45 45 - 50 50 - 55 55 - 60 60 - 65 65 - 70 ¶ (legend used throughout table)¶ </td> <td data-bbox="1588 794 1935 1219"> Kenton Hills/ Fiscal Policy/ Nursery Covert complex – remaining woodland complex approximately 50m beyond development site boundary¶  The Grove / Barn Walk – commuting route north from Goose Hill.¶ </td> </tr> </tbody> </table>	dB at 22k Hz¶	Within Site Boundary¶	Outside Site Boundary¶	Below 65 dB¶	Retained area of Goose Hill to the east of the SSSI crossing¶ NOISE LEVEL Lmax (dB) ≤ 30 30 - 35 35 - 40 40 - 45 45 - 50 50 - 55 55 - 60 60 - 65 65 - 70 ¶ (legend used throughout table)¶	Kenton Hills/ Fiscal Policy/ Nursery Covert complex – remaining woodland complex approximately 50m beyond development site boundary¶  The Grove / Barn Walk – commuting route north from Goose Hill.¶
dB at 22k Hz¶	Within Site Boundary¶	Outside Site Boundary¶					
Below 65 dB¶	Retained area of Goose Hill to the east of the SSSI crossing¶ NOISE LEVEL Lmax (dB) ≤ 30 30 - 35 35 - 40 40 - 45 45 - 50 50 - 55 55 - 60 60 - 65 65 - 70 ¶ (legend used throughout table)¶	Kenton Hills/ Fiscal Policy/ Nursery Covert complex – remaining woodland complex approximately 50m beyond development site boundary¶  The Grove / Barn Walk – commuting route north from Goose Hill.¶					

LIR Comment	SZC Co. Response
<p><i>Notwithstanding the above, we are concerned that the modelling indicates that several of the retained/created habitat links to be used by foraging/commuting bats (see section on habitat fragmentation above) will experience noise levels of above the threshold set for the assessment (above 65dB at 22kHz). This is particularly the case during construction phases 1 and 2. Figures 2.9.B.14 to 2.9.B.16 in the Updated Bat Impact Assessment [AS-208] show the 22kHz noise modelling outputs with important bat foraging and commuting areas overlaid. It is understood that these figures show noise modelling with the mitigation measures described in the application in place (primarily a 5m acoustic fence and/or earth bund). These appear to indicate that during all construction phases the important habitat linkages at Bridleway 19, the link between Kenton Hills and Ash Wood and the SSSI Crossing area will be exposed to noise levels at or above the threshold set as being disturbing to foraging and commuting bats. Also, the north, south and west edges of Ash Wood, an area known to support a range of bat roosts including maternity roosts for barbastelle, will also experience similar noise levels during all phases, as will the northern edge of Kenton Hills during at least phase 1. Based on this modelling, and acknowledging that it presents a worst-case scenario, we have significant concerns that high noise levels in the range known to be disturbing to foraging/commuting bats will render the strategic mitigation measures put in place to address habitat fragmentation impacts unsuccessful. This is of particular concern for species which will rely on these linkages, including barbastelle for which a</i></p>	<p>The use of noise barriers, vegetation/screening and working protocols for mobile work/noise issues will be employed to reduce effects to an acceptable level where such impacts occur.</p> <p>The approach of the Sizewell C ES is to incorporate best practice and utilise precautionary assessment of the impact from noise. Within the assessment in Volume 2, Chapter 14 of the ES [AS-033], the impact assessment in relation to noise is considered to have applied the level of information that could be reasonably expected at this stage. The monitoring is designed to confirm the effectiveness of the best practice mitigation employed to address the effects (as such mitigation is expected to be effective), but where wider research is not entirely conclusive. Few peer reviewed studies have been conducted specifically in relation to the impact of noise on barbastelle, however available information has been consulted. Therefore, it is considered that the proposed mitigation measures will allow impacts to be controlled, however the ES acknowledges monitoring will need to confirm the success of the implemented mitigation. This is a strength of the application approach, wherein any impacts which are not foreseeable under current understanding can be identified and addressed.</p> <p>The monitoring proposed in the TEMMP [REP1-016] for bats provides some opportunity for remedial actions, e.g. to reduce noise levels, but these measures are to provide confidence that active mechanisms are in place and are secured to ensure that impacts are controlled, rather than a reliance being placed on them. The primary mechanism of noise control will be via the primary and secondary mitigation, which is secured by Requirement.</p> <p>The monitoring will also support any necessary modifications to mitigation that can be made to achieve or further the objectives of the mitigation strategy. Clearly updating</p>

LIR Comment	SZC Co. Response
<p><i>population level adverse impact is already predicted from habitat fragmentation.</i></p>	<p>surveys etc over time for various stages (i.e. licensing) is also appropriate, however the overall impacts and mitigation strategy has been developed with the significant level of survey information gained to date that provides confidence in the effectiveness of the mitigation, and the assessment of no significant effect.</p>
<p><i>The Updated Bat Impact Assessment draws on the results of monitoring at the construction of Hinkley Point C to provide demonstration that bats (including barbastelle) will continue to use corridors around and through construction areas. Whilst the results of this monitoring are interesting, the Councils do not consider that they are directly relatable to the situation at Sizewell. At Hinkley the habitats within the construction area are on the fringe of those relied on by that barbastelle population for foraging and commuting, whereas at Sizewell the affected habitats are within the core area understood to be used by the population. There is likely to be a significant difference in population responses to the loss (be it temporary or permanent) of fringe habitat when compared to core habitat. Also, we have reservations on the sole use of static detector surveys for population monitoring, particularly as static detectors have limitations on the data that they can collect and how this can be interpreted - please see the Monitoring Strategy section below for further comment on what we consider these limitations to be.</i></p>	<p>Monitoring from static bat detectors will be a key component of baseline and future monitoring of bat activity pre-during and post development. Static loggers provide a quantitative method for assessing bat activity levels at different locations over time.</p> <p>However, this is not the only monitoring approach to be employed. For a landscape level response to the development, further radio tracking studies will be undertaken on the barbastelle and Natterer's bat population pre-construction, during and post construction to assess any changes in activity patterns, and overall response to the commencement of construction.</p> <p>Roost mitigation monitoring to assess use/uptake will also be undertaken to provide a holistic approach at both the site and landscape level.</p>
<p><i>In addition to the above, it also remains unclear how, in practical terms, unacceptable levels of noise will be defined and mitigated during construction. There appear to be potential conflicts</i></p>	<p>The monitoring proposed in the TEMMP [REP1-016] for bats does provide some opportunity for remedial actions, e.g. to reduce noise levels, but these measures are to provide confidence that active mechanisms are in place and are secured to ensure</p>

LIR Comment	SZC Co. Response
<p><i>between health and safety and further controls being implemented. At present there is nothing included in the application documentation that could be easily adapted to provide the basis for a Working Method Statement for an Ecological Clerk of Works (team).</i></p> <p><i>Given the concerns set out above in relation to construction noise and the mitigation measures included to address it, the Councils consider that bat IEFs will experience impacts above the Minor Adverse, Not Significant level set out in the ES. Dependent on the mitigation measures achievable, the actual night-time noise levels generated during the works and the duration of these, it is possible that some bat IEFs may experience an adverse impact of at least a Moderate Adverse, Significant level.</i></p>	<p>that impacts are controlled, rather than a reliance being placed on them. Noise will be controlled by the measures in the CoCP [REP2-056], which is secured by Requirement. Through discussions with the Councils, further detail may be added to the TEMMP for Deadline 5.</p>
<p><i>Construction - Disturbance (Lighting): In relation to impacts arising from construction lighting, whilst the Councils note the additional modelling presented in the Updated Bat Impact Assessment, it is unclear why this has only been undertaken at parts of the site and we are concerned that this hasn't adequately considered lighting at all critical points along the corridors identified as being required to be kept dark. For example, there does not appear to be any detailed modelling of the southern end of Bridleway 19 where the site access plaza will be. Also, the modelling presented for the SSSI Crossing appears to be for the culvert and embankment option not the open span bridge and embankment option, it is therefore not possible to conclude that the lighting strategy proposed for this area will be adequate</i></p>	<p>The approach of the Sizewell C ES is to incorporate best practice and utilise precautionary assessment of the impact from lighting. Within the assessment in Volume 2, Chapter 14 of the ES [AS-033], the impact assessment in relation to lighting is considered to have applied the level of information that could be reasonably expected at this stage.</p> <p>As stated above, three large dark corridors will be retained within development area during construction as shown on the indicative lighting plans appended to the updated Lighting Management Plan at Deadline 3 (Doc Ref. 6.3 2B (A)). These corridors will ensure bats have the ability to commute from roosting grounds in the north and foraging areas to the south, whilst dark boundaries will also ensure bats can move around the boundaries of the development.</p>

LIR Comment	SZC Co. Response
<p><i>to maintain sufficient darkness so that the area does not become a barrier to foraging and commuting bats. As set out in the Habitat Fragmentation section above, details of the parameters for these corridors need to be set out and these should include acceptable light levels.</i></p> <p><i>We are also concerned that reference continues to be made to keeping areas as dark as is 'reasonably practicable' and that no parameters for acceptable light levels have been set out. This does not provide confidence that bats will be a key driver in terms of limiting / controlling light during construction. It also remains unclear how, in practical terms, unacceptable levels of lighting will be defined and mitigated during construction. There appear to be potential conflicts between health and safety and further controls being implemented. At present there is nothing included in the application documentation that could be easily adapted to provide the basis for a Working Method Statement for an Ecological Clerk of Works (team). The absence of suitable parameters and controls will lead to an impact on bat IEFs greater than the Minor Adverse, Not Significant set out in the ES.</i></p>	<p>The monitoring proposed is designed to confirm the effectiveness of the best practice mitigation employed to address the effects (as such mitigation is expected to be effective), but where wider research is not entirely conclusive. Few peer reviewed studies have been conducted specifically in relation to the impact of lighting on barbastelle, however available information has been consulted, and there are examples / observations of barbastelles foraging 25m from street lights where vegetation screening is present (IDW pers. obs.). Therefore, it is considered that the proposed dark corridors will allow impacts to be controlled, however the ES acknowledges monitoring will need to confirm the success of the implemented mitigation. This is a strength of the application approach, wherein any impacts which are not foreseeable under current understanding can be identified and addressed.</p> <p>The monitoring proposed in the TEMMP [REP1-016] for bats provides some opportunity for remedial actions, e.g. to reduce lighting levels, but these measures are to provide confidence that active mechanisms are in place and are secured to ensure that impacts are controlled, rather than a reliance being placed on them. The primary mechanism of lighting control will be via the Section 1.3 of the Lighting Management Plan (Doc Ref. 6.3 2B (A)), which is secured by Requirement.</p> <p>The monitoring will also support any necessary modifications to mitigation that can be made to achieve or further the objectives of the mitigation strategy. Clearly updating surveys etc over time for various stages (i.e. licensing) is also appropriate, however the overall impacts and mitigation strategy has been developed with the significant level of survey information gained to date that provides confidence in the effectiveness of the mitigation, and the assessment of no significant effect.</p>
<p>Assessment of Significance of Residual Effects: <i>Notwithstanding the Council's concerns set out above that</i></p>	<p>The fragmentation of habitats within the home ranges of the local barbastelle population has been identified as a significant adverse effect. It is accepted that the</p>

LIR Comment	SZC Co. Response
<p><i>construction habitat loss, noise and lighting will result in greater impacts than presented in the ES, no conclusion is drawn in the application documents on what the predicted significant residual effect of habitat fragmentation on barbastelle will mean for the population.</i></p>	<p>construction phase will have the greatest level of effect, however the habitat enhancement created in the long term will be produce a beneficial effect for the barbastelle population.</p> <p>Fragmentation impacts during construction will be addressed through the provision of wide dark corridors at three locations to limit the distances bats will need to travel to retained and created foraging and roost areas. It is considered, based on the activity patterns of barbastelle populations elsewhere, that after a period of habituation barbastelles will continue to use foraging areas initially fragmented by the development. Whilst the mitigation developed is based on the best information available, there remains a level of uncertainty resulting in a precautionary residual significant moderate adverse effect on the local barbastelle population bat during the construction phase of the scheme.</p>
<p><i>For 9-12 years during construction connection of local landscape features known to be used by barbastelle will be affected, as some of these features and linking hedgerows will be within the footprint of the site and its construction area. The construction footprint will result in both east-west and north-south commuting features being lost. This is likely to result in barbastelles taking more circuitous routes to foraging areas: for males, which range considerable distances this may be sustainable; for females, which forage close to roost sites when breeding, and for volant young with limited ranging ability, this may prevent them reaching preferred areas for feeding.</i></p>	<p>As outlined above the creation of large north south dark corridors will aim to address impacts of fragmentation, limiting the distances travelled by bats between roosts and foraging areas to the south. Furthermore, newly created foraging areas will provide replacement foraging sites.</p>

LIR Comment	SZC Co. Response
<p><i>If barbastelle continues to roost within the EDF Estate, there is likely to be a population level effect on the species as a result of this effective displacement of females and young bats from foraging habitats due to the construction area representing a partial barrier to movement. Alternatively, the colony might relocate into the wider area, potentially competing with other colonies for resources. The extent of decline might be possible to model, but how populations will respond cannot be concluded with certainty. In the very worst case, the development could result in the local extinction of the barbastelle population. The lack of conclusion on this in the ES and the Updated Bat Impact Assessment is considered to be a significant omission and effects not only consideration of the robustness of the conclusions presented but also consideration of how an adequate monitoring strategy can be designed.</i></p>	<p>The mitigation approach is to provide access to higher quality and replacement foraging habitats within the existing home ranges of the barbastelle bat population in areas unaffected by the construction.</p> <p>The holistic monitoring approach will assess the use of mitigation areas and be used to make adjustments to mitigation where required.</p>
<p><i>For Natterer's bat, the assessment concludes that due to the more generalist habitat preferences of the species, the colony is likely to adapt to habitat fragmentation impacts resulting from construction, but that it will become more 'vulnerable'. It is unclear in this context whether vulnerability could result in a population-level effect as a result of additional impacts arising from the Sizewell Link Road, for example. This, and inherent uncertainty in the conclusions regarding the magnitude of effect on the county-level important population are of significant concern. As with barbastelle, the lack of conclusion on this in the ES and the Updated Bat Impact Assessment is considered to be a significant</i></p>	<p>The response for Natterer's bat is the same as for barbastelle.</p>

LIR Comment	SZC Co. Response
<p><i>omission and effects not only consideration of the robustness of the conclusions presented but also consideration of how an adequate monitoring strategy can be designed.</i></p>	
<p>Bats – Conclusion: <i>The ES concludes that, subject to the implementation of the identified mitigation measures, with the exception of the impact of habitat fragmentation on barbastelle, no bat IEFs will experience construction impacts above Minor Adverse, Not Significant. For barbastelle, habitat fragmentation is considered likely to result in a construction impact at a Moderate Adverse, Significant level. For the reasons set out above, the Councils consider that there are a number of limitations in the assessment which undermine these conclusions. Impacts from construction habitat loss, construction noise and construction lighting all have the potential to result in impacts of greater significance than those predicted in the ES. Of additional particular concern is the fact that construction noise and lighting have the potential to adversely impact the mitigation measures being put in place to address impacts arising from fragmentation of connectivity due to habitat loss. In the absence of parameters relating to the retained habitat corridors we do not consider that it is possible to be confident that the habitat mitigation measures identified can be adequately implemented. It is the Council's opinion that the failure of these measures would result in adverse impacts for all bat IEFs (particularly foraging and commuting) of at least a Moderate Adverse, Significant level</i></p>	<p>The responses and further information provided above support the conclusions made in the ES [AS-033 and AS-208].</p>

9. SOILS AND AGRICULTURE

9.1 Overview

9.1.1 SZC Co. has reviewed Chapter 9 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 9.1** below provides a summary response to the principal points raised.

9.1.2 The detailed comments made in the LIR [[REP1-045](#)] regarding soils and agricultural effects are addressed below where appropriate. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

9.2 Response to issues: summary

9.2.1 Chapter 9 of the LIR helpfully sets out a Table (Table 4), which contains a summary of the impacts drawn out in that Chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 9.1: Responses to LIR summary of soils and agriculture impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
4a	Permanent / Temporary loss of agricultural land	Negative Appropriate mitigation and compensation should be reached for proposals with regard to agricultural land	Further consultation with the landowners will be undertaken to reduce the impacts on the farm businesses, as far as practicable, especially during the construction phase. This will include agreement of assurances and obligations that SZC Co. will accept upon entering the land and compensation, where applicable.
4b	Landscaping of former construction land to heathland mosaic	Positive Landscaping of former construction land to be secured through a Trust.	The land within the application boundary will be secured through the Outline Landscape and Ecology Masterplan [APP-588]. SZC Co.'s proposals for a wider environmental trust are explained in the response to ExQ1 LI.1.49 [REP2-100].
4c	Permanent loss of agricultural land at Two Village Bypass (Grade 2 and 4) and Sizewell Link Road (Grade 2 and 3)	Negative Appropriate mitigation and compensation should be reached for proposals with regard to agricultural land	See response to 4a above. Further consultation with the landowners will be undertaken to reduce the impacts on the farm businesses, as far as practicable, especially during the construction phase. This will include agreement of assurances and obligations that SZC Co. will accept upon entering the land and compensation, where applicable.
4d	Temporary loss of agricultural land at Freight Management Facility, Northern and Southern Park and Ride sites and LEEIE; Green Rail Route	Neutral When the sites are no longer required, the land will be returned to baseline agricultural conditions	Land required temporarily will be fully restored following construction. Soil handling, storage and re-use is detailed within the outline Soil Management Plan to ensure the soils are fit for purpose on reinstatement of the land. Further measures are set out within the CoCP [REP2-056].
4e	Contaminated land	Provided an appropriate Land Contamination Management Plan is required and adhered to, contaminated land matters can usually be resolved.	Further information and documentation has been developed to address recommendations in the initial reports but also to gain further design data.

9.3 Requirements and Obligations

9.3.1 SZC Co. notes the requirements and obligations as set out in the LIR and provides the following response:

Table 9.2: Responses to LIR summary of soils and agriculture impacts re requirements and obligations

Ref	Issue	SZC Co response
9.27	The Soil Management Plan as part of the CoCP and the LEMP will be secured by obligation.	AGREED: the SMP is agreed through obligation.
9.28	Mitigation and compensation for affected agricultural use needs to be secured.	AGREED: The significant majority of landowners has entered into private treaty agreements or have signed Heads of Terms for private treaty agreements, which detail arrangements for mitigation and compensation. Where landowners have not entered into a private treaty agreement (or signed Heads of Terms) SZC Co. will continue to liaise with landowners, their agents and the NFU to identify mitigation measures that can be adopted. Where impacts cannot be mitigated, the compensation code provides appropriate financial compensation for landowners.
9.29	Particularly for the permanent elements of the proposal, there is an expectation that recognition of the loss of agricultural land and reduced soil quality should be compensated through payments to the Natural Environment Fund, secured by obligation.	DISAGREE: SZC Co. will seek agreement with landowners through individual agreements. The Natural Environment Fund will not be used to compensate for the loss of agricultural land to landowners.
9.30	A Land Contamination Management Plan is required to cover all aspects with regards to unidentified and known land contamination and unforeseen land contamination.	AGREED: SZC Co. will provide further information regarding a Land Contamination Management Plan in due course, building on existing information as set out within the Phase 2 Geo-environmental Interpretative Report [AS-211 to AS-235].

9.4 Detailed comments

- 9.4.1 SZC Co. notes that neither Council has technical expertise in this area and that the LIR focuses mainly on summarising the assessment within the soils and agriculture chapter.
- 9.4.2 SZC Co. notes that engagement with landowners affected by the proposals is ongoing to develop a close understanding of the impacts on land holdings and businesses. SZC Co. seeks to reach agreement on appropriate compensation where effects cannot be mitigated, this includes agreement of assurances and obligations that SZC Co. will accept upon entering the land and compensation, where applicable.
- 9.4.3 SZC Co. notes that further phases of combined geotechnical and contaminated land ground investigations have been ongoing since 2019 and continued into 2021 on the main development site and the Phase 2 Geo-environmental Interpretative Report for the Main Development Site are being updated on a regular basis to reflect these ground investigation campaigns.
- 9.4.4 Ground investigation works are also ongoing for the road schemes including Sizewell Link Road, Yoxford Roundabout and Two Village Bypass with further ground investigations planned for the remaining Associated Development Sites in due course.
- 9.4.5 Remediation of soil and groundwater contamination will be undertaken prior to construction (e.g. source removal, treatment or capping) if deemed necessary. This will be captured through a Land Contamination Management Plan which will be produced to reflect recent ground investigation data. This will be secured through the **CoCP** [\[REP2-056\]](#).
- 9.4.6 SZC Co. has established procedures for the management of incidents that could give rise to pollution at SZC from unknown soil contamination uncovered during the works or incidents on site which are secured through the **CoCP** [\[REP2-056\]](#). The response will depend on specific circumstances, but procedures involve notification and communication, containment and clean up e.g. via use of spill kits, followed by post-incident investigation, correction and learning actions. Within these steps it is possible that site investigation, risk assessment and remediation will be required. The physical response may be undertaken by contractors, trained SZC Co. staff, emergency services or third-party specialists depending on circumstances, complexity and severity.

10. MINERALS AND WASTE

- 10.1.1 SZC Co. has no substantive comments to make on Chapter 10 of the LIR [[REP1-045](#)], apart from those in relation to the Lover's Lane Household Waste Recycling Centre (HWRC).
- 10.1.2 SZC Co. notes the comments raised by the Councils in respect of this facility. In order to mitigate any road safety risk associated in particular with HGVs during the early years of construction, SZC Co. has submitted proposals to enhance current access arrangements to the HWRC. These proposals include an entry slip road for vehicles entering from the north, and a dedicated traffic lane provided for vehicles turning into the site from the south. This detailed design is submitted for approval in the **Main Development Site Highways Plans** [[AS-119](#)] at Sheet 3 of 9.

11. COASTAL CHANGE/GEOMORPHOLOGY

11.1 Overview

- 11.1.1 SZC Co has reviewed Chapter 11 of the Local Impact Report (LIR) [[REP1-045](#)], on Coastal Change/Geomorphology for which ESC is the lead authority.
- 11.1.2 **Table 11.1** below provides a response to the principal points raised where a response is appropriate.
- 11.1.3 SZC Co's position in relation to potential effects of the Sizewell C project on coastal processes during construction and operation is set out in the Coastal Geomorphology and Hydrodynamics chapter at **Volume 2, Chapter 20** of the **ES, Volume 2; Appendix 20A** of the **ES; Volume 1** and **Chapter 2** (Section 2.15) of the **ES Addendum** (see [[APP-311](#)], [[APP-312](#)] and [[AS-181](#)], respectively).
- 11.1.4 Mitigation is proposed where the assessment identifies that it is required. This includes measures set out in the **Draft Development Consent Order: Requirement 7A and DML Condition 17 – "Coastal Processes Monitoring and Mitigation Plan"** (see **Volume 3, Appendix 2.15A** of the **ES Addendum** [[AS-237](#)]).
- 11.1.5 As set out in the **Initial Statement of Common Ground**, Table 10.1 [[REP2-078](#)], SZC Co. and the Councils are agreed on some elements of the methodology, baseline, impacts and mitigation for coastal process impacts however a number of issues remain. Much will be agreed via the ongoing

engagement on the CPMMP (**Draft Development Consent Order: Requirement 7A and DML Condition 17**) as well as ESC's review and approval of the design of the Hard Coastal Defence Feature prior to construction (secured by **Draft Development Consent Order, Requirement 12B**).

11.1.6 In addition, SZC Co. welcomes ESC's ongoing engagement since the submission of the LIR which has allowed progress to be made, as reflected in **Table 11.1**.

11.2 Response to issues

11.2.1 Chapter 11 of the LIR reviews the coastal geomorphology assessments and identify areas of concern for the Councils.

11.2.2 SZC Co.'s responses can be found in the table below, which is linked to the LIR paragraph or table numbers. Paragraphs and table sections not listed indicate that SZC co. has no comment to make.

Table 11.1: responses to LIR coastal and geomorphology impacts

LIR ref.	LIR comment	SZC Co. response
11.1	The Councils consider there is the potential for the development's marine works to alter the natural development of the shoreline that would occur, as far as can be predicted, in a 'without Sizewell C' scenario. The Councils believe that the marine works have potential to cause impacts that can be defined as Negative (disrupts natural change) to Neutral (allows natural change). Any impact may have a magnitude within a range of significant to negligible and may also vary over time. Furthermore, impacts noted as applicable to each phase may occur over all or part of the time range.	As recognised in LIR Table 6 (Ref.6b) there are also positive impacts. See also the ES Addendum SCDF assessment, which identifies that sediment eroded from the SCDF could deposit and slow erosion rates immediately north of SZC. The deposited SCDF sediments could also increase the supra-tidal area with potential for colonisation of annual vegetated drift line species (where there presently is none), and may reduce risks of natural overtopping or breaching on the southern Minsmere frontage (Section 2.15 g iii) b b)).
11.3	Assessment of the coastal impacts of the proposed development has been made more difficult by the absence of information from the Applicant, both in the original submission and the subsequent changes submission, this absence is keenly felt in the lack of dimensions and levels on illustrations that are provided. This is particularly evident when assessing the impact of the permanent Hard Coastal Defence Feature (HCDF) and design details for marine components.	SZC Co. has continued to consult regularly with ESC before and since the change submission in January 2021 and provided relevant detail where it has become available from the approved design process. However, SZC Co. maintains that the assessment can be made based on the basic parameters provided in Description of Development in the May (2020) DCO and January (2021) DCO Change submissions ([APP-180] and [AS-181], respectively). Regardless, detailed design information for the HCDF was provided at Deadline 2 (see Sizewell C Coastal Defences Design Report [REP2-116]). Further information on the Soft Coastal Defence Feature (SCDF) was also provided at Deadline 2 (see One Dimensional Modelling of Soft

LIR ref.	LIR comment	SZC Co. response
		Coastal Defence Feature (SCDF) [REP2-115] and more detailed modelling of the SCDF is provided at Deadline 3.
Table 6 Ref. 6b	Reduction in coastal change over Minsmere frontage and Sediment interruption and entrapment increasing over time. A maintained SCDF has potential to sustain a 'neutral' "Without Sizewell C" sediment movement scenario	Clarification: impacts are only expected on the southern Minsmere frontage, with no impacts north of the sluice. SZC Co. agrees that the SCDF would, as stated in Table 6 (Ref. 6b), mitigate the potential interruption of longshore transport and sediment entrapment against the HCDF following coastal change at Minsmere. SZC Co. considers that the presence of the SCDF would sustain the present-day shoreline (and the longshore transport corridor) – the shoreline without Sizewell C would adopt a different position over time and the coastal system would not receive the supply of SCDF sediments.
Table 6 Ref. 6f	Impacts of Temporary HCDF (not a temporary structure)	The temporary HCDF will be cut down and as it lies within the footprint of the HCDF will be incorporated (covered) by the HCDF when complete. In that sense any effects are temporary as superseded by the completion of the HCDF.
Table 6 Ref. 6h	Removal of HCDF at decommissioning to restore a naturally functioning 'neutral' shoreline	SZC Co. maintains the position that a decision on the merits or risks of removal of the HCDF after decommissioning cannot be made with any kind of certainty at this time and that decision will need to be made closer to the time (in 100 years time). The Coastal Processes Monitoring and Mitigation Plan (CPMMP) [AS-237], secured in the Draft Development Consent Order:

LIR ref.	LIR comment	SZC Co. response
		Requirement 7A and DML Condition 17, includes the preparation of a Cessation Report to be drafted within 10 years of the completion of decommissioning. The CPMMP and Cessation Reprt will provide all of the necessary information for a well-informed decision to be made at that time.
Table 6 Ref. 6i	<p>IF HCDF retained at decommissioning – it becomes a permanent and significant block to natural coastal change.</p> <p>Control – future maintenance of the SCDF may be required to protect the beach in front of the HCDF – requirement.</p> <p>Monitor - ongoing monitoring may be required via a Coastal Process Monitoring and Mitigation Plan (CPMMP), scope, approval process, content to be secured by requirement.</p> <p>Maintenance Activities Plan – if the structure remains on the beach it will need to be maintained for safety purposes - requirement</p>	<p>SZC Co. accepts that would be the case if assessed today, but as above it is more appropriate to make a decision nearer the time when all factors are know with better certainty.</p> <p>The application documents and CPMMP describe a cessation report that would be required to be approved by the relevant regulator at the time. The cessation report would outline the conditions at the time.</p> <p>The HCDF would continue to be maintained, as required, throughout operation and decommissioning.</p>
11.13	Although there is a presumption against some forms of development, essential infrastructure will be permitted where no other sites outside the area are feasible and there is a management plan in place to manage the	SZC Co. presumes this refers to the HCDF and its removal, or otherwise, after decommissioning. As outlined above, SZC Co. is of the view that such decisions are better made nearer the time, given the particularly long operational period.

LIR ref.	LIR comment	SZC Co. response
	impact of coastal change including their future removal and replacement.	
11.16	Sizewell's Nearshore Waters Seascape is judged to have high sensitivity and be highly susceptible to the effects arising from major construction activity within the character type and adjacent to the coast.	A full landscape and visual impact assessment has been made as part of the application (see Volume 2, Chapter 13 of the ES [APP-216] and Volume 1, Chapter 2 (section 2.8) of the ES Addendum [AS-181] . The sea defences are designed to complement the existing Bent Hills and Northern Mound landscaping (man-made) associated with Sizewell B.
11.20	The Sizewell C frontage lies within Policy Development Zone 4 (Dunwich to Thorpeness). The southern majority of the Sizewell C site is in policy unit MIN 13.1 with the northern minority in policy unit MIN 12.4.	SZC Co.'s understanding (following verbal discussion with ESC) is that the SMP policy boundary between MIN 12.4 and MIN 13.1 has been drawn in error. Instead, it should logically match with the boundary between the Minsmere designated sites and the Sizewell C property.
11.21	The policy for MIN 13.1 is to Hold the Line to 2105 and acknowledges that defence works may be required in the long term (from 2055) to protect the power stations. The intent for management for the Sizewell and Sizewell cliffs shoreline frontage is summarised as: The aim of the plan is to maintain the defence of Sizewell but to generally allow the natural development of the coast. These two aims are not seen as being in conflict. Within this, the plan would not preclude local management to reduce the rate of erosion but this would have to be assessed in detail, taking into account the potential impacts on nature conservation interests.	<p>ESC's interpretation of the line to be held is not contained or documented in the SMP. The SMP states that, for Policy Development Zone 4, "<i>The intent of the SMP is to maintain a natural coastline where possible</i>". The SZC development does not conflict with this statement and its SCDF [REP2-115] specifically addresses it by eliminating or minimising obstructions to sediment transport.</p> <p>A secondary aim of the SCDF is to supply additional sediment to the eroding section which would reduce the rate of retreat relative to the defined line of the SZC frontage and 'smooth' the angle of the shoreline across the boundary with the Minsmere designated sites.</p>

LIR ref.	LIR comment	SZC Co. response
	Although not explicitly defined in the SMP the Councils interpret the 'line to be held' as the seaward extent of the existing Sizewell A and Sizewell B flood defence embankment. If Sizewell C's HCDF goes ahead as planned, the Councils consider that these aims would be in conflict.	
11.22	The Sizewell C development will extend northward into the Minsmere South policy unit MIN12.4. The policy intention is Managed Realignment to 2105, with acknowledgement of possible minor works required to address local weak spots. The intent for management is summarised as: <i>... the shingle banks to the south of the sluice would continue to roll back. The risk (of inundation) is unlikely to become substantial until such a time that regular overtopping of the shoreline ridge occurs, potentially not till epoch 3 (after 2055). Flood management to the rear of the power station would need to be reviewed and it is important that development of the power station site is fully integrated with management of this northern area.</i>	Please refer to reply on 11.20 above.
11.23	The Councils consider that the SMP Intent for Management, and future management action plan for MIN 13.1, is based on an assumption that any new power station development would have a similar plan position in relation to the active shoreline as sites Sizewell A and Sizewell B. However, the equivalent	Areas with a Hold the Line (HtL) policy are typically a combination of hard and soft features designed to protect coastal infrastructure. "The Line" is not defined in the SMP because HtL is a concept meaning the frontage is protected. SZC Co. see, for example, the Sizewell Shoreline Management Steering Group assessing their soft features ('the 5 m bund') and considering when intervention will be necessary to maintain

LIR ref.	LIR comment	SZC Co. response
	primary defence position of Sizewell C is much further seaward (estimated 40-50m) than that for sites Sizewell A and Sizewell B, which is tantamount to an Advanced defence line. This is not consistent with the headline policy.	<p>the 5 m bund, which is seaward of their main defence. For all Sizewell power stations, it is not the intention to allow the coast to erode back to the hard defences.</p> <p>The planned HCDF and SCDF do not conflict with the SMP statements to provide “<i>support for any future development of the site</i>” and “<i>to allow the variation of sediment drift across the frontage</i>”.</p> <p>Refer also to reply on 11.20.</p> <p>Engineering diagrams and justification for the seaward extent of the HCDF can be found in the Sizewell C Coastal Defences Design Report [REP2-116].</p>
11.24	This situation is attributable in part to the landward flank of the Sizewell C site being constrained by a SSSI. Earlier in the Sizewell C development process the Councils, in discussion with other stakeholders, took the view that protection of the SSSI would have to take priority over avoidance of seaward advancement. The landward boundary was thought to be compatible with the seaward boundary. However, it has been apparent for some time (since 2015) that the HCDF is unable to comply with the SMP policy and will be located closer to the sea than the Line to be held as it existed at the time of SMP adoption. The SMP Intent for Management aspiration to <i>generally allow the natural development of the coast</i> is made more difficult to achieve by the more	<p>Please refer to reply at 11.23. It is also worth noting that the Sizewell C plans do “<i>generally allow the natural development of the coast</i>” as HCDF exposure is avoided and the SCDF [REP2-115] provides additional benefits to the neighbouring shoreline. There would be no blockage to longshore transport under this scenario.</p> <p>SZC Co does not consider that the HCDF conflicts with the SMP policy as no “line to be held” is specified in the SMP.</p> <p>The SCDF represents a proposal to work almost entirely with natural processes to achieve this as far as is possible.</p> <p>Its purpose is to avoid exposure of the landward HCDF and the disruption to longshore transport that would result. The SCDF would be constructed between the HCDF and Mean High Water Spring</p>

LIR ref.	LIR comment	SZC Co. response
	seaward position of the Sizewell C site relative to sites Sizewell A and B.	(MHWS) level and would release sediment into the coastal system when eroded by waves. It provides a large reservoir of shingle designed to release sediment into the coastal system, prevent HCDF exposure, and thereby avoid or minimise disruption to longshore shingle transport and the potential downdrift beach erosion. It uses a “working with nature” approach where the release of sediment into the coastal system, and its re-distribution, are determined by natural coastal processes (erosion by waves).
11.27	<p>To assess the nature, extent and duration of potential impacts of the Sizewell C development on coastal geomorphology it is necessary to develop a vision of how the shoreline might evolve in a ‘without Sizewell C’ scenario. Projections of future coastal change are inherently uncertain. The SMP provides information on this as does the Applicant’s DCO documents, notably in BEEMS report TR311 [APP-312]. From those documents the following can be assumed as possible changes in the period to 2100.</p> <p>i. Slow retreat of the Sizewell shoreline possibly leading to exposure of, and need for reinforcement of, the Sizewell B defence.</p> <p>ii. Retreat leading to breaching of the Minsmere frontage, perhaps creating a new tidal inlet.</p>	<p>Visions of potential future coastal geomorphology have been generated to gauge the potential context of the ‘worst case impact’ of SZC – establishing (with the input of the MTF) that the worst case arises only if the HCDF blocks an unbroken longshore transport pathway running the length of the Sizewell Bay i.e., the present geomorphic context. Subsequent shoreline predictions were made to justify whether mitigation (SCDF & beach management) is needed. SZC Co. is of the view that these are suitable for their intended purpose - the primary outcome of TR403 is stated in 20.4.76 – “<i>The future shoreline baseline therefore provides a context for mitigation to avoid HCDF exposure</i>”.</p> <p>Within this context the three possible changes listed are a subset of other possible small-scale changes within the bay which have been considered by Cefas:</p> <p>i. SCDF will actually cover c. 25% of the SZB frontage and the net southward transport makes this sector a natural beneficiary of the long-</p>

LIR ref.	LIR comment	SZC Co. response
	iii. Failure of the Minsmere sluice outfall requiring a new method of draining low land behind.	<p>term movement of the materials eroded from the SCDF, minimising requirements for future HtL interventions.</p> <p>ii. If a new and stable tidal inlet were to develop it would represent a natural interruption of the longshore transport pathway and lessen the relative impact of the HCDF.</p> <p>iii. Failure of the outfall as a potential benefit (in reducing artificial constraints on bay shape) which may act to counter (i). The new method of draining is not a matter for SZC and is not obviously affected by it.</p>
11.30 ii	SCDF – further information	<p>Since the LIR [REP1-045] (on 03/06/21), SZC Co. has provided reports on the HCDF and SCDF [REP2-115] engineering design (9.13 <i>Sizewell C Coastal Defences Design Report</i> and <i>BEEMS Technical Report TR544 Preliminary design and maintenance requirements for the Sizewell C Soft Coastal Defence Feature</i>). In brief, embedded mitigation is proposed in the form of the SCDF. Its ultimate purpose is to avoid exposure of the landward HCDF and the disruption to longshore transport that would result. The SCDF would be constructed between the HCDF and Mean High Water Spring (MHWS) level and would release sediment into the coastal system when eroded by waves. It provides a large reservoir of shingle designed to release sediment into the coastal system, prevent HCDF exposure, and thereby avoid or minimise disruption to longshore shingle transport and the potential downdrift beach erosion. It uses a “working with nature” approach where the release of sediment into the coastal system, and</p>

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LIR ref.	LIR comment	SZC Co. response
		<p>its re-distribution, are determined by natural coastal processes (erosion by waves).</p> <p>Shingle eroded from the SCDF would be drawn into the intertidal beach at SZC and subsequently moved along the shoreline (longshore transport) either to the north or the south, depending on the direction from which subsequent waves arrive. Over time, the volumes of sediment arriving on immediately adjacent shores may be sufficient to reduce erosion rates there, which is a by-product of maintaining the SCDF. Accumulation of SCDF sediments immediately north of SZC may, over the station's life, increase the supra-tidal area and restore the former annual vegetated drift lines habitat, which was been lost as a result of natural coastal erosion.</p>
11.30 iii	The permanent BLF includes dredging and, during the construction phase, a barge berthing platform and is likely to be more impactful than the temporary BLF.	As outlined in submissions at Deadline 2, the barge berthing platform design has evolved from a grillage, that would be in place for all of the construction period, to a concrete mattress, that would be removed for the energetic winter months when the greatest impacts would have otherwise occurred. A concrete mattress is likely to have less impact on coastal processes (sediment transport in this instance) in the first place but, by being removed over the stormy winter months, also allows for any localised changes in bathymetry to be 'reset' by natural processes.
11.30 v & vi	The potential of nearshore outfalls to cause adjacent shoreline accretion.	As set out in the ES: while some localised scour is expected around the heads (7.2 m north and south of the heads), the scenario of adjacent shoreline accretion is considered to be very unlikely because the physical size and discharge from the outfalls are significantly less

LIR ref.	LIR comment	SZC Co. response
		than the SZB outfall (discharge is more than 100 x smaller) and they are located seaward of the outer bar and therefore would not affect bar migration.
11.31	The main cooling water intake and outfall structures are located ~ 3km offshore on the seaward flank of the Sizewell sandbank.	For clarity, the cooling water structures are seaward and clear of the Sizewell Bank, not on its seaward flank.
11.34	Design details (drawings, reporting) have not yet been received from the Applicant. This prevents a proper assessment of potential impacts. There are elements of exhibited outline design (received to date) of both the HCDF and the SCDF that raise potential concerns, e.g., the shallowness of the HCDF seaward foundation structure, how to adapt when the HCDF becomes exposed, and the shoreline is upon the structure; the purpose of the erosion resistant cobbles that may create a further incursion seaward; <u>the sustainability of the SCDF</u> ; design methodology for secondary mitigation (by-passing, recycling, renourishment). Further detail, with design information (as distinct from modelling to date) may identify further, previously not apparent, impacts or may alleviate them. Further specific detail is provided in ANNEX O .	<p>SZC Co provided reports on the HCDF and SCDF engineering design (<i>9.13 Sizewell C Coastal Defences Design Report and BEEMS Technical Report TR544 Preliminary design and maintenance requirements for the Sizewell C Soft Coastal Defence Feature</i>) at Deadline 2.</p> <p>An updated version of TR544 (to include more sophisticated modelling of the SCDF) and drawings of the HCDF will be provided at Deadline 3.</p> <p>SZC Co. is committed to maintaining the SCDF across the operational and decommissioning phases of the project. The sustainability of this commitment is evidenced in BEEMS Technical Report TR544 Preliminary design and maintenance requirements for the Sizewell C Soft Coastal Defence Feature).</p> <p>There is no intention that the inclusion of an internal cobble layer, if incorporated in the final design, will cause further incursion seaward.</p>

LIR ref.	LIR comment	SZC Co. response
		Regarding design methodology for secondary mitigation, the principles of how these methods would be used are in the ES, and further examples will be provided in the developing CPMMP.
11.38	The advancement of the Sizewell C platform to seaward of the Sizewell A and B building line will result in the loss of several hectares of valuable vegetated shingle (discussed in the Ecology section).	The ES , in Volume 2, Chapter 14 [AS-033], explained that the shingle habitats will be removed during the construction phase and the sediments stockpiled. Once the coastal defence works have been completed, the shingle habitats will be reinstated and the vegetation allowed to re-establish naturally using a similar approach to that used successfully for the Sizewell B defences. This is more fully described in Chapter 8 of this report, which reviews ecology and biodiversity issues (see Reference 3g in Table 8.1).
11.40 i	The HCDF may undergo design adaption during its life that will move the rock slope foundation further seaward by 18m over the southern majority of its length.	The adapted design will have a deeper toe that will necessarily extend further seaward, with the seaward extent of the toe extending approximately 17m further seaward. The incorporation of the adapted design is to maintain nuclear safety against predicted increase in sea-levels, although, this may not be necessary.
11.40 iv & v	Combined Discharge Outfall and Fish Recovery and Return outfalls	Please refer to reply on 11.30 v & vi.
11.41	The Applicant created the Sizewell C Marine Technical Forum (MTF) group in 2014 after learning from the Hinkley Point C development consultation process.	The SZC MTF was created to mirror the successful MTF developed at HPC to assess monitoring and mitigation plans.

LIR ref.	LIR comment	SZC Co. response
	The primary purpose of the MTF is to develop and oversee implementation of a plan for monitoring of the impacts of the development on coastal processes during the construction and operation phases, and to specify and deliver appropriate mitigation actions.	<p>The purpose of the MTF is to provide a mechanism where SZC Co. can consult with the regulatory stakeholders (and other invited attendees) in a single forum on all matters relating to the marine environment (i.e. not just coastal geomorphology).</p> <p>In addition to the CPMMP, the MTF has overseen the reporting on baseline conditions and predicted impacts of development to coastal geomorphology.</p>
11.46	Within this process a notable long-running concern for the Councils, has been the slow preparation and release by the Applicant of design details (profiles and plan position) for the HCDF and SCDF in general, and the seaward HCDF/defence foundation in particular. This information is fundamental to the assessment of impact of and mitigation for the HCDF on coastal processes and its late supply – that is still ongoing – has led to significant changes in potential impacts and mitigation actions to those identified in the DCO submission.	Please refer to response at 11.3.
11.48	<p>A sample of current matters of uncommon ground are listed below. This is a small extract of the long list that the Councils are working through with the Applicant.</p> <p>i. The long-term sustainability of the SCDF that is mitigation for the negative impact of the HCDF.</p>	<p>SZC Co. and ESC agreed a draft initial Statement of Common Ground at Deadline 2. This will be continually updated and a new version submitted at Deadline 5.</p> <p>i. Please see “<i>One Dimensional Modelling of Soft</i></p>

LIR ref.	LIR comment	SZC Co. response
		<p><i>Coastal Defence Feature (SCDF)</i> [REP2-115] which reports on the long-term sustainability of the SCDF.</p>
	<p>ii. A default commitment for the Applicant to remove the HCDF at decommissioning.</p>	<p>SZC Co. believes any such decision to remove the HCDF after decommissioning is best made nearer the time when the local prevailing conditions are better known.</p> <p>The Coastal Processes Monitoring and Mitigation Plan (CPMMP) [AS-237], secured in the Draft Development Consent Order: Requirement 7A and DML Condition 17, includes the preparation of a Cessation Report to be drafted within 10 years of the completion of decommissioning. The CPMMP and Cessation Report will provide all of the necessary information for a well-informed decision to be made at that time.</p> <p>However, SZC Co. agrees this does leave uncertainty at the present time and is content for the default position to be that the HCDF will be removed during/after decommissioning unless the relevant decision makers at the time agree otherwise.</p>
	<p>iii. Consideration of potential 'worst case' and 'what if' shoreline evolution / short term change scenarios over the site life plus evidence of design resilience in response thereto.</p>	<p>The impacts of the future baseline, uncertainty and the approach to EIA are described fully in Section 7.7 of the ES & BEEMS Technical Report TR403.</p> <p>The approach taken to 'what-if?' evolution has been to assess how the shoreline and sediment transport responds to the forcing which would lead to change i.e., not 'where might it go?' scenarios but 'how must it get there?'. This</p>

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LIR ref.	LIR comment	SZC Co. response
		<p>approach directly addresses the question of design resilience (“<i>One Dimensional Modelling of Soft Coastal Defence Feature (SCDF)(Ver 1)</i>” [REP2-115] provided at Deadline 2 and ““<i>One Dimensional Modelling of Soft Coastal Defence Feature (SCDF) (Ver 2)</i>” and “<i>Storm Erosion Modelling of the SCDF</i>” to be provided at Deadline 3).</p>
	iv. The inclusion of Thorpeness Village in the extent of the baseline monitoring plan.	<p>All of the evidence (including published works pre-dating the plans for SZC) indicates that there is no justification for this; including Coastal Partnership East’s most recent shoreline monitoring report for Thorpeness (April 2021), which highlights the contrast between the eroding village frontage and the accreting shorelines to the north (and also around the ness), and the documents prepared for the SMP which place Thorpeness in a separate sediment cell to SZC. Coastal Partnership East’s “Thorpeness; Coast Protection Options Report” assesses causes of erosion at Thorpeness over long and short timescales and makes no mention of any process linking the erosion to processes within Sizewell Bay.</p>
	v. When assessing the need for potential mitigation how will the Applicant differentiate scheme-related impacts from behaviour which might otherwise have prevailed naturally (no scheme).	<p>As highlighted by the question, behaviour which ‘might’ have prevailed in an alternative future will always be uncertain. Monitoring data will be examined for changes outside of natural variability. Changes will be compared to SZC activities (many in the construction phase, few in the operation phase) and changes in natural processes, for cause and effect. If there is a potential link between an activity and observed change (which itself is of significance) this may warrant adjustments to</p>

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LIR ref.	LIR comment	SZC Co. response
		monitoring (ie adaptive monitoring), such as increasing the frequency of survey.
	vi. Agreement on longer term monitoring plans and how they will affect the decommissioning report and decisions on the HCDF thereafter.	The CPMMP involves a Cessation Report that would outline the plan for stopping monitoring and mitigation. SZC Co. has stated it would prefer the HCDF to be removed, at which point there would be no need to report. As stated in previous responses a decision will be made nearer the time with the relevant stakeholders. However, SZC Co. agrees this does leave uncertainty at the present time and is content for the default position to be that the HCDF will be removed during/after decommissioning unless the relevant decision makers at the time agree otherwise.
	vii. Agreement on if/how to monitor activities and shoreline behaviour where there is potential for negative impacts which are not prevalent immediately, or even certain to happen.	See response to (v) above. Impacts are predicted and monitoring extents have a wide spatial buffer to encompass the uncertainty in the extents. The MMP will be an adaptive programme which will take account of the results of monitoring results and will extend the spatial/temporal extents if considered necessary. Therefore, the method for tracking any impacts of unexpected spatial extent is to adapt the extent of monitoring accordingly.
11.51	Assessment of the coastal impacts of the proposed development has been made more difficult by the absence of information from the Applicant, both in the original submission and the subsequent changes submission, this absence is keenly felt in the lack of dimensions and levels on illustrations that are provided.	See response to 11.46.

LIR ref.	LIR comment	SZC Co. response
	This is particularly evident when assessing the impact of the permanent HCDF and design details for marine components.	
Table 7		Tables 7 and 8 combine potential impacts for which secondary mitigation is proposed (e.g. HCDF) with elements for which no secondary mitigation is proposed (e.g. FRR and CDO). The accompanying text (11.54) appears to imply that mitigation is possible for all 'Possible' impacts, and required for reducing impacts to 'Neutral', whereas for many impacts we do not consider this to be the case. For the cases of the BLF, FRR and CDO, SZC Co. considers the 'Probable' neutral impacts to be the most likely even without mitigation.
11.56	Where an impact is attributable to the development it will require mitigation action.	<p>It is not correct that all impacts need be mitigated – only those assessed as significant necessarily require mitigation. The impacts have been assessed in the ES and ES Addendum with primary mitigation provided by the SCDF, which has been assessed and will reduce or avoid a potential significant impact from the HCDF. Except for the potential to backfill the BLF grounding pocket (as a precaution and only if needed), no other mitigation is proposed, as no other significant impacts were identified in the ES – however, monitoring is required to ensure that impacts are in line with the ES assessments and mitigation measures are defined should significant impacts be identified by monitoring.</p> <p>The CPMMP identifies the aim of mitigation to be maintenance of the longshore shingle transport corridor – hence, only impacts that cause</p>

LIR ref.	LIR comment	SZC Co. response
		measurable effects on the longshore transport system propagating from SZC will require mitigation.
11.60 iii	Decommissioning and Removal – of the HCDF	See response to 11.48(ii).
11.60 viii	ESC requires the zone for baseline monitoring and mitigation to extend southward to include Thorpeness village.	SZC Co. consider that there is no justification for baseline monitoring of Thorpeness - refer to previous reply on this request (11.48 iv).
11.60 ix	ESC requires monitoring for Coralline crag outcrop to allow detection of any potential negative impacts (not limited to physical) from the Sizewell C development.	The ES makes clear that there is no pathway to impact on the crag and it should not be SZC Co's responsibility to monitor this, but from a coastal geomorphology perspective it will be covered by the 5-yearly bathymetric survey.
11.60 x	ESC remains unclear on how the Applicant will identify an impact caused by the development over frontages beyond a maintained SCDF, without having in place a process to predict shoreline change in a without Sizewell C condition.	Please refer to responses to 11.48 v and vi. It is the intention of SZC Co. to establish the signal of a pathway of impact and response from within future monitoring data. It will consider natural variability, incident conditions and the nature and timing of SZC activities predicted to cause impacts to geomorphic receptors – this approach has the dual benefits of detecting the actual impacts of the development and responding as needed to them swiftly. It cannot make comparisons with modelled scenarios of shoreline changes as the uncertainty in these is too high to confidently identify and assess impacts. Such an approach is likely to yield false positive and false negative results.

LIR ref.	LIR comment	SZC Co. response
Annex Q.2	To date no possible change involving a landward movement of all or part has been identified. The change has increased the Councils concerns expressed at Relevant Representation stage.	SZC Co. continues to work on the detailed design of the HCDF and although no means to move the eastern extent landward have been identified as yet future work may yet provide a means to do so. Nevertheless, the application, assessment and proposed mitigation are sufficient for the existing design.
Annex Q.5	The function of the SCDF has altered significantly. At DCO it was a one-off sacrificial deposit over the seaward face of the HCDF, that would be allowed to degrade without management, and be replaced ~ mid Operation phase by secondary mitigation involving bypassing, recycling and nourishment. The SCDF is now proposed to be a permanently maintained substantial sediment buffer and transport corridor extending a significant distance to seaward of the HCDF.	The function of the SCDF [REP2-115] (as a buffer to maintain the longshore sediment transport corridor) is largely the same as originally conceived. Though referred to as a sacrificial dune, reference is made throughout the ES to repair or replenishment to maintain its volume. The change to a maintained buffer is simply that the buffer volume would be larger, rather than allowing erosion to continue until a narrow beach remains before intervention, and simply represents prioritising nourishment of the buffer over the bypassing and recycling methods (mitigating NE concerns regarding vehicle movements on the wider beach). This approach de-risks HCDF exposure as a larger SCDF makes it much more unlikely that exposure could occur. See “ <i>One Dimensional Modelling of Soft Coastal Defence Feature (SCDF)</i> ” [REP2-115] for further details.
Annex Q.7	Permanent BLF. New impact assessments have been undertaken that show a greater potential magnitude and extent of change than was suggested by the DCO findings (tbc when we see the report).	BEEMS Technical Report TR543 on the BLFs was provided to ESC on the 29 th of March 2021. Although the impacts have changed, the conclusions from the EIA have not altered in terms of the overall the significance of effects.

NOT PROTECTIVELY MARKED

LIR ref.	LIR comment	SZC Co. response
Annex Q.8 & 10	The Councils also note that if impacts occur at the shoreline or seabed they will be detected and corrected under the Monitoring and Mitigation Plan.	Not all impacts will be mitigated. Significant impacts will be addressed under the Monitoring and Mitigation Plan.

NOT PROTECTIVELY MARKED

12. HISTORIC ENVIRONMENT

12.1 Overview

- 12.1.1 SZC Co. has reviewed Chapter 12 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Annex K - Historic Environment Critical Assessment [[REP1-056](#)].
- 12.1.2 Table 12.1 below provides a response to the principal points raised where a response is appropriate.
- 12.1.3 SZC Co.'s position in relation to effects on the terrestrial historic environment, including effects on the setting of heritage assets and the historic landscape, is set out at **Volume 2, Chapter 16** and **Volumes 3-9** of the **ES, Chapter 9**, this is set out in the historic environment chapters of the **ES** [[APP-272](#), [APP-368](#), [APP-399](#), [APP-432](#), [APP-467](#), [APP-499](#), [APP-528](#) and [APP-560](#)].
- 12.1.4 **Volume 1, Appendix 6L** of the **ES** [[APP-171](#)] outlines the process to identify those assets with settings which might be sensitive to change arising from the proposed development. These are set out in the settings scoping appraisal included in **Volume 1, Appendix 6L, Annex 6L.1** of the **ES** [[APP-171](#)] which had regard to the specific nature of each asset's setting, and considered factors such as visibility of the proposed development in views of and from heritage assets as well as other potential perceptual changes such as increased traffic movements and noise. The process of appraisal was refined through engagement with Historic England and East Suffolk Council.
- 12.1.5 Mitigation is proposed where the assessment identifies that it is required. This includes measures set out in the **Draft Deed of Obligation**, Schedule 8: Heritage [[REP2-060](#)], as well as taking into account primary and tertiary mitigation measures which address issues such as change to historic landscape character, visibility of the proposed development and noise effects, which interact with those proposed for other topic areas, such as noise and landscape and visual impacts and would also reduce effects on the setting of heritage assets.
- 12.1.6 As set out in the **Initial Statement of Common Ground, Table 8.1** [[REP2-076](#)], SZC Co. and the Councils are agreed on the methodology and baseline for the historic environment assessment.
- 12.1.7 In addition, SZC Co. welcomes ESC's engagement on the issues raised in their relevant representation [[RR-0342](#)]; this has enabled the number of heritage assets under discussion to be reduced substantially.

12.2 Response to Issues (Summary)

Table 12.1: Responses to LIR summary of historic environment impacts

Ref No.	Asset	Description of issue raised in LIR	SZC Co. Response
9a	Abbey Cottage	Significant impact arising through change to setting during the operational phase	SZC Co. considers that the ESC assessment does not give regard to the significant reduction in impact during operation and the embedded/primary mitigation offered by the landscaping of the main development site entrance. Consequently, the operational phase impact is significantly overstated in the LIR. These matters are considered in more detail below.
9b	Upper Abbey Farmhouse and Barn	Moderate adverse effects during construction	Noted. Remedial works to Upper Abbey Farmhouse, Barn and curtilage structures would be undertaken as a requirement of the DCO; the ESC Conservation Officer would be consulted on proposed works.
9c	Upper Abbey Farmhouse and Barn	Moderate positive effects during operation	Noted.
9d	Coastguard Cottages	Significant adverse effects during construction and operation	The ESC response suggests that the assessment in Volume 2, Chapter 16 of the ES [APP-272], undervalues the asset, although this suggestion is not evidenced in the text of the LIR or Annex K , which discuss the nature of the effect. This is considered further below.
9e	Two Village Bypass	Negative effect on Farnham Hall, St Mary's Parish Church and Glemham Hall	A more detailed response regarding these heritage assets is set out below. In summary, SZC Co. considers that the ESC assessment of these effects does not follow the appropriate guidance and does not pay appropriate regard to primary mitigation measures provided as part of the scheme. In addition, these assessments request

Ref No.	Asset	Description of issue raised in LIR	SZC Co. Response
			mitigation that is already provided within the scheme.
9f	Two Village Bypass	Significant positive effects on listed buildings in Farnham	Noted and welcomed.
9g	Sizewell Link Road.	Effects on Theberton Hall and Hill Farmhouse	SZC Co. considers that the ESC assessment of these effects is based on an inappropriate reliance on the generalised contribution of the historic landscape rather than the considerations set out in GPA3, and that the requested mitigation is already provided within the landscape planning of the proposed road scheme. Consequently, these assessments cannot be considered to be appropriate. These issues are discussed further below.
9h	Green Rail Route	Effects on Leiston Abbey Group during construction	Noted. SZC Co. is committed to providing appropriate mitigation for the Leiston Abbey second site and is discussing the scope and quantum of this with the English Heritage Trust and Pro Corda.
9i	Leiston Abbey First Site	Effects arising through change to setting during construction and operation	ESC's concerns on this point are similar with those of Historic England, and similar points apply. Neither response provides any regard to the reduction in the perceptual prominence of the proposed development following the completion of construction works, nor to mitigation measures offered in the proposed scheme. A more detailed response is set out below.

12.3 Detailed Comments

12.3.1 There are, a limited number of matters raised in the LIR to which SZC Co. wishes to respond, either because they raise additional issues or because SZC Co does not accept the way in which they are characterised in the LIR. These are:

- The assessment of effects on the significance of the Grade II listed Abbey Cottage (1216395).
- The assessment of effects on the significance of the non-designated Coastguard Cottages, Dunwich Heath.
- The assessment of the effects of the two village bypass on the Grade II listed Farnham Manor (1230210; referred to in the LIR as Farnham Hall); the Grade II* listed Church of St Mary, Farnham (1230211) and the Grade II listed park and garden at Glemham Hall (1001461).
- The assessment of the effects of the two village bypass on the significance of the Grade II listed Theberton Hall (1287529) and Hill Farmhouse (1030643).
- The assessment of effects on the significance of the Scheduled Leiston Abbey (first site) with later chapel and pill box (1015687) during operation of the proposed development.

a) [Abbey Cottage \(1216395\)](#)

12.3.2 The LIR assesses significant adverse effects on Abbey Cottage during construction and operational phases. **Volume 2** (main development site), **Chapter 16** of the **ES** [[APP-272](#)], assessed a moderate adverse effect - which would be significant - on the significance of Abbey Cottage during the construction phase. This arose primarily from the presence and use of the site entrance close to the garden of Abbey Cottage, which would present a qualitative change to the nature of the surrounding historic landscape, resulting in the loss of historic interest.

12.3.3 The magnitude and nature of the effect would, however, alter discernibly during the operational phase, resulting in a reduction of the effect to not significant [[APP-272](#)]. It is SZC Co's view that this significant reduction in effect is not acknowledged in the LIR, and consequently the magnitude of the effect identified in the LIR is overstated. The changes which would contribute to this reduction in effect following completion of the construction phase may be summarised as:

- substantial reduction in vehicle movements along the B1122 and at the site entrance;
- maturing of screening planting and landscaping; and
- the removal of the accommodation campus and temporary construction area.

- 12.3.4 With the removal of the accommodation campus and the restoration of the land to semi-improved grassland, the rural views north of the cottage would be reinstated, while the site entrance would be screened by the new landscaping scheme. Views to the east and south-east, over the temporary construction area (insofar as these are available from Abbey Cottage and its garden) towards Leiston Old Abbey, would be restored to a view of agricultural land. The historic interest from this view of the wider agricultural setting and the possible tenorial relationship with Leiston Old Abbey Farm, would be restored.
- 12.3.5 During post-application discussions, ESC identified an infiltration basin proposed between the new roundabout and Abbey Cottage that had not been explicitly discussed within the assessment. The infiltration basin will be a dry depression, which would only fill during storm events and then drain naturally. The basin will comprise a grassed depression with an inlet and outlet structure and would be constructed in the arable field to the north of Eastbridge Road, opposite Abbey Cottage. The grassed nature of the basin along with its limited size means that it would not be readily perceptible and will not change historic interest drawn from the setting of Abbey Cottage. No adverse effect is anticipated from this feature.
- 12.3.6 SZC Co. considers that the assessment in **Volume 2, Chapter 16** of the **ES** [APP-272], of the significance of the operational effect as minor adverse and not significant remains valid. SZC Co. has highlighted the proposed landscape restoration measures in this area to the ESC Conservation Officer and would be happy to consider any suggested enhancements to this to secure the best protection of the significance of Abbey Cottage.
- b) Coastguard Cottages
- 12.3.7 SZC Co.'s assessment of the effects arising on the non-designated Coastguard Cottages at Dunwich Heath as adverse but non-significant, is set out in the **Volume 2** (main development site), **Chapter 16** of the **ES** [APP-272] and a response to the points raised in the ESC relevant representation is set out in SZC Co's **Responses to the ExA's First Written Questions** at **HE.1.16** [REP2-100] and it is not proposed to repeat those arguments here.
- 12.3.8 The LIR, however, raises a point that was not addressed in either **Volume 2** (main development site), **Chapter 16** of the **ES** [APP-272] or SZC Co's **Responses to the ExA's First Written Questions** at **HE.1.16** [REP2-100] response: the assertion that NPS EN-1 '*notes non-formally designated heritage assets are not awarded lower significance*'. This statement is not an accurate summary of NPS EN-1, which explicitly distinguishes between designated and non-designated heritage assets. The appropriate

paragraphs of EN-1 in this situation are 5.8.6, which sets out that *'The IPC should also consider the impacts on other non-designated heritage assets [i.e. those not judged to be of equivalent significance to scheduled monuments]... even though those assets are of lesser value than designated heritage assets'*, and 5.8.12, which sets out *'...the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations.'*

- 12.3.9 In addition, the LIR assessment does not have regard to the reduction in impact that would result from the completion of construction works, the maturing of screening planting on the northern fringes of the completed development, and the removal of the water management infrastructure.
- 12.3.10 Notwithstanding this, SZC Co. is progressing discussions with the National Trust regarding the scope and quantum of the resilience fund proposed for Dunwich Heath and this may provide measures for Coastguard Cottages which would address ESC's concerns (see **Draft Deed of Obligation, Schedule 13** (Doc Ref. 8.17(D)).
- c) Farnham Manor (1230210)
- i. LIR Position
- 12.3.11 The LIR assesses a significant adverse effect on the significance of Farnham Manor.
- 12.3.12 ESC suggests that the assessment of effects set out in **Volume 5** (two village bypass), **Chapter 9** of the **ES** [[APP-432](#)] on Farnham Manor, which identified a very low magnitude of change that would not give rise to a significant adverse effect, understates the magnitude of effect on this asset, specifically citing separation from the surrounding landscape, alteration of views out into the surrounding countryside and traffic noise. In this context, it seems appropriate to set out the assessment in more detail to address these concerns.
- ii. Significance of the asset
- 12.3.13 Farnham Manor comprises, at its core, a 17th-century manor house. It has a particularly complex structural history, containing elements that contribute to significance, that are relatively neutral or in some cases detract. Consequently, to present a clearer understanding of the nature of the effect, it is necessary to understand these further. There are 20th century extensions to the east which form part of the listed building, but which are

explicitly noted in the list description⁴ as '*not of special architectural interest*' (Plate 12.1).

Plate 12.1: Eastern wing of Farnham Manor from the east showing later extensions



- 12.3.14 To the east of the manor house are a collection of residential properties and ancillary buildings, combining much-altered 19th century farm buildings converted to residential use and more recent houses, sheds and garages. It is these structures that are visible in Figure 2 of Annex K to the LIR [[REP1-056](#)] rather than the listed structure itself, of which only a chimney and the roofline of the southern range are visible behind these modern buildings. While the older structures historically formed part of a discrete farmstead, following the worked examples in the relevant Historic England guidance⁵, the separate property ownership (certainly at time of relisting), change of use from agricultural to residential buildings removing any functional connection and the physical separation arising from the change in ownership and subdivision of what was formerly a coherent farmstead during the early 20th century, it appears likely that these structures cannot be considered curtilage. In the matter of understanding change to setting, however, the question of whether these structures form curtilage is less

⁴ Farnham Manor, Farnham - 1230210 | Historic England

⁵ Historic England 2018 *Historic England Advice Note 10: Listed Buildings and Curtilage*

important than the understanding of their significance and contribution to significance the significance of Farnham Manor is more important.

- 12.3.15 These structures are of limited architectural value and preclude views to the east from Farnham Manor and from the track which passes to the east of Farnham Manor, breaking up the historic coherence of the area around the house and detracting from historic interest. In views from the east, they serve to locate the farmstead in views, but otherwise detract by precluding views of all but elements of the roofline of Farnham Manor.
- 12.3.16 The heritage significance of Farnham Manor combines archaeological, architectural, and historic interest. Archaeological and architectural interest are drawn from the area immediately around the manor, primarily from within its gardens to the west and the approach to the house, but also from the west. No change should be introduced that is likely to affect these, as the proposed development would be screened by planting within the garden and to the south of the house, and by the modern estate houses and planting to the east. From the east, views are of the modern extensions, which provide minimal opportunity for the architectural and historical interest of the Farnham Manor to be appreciated.
- 12.3.17 While Historic England Guidance on assessment of change to setting (GPA3)⁶ notes that tenurial relationships are important to setting, as setting relates to the perception of a heritage asset, these relationships need to be perceived in order to contribute to significance. Beyond the immediate surroundings of the house, historic interest is primarily drawn from the manor's rural context, although the nature of Farnham Manor's garden and the 20th century alterations to the east mean that this contribution is generalised and there are no specific elements of views of or from the Manor that contribute to significance beyond placing it into this rural context. In effect, the architectural and historic interests of Farnham Manor can best be experienced and appreciated within a well-defined and enclosed setting in which the architectural and historic interests of the 17th century elements of the structure are visible; archaeological interests are almost entirely intrinsic to the structure and its curtilage.

iii. Historic landscape character

- 12.3.18 Views from Farnham Manor into the landscape to the south and east where the two village bypass (road) would be located are experienced primarily from the southern portions of the gardens south of the manor beyond the tennis court and outbuildings. Views back towards the Manor are limited by planting and are primarily of the 20th-century range rather than the historic

⁶ Historic England 2017 *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets*

structure. There is also a high brick wall around the garden to the south-east of the Manor, precluding views eastwards from the garden to the south of the house and reinforcing the enclosed nature of the setting of the Manor. Even from the lane outwith the eastern garden wall, views are very limited until the viewer approaches the extreme southern end of the lane, from where Farnham Manor is not clearly discernible, and the sense of a rural context is drawn primarily from the planting on either side of the lane.

- 12.3.19 Views from the lane are constrained to a very narrow arc by the mature woodland and hedgerow planting to either side (**Plate 12.2**), and views from the Manor are filtered by the mature planting, including the hedge to the south of the tennis court. Views to the Manor are also limited by the same dense vegetation, resulting in views experienced over relatively short distances from within the Manor's gardens and on the approach along the private drive. The dense, mature trees along the track to the wood prevent clear views of the manor from this location (**Plate 12.3**). As noted above, in views from the north-western corner of Foxburrow Wood, the view is of the later converted farm buildings rather than Farnham Manor.

Plate 12:2: View southwards along the lane along the East side of the garden south-east of Farnham Manor



Plate 12:3: View of the road alignment looking towards Farnham Manor (garden wall visible to the right of the picture) from the track leading to Foxburrow Wood.



12.3.20 The rural character of the area around Farnham Manor comprises large regular fields typically with long, straight boundaries (Plate 12:3). These fields have been created through a process of amalgamation of enclosures, including the removal of historic boundaries. At the perimeter of these modern fields, the boundaries of the earlier fields survive as thickly vegetated and mature hedgerows. Large copses and woodland belts are interspersed through these fields and are particularly concentrated in the area immediately around Farnham Manor, and it is this network of small woods and copses that contributes most to historic landscape character. The proposed route of the two village bypass would allow for the preservation of this network of woodland, and while the grain of the existing field system would be disturbed, the proposed mitigation planting would reflect this contribution to historic character.

iv. Noise and tranquillity

12.3.21 While there is no specific guidance for assessing the effects of traffic noise on setting, it is noted that Historic England guidance on assessing the effects of aviation noise⁷ identifies types of heritage assets which would be considered sensitive to change in sound environment, comprising:

- A - When solitude, embedded with quietness, is intrinsic to understanding the form, the function, the design intentions and the rationale for the siting of a heritage asset (primarily churches, monastic sites and burial grounds).
- B - When a non-quiet and specific existing soundscape forms part of the functional understanding of the heritage asset (e.g. industrial sites, theatres, cascades).

⁷ Historic England 2014 *Report number: 87/2014 Aviation Noise Metric - Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England*

- C – When the abandonment of a heritage asset; a monument, building or landscape, in antiquity (or more recently), has created a perceived ‘otherworldly romanticism’ enabled by the absence of anthropogenic sounds (quietness) (e.g. ruins or battlefields).
- D - When the absence of ‘foreign (modern) sounds’ allow an asset to be experienced at ‘a very specific point in time’ that is intrinsic to understanding the heritage assets significance.

12.3.22 Farnham Manor does not fall into any of these categories, and it is considered that the present sound environment contributes to significance primarily as a function of the general rural context rather than as a specific aspect of the asset.

12.3.23 **Volume 1, Chapter 5** of the **ES Addendum [AS-184]** and associated **Volume 3 Appendices 5.3.A to 5.3.C** of the **ES Addendum [AS-245]** note that design measures have been adopted, including the construction of the road within a cutting rather than at grade, to minimise noise from the completed development (paragraph 4.5.4) and that best-practice construction techniques would be used to minimise the volume and duration of construction noise (paragraph 4.5.6). During construction, noise levels would give rise to a significant adverse effect which could be mitigated to non-significant by adoption of these best practice working measures and provision of acoustic screening (Table 4.21).

12.3.24 **Volume 1, Chapter 5** of the **ES Addendum [AS-184]** and associated **Volume 3 Appendices 5.3.A to 5.3.C** of the **ES Addendum [AS-245]** identifies that a significant adverse noise effect would arise during operation of the proposed bypass. The assessment point for this conclusion is located to the east of Farnham Manor, which was selected as a worst case and the increase in traffic noise in the garden to the west, in which the architectural and historical interest of the house can best be appreciated, is likely to be lower.

12.3.25 This more generalised contribution to significance means that the *Tranquillity Assessment using the Natural Tranquillity Method* contained at **Appendix 8A** of **Volume 5, Chapter 8** (Amenity and Recreation) of the **ES [APP-430]** assessment is more useful for characterising the potential effect of the changing sound environment. This identifies location TVB4, immediately north-east of Farnham Manor, is rated as a changed from 7- *Good Tranquillity* to 6-*Fairly Tranquil* during operation of the new road – “*Quiet, with a small amount of local traffic and some distant road traffic audible at times (depending on the wind direction). With the development, distant road traffic noise levels would be increased slightly resulting in a small reduction in tranquillity*” (**Table 1.2**).

12.3.26 SZC Co. considers that the available guidance indicates clearly that Farnham Manor is not a heritage asset which would be considered to be particularly sensitive to change in sound environment. Consequently, it is concluded that any change would affect only the contribution of the wider rural landscape to significance, and that as the contribution of this wider rural landscape to significance is limited, the influence of this change on the loss of significance would be limited.

v. Severance from Foxburrow Wood

12.3.27 The connection between Foxburrow Wood and Farnham Manor is retained solely by the footpath which links them rather than by intervisibility. The track running south past the Manor's eastern perimeter and then east to the wood provides the physical link. Whilst the trees along its length significantly reduce the possibility of any visibility of the Manor, they do serve to indicate the age of the track and thus contribute to historic interest.

12.3.28 Views from the southern part of the garden would include the proposed development, but as noted above, visibility from the architecturally significant parts of the Manor building or in which those significant elements of the building are discernible would be very limited. Views towards Farnham Manor from Foxburrow Wood would also include the proposed development, but the Manor house is not visible in these views and is only visible in the approach from Foxburrow Wood once the viewer has entered the lane adjacent the house and has crossed the line of the proposed bypass.

12.3.29 During construction of the bypass, the physical link between the wood and Manor will be temporarily severed, but this will be restored with a footbridge. Whilst the physical link will be restored, the character of this track will be changed.

vi. Conclusion

12.3.30 To summarise, visibility of the proposed development in views of and from the elements of Farnham Manor that contribute to its significance would be very limited. In particular, the key views of contributing elements of the structure from its gardens and the approach from the west would be preserved. meaning that the contribution of the historic landscape character of the surrounding area to the significance of the asset is limited. This landscape is characterised by the changes associated with mechanisation of farming and is of limited value, and in views from ground level, the suggested planting scheme would serve to reduce the visibility of the scheme and lessen any perceptual change. The connection with Foxburrow Wood would be severed during construction but would be restored.

12.3.31 Guidance suggests that the significance of Farnham Manor would not be sensitive to change in sound environment, and while noise from the new road during construction and operation would increase, this change would have a minimal effect on the perceived tranquillity of areas, and the assessment of a very low magnitude of effect is appropriate.

12.3.32 SZC Co. is engaging with ESC with regard to the provision of primary mitigation for visual effects and landscape character.

vii. Church of St Mary, Farnham (1230211)

12.3.33 The LIR suggests that the assessment of effects set out in **Volume 5** (two village bypass), **Chapter 9** of the **ES** [[APP-432](#)], on the Church of St Mary, Farnham understates the magnitude of the potential effect. This conclusion is based on the assertion that the church was located as a landmark on a high point within the landscape, and that there would be intervisibility between the proposed development and the church, particularly in longer views.

12.3.34 The historic interest of the church is also drawn from a wider area and it is acknowledged that, the church is visible from and has views of both the settlement and the wider rural parish it was built to serve and that these views, contribute to its historic interest.

12.3.35 It should be emphasised that, given dense planting adjacent to the church and buildings to the north, the intervisibility of the body of the church and its wider setting is limited, and the heritage significance of St Mary's Church is mostly clearly appreciated in close views from within the churchyard. The church tower is, however, more visually prominent as shown in Figure 3 of Annex K to the LIR [[REP1-056](#)]. This view, is however, relatively distant, and would be largely unchanged by the addition of the roundabout at Tinker Brook and other changes to the road layout; the relative prominence of the church as an element of the background to wider views would remain largely unchanged.

12.3.36 Other longer views, which would not be affected also contribute to historic interest; from The Street (the A12 as it passes through Farnham), the top of the church tower forms a focal point at the end of the view along the historic streetscape. Other important views are from the tracks beside Parkgate Farm and Nuttery Belt, where not only the tower but the nave can be seen across intervening agricultural fields and between mature trees. From the track close to Nuttery Belt, the Church of St Andrew at Stratford St Andrew can also be seen. These views contribute to the historic interest of the church to varying degrees, situating it within its historic rural community.

- 12.3.37 Views from the church are primarily to the south across fields to Nuttery Belt, to the south east to the adjacent entrance drive to Farnham Manor, and to the west across fields to the River Alde. In these views, agricultural fields with thick and mature hedgerows interspersed with large, wooded copses contribute to the rural setting and therefore to historic interest (**Plates 12.4 and 12.5**). The roofs of the barns at Parkgate Farm are just visible in **Plate 12.4**, providing an indication of the effect of these hedgerows as screening. This screening would reduce in winter with the loss of foliage from deciduous trees, but the intervening hedgerows would still present a clear separation between the asset and the proposed development.
- 12.3.38 Figure 3 of Annex K of the LIR [[REP1-056](#)], further demonstrates the effect of the intervening hedgerows in reducing visibility of the roundabout and construction compound sites at ground level from the churchyard – it is only the church tower that is visible from this area.

Plate 12:4: View looking west from the churchyard into the Alde Valley



Plate 12:5: View looking south-west from the churchyard into the Alde Valley



- 12.3.39 The soundscape at St Mary's is relatively quiet but includes the noise of vehicles on the nearby A12.
- 12.3.40 During both the construction and operation phases of the two village bypass, the physical relationship between the church, the village, and the agricultural surrounds will be unaffected. The key view along The Street will also see no adverse impact from the proposed development. The reduction in traffic along The Street once the proposed development is in operation will provide benefits to the historic streetscape. Views to the entrance of Farnham Manor will be unaffected by the proposed development.
- 12.3.41 In views from the A12 near Stratford St Andrew, the proposed development may appear in occasional views with the church. Impacts are likely to be greatest during the construction phase and would reduce during the operational phase once the construction compound at the western end of the route is removed. However, the distances involved, the intervening mature trees and glimpsed nature of the views of the church make it likely that, at worst, this will be a change of very low magnitude.
- 12.3.42 The proposed development will lie between Nuttery Belt and the Church of St Mary and will be visible from within the churchyard. During the construction of the two village bypass, there is also likely to be some audibility of construction activity from outside the church. These changes

during construction will affect the ability to appreciate this aspect of the rural setting of the church, but will be temporary, short-term and reversible, representing a very low magnitude of change for a very limited period. During operation these impacts will be removed or reduced. The proposed development will still be visible from the churchyard to the south, but at a greater distance than the existing A12, with multiple intervening fields and hedgerows including mature trees intervening; planting and landscaping to the roundabout would seek to exploit this character and break up the form of the road and the river crossing rather than screen the development entirely.

12.3.43 During both construction and operation, the proposed development will be visible in views of St Mary's tower from Parkgate Farm. Trees along the River Alde and elsewhere in the intervening landscape preclude any visibility from the church to this part of the proposed development. Changes to the views from Parkgate Farm will slightly affect historic interest drawn from the rural context of the church from the west by introducing new engineered elements. Views of the trees along the Alde, however, and on either side of the church will be unaffected and the overall impression of a rural parish church will persist. Changes will be further reduced by the position of the road within a cutting, which will reduce the visual and audible impact to the rural setting. Given the distance and intervening topography, audible impacts during construction are likely to be very low at St Mary's. These audible impacts would reduce during operation, with traffic volumes anticipated to be similar to those of the current A12, which passes closer to the church than the proposed bypass. Effects on historic interest are therefore assessed from this location as of a very low magnitude during both construction and operation.

12.3.44 In conclusion, during construction the magnitude of change to the heritage significance of St Mary's Church is assessed as being, at worst, a very low magnitude resulting in a minor adverse effect which would not be significant.

12.3.45 During operation, while the proposed development would be discernible, it would be perceived as a distant development and the relationship of the church to the village, and its prominent location in the surrounding countryside retained. There would be no discernible change to heritage significance resulting in no effect. The ES assessment remains valid.

viii. Little Glemham Hall

12.3.46 The LIR notes an adverse effect arising from the change to historic landscape character of the area to the east of the park, citing Repton's alterations to the park that extended it to what is now the line of Tinker

Brook as a critical design element that links the setting of the asset to the area to be occupied by construction compound and a proposed roundabout at the western end of the Two Village Bypass. The assessment presented at **Volume 5, Chapter 9** of the **ES** [[APP-432](#)] found no adverse effects.

12.3.47 Consequently, this response focuses on the former eastern entrance to Glemham Hall Park and the landscape surrounding this part of the park and how these contribute to the heritage significance of both the registered park and the listed Hall.

12.3.48 Prior to Humphrey Repton's remodelling in the late 18th and early 19th century, the north-eastern part of the park was used as paddocks and as a walled garden. This contrasts with the grand tree-lined avenues, formal gardens, and main entrance laid out in the western half of the park, upon which the Hall and, therefore its heritage significance, is primarily drawn. As part of Repton's redesign, a second entrance was added to the park in the north-east corner, and in so doing a small extension to the park was added, adjoining what is now the A12. This extension required the diversion of the minor road on the eastern boundary of the park, Tinker's Brook, to its current course and dense woodland was planted in the area of the extension and along the eastern boundary, the latter known as Boundyard Wood. The former walled garden, associated buildings and paddocks were cleared away and the park-scape was extended across this north-eastern area, flanking the new approach. This second entrance to the park allowed a new vista on approach to the Hall, but the planting on the eastern boundary limited the appreciation of this vista to within the park itself. Indeed, the dense woodland planting around the new gate which precluded views into the park or of the Hall, the lack of the lodge, and the development of the utilitarian Parkgate Farm all suggest that this entrance was of less importance than the one to the west, perhaps a "tradesman's entrance". Having crossed through the woods a "reveal" of the Hall across the landscaped park would be experienced on this new approach, creating a sense of inward-looking focus towards the Hall's northern façade. During the 20th century this access was closed off and the access route across the park was removed.

12.3.49 Unlike some parts of the park, this north-eastern section of the park was separated from its surrounding landscape, with views out all but prevented by Repton's dense woodland planting. At the present, this planting to the west of Tinket Brook screens the substantial modern farm sheds that are located in this area. On approach from this direction, particularly from the A12, this same woodland presents a clear boundary within the generally open agricultural landscape, meaning that travellers along the A12 are in no doubt that they have passed into a distinct parkland landscape. In this sense, the detail of the historic character of the land outwith the park (which

has already been significantly altered by agricultural improvement) primarily provides a rural and regionally distinctive context in which the park is located, and contrasts with the parkland character. This conflation of context and setting is drawn carefully by Historic England in GPA3⁸, and requires further explanation in order for the nature and magnitude of any effect to be understood.

12.3.50 Historic interest from this part of the park is drawn from the extension of the park, Boundyard Wood and the dense planting in the extreme north-east corner which create a very strong physical boundary between the park and the outside world. This interest comes from the link to Humphrey Repton, the growing fortunes of the hall in the 18th century, and landscape change. The closure of the north-eastern entrance, the removal of the route across the park and its erasure by planting west of Tinker Brook makes this phase of the park's history illegible within the current setting of the park or the Hall and it does not contribute to historic interest.

12.3.51 The proposed development will have no direct impacts to historic interest, lying as it does beyond the eastern limits of the park. There will be no visibility between the Hall and the development and the important planting along this eastern boundary will remain. There will be no visibility of the development from within the park itself and any views from within the woodland will be strongly filtered by the mature trees. Noise levels during construction may be increased but this will be a short-term temporary effect. Road noise during operation would be similar to that currently experienced and would not represent a qualitative change.

12.3.52 The magnitude of change during construction is not expected to exceed any more than a very low magnitude to the park and no change is expected to the setting of the Hall. This would result in a minor adverse effect, which would not be significant, to the park and no adverse effect to the Hall.

12.3.53 No adverse effect is anticipated during the operation phase for either the park or the Hall.

ix. Theberton Hall

12.3.54 The LIR considers that Theberton Hall would be significantly affected by the loss of mature woodland at Plumtreehill Covert, the construction of the Sizewell Link Road on an embankment and the partial severance of the historic access to the house from Pretty Road.

⁸ Historic England 2017 *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets*

- 12.3.55 During both the construction and operation the proposed development impacts to Theberton Hall were assessed in **Volume 6, Chapter 9** of the **ES** [APP-467] as resulting in a minor adverse effect, rather than no effect as has been stated in ESC's response. As noted by ESC, this parkland is neither designated nor locally listed. This is due to the erosion of its heritage significance, and the degree to which the relict parkland contributes to setting is a matter of debate; certainly without prior knowledge, there is little that allows the area of the former parkland that would be affected by the road to be read as parkland by most viewers. Impacts to Plumtreehill Covert are identified in the ES; however, the lack of legibility of this feature as part of the Hall's former parkland reduces the contribution this wood makes to the Hall's heritage significance.
- 12.3.56 There are multiple historic accesses to the park, some of which survive; the access from Pretty Road affords views across the only area where the distinctive 'clump' planting survives, and this would remain unchanged.
- 12.3.57 It is acknowledged that changes to the approaches to Theberton Hall will reduce the ability to appreciate their contribution to the historic interest of the Hall, but the magnitude of these impacts is tempered by the conversion of this landscape to agricultural use and the lack of legibility of the former designed landscape, including the loss of historic access routes around the property. Impacts are therefore assessed as very low, resulting in a minor adverse effect which would be not significant.
- 12.3.58 SZC Co. is committed to providing landscape mitigation planting to the route of the Sizewell Link Road and welcomes further dialogue with ESC to identify any potential enhancements to the detail of the mitigation scheme.

x. Hill Farmhouse

- 12.3.59 Hill Farmhouse was not scoped into the **ES** assessment [APP-467]. It was considered in the Settings Scoping document issued with the scoping report with a recommendation to scope it out of the assessment. No request to consider assessment was made at that time by any consultees. It is therefore considered in detail below.
- 12.3.60 The heritage significance of Hill Farmhouse is drawn from its architectural and historic interests. The former is inherent in the farmhouse building and is drawn from the gardens and agricultural buildings surrounding the house, which allow architectural detail to be seen and contextualised with the local farming vernacular. Historic interest is drawn from a wider area, encompassing not only the farm buildings, but also the surrounding landscape.

- 12.3.61 Immediately surrounding the buildings lie a series of rectilinear paddocks, created through the amalgamation of smaller fields during the 20th century. These give a specifically equestrian context to the farm. Beyond these paddocks lie larger arable fields to the east and west and pastoral fields to the north and south. Views into this agricultural landscape and on approach contribute to our understanding of the historic use and development of the farm, although it is important to note that while NPS EN-1 does not offer a formal definition of setting, GPA3⁹ and NPPF Annex 2¹⁰ are clear that setting is a concept that relates to the present experience of a heritage asset, and historic and tenurial links contribute only as far as they are perceptible within that setting.
- 12.3.62 The proximity of the B1122 and the orientation of the principal elevation of the farmhouse towards the road, also contribute to historic interest, allowing an understanding of the influence of the farmstead on the historic landscape. Views to the west into the agricultural landscape include views of the B1122; these views are partially screened by planting along the B1122 and by the established hedgerows between fields. Views into the landscape provide an agricultural setting for the farm, but the legibility of any tenurial link between the farm and the surrounding fields, is restricted to the immediate surroundings of the farmstead.
- 12.3.63 The proposed development would have no impact on architectural interests. Historic interest drawn from the adjacent equestrian facilities and the agricultural land surrounding most of the farm, to the north, east and south, would be unaffected. The important relationship with the B1122 would continue and the visibility of an additional road would not reduce the ability to discern this close relationship. The introduction of new elements in views to the west of the farm and on approach along the B1122 would give rise to some change to the setting of the farmhouse, however. Historic interest drawn from the agricultural views from the principal elevation of the farmhouse would be affected by the introduction of a new road. It is assessed that during both construction and operation the magnitude of change would not exceed a very low impact, resulting in a minor adverse effect which would not be significant. This effect is in accord with the original decision to scope this asset out of the assessment of effects (see **Volume 1, Appendix 6L, Annex 6L.1** - Historic Environment Settings Scoping Update [[APP-171](#)]).

⁹ Historic England 2017 [Historic Environment Good Practice Advice in Planning Note 3 \(Second Edition\) The Setting of Heritage Assets](#)

¹⁰ [NPPF 2019](#)

xi. Leiston Abbey First Site

- 12.3.64 The LIR assesses a significant adverse effect on Leiston Abbey First Site arising during construction and persisting through the operational period; **Volume 2 Chapter 16** [[APP-272](#)] identifies a significant effect but one which can be mitigated to non-significant through provision of enhanced access and interpretation.
- 12.3.65 The LIR [[REP1-045](#)] does not have regard to the mitigation proposed, including the enhancements to access and interpretation provided by the establishment of an off-road link between to the two Abbey sites, enhanced interpretation to be provided at the site and more general landscape enhancements of the Minsmere area. Consequently, the assessment provided in the LIR is overstated.
- 12.3.66 SZC Co. is in discussions with relevant stakeholders (RSPB Minsmere and Historic England) to agree detailed mitigation proposals.

13. ARCHAEOLOGY

13.1 Overview

- 13.1.1 SZC Co. has reviewed Chapter 13 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Annex L - Site by site assessment of archaeological impacts and mitigation [[REP1-057](#)] and Suffolk County Council's comments on the draft s.106 [[REP2-194](#)] so far as they relate to Requirement 3: Project wide: Archaeology and Peat.
- 13.1.2 **Table 13.1** below provides a response to the principal points raised where a response is appropriate.
- 13.1.3 SZC Co.'s position in relation to effects on the terrestrial historic environment, including effects on archaeology, is set out in the historic environment chapters at **Volume 2, Chapter 16** and **Volumes 3-9** of the **ES, Chapter 9** of the **ES** [[APP-272](#), [APP-368](#), [APP-399](#), [APP-432](#), [APP-467](#), [APP-499](#), [APP-528](#) and [APP-560](#)].
- 13.1.4 Mitigation is proposed where the assessment identifies that it is required. This includes measures set out in the **Draft Development Consent Order**, Requirement 3: Project wide: Archaeology and Peat [[REP2-015](#)] and the heritage contribution proposed in the **Draft Deed of Obligation**, Schedule 8: Heritage (Doc Ref. 8.17(D)).

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- 13.1.5 As set out in the **Initial Statement of Common Ground**, Table 8.1 [[REP2-076](#)], SZC Co. and the Councils are largely agreed on the methodology, baseline, impacts and mitigation for archaeology. This is subject to the agreement of the Overarching Archaeological Written Scheme of Investigation, detailed requirement wording and agreement of the quantum of the monitoring contribution in the **Deed of Obligation** (see **Schedule 8, Draft Deed of Obligation** (Doc Ref. 8.17(D))).
- 13.1.6 In addition, SZC Co. welcomes SCC's engagement since the submission of the LIR which has allowed progress to be made, as reflected in **Table 13.1** below.

13.2 Response to Issues (Summary)

Table 13.1: Responses to LIR summary of archaeology impacts

Reference	Issue	Description	SZC Co. Response
13.1, 13.2	Gaps in archaeological fieldwork	Archaeological evaluation work has commenced, however, a number of areas of land impacted by the proposal have yet to be properly evaluated. This evaluation must be completed to inform the mitigation.	This is agreed - the structure of the mitigation would allow for intrusive fieldwork on those areas that have not yet been evaluated to be completed ahead of agreeing a site-specific WSI for mitigation for those parts of the relevant site. SZC Co. welcomes SCCAS's position that the fieldwork undertaken to date is sufficient for the DCO submission and confirms its commitment to complete the evaluation work.
13.3	Overarching Archaeological Written Scheme of Investigation (OWSI)	Now approved by SCC Archaeological Service, subject to minor amendments. Anticipated that this control document will be resubmitted by the Applicant.	Additional comments received by SCC and from Historic England in their written representation [REP2-138] have been incorporated. A final version of the OWSI is submitted at Deadline 3 (Doc Ref. 6.14 2.11A (A)).
13.4 Annex L	Peat Strategy	Need for a separate requirement for a specific Peat Archaeological Mitigation WSI, to deliver the outcomes identified in the Peat Strategy	This approach is agreed. SZC Co. does not agree with comments on the Peat Strategy in Annex L of the LIR [REP1-057] however - this is addressed below.
Table 10a	Disturbance of archaeological remains	The proposed works would disturb archaeological remains, requiring a robust and effective mitigation scheme to be secured by requirement, and that appropriate support to allow SCCAS to monitor the implementation of this mitigation scheme should be provided as an obligation.	Further discussions have been held on the requirements since the submission of the LIR and it is envisaged that the wording should be largely agreed when the next draft of the DCO is submitted at Deadline 5. Monitoring the implementation of the mitigation is agreed in principle, subject to the agreement of the exact scope and quantum in the Draft Deed of Obligation (Doc Ref. 8.17(D)).

Reference	Issue	Description	SZC Co. Response
Annex L	Finalisation of site-specific WSIs / mitigation proposals	Notes specific areas where further work is required to reach agreement on the detail of mitigation.	SZC Co. is progressing discussions with SCC on the site-specific details of mitigation. It is not envisaged that there will be any issues which cannot be resolved in this respect. Submission and agreement of site-specific WSIs setting out the detail will be secured by requirement Project Wide 3: Archaeology and Peat [REP2-015] .

13.3 Detailed comments - Peat Strategy (Main Reactor Site)

13.3.1 In Annex L of the LIR [[REP1-057](#)], SCC note: *'potential for waterlogged prehistoric settlement, potentially of major significance. Spatial extent unknown, but potential settlement and riverine areas indicated by resistivity tomography. Needs testing through evaluation. Proposed trenching for high potential areas plus further sampling required, in line with the Peat Strategy (now agreed). Further mitigation to be decided pending results of evaluation'*.

13.3.2 There are a number of points in this summary which are incorrect. Firstly, the resistivity tomography survey and other data drawn upon in the Peat Strategy which is set out at **Volume 2, Chapter 16, Appendix 16G** of the ES [[APP-275](#)] does not identify potential settlement areas:

- **Volume 2, Chapter 16** (Terrestrial Historic Environment) of the ES [[APP-272](#)] notes: *'Geoarchaeological survey comprising resistivity tomography and intrusive survey work has determined that these deposits are potentially of high paleoenvironmental interest as they formed over a prolonged period of time during the Mesolithic and Neolithic periods. The peats are likely to be primarily of interest for their ability to enhance understanding of past environments, rather than past human activity. The dynamic and fast flowing nature of later periods would not have been favourable for settlement, and the peat deposits were inundated by the early Bronze Age'. In addition, 'These peats were significantly disturbed during the construction of Sizewell B, with widespread removal of peats from the southern part of the area, where peats survive, and compaction of the northern part, with subsequent disturbance during the heathland creation trials.'*
- **Volume 2, Chapter 16** [[APP-272](#)] concludes, *'This disturbance, taken with the early inundation of these deposits means that there is a low potential for extensive archaeological remains, although some material related to exploitation of the estuarine fringes may be present. Any archaeological remains that are present are likely to be of medium heritage significance at most as relics of what were once more extensive remains.'*

13.3.3 Secondly, the **Peat Strategy** [[APP-275](#)] does not propose further evaluation to be followed by a decision on further mitigation, the four trenches proposed comprise the mitigation, along with investigation of the multiphased palaeochannel record from the site, geoarchaeological sampling (and palaeoenvironmental assessment from the proposed trench locations:

- As set out in paragraph 6.2.5.5 [[APP-275](#)], the predictive model has been used to propose this excavation strategy to investigation to Holocene alluvial sequence and areas identified as having the highest archaeological potential. Using this approach an excavation strategy has been developed that considers the considerable challenges presented by this site (water table, depth of excavation, health and safety).
- **Volume 2, Chapter 16** [[APP-272](#)] notes that the Peat Strategy in **Appendix 16G** [[APP-275](#)] sets out appropriate investigative techniques to allow loss of archaeological interest in the peats on the main platform site to be mitigated. A WSI setting out specific details of the methodology to be adopted will be agreed with SCCAS and Historic England once the earthworks contractor is appointed. Publication and popular dissemination of the results would allow any informative, and historic value, to be fully realised, and details of this will be set out within the WSIs. This will be secured in the **Draft Development Consent Order**, Requirement 3: Project wide: Archaeology and Peat [[REP2-015](#)].

14. DESIGN

14.1 Overview

14.1.1 SZC Co. has reviewed Chapter 14 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 14.1** below provides a summary response to the principal points raised.

14.1.2 The detailed comments made in the LIR [[REP1-045](#)] regarding design are addressed below where appropriate. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

14.1.3 Particular attention is drawn to responses to the first set of Examining Authority questions (ExQ1) [[REP2-100](#)].

14.2 Response to issues: summary

14.2.1 Chapter 14 of the LIR sets out a table, which contains a summary of the impacts drawn out in that chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 14.1: Response to summary of design impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
11a	Potential for inappropriate materials and layout and landscaping for the accommodation campus and ancillary buildings	Negative Design detail and materials to be agreed – requirement. Control – Design Review Panel to work with / advise the Councils – section 106.	SZC Co. has proposed an approach to design governance in the response to ExQ1 LI.1.1 and in response to ExQ1 LI.1.42 in relation to campus design [REP2-100]. SZC Co. has provided responses to stakeholder submissions made at ExQ1 (Doc Ref. 9.30). SZC Co. intends to provide increased levels of design commitment through additional design principles for the campus design which are to be provided in an updated DAS to be submitted at Deadline 5. This additional information provides enhanced direction on the approach to materials and finishes with reference to colour and approaches to sustainable design.
11b	Potential for inappropriate finishes and materials on main nuclear island buildings: turbine halls, OSC, gateway building	Negative Design detail and materials to be agreed – requirement Control – Design Review Panel to work with / advise the Councils – section 106	SZC Co. has proposed an approach to design governance in the response to ExQ1 LI.1.1 [REP2-100]. In specific response to the matters raised at Ref. 11b, SZC Co. anticipate that the selection of final materials for the Turbine Halls and Operational Service Centre (OSC) will be agreed with ESC in consultation with relevant stakeholders (including the AONB Partnership), finalising colour and cladding design founded on the extensive level of detail and commitments already illustrated for approval in the DAS ([APP-585], [APP-586] and [APP-587]) and the subsequent updates in January 2021 [AS-261], at Deadline 1 [REP1-005] and Deadline 2 [REP2-040]. With reference to approval of materials and finishes for the gateway building please refer to Detailed comments below.

14.3 Detailed comments

14.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and there would be little benefit repeating it here. There are, however, a limited number of matters raised in the LIR [[REP1-045](#)] to which SZC Co. wishes to respond. These relate to matter 11b, addressing outstanding key design matters and the role of a design review panel.

14.3.2 ESC's comments in the LIR describe in some detail, the strength of the main platform buildings designs including the careful consideration given to both the design concept and approach to materials, especially in relation to the Turbine Halls and OSC. Detailed information is provided in the application for main nuclear buildings including the Turbine Halls and OSC. The main access building referred to by the councils as the 'proposed gateway building' (No 30 page 147 of the **DAS** [APP-586] forms part of the set of Ancillary Buildings. The extent of detail on these structures is limited and is provided in section 7.20 and 7.21 and Figure 7.72 of the **DAS** [APP-586]. The building is not 'the gateway to the estate' but performs an operational function to staff and visitors accessing the main platform and is screened from wider views in the landscape by retained vegetation. Matters of design in relation to this building were addressed in **ExQ1 LI.1.30** where SZC Co. stated:

"Whilst the building (Building no. 30 plan ref Design and Access Statement section 7.20.2 – 3) [APP-586] should generally retain the 'lower tier' character and finishes described in the Design and Access Statement and in line with Detailed Built Design Principles 58, 59 and 60 in the Design and Access Statement, consideration is being given to whether a more agreeable design can be achieved."

14.3.3 SZC Co. is preparing additional design principles bespoke to this building to be submitted in Deadline 5 for approval and which would be inserted into Table 5.3 of the DAS.

14.3.4 In relation to approval of the detailed design of the Ancillary Structures, it is not presently intended that would be subject to approval by ESC as outlined in paragraphs 1.3.10 to 1.3.11 of the **Design and Access Statement** [[APP-585](#)].

14.3.5 A number of remaining issues of detail are outlined in the LIR.

14.3.6 With reference to securing the mechanism by which design matters are finalised, SZC Co. has provided a response at **ExQ1 LI.1.1** and in short does not consider that a design review panel is required to address matters

of design. SZC Co. considers that a properly funded and qualified planning officer within the authority along with the proposed design guardianship role of the design team working in accordance with the design direction set out in the **Design and Access Statement**, is sufficient and indeed a better approach to secure good design outcomes.

- 14.3.7 The Councils note that greater mitigation and compensation will be required given the limitations of design fixity for nuclear buildings with particular reference to the concrete domes. SZC Co. recognises the limitations and design responses were provided in **ExQ1 LI.1.21** [[REP2-100](#)] in relation to this matter. SZC Co. does, however, note that the Councils do record the embodied nature of design mitigation that is proposed and the extent of its effectiveness. In accordance with NPS EN-6, SZC Co. has sought to limit visual impacts through design and to mitigate residual impacts where practical. As the paragraph 3.10.8 of NPS EN-6 recognises, however, effects cannot be eliminated. SZC Co. has proposed a Natural Environment Improvement Fund in the **Draft Deed of Obligation** (Doc Ref. 8.17(D)) as an effective approach to enabling the conservation and enhancement of the landscape improvements to be delivered over time across the area of visual influence, thereby further limiting and mitigating effects. This is a practical and effective approach, to addressing residual impacts that cannot be addressed through design and is consistent with the NPS.
- 14.3.8 The Councils note in relation to the Accommodation Campus, that *“It is understood that the site layout is now fixed in terms of disposition of the accommodation blocks, recreation centre, access and routes, and the decked car park.”* (LIR, paragraph 14.32).
- 14.3.9 SZC Co. notes that the campus layout is defined in the DCO as a set of parameters and that design information within the **Design and Access Statement** is illustrative, as set out at paragraphs A.26.1 to A.26.2 of the **Design and Access Statement** [[APP-587](#)]. SZC Co. is submitting additional design principles in a revised version of the DAS to be submitted at Deadline 5 for the campus in response to comments received from stakeholders in relation to **ExQ1 LI. 1.41** to further support the delivery of good design.
- 14.3.10 Reference is made to the role of Requirements to support the delivery of good design and to provide where relevant certainty of design detail where this doesn't presently exist. SZC Co. supports this approach to accord with the strategy outlined in the **Design and Access Statement** [[APP-585](#)].
- 14.3.11 With regard to the application of colour to the Turbine Halls, paragraph 14.15 of the LIR records that *“The Councils do however endorse the*

approach of a vertical gradation in visual effect from lighter to darker, top to bottom (as illustrated in Figure 7.42 of the Main Development Site Design and Access Statement [APP-586]). The Councils, with the AONB, expect to be consulted on colour choices through either a design review process or through a requirement.” SZC Co. notes that it is not presently intended to produce vertical gradation in the turbine hall cladding. The effect generated in the visual is the product of the effects of natural lighting on the proposed material and orientation of textured panels.

15. TRAFFIC AND TRANSPORT

15.1 Overview

15.1.1 Whilst the LIR [REP1-045] sets out a series of concerns with regards to traffic and transport, many of those relate to matters where agreement has been reached, at least in principle, and discussions are ongoing with the local authorities in order to finalise agreement on details as well as reach agreement on outstanding matters. SZC Co. considers that the Councils and SZC Co. are largely aligned on the following key transport aspects:

- The Councils are generally satisfied that the transport modelling is an acceptable evidence base for assessing impacts.
- The principle of increasing freight movement by rail and marine is supported by the Councils. However, the Councils raise concerns with the deliverability and timing of the proposed rail and marine infrastructure and discussions are ongoing with Network Rail and the Councils to provide greater certainty on the deliverability of the additional trains and temporary beach landing facility.
- The transport governance proposed through the Transport Review Group (TRG) in order to monitor and review the effectiveness of the **Construction Traffic Management Plan (CTMP)** [REP2-054], **Construction Worker Travel Plan (CWTP)** [REP2-055] and **Traffic Incident Management Plan (TIMP)** [REP2-053] is largely agreed between the parties. Suffolk County Council is chair of the TRG meetings, and this is secured through the **Draft Deed of Obligation** (Doc Ref. 8.17(D)). However, SZC Co. does not agree that Suffolk County Council should have the casting vote. The proposed TRG structure mirrors that of Hinkley Point C, which has been received positively. There has been no need for voting to date and the parties work collaboratively to ensure the efficient construction of the project

and effective mitigation of effects. Should voting be required for a particular matter and no majority can be reached, an appropriate dispute resolution mechanism is secured within the **Draft Deed of Obligation** (Doc Ref. 8.17(D)).

- Since the drafting of the LIR, an updated **CTMP** [REP2-054], **CWTP** [REP2-055] and **TIMP** [REP2-053] have been submitted to the examination. Many of the comments raised by the Councils with regards to the management and monitoring of Sizewell C vehicles, including abnormal loads, have been addressed in the updated transport management plans. SZC Co. continues to work closely with the Councils to agree the transport management plans. The proposed transport monitoring is more comprehensive than at Hinkley Point C and takes account of the suggestions raised in the “Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station”, Oxford Brookes University [REP1-089] in terms of monitoring of fly parking, vehicle emissions, bus passenger movements to site and LGV movements.
- SZC Co. is working closely with the Councils and parish councils to agree additional transport mitigation to that proposed in the DCO, which would be secured via the **Draft Deed of Obligation** (Doc Ref. 8.17(D)), including improvements in Leiston, Wickham Market, Little Glemham, Marlesford, the B1122 (including Theberton and Middleton Moor), Westleton and a cycle connectivity fund.
- In addition, SZC Co. is proposing a transport contingency fund to be secured via the **Draft Deed of Obligation** (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO. Whilst the principle of the transport contingency fund is agreed between SZC Co. and the Councils, the scope of the fund is yet to be agreed. SZC Co. continues to liaise with the Councils to address outstanding comments with regards to the environmental transport assessment (e.g. with regards to severance, amenity, pedestrian delay and fear and intimidation). It is only once the Councils and SZC Co. are in agreement on the assessment that the proposed scope of the transport contingency fund can be finalised and agreed.

15.2 Response to issues: summary

15.2.1 SZC Co. has reviewed Chapter 15 of the LIR and **Table 15.1** below provides a summary response to the LIR’s Summary of Impacts table and

then provides a response to some of the principal points raised where a response is appropriate.

- 15.2.2 The detailed comments made in the LIR regarding traffic and transport are addressed further below, although this chapter does not repeat matters which are already set out in documents available to the examination.

Table 15.1: Response to summary of traffic and transport impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
12a	Substantial negative impact on local network in terms of environmental transport effects (e.g. severance, amenity etc), driver delay, road safety, noise and air quality	Negative: LIR refers to proposed rail and marine infrastructure to reduce freight by road as well as HGV caps, transport management plans and monitoring and governance through Transport Review Group.	HGV caps for network peak hours and daily HGVs are included in the CTMP [REP2-054]. Quarterly HGV caps are not considered necessary as outlined below. Monitoring and governance proposed via Transport Review Group (TRG). CTMP [REP2-054], CWTP [REP2-055] and TIMP [REP2-053] are to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)).
12b	Reduced residual capacity on A14 as a result of construction HGVs	Negative – LIR refers to need for HGV caps to control HGVs on Suffolk's road network and TIMP [REP2-053] to address A14 and Orwell bridge closures	The A14 forms part of the strategic road network (SRN) and is managed by Highways England rather than Suffolk County Council. Highways England has confirmed in the Statement of Common Ground [REP2-069] that <i>they are “reasonably satisfied that the Sizewell C Project will not have a material impact on the SRN and no highway improvements are required over and above the improvements committed as part of the Brightwell Lakes development at the A12/A14 Seven Hills Interchange. However, the predicted impacts will be contingent upon robust management protocols as defined through the CWTP, CTMP and TIMP which are not yet fully agreed.”</i> SZC Co. continues to liaise with Highways England to reach agreement on the CTMP [REP2-054], CWTP [REP2-055] and TIMP [REP2-053].

Ref no.	Impact	Summary of LIR	SZC Co. response
12c	Two village bypass improvements to amenity, severance through Stratford St Andrew and Farnham and improvement to journey time on this part of the A12	Positive – secure delivery and technical approval of design by requirement/ obligation	<p>SZC Co. agrees the positive benefits of the two village bypass.</p> <p>Requirement 22 requires that the relevant highway works are in accordance with the approved plans and in general accordance with the Associated Development Design Principles. Any alternative plans to be approved by Suffolk County Council must be in general accordance with the Associated Development Design Principles and within the vertical limits of deviation in Article 4. Unless shown on the approved plans, Suffolk County Council must approve any changes to existing finished ground levels of surface water drainage.</p> <p>Requirement 5 requires that details of the surface and foul water drainage system are approved by East Suffolk Council in consultation with Suffolk County Council.</p>
12d	Sizewell link road will remove construction and general traffic from Middleton Moor and Theberton	Positive - secure delivery and technical approval of design by requirement/ obligation	SZC Co. agrees the positive benefits of the Sizewell link road. Refer to the response to 12c with regards to the proposed securing mechanisms for the road.
12e	A12 impacts between A14 (Seven Hills) and Lowestoft in terms of reduced resilience and capacity, potential for road safety incidents, driver delay, increased severance and anxiety of vulnerable road users and reduced amenity. Increased journey time on A12 between between Seven Hills and A1152. Reduced residual capacity at a number of	Negative – LIR refers to the proposed highway improvements to be secured by requirement, a contribution towards capacity improvements on the A12 between Seven Hills and A1152, funding for junction and road safety improvements at a range of locations (Annex M) and monitoring	SZC Co. is largely aligned with the authorities in terms of the proposed transport mitigation. A package of highway/transport improvements for the A12 is proposed to be secured by requirement or funded via an obligation in the Draft Deed of Obligation (Doc Ref. 8.17(D)). In addition, a transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in

Ref no.	Impact	Summary of LIR	SZC Co. response
	Suffolk junctions. Reduced exit capacity for side roads.	and mitigation requirements and governance through the TRG.	the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO. Monitoring and governance is proposed via the TRG, which is also secured in the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. does not consider that a contribution towards capacity improvements on the A12 between Seven Hills and A1152 is necessary based on the VISSIM traffic modelling of the corridor summarised in the Consolidated Transport Assessment [REP2-045 to REP2-052] and the proposed demand management measures included in the CTMP [REP2-054], CWTP [REP2-055].
12f	Transport impacts on other A and B roads beyond the A12 in relation to reduced resilience, capacity, vulnerable road user amenity, anxiety, severance and road safety.	Negative – the LIR refers to the need to secure highway junction and road safety improvements and monitoring and governance through the TRG.	SZC Co. is aligned with the authorities on the proposed mitigation, subject to agreeing some of the details. A package of highway/transport/ environmental improvements for A and B roads beyond the A12 are proposed to be secured either by requirement or funded via an obligation in the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. will continue to liaise with the authorities with regard to the details of the improvements to be secured via the Draft Deed of Obligation (Doc Ref. 8.17(D)). In addition, a transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO. Monitoring and governance

Ref no.	Impact	Summary of LIR	SZC Co. response
			are proposed via the TRG, which is also secured in the Draft Deed of Obligation (Doc Ref. 8.17(D)).
12g	Detrimental effect on road surface of Suffolk highway network due to the number of HGVs and AILs.	Negative – LIR requires SZC Co. commit to funding the increased levels of remediation through maintenance.	SZC Co. is proposing a permanent beach landing facility (BLF) to enable the heaviest/largest AILs to be delivered by sea rather than road. In addition, SZC Co. has committed through an obligation in the Draft Deed of Obligation (Doc Ref. 8.17(D)) to undertake a highway condition survey of the B1122 pre commencement and post the opening of the Sizewell link road and to fund Suffolk County Council to maintain the B1122 in good repair prior to the opening of the Sizewell link road. SZC Co. does not consider that funding is required to mitigate the detrimental effect of the road surface on the A12, as this forms part of the Suffolk primary road network and one of its functions is to accommodate HGV traffic.
12h	Reduced ability for Suffolk County Council to undertake necessary road maintenance during normal working hours without significant detrimental impact.	Negative – LIR requests that SZC Co. contribute towards increased costs for road maintenance.	SZC Co. understands that Suffolk County Council currently endeavours to co-ordinate highway maintenance to limit the impact on road users. For example, SZC Co. understands that overnight highway maintenance is currently undertaken on the A12 in order to limit the impact of the maintenance. SZC Co. therefore does not consider that the Sizewell C Project will have a significant detrimental impact on the ability of Suffolk County Council to maintain the local highways.
12i	Economic impacts of journey delays	Negative – compensation fund for local economic impacts.	SZC Co. does not agree the economic assessment that has been undertaken with regards to the economic cost of congestion. Refer to SZC Co. response to Suffolk

Ref no.	Impact	Summary of LIR	SZC Co. response
			County Council's response to ExQ1 SE.1.42 for further details (Doc Ref. 9.30).
12j	Reduced propensity for people to cycle or walk along the existing transport network, especially on the B1122 section beyond the limits of the Sizewell link road.	Negative – improvements to cycle and pedestrian infrastructure.	SZC Co. continues to liaise with the authorities to agree a package of improvements for the B1122 to mitigate impacts on vulnerable road users, which is proposed to be secured through an obligation in the Draft Deed of Obligation (Doc Ref. 8.17(D)).
12k	Risk of late delivery of transport infrastructure to exacerbate transport issues	Negative – caps to control movement of HGVs on Suffolk's road network.	HGV caps for network peak hours and daily HGVs and included in the CTMP [REP2-054]. Quarterly HGV caps are not considered necessary as outlined below.
12l	Reduced availability of on-street parking in areas in vicinity of the site, as a result of increased numbers of houses in multiple occupation and fly parking.	Negative – mitigation package for on-street parking impacts	Details of the proposed monitoring and management of fly parking are set out in the CWTP [REP2-055], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. is not proposing to build new houses as part of the DCO, which would generate additional parking demand. Instead, non-home based Sizewell C construction workers would be able to utilise existing accommodation, including private rental accommodation. Any new houses in multiple occupation (HMO) would require a licence from East Suffolk Council and consideration should be given to existing parking capacity when issuing licences.
12m	Impacts of additional freight trains on passenger trains and freight trains operating out of the Port of Felixstowe	Negative – TRG to monitor rail freight operation to ensure no adverse impacts on the railway line.	Network Rail has responsibilities for the operation of the rail network. Capacity analysis undertaken demonstrates that SZC trains can operate within the proposed hours without impacting services from Felixstowe.

Ref no.	Impact	Summary of LIR	SZC Co. response
12n	Possible improvements to the East Suffolk Line as a legacy benefit	Positive – required improvements to be confirmed by Network Rail and secured by requirement / obligation	SZC Co. Is working closely with Network Rail to determine whether track renewal on the East Suffolk Line can be delivered as a legacy benefit (rather than a necessity for this application).
12o	Improvements to the Leiston Branch Line	Neutral	The benefit in upgrading the branch line to enhance its resilience, safety and noise performance should be recognised.
12p	Additional transport impact from operational workforce and outage staff	Negative	SZC Co. is to submit an Operational Travel Plan to Suffolk County Council for approval prior to the end of the construction period, which would seek to reduce the reliance on the private car for travel to the site by the operational workforce and outage staff. The Operational Travel Plan is proposed to be secured through an obligation in the Draft Deed of Obligation (Doc Ref. 8.17(D)).
12q	Improved walking and cycling facilities as a legacy benefit	Positive	SZC Co. agrees that the proposed walking and cycling improvements will provide a legacy benefit for vulnerable road users.
12r	Highway maintenance burden as a result of additional permanent roads	Negative – maintenance contribution to the highway authority	SZC Co. accepts that there will be a need for a commuted sum for the maintenance of the two village bypass and Sizewell link road, which will be discussed with Suffolk County Council through ongoing workstreams.

15.3 Detailed comments

15.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and there would be little benefit repeating it here. There are, however, a limited number of matters raised in the LIR to which SZC Co. wishes to respond, either because they raise additional issues or because SZC Co. does not accept the way in which they are characterised in the LIR. These are:

- the risks within the transport assessment underline the need for comprehensive monitoring, controls and potential additional mitigation for unforeseen impacts;
- the need for quarterly HGV caps;
- contribution to A12 improvements between Seven Hills and Melton;
- SZC Co. has not fully explored the maximisation of delivery of materials by modes other than road and is not matching the aspirations of other nuclear projects.

15.4 Risks within the Transport Assessment

15.4.1 From paragraph 15.51 to 15.72 the LIR sets out what the Councils consider to be the inherent risks in both the traffic modelling and trip generation assumptions and that, given this, there is a need to impose additional controls and caps within the transport management plans.

15.4.2 It should be noted that since the LIR was drafted, an updated CTMP [REP2-054], CWTP [REP2-055] and TIMP [REP2-053] have been submitted to the examination and many of the comments raised by the Councils with regards to the management and monitoring of Sizewell C vehicles are considered by SZC Co. to have been addressed.

15.4.3 SZC Co. accepts that there are some risks in the assessment but notes that this is the case for all Transport Assessments and therefore consideration needs to be given to the basis and robustness of the assumptions made and whether this presents a greater risk to the assessment than would normally be acceptable. The level of control should be proportionate to the risk in the assessment.

15.4.4 It may be argued that the Project is not 'typical' and that the level of traffic generated by the Project warrants additional controls that would not normally be imposed on a development. It should be noted, however, that Transport Assessments do not typically set out the daily trip generation of

the proposals and concentrate primarily on the trip generation during the network peak periods. Nor do Transport Assessment typically set out the likely variation in traffic between a typical and busiest day and concentrate the assessment only on an average day (e.g. a Transport Assessment for a supermarket does not design mitigation based on the busiest days in the lead up to Christmas but it is accepted that there will be additional queuing and delay at certain times of the year that are unmitigated). Therefore, unlike for the Sizewell C Project, stakeholders are not always fully aware of the level of traffic that a development generates over the course of a typical day or indeed busier days of the year. For example, the Transport Assessment¹¹ for the consented Brightwell Lakes development did not include a forecast of the daily trip generation of the scheme but estimated that the development would generate 6,046 two-way vehicular trips over the 6 hour AM (07:00-10:00) and PM (16:00-19:00) peak periods and assumed that there would be 34% internalisation of trips, resulting in an estimated 3,982 two-way vehicular trips assigned to the highway network over the 6 hour period, which would be predominantly cars. Daily traffic flows would be in excess of this. The agreed package of transport mitigation with Suffolk County Council and Highways England included highway improvements as well as sustainable transport improvements and a Travel Plan but no vehicle caps or controls were imposed on the scheme despite the level of traffic generated and the inherent risk in the assessment and assumptions that may be exceeded in reality (e.g. the level of internal trips may be less than the 34% assumed, which would result in a greater level of external vehicular trips on the highway network).

15.4.5 With regard to the Sizewell C traffic modelling, the Councils state at paragraph 15.53 of the LIR that, given the limitations of the strategic transport model, the scale of network and scale of development, results need to be treated as indicative and with inherent risks. However, transport modelling operates at various levels of detail and scale, covering regions all the way down to single junctions. The Councils do not make reference to the hierarchical modelling approach that has been taken within the **Consolidated Transport Assessment** [REP2-045 to REP2-052] and agreed with the Councils, which includes a suite of traffic models including the strategic VISUM model, which is designed to predict the impact of area wide road-based trip diversion and route choice, and more detailed junction and micro-simulation models, which are designed to predict the impact on the operation of individual junctions or corridors.

15.4.6 At paragraph 15.54 of the LIR the Councils state that the modelling scenarios only represent a snapshot in time. However, the Councils do not

¹¹ Transport Assessment V6 to support the planning application for Land South and East of Adastral Park (planning ref DC/17/1435/OUT)
<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01344559.pdf>

make reference to the derivation of the modelling scenarios and that the 'snapshots in time' have been derived to ensure a robust assessment of the likely significant impacts of the Project. For example, the peak construction scenario represents the construction phase once the key embedded mitigation is in place and assesses the peak HGV movements coinciding with the peak workforce. The **Implementation Plan** [REP2-044] demonstrates that the majority of embedded infrastructure is expected to be operational by the end of Year 2 of the construction phase, including the Sizewell link road and two village bypass, which is the point at which the proposed HGV caps change within the **CTMP** [REP2-054]. **Table 1.5 in Volume 2, Appendix 9A** of the **ES** [APP-196] provides a breakdown of the construction workforce by year. It shows that from year 3 to the end of the construction phase, the workforce at the main development site is forecast to range from 1,280 to a peak of 7,900 people. Likewise, the HGV profile for the whole construction phase, which was submitted in response to **ExQ1 TT.1.16** [REP2-100], demonstrates that the HGV movements will fluctuate during the construction phase in a similar way to the experience at Hinkley Point C. Therefore, the assessment of the peak construction phase has sought to assess the peak of the peak construction phase in order to provide a robust assessment and for the remainder of the peak construction phase traffic flows are expected to be lower than assessed. The same approach has been taken with the other scenarios assessed.

- 15.4.7 Finally, the Councils raise concerns with the inherent risks associated with the trip generation assumptions that have informed the assessment in the **Consolidated Transport Assessment** [REP2-045 to REP2-052] and that additional controls and caps are required in order to mitigate these risks. All Transport Assessments are based on reasonable assumptions and available evidence. For atypical developments, such as nuclear power stations, the standard forms of evidence base (e.g. TRICS trip rate database, Census data, National Travel Survey etc) are not appropriate and therefore a first principles approach is required. At the time of the Hinkley Point C DCO, there had not been a nuclear power station built within the UK since Sizewell B in the 1990s. Therefore, reliance needed to be placed on the expertise of the construction team to derive a reasonable trip generation forecast for the construction phase of the project. Given the lack of comparable evidence from other similar schemes, the highway and local authorities at that time considered that a range of HGV caps and other monitoring requirements would be the most appropriate approach to ensuring that there would not be unmitigated transport impacts. Sizewell C is in a very fortunate position in that it has a wealth of data from Hinkley Point C in order to base the trip generation forecasts on. Given this, it is considered that the inherent risks that the Councils refer to with regard to the trip generation assumptions are overstated and that the proposed monitoring and controls set out in the updated **CTMP** [REP2-054], **CWTP**

[[REP2-055](#)] and **TIMP** [[REP2-053](#)] are reasonable and proportionate to the actual risks in the assessment.

15.5 Quarterly HGV caps

15.5.1 Within the LIR, the Councils have requested that Hinkley Point C style HGV caps are imposed on SZC Co. for the construction phase. For the reasons set out above, a direct transfer of caps from Hinkley Point C to Sizewell C is not considered to be reasonable and instead consideration needs to be given to the necessity and reasonableness of HGV caps in the context of the Sizewell C specific assessment of transport impacts and the evidence base upon which those impacts have been derived.

15.5.2 Hinkley Point C has three types of HGV caps:

- Peak hour HGV limits (i.e. 08:00-09:00 and 17:00-18:00);
- Maximum daily HGV limit; and
- Quarterly HGV limit, whereby HGVs can be generated up to a maximum HGV limit per day but over any quarter the daily HGVs must average to an average quarterly daily HGV limit.

15.5.3 The **CTMP** [[REP2-054](#)] for Sizewell C includes AM and PM peak hour HGV limits and daily HGV limits for the early years, as well as peak hour and daily HGV limits, based on the busiest day for the peak construction phase, once the Sizewell link road and two village bypass are operational. The reason for including these HGV limits is as follows:

- Peak hour HGV limits – EN-1¹² states at paragraph 5.13.8 that “Where mitigation is needed, possible demand management measures must be considered and if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts.” The **Consolidated Transport Assessment** [REP2-045 to REP2-052] includes an A12 VISSIM micro-simulation model to assess the effects of the Sizewell C project on the A12 corridor between Seven Hills and A1152, which is susceptible to peak period congestion. It concludes that the impact on journey times over a 14km corridor are not considered to be significant (i.e. up to 37 seconds increase during the peak construction busiest day for the preferred freight strategy, with all other scenarios and time periods experiencing less increase in journey time on the corridor for the preferred freight strategy) and no

¹²Department of Energy and Climate Change. Overarching National Policy Statement for Energy (EN-1). London: The Stationery Office, 2011.

highway improvements are proposed for this section of the A12. Instead demand management measures are proposed for this section of the A12, which include, but are not limited to, the delivery management system and freight management facility at Seven Hills to enable the control of HGVs on the highway network as well as a direct bus strategy to reduce car trips. The sensitivity of the A12 corridor is recognised by SZC Co. and should the HGV trips be more than assessed, particularly during the network peak periods, then unmitigated impacts may arise. It is for this reason that the peak hour HGV limits are proposed.

- Maximum HGV daily limits – **Volume 1, Chapter 2** of the **ES Addendum [AS-181]** has assessed the environmental transport effects for both the typical and busiest day during the peak construction phase and mitigation is proposed to mitigate significant adverse effects. It is recognised that, should the daily HGV generation exceed the busiest day, then unmitigated impacts may arise. It is for this reason that maximum daily HGV limits for the early years and peak construction phase are proposed.

15.5.4 It is not considered necessary to also have a quarterly average HGV cap for the Sizewell C peak construction phase. The purpose for including the quarterly HGV cap within the Hinkley Point C project was due to the lack of evidence to support the view that there would be variation in daily HGV movements and that every day of the construction phase would not generate the maximum HGV limit. However, as set out above, Sizewell C is in the fortunate position to have a wealth of data available from Hinkley Point C, which has informed the Sizewell C HGV profile. The experience from Hinkley Point C demonstrates that there will be variation in daily HGV flows throughout the Sizewell C construction phase and it will not operate at the maximum HGV flows continuously. It may be argued that the daily variation in HGV flows at Hinkley Point C is a direct consequence of the quarterly average HGV cap and that, were HGV demand to be unfettered, the HGV profile could operate at the maximum daily HGV limit. However, there was a period at Hinkley Point C from April 2018 to September 2019 where the quarterly average cap (i.e. 500 two-way daily HGVs on average per quarter) was by agreement temporarily lifted, allowing for the project to operate at the maximum daily HGV limit (i.e. 750 two-way HGVs per day). **Table 5.2** below shows the HGV movements reported to the Hinkley Point C Transport Review Group during the six quarters that the average quarterly HGV cap was temporarily lifted.

Table 15.2: Hinkley Point C daily average and maximum HGV movements when the average quarterly HGV cap was temporarily lifted.

Quarter	Average daily HGV movements	Maximum number of daily HGV movements
Q2 (April-June) 2018	374	568
Q3 (July-Sept) 2018	356	536
Q4 (Oct-Dec) 2018	354	544
Q1 (Jan-March) 2019	366	532
Q2 (April-June) 2019	380	564
Q3 (July-Sept) 2019	238	532

15.5.5 The evidence in **Table 5.2** demonstrates that the daily HGV trip generation during this 'unfettered period' did not operate at the maximum HGV limit and that there continued to be daily variation in HGV movements well within the maximum HGV limit.

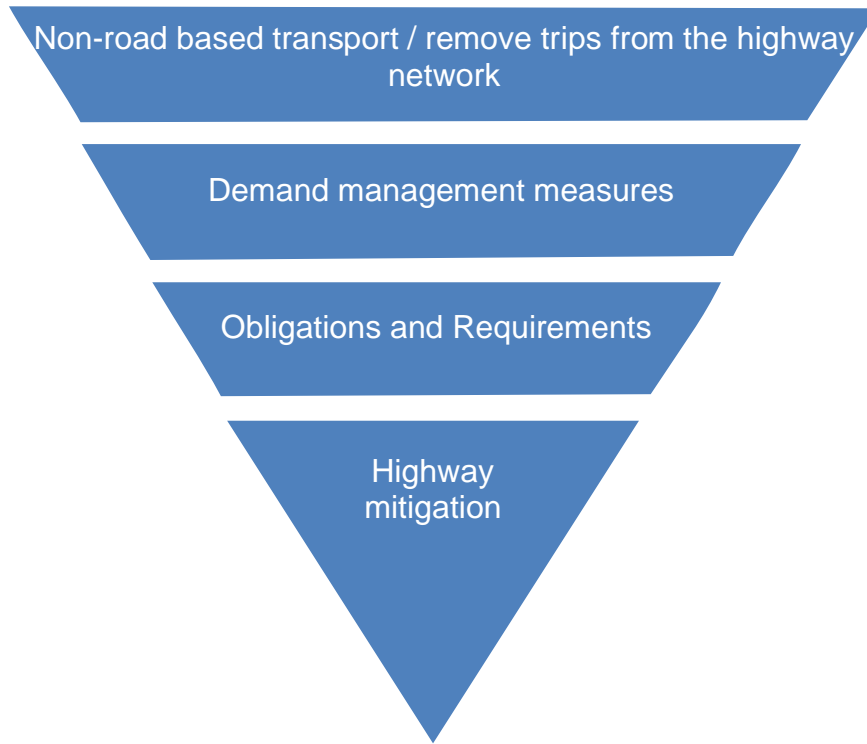
15.5.6 It is therefore considered that there is sufficient confidence and evidence to support the HGV profile and that a quarterly average HGV cap is not necessary or reasonable.

15.6 Contribution to A12 improvements

15.6.1 Suffolk County Council, as highway authority, expects a financial contribution towards improvements to the A12 corridor between Seven Hills and A1152 to mitigate transport related impacts.

15.6.2 **Figure 15.1** illustrates the hierarchy that the Sizewell C transport strategy has been based on, which aligns with EN-1.

Figure 15-1: Sizewell C Transport Strategy Hierarchy



- 15.6.3 In accordance with EN-1, SZC Co. has sought to minimise road-based freight traffic through the delivery of materials and by rail and marine. With regard to the workforce strategy SZC Co. has also sought to remove car trips from the highway network through the provision of the accommodation campus adjacent to the main development site, the proposed park and ride facilities, direct bus strategy and walk and cycle improvements. In addition, SZC Co. has proposed a package of demand management measures within the **CTMP** [REP2-054], **CWTP** [REP2-055] and **TIMP** [REP2-053].
- 15.6.4 As set out above at paragraph 15.5.3 above, SZC Co. considers that, based on the assessment included within the **Consolidated Transport Assessment** [REP2-045 to REP2-052], the residual impact on journey times along the 14km corridor is not significant and as a result no highway improvements are considered to be necessary for this section of the A12 associated with the Sizewell C Project.
- 15.7 **Maximising delivery of materials by rail and marine**
- 15.7.1 The Councils consider that SZC Co. has not fully explored the maximisation of delivery of materials by modes other than road and is not matching the aspirations of other nuclear projects.

- 15.7.2 First, this response sets out further information with regards to the 40% delivery of material by road. Secondly, this section compares the proposed mode split between road and rail/marine with other nuclear projects.
- 15.7.3 As set out in the **Freight Management Strategy** [AS-280], 40% of imported material is considered to require road transport due to its original point or material type, including the relatively small volumes of some materials. The remaining 60% generally represents bulk materials which are suited to either rail or marine transport. It is important to note that the forecast Sizewell C road and rail/marine mode split is for all construction materials over the entire construction phase.
- 15.7.4 **Table 15.3** below replicates Table 2.2 in the **Freight Management Strategy** [AS-280] and provides additional information with regard to the types of materials for each of the material categories or whether the material is to be sourced locally.

Table 15.3: Sizewell preferred modal split for material transport

Materials	Primary mode			Further details on road based materials
	Rail	Marine	Road	
Concrete aggregates	✓	✓		
Backfill aggregates	✓	✓		
Cement and lime powders (for ground improvement)	✓		✓	Majority of the haulage from origin to local stock holding point is proposed to be undertaken by rail with only the final local movements by road to the main development site. Rail direct to site for the powders is not possible due to the delivery of aggregates at the same time, which will utilise the available rail capacity.
Concrete powders	✓		✓	
Tunnel segments	✓		✓	Likely to be manufactured locally
Reinforcement	✓		✓	Potential to be manufactured locally
Other materials			✓	Other materials such as: <ul style="list-style-type: none"> - Asphalt / bitumen, aluminium, canteen supplies and food, ceramics, construction

Materials	Primary mode			Further details on road based materials
	Rail	Marine	Road	
				<p>plant, consumables, epoxy resin, greases, GPR, gypsum, metals, mortar, oils, paint, prefabricated modular buildings, polyester, polypropylene, timber, uPVC, vinyl. Largest single material volume circa 6,000t over project construction.</p> <p>- Enabling works materials for site establishment and construction of rail/marine infrastructure.</p>
Overall ambition	30-50%	10-30%	40%	

- 15.7.5 It can be seen from **Table 15.3** that the road-based materials have potential to be sourced/manufactured locally, making road delivery necessary. In addition, in the case of the “other materials” category the largest single volume is circa 6,000t over the construction phase, which also necessitates road delivery rather than rail or sea delivery due to the small quantities.
- 15.7.6 An argument which has been presented previously is that the road-based materials could be containerised and transported by sea. However, such a solution has a number of challenges and specifically would need a substantially enhanced marine offloading facility (i.e. a MOLF), which has previously been ruled out on environmental grounds.
- 15.7.7 In addition, the nature of the materials remaining to be delivered by road does not suit consolidation into containers, in either characteristics or quantum. To attempt this would require a significant consolidation operation somewhere, such as Felixstowe, transshipping goods from vehicles into containers ahead of shipment by sea. The double and triple handling involved, alongside the land take requirement, would add considerable time and cost.

- 15.7.8 Deliveries currently planned by HGV will be required 24/7/365 and therefore, when the temporary marine bulk import facility (MBIF) is being used for bulk material import, it could not also be used for delivery of containers. This would require having two separate delivery methods for the same materials which would add cost and complexity to the logistics programme and require a redesign of the facility.
- 15.7.9 Weather also plays a part as there are currently constraints which may rule out use of the MBIF in the off season (October to April).
- 15.7.10 With regard to the mode split of other nuclear projects, Hinkley Point C is currently being constructed and the DCO set a target for 80% of the materials used for concrete materials to be delivered via the jetty once the jetty is available. This is not a like for like comparison between the 60% rail/marine mode share forecast for Sizewell C as the 80% target for Hinkley is not for all construction materials over the entire construction phase. A Freight Management Strategy was annexed to the Transport Assessment (duplicated at **Appendix 15A** of this report) submitted to support the Hinkley Point C DCO, which included a breakdown of the estimated materials required for the construction phase and the assumed mode of delivery. Analysis has been undertaken by SZC Co. to determine the mode share forecast within the DCO submission for Hinkley Point C over the entire construction phase, which is included as **Appendix 15B**, and shows that the 80% target via the jetty for concrete materials translates to 43% of the total construction phase materials via the jetty and 57% delivered by road. Therefore, the freight management strategy for Sizewell C will deliver a greater level of materials by rail/marine than Hinkley Point C.
- 15.7.11 With regard to Wylfa, it was forecast that the marine off-loading facility (MOLF) would enable between 60-80% of all construction materials to be delivered by marine with the remaining 20-40% delivered by road. The draft Development Consent Order sought to secure at least 60% of deliveries by sea, which would have resulted in a maximum of 40% of deliveries by road.
- 15.7.12 Requirement WN31 of Schedule 2 of the draft Wylfa DCO stated:
- “WN31 Operation and use of the Marine Off-Loading Facility*
- (1) The undertaker must ensure that during construction of the authorised development at least 60% of all materials required for the construction of the Power Station Works are delivered via the Marine Off-Loading Facility*
- (2) The undertaker must undertake monthly monitoring of material deliveries and report compliance with paragraph (1) to IACC on a quarterly basis.”*

- 15.7.13 The 80% aspiration was set out in the Wylfa Newydd Code of Construction Practice (CoCP). Para 5.8.2 of the Wylfa CoCP, which was to be secured via Requirement PW7 stated:

“In accordance with the Order, at least 60% of all materials required for the construction of the Power Station Works (as defined in the Order) will be delivered via the MOLF, (although Horizon will seek to increase this amount up to 80% where possible). This will limit the amount of material required to be transported by road.”

- 15.7.14 A MOLF is a jetty structure extending a significant distance into the sea to deep water berths that enable larger dry bulk vessels (40,000t+) to moor and offload their cargoes. Typically, such a structure would have multiple berths enabling different types of cargo to be received. This could include AILs (if the design is sufficiently robust) through a Roll-on, Roll-off (RO-RO) design, bulk materials (via conveyor) and other unitised cargoes through enabling appropriate craneage to be located on the jetty. The use of such a facility is less impacted by weather conditions due to its robust design and therefore presents greater opportunity for use all year round.

- 15.7.15 A MOLF was discounted at Sizewell C on environmental grounds and instead a permanent beach landing facility (BLF) is proposed to deliver the heaviest/largest abnormal indivisible loads (AILs) by sea as well as a temporary marine bulk import facility (MBIF) for the delivery of bulk materials during the construction phase. For context and comparison with a MOLF facility, each type of facility is described below:

- The proposed permanent BLF is a short unloading platform that has been designed to limit impact on the marine environment and enable the berthing of north-sea barges (or similar) via a NAABSA (“Not always afloat but safely aground”) berth. The facility is located in shallow water (and is therefore tidally restricted) and the draft of the barge must be set so that when grounded it is level with the jetty deck. This then allows vehicles to drive on and off (Ro-Ro)). Suitable cargoes include AILs which can only be offloaded once the barge has grounded onto the landing platform. AILs would be brought to site mounted on Self Propelled Modular Transport (SPMT) transporters carried on a barge. The barge would approach the BLF and berth at high water and be allowed to ground as the tide falls. The AIL and SPMT would move from the barge to the construction site, and the empty barge (or barge with empty SPMT) would move away on a subsequent rising tide. Weather conditions impact the ability to use such a facility to the extent that during the winter months the deck of

the facility is demobilised thereby removing the ability to use it for circa 5 months of the year.

- The proposed temporary MBIF is designed to receive bulk aggregate materials only from self-discharging vessels into a conveyor system to transport these materials from the unloading platform to the landside storage area. The length of the proposed MBIF has been compromised to minimise the extent / number of marine piles and their impact on the marine environment; this limits the depth available at the berth and the tidal range where the facility can operate to coaster type vessels during high tide. These vessels will not operate at the full capacity, but generally only be partially filled to circa 4,500t payload (potential 6,000t capacity depending on vessel) to ensure sufficient draft and under keel clearance. The facility provides for pedestrian access to enable the required maintenance of the conveyor to be undertaken. This facility is not designed to be able to receive AILs due to the size and weight of loads required to be received as well as the requirement for sizeable vehicular access. Weather conditions have the potential to impact the ability to use such a facility all year around.

15.7.16 It is the number of berths, and significantly greater depth and tidal access that enable higher percentages of materials and types of cargo to be delivered by sea if using a MOLF type facility.

15.7.17 Finally, Bradwell B is at the early stages of the DCO process and the Stage 1 consultation ran in 2020. Within the Stage 1 Consultation document it stated that the initial view was that at least 50% of bulk construction materials could be delivered by rail/marine.

15.7.18 It can be seen from the above overview that the proposed marine/rail mode share of 60% is greater than Hinkley and Bradwell and comparable with Wylfa, although the Wylfa proposals are not proceeding. The aspirational target of 80% by marine at Wylfa was associated with the additional capacity that a MOLF provides, and which is not possible to deliver at Sizewell C.

16. TRANSPORT IMPACTS AT ASSOCIATED DEVELOPMENT SITES

16.1 Overview

16.1.1 Whilst the LIR [[REP1-045](#)] sets out a series of concerns with regards to transport impacts at associated development sites, many of those relate to

matters where agreement has been reached, at least in principle, and discussions are ongoing with the local authorities in order to finalise agreement on details as well as reach agreement on outstanding matters.

16.2 Response to issues: summary

16.2.1 SZC Co. has reviewed Chapter 16 of the LIR and **Table 16.1** below provides a summary response to the LIR's Summary of Impacts table and then provides a response to some of the principal points raised where a response is appropriate.

16.2.2 The detailed comments made in the LIR regarding the transport impacts at associated development sites are addressed further below, although this chapter does not repeat matters which are already set out in documents available to the examination.

Table 16.1: Response to summary of transport impacts at associated development sites

Ref no.	Impact	Summary of LIR	SZC Co. response
18a	Potential for Valley Road to be made pedestrian/cycle only from the proposed LEEIE caravan park	Positive – secured by obligation	SZC Co. supports the proposed closure of Valley Road for pedestrian/cycle access only, which is to be funded through the cycle connectivity fund secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)) and consented through the process set out in Article 22 of the Draft Development Consent Order (DCO) [REP2-015].
18b	Noise and amenity impact of night time train operations at LEEIE rail sidings, including night time loading/unloading of trains.	Negative – code of construction practice, noise mitigation package	This is addressed in Chapter 18 of this report.
18c	Provision of parking facilities for cycles, motorcycles and electric vehicles – potential to reduce the impacts of the park and ride sites and workforce car traffic	Neutral – proposals for the design, construction and removal of the proposed park and ride access, including traffic management, to be submitted to and approved by the highway authority	The park and ride facilities are secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). The Deed of Obligation confirms that SZC Co. shall use reasonable endeavours to carry out and complete the park and ride facilities in accordance with the Implementation Plan [REP2-044], unless otherwise agreed with the local authorities. This includes the timing of the proposed closure of the park and ride facilities. Requirement 21 requires that the related highway works have been completed before the park and ride facilities are brought into use. Requirement 24 requires that within 12 months of completion of the SZC construction, the park and ride facilities must be demolished and returned to agricultural use.

Ref no.	Impact	Summary of LIR	SZC Co. response
			<p>Requirement 20 requires that a statement of compliance is submitted to East Suffolk Council for approval, demonstrating how the detailed design complies with the Associated Development Design Principles. The works must be carried out in accordance with the parameter plans and the approved plans and in general accordance with the Associated Development Design Principles. Any alternative plans need to be in accordance with the parameter plans and the Associated Development Design Principles and will be subject to East Suffolk Council's approval.</p> <p>Requirement 22 requires that the relevant highway works are in accordance with the approved plans and in general accordance with the Associated Development Design Principles. Any alternative plans to be approved by Suffolk County Council must be in general accordance with the Associated Development Design Principles and in the vertical limits of deviation in Article 4. Unless shown on the approved plans, Suffolk County Council must approve any changes to existing finished ground levels of surface water drainage.</p> <p>Requirement 5 requires that details of the surface and foul water drainage system are approved by East Suffolk Council in consultation with Suffolk County Council.</p>
18d	Construction traffic for the construction of associated development sites and later	Negative - proposals for the design, construction and removal of the proposed	Please refer to response to 18c.

Ref no.	Impact	Summary of LIR	SZC Co. response
	removal of temporary associated development sites will create congestion and delay on the local highway network	park and ride access, including traffic management, to be submitted to and approved by the highway authority	
18e	Staff potentially not using the park and ride effecting the overall transport strategy	Neutral/negative – an operational phase plan clearly showing delivery of parking spaces and closure of the site to be submitted to Councils	<p>The park and ride facilities are secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). The Deed of Obligation confirms that SZC Co. shall use reasonable endeavours to carry out and complete the park and ride facilities in accordance with the Implementation Plan [REP2-044], unless otherwise agreed with the local authorities. This includes the timing of the removal of the park and ride facilities.</p> <p>Notwithstanding this, SZC Co. acknowledges Suffolk County Council's comments and will discuss through ongoing workstreams.</p>
18f	Potential legacy benefit of retaining small proportion of parking at southern end of Northern park and ride facility associated with Darsham railway station parking	Positive – to be considered towards end of construction phase	The DCO proposes to reinstate the northern park and ride and therefore, should the Councils wish to retain some of the parking for the railway station, the Councils would need to obtain planning consent via a separate application prior to the proposed reinstatement of the northern park and ride facility.
18g	Improvements of footway and cycling infrastructure linking the site to Wickham Market and Marlesford for southern park and ride	Positive – to be secured by obligation / through DCO plans	A cycle connectivity fund is proposed to be secured via the Draft Deed of Obligation (Doc Ref. 8.17(D)). Discussions are ongoing with the Councils with regards to the scope of the fund but it will include proportionate improvements to walk and cycling facilities to the southern park and ride facility.

Ref no.	Impact	Summary of LIR	SZC Co. response
18h	Increase in workforce car traffic and construction LGV to southern park and ride traffic through Wickham Market	Negative – transport improvement package for Wickham Market to be secured by obligation	In consultation with the Councils and Wickham Market parish council, SZC Co. has developed a package of improvements within Wickham Market, which are to be funded via an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)).
18i	Increased workforce car movement and construction LGV movements as a result of southern park and ride with impacts on B1078 and B1079 corridor	Negative – transport mitigation package for B1078/B1079 corridor to be secured by obligation	In consultation with the Councils, SZC Co. has developed a package of improvements for the B1078/B1079 corridor, which are to be funded via an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)).
18j	Two village bypass removing through traffic from the existing A12 through Farnham and Stratford St Andrew	Positive – proposals for the design and construction access, including traffic management, should be submitted to and approved by the Councils	SZC Co. agrees that the two village bypass will have positive benefits of removing through traffic from the A12 through Farnham and Stratford St Andrew. Requirements 5 and 22 apply – see above.
18k	Two village bypass fails to mitigate the traffic impacts of the development on Marlesford and Little Glemham	Negative – additional mitigation for Marlesford and Little Glemham to be secured by obligation	SZC Co. is currently liaising with the Councils and parish council to develop a package of improvements for Little Glemham and Marlesford, which are to be funded via an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)).
18l	Improved junction layout of A12 / A1094 Friday Street	Positive – detailed design to be approved by Councils to be secured by obligation	SZC Co. agrees that the proposed improvement at A12 / A1094 will provide legacy benefit. Refer to response to 18j with regards to the securing mechanisms for the roundabout.
18m	Permanent environmental impacts of Sizewell link road and two village bypass	Negative – SCC request to construction Sizewell link road as a temporary haul	The removal of the Sizewell link road would require a significant amount of construction activity and would

Ref no.	Impact	Summary of LIR	SZC Co. response
	on biodiversity, landscape, agricultural land	road and remove it after the construction phase. SCC considers that the two village bypass as important legacy benefits, which on balance justifies its retention.	have environmental impacts. SZC Co. propose to retain the Sizewell link road for the reasons set out in SZC Co.'s response to ExQ1 AI.1.33 [REP2-100].
18n	Maintenance burden of additional road infrastructure to SCC as local highway authority (particularly two village bypass and Sizewell link road)	Negative – commuted sum for highway authority to be secured by obligation.	SZC Co. accepts that there will be a need for a commuted sum for the maintenance of the two village bypass and Sizewell link road, which will be discussed with Suffolk County Council through ongoing workstreams.
18o	Sizewell link road – reduce impacts of construction traffic on houses adjacent to current B1122 (Middleton Moor, Theberton and parts of Yoxford)	Positive	SZC Co. agrees that the Sizewell link road will result in reduced impacts of construction traffic for houses along the B1122.
18p	Noise, amenity, severance impact on B1122 prior to completion of Sizewell link road from increased construction traffic	Negative – mitigation package for B1122.	SZC Co. is currently liaising with the Councils to develop a package of improvements for the B1122 to be implemented during the early years, which is to be funded via an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)).
18q	Opportunity, if Sizewell link road is retained, to downgrade current B1122 to become a quiet road, with cycling and walking improvements	Positive – mitigation package for B1122 to be secured by obligation	SZC Co. supports the downgrading of the B1122 once the Sizewell link road is operational and considers this to provide benefits for vulnerable road users. SZC Co. is currently liaising with the Councils to develop a package of improvements for the B1122, which is to be funded via an obligation within the Deed of Obligation [REP2-060].

Ref no.	Impact	Summary of LIR	SZC Co. response
18r	Yoxford roundabout upgrade to existing junction with road safety improvements	Positive – proposals for the design and construction, including traffic management, to be approved by the Councils	SZC Co. agrees that there are capacity and road safety benefits of the proposed Yoxford roundabout. Refer to response to 18j with regards to the securing mechanisms for the roundabout.
18s	Location of freight management facility results in multiple movements of HGVs at strategically important junction, resulting in disruption, delay and risk to road safety at Seven Hills as well as Felixstowe Road and A1156	Negative – proposals for the design and construction, including traffic management, to be approved by the Councils. Additional mitigation measures to be secured by obligation. Monitoring to be secured by obligation.	SZC Co. does not consider that any physical improvements to the Seven Hills junction are required based on the VISSIM traffic modelling summarised in the Consolidated Transport Assessment [REP2-045 to REP2-056]. Highways England has confirmed in the Statement of Common Ground [REP2-069] that they are “reasonably satisfied that the Sizewell C Project will not have a material impact on the SRN and no highway improvements are required over and above the improvements committed as part of the Brightwell Lakes development at the A12/A14 Seven Hills Interchange. However, the predicted impacts will be contingent upon robust management protocols as defined through the CWTP, CTMP and TIMP which are not yet fully agreed.” SZC Co. will continue to liaise with the Councils and Highways England to reach agreement on the CTMP [REP2-054], CWTP [REP2-055] and TIMP [REP2-053].
18t	Potential of queuing back on the highway	Negative – monitoring to be secured by obligation	SZC Co. does not agree that queuing back onto the highway from the freight management facility, especially during incidents on the highway network, is likely to occur. The freight management facility has been designed based on an incident scenario and the need to hold HGVs off the highway network rather than typical operations. For example, the internal site access road

Ref no.	Impact	Summary of LIR	SZC Co. response
			has been designed with queuing capacity with the access control barriers set back a considerable distance from Felixstowe Road in order to avoid any queuing back onto the highway. In addition, the number of HGV parking spaces is based on the ability to hold HGVs for a number of hours, if required.
18u	Reduced capacity for Operation Stack	Negative – monitoring to be secured by obligation	The role of Operation Stack is to stack HGVs on Felixstowe Road in the event that Felixstowe Port is closed, usually due to high winds. It is understood by SZC Co. that Operation Stack is now far less likely to be implemented as Felixstowe Port has improved their on-site operations and delivery management system in recent years in order to better manage deliveries in the event of the Port closure. Likewise, Highways England has recently implemented a variable speed limit scheme for the Orwell bridge, which Highways England considers will reduce the need to close Orwell bridge in the event of high winds. The management of Sizewell C traffic in the event of an incident on the highway network is to be managed via the TIMP [REP2-053], which is to be secured through an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)).
18v	Park and ride sites and freight management facility to be returned to agricultural land after use	Neutral – to be secured by obligation	The reinstatement of the park and ride facilities and freight management facility is to be secured by requirement.
18w	Green Rail Route impact of construction and removal of level crossings – disruption to road users	Negative	The construction and removal of level crossings at Buckleswood Road and Abbey Road will be undertaken using appropriate traffic management controls and

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Ref no.	Impact	Summary of LIR	SZC Co. response
			where possible temporary road surfaces to minimise disruption for road users.
18x	Leiston branch line closure of minor roads	Negative	Temporary closure of minor roads during the upgrade to level crossings on the Leiston branch line will be minimised. Work will be scheduled to keep local alternative diversion routes available.
18y	East Suffolk line improvements in signalling, level crossing safety and noise and vibration measures as legacy	Positive – to be secured with Network Rail	-

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17. ACCESS, AMENITY AND RECREATION

17.1 Overview

17.1.1 SZC Co. has reviewed Chapter 17 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 17.1** below provides a summary response to the principal points raised.

17.1.2 The detailed comments made in the LIR [[REP1-045](#)] regarding amenity and recreation effects are addressed below where appropriate. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

17.1.3 Particular attention is drawn to responses to the first set of Examining Authority questions (ExQ1) [[REP2-100](#)].

17.2 Response to issues: summary

17.2.1 Chapter 17 of the LIR helpfully sets out a table (**Table 19**), which contains a summary of the impacts drawn out in that chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 17.1: Response to access, amenity and recreation

Ref no.	Impact	Summary of LIR	SZC Co. response
19a	Significant adverse impacts on the amenity and recreation value for beach users and of the PRow on the coast path in the Main Development Site, particularly the public footpath (E-363/021/0) and also the proposed England Coast Path National Trail along the coastal frontage	Negative S106 obligation – PRow fund to mitigate negative impacts To be reflected in scale and criteria of PRow Fund, Natural Environment Fund and Community Fund, as well as the Tourism Fund	The significance of effects are acknowledged. Discussions are continuing with the Councils regarding the scale and criteria within the mitigation funds within the Deed of Obligation.
19b	Short term closures of the coast path, with 5.51km longer and less attractive alternative inland route, which is proposed to be partly on-road, and closure and diversion of Sandlings Walk at Goose Hill as a result of closure of permissive path at Goose Hill and public bridleway through the campus site	Negative An agreed protocol/limitations to closures would be required and appropriate agreed off-road diversion would need to be secured through a requirement or obligation.	SZC Co. has outlined the likely frequency and duration of any coast path closures in the Additional Submission in January 2021 (Volume 1 Chapter 2 of the ES Addendum [AS-181] which represents a substantial reduction in closures over the original DCO submission assumption. The protocols for advertising and management of closures of Public Rights of Way will be agreed with SCC and ESC. The off-road diversion of Bridleway 19 (E-363/019/0) route is recorded in the Rights of Way and Access Strategy [REP2-035] and has been agreed with stakeholders and would be secured through the DCO.
19c	Significant concern that proposals will leave public footpath along coast more vulnerable to erosion from coastal processes	Negative	PRow E-363/021/0, and the Coast Path are proposed to follow the same route along the platform east of the hard sea defence, where the higher hard sea defence to the west will screen

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Ref no.	Impact	Summary of LIR	SZC Co. response
		<p>Alternative location of the PRow to the one proposed, to reduce the likelihood of this impact – change required.</p> <p>Coastal Monitoring Plan to include monitoring and mitigation of adverse impacts to the Coast Path – requirement.</p>	<p>lower level buildings and structures within the power station and provide some noise mitigation, allowing people to enjoy the coastal landscape and minimise intrusion from the power station. This is similar to the existing Coast Path and coastal defence alongside Sizewell B. The final alignment will be agreed pursuant to Requirement 12B in the relevant footpath implementation plan.</p> <p>SZC Co. will provide an alternative informal footpath along the top of the hard sea defence which people will be able to use at all times, including if the lower PRow is affected by extreme sea events. The proposed PRow and Coast Path route east of the hard sea defence will be at a higher elevation than the existing PRow and coast path within the main development site, and the existing PRow and coast path to the north and south of the main development site. As set out in the DCO, SZC Co. will maintain the soft sea defence to minimise likelihood of erosion of the PRow and coast path.</p>
19d	<p>Significant adverse operational impacts on the amenity and recreation value of the PRow near the power station, particularly the public footpath (E-363/021/0) and also the proposed England Coast Path National Trail along the coastal frontage.</p>	<p>Negative</p> <p>To be reflected in scale and criteria of PRow Fund and Natural Environment Fund</p>	<p>Agree, in part.</p> <p>Adverse effects on users of PRow during operation are presented in Volume 2 Chapter 15 of the ES [APP-267]. Only users within Receptor Group 12: Minsmere to Sizewell Coast which includes PRow E-363/021/0 would experience significant adverse effects.</p>

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Ref no.	Impact	Summary of LIR	SZC Co. response
19e	Provision of a new off-road bridleway link from the Sandy Lane bridleway south to Lovers Lane and King Georges Avenue junction.	Positive To be secured through the DCO	Agree
19f	Recreational pressures as a result of the public displaced from the beach and from construction workers	Negative Measures to enable workforce to walk or cycle to the main site Cycle infrastructure funding - obligation. Proposed Resilience Funds for National Trust and RSPB - obligation. RAMS payment - obligation.	Measures to enable workforce to walk or cycle to the main site: The bridleway proposals will support cycle and pedestrian journeys for the local construction workforce as they near the main site entrance. The workforce who use the Accommodation Campus will have immediate access to the construction site via pedestrian routes. Construction workers accessing the site from a wider catchment will access the site via the park and ride bringing workers to site on bonded buses. Cycle infrastructure funding – obligation: Agreed. Proposed Resilience Funds for National Trust and RSPB – obligation: Agreed. RAMS payment – obligation: Agreed.
19g	Restoration of existing permissive walking access through Kenton and Goose Hills to the coast route of the Sandlings Walk, retention of the inland alternative Bridleway route which will provide a link in the currently fractured bridleway north-south bridleway network, Provision of a bridleway link from the new bridleway in Aldhurst	Neutral / positive To be secured by obligation. Councils request provision of a permanent public right of way from the beach at the north end of the Sizewell C site, inland to join	Disagree: The provision of a permanent right of way along the route of the Sandlings Walk linking the coast/beach to Bridleway 19 is not possible because SZC Co needs to retain control of permissive footpaths so that access can be temporarily withdrawn with limited or no notice for security reasons. SZC Co. does not foresee that

Ref no.	Impact	Summary of LIR	SZC Co. response
	Farm to public bridleway 19 at the Kenton Hills car park.	Bridleway 19 close to the Kenton Hills Car park - Change required. Closed section of Bridleway 19 to be reinstated post-construction phase - obligation	such closures would happen but needs to retain ability to close the permissive paths if absolutely necessary. This is recorded in the Statement of Common Ground (PRO_8) [REP2-076]. Agreed: SZC Co. confirm that the closed section of BW 19 will be reopened through the DCO.
19h	Significant adverse effects on the amenity and recreation value of the network of PRoW affected by the Sizewell Link Road and the Two Village Bypass	Negative PRoW fund to mitigate negative impacts to be expanded to include all those sites where there is a negative local impact identified and not just those with moderate to major impact identified. - obligation Cycle infrastructure funding - obligation	Agree that receptors where there is a minor adverse effect be included in the parameters for the PRoW Fund within the Deed of Obligation. SZC Co. is awaiting a proposal from SCC setting out the PRoW to be addressed through the fund. Cycle infrastructure funding – obligation: Agreed.
19i	Adverse impacts at Park and ride sites and Freight Management Facility on amenity and recreation	Negative Embedded mitigation in the project through controls in the proposed Code of Construction Practice are proposed for the two park and ride sites and the other Associated Developments. Residual impacts to be reflected in PRoW Fund, Community Fund and/or Natural Environment Fund - obligation	Significant adverse effects are not anticipated. However, in principle, the areas around the sites will be eligible to apply under the funds.
19j	Footpaths diversions at Southern Park and Ride, Two Village Bypass, Sizewell Link Road and Green Rail Route; and temporary PRoW	Neutral Secured through DCO proposals	Agreed that PRoW diversions listed will be secured through the DCO.

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Ref no.	Impact	Summary of LIR	SZC Co. response
	diversions during construction of Associated Development sites	Retention of the additional link provided between the public footpaths affected by the green rail route - DCO plans	The southern part of the diversion of PRoW E-363/006 and E-363/010/0 around the green rail route during the construction phase will be retained and designated as a definitive PRoW on completion of the construction phase. The eastern and northern sections of the temporary diversions will be removed on completion of the construction phase.

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17.3 Detailed comments

17.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and there would be little benefit repeating it here. There are, however, a limited number of matters raised in the LIR to which SZC Co. wishes to respond. These are:

- the Coast Path;
- potential diversion of the Coast Path on to Eastbridge Road;
- access improvements;
- recreational pressures as a result of the public displaced from the beach and from construction workers;
- network of PRow affected by the Sizewell Link Road and the Two Village Bypass;
- tranquillity.

a) Issue 1 The Coast Path

17.3.2 The Coast Path (comprising the Suffolk Coast Path, the future England Coast Path, Sandlings Walk and PRow E-021/363/0 within the main development site) will be kept open at all times during the construction phase except potentially when it might need to be temporarily closed for very short periods in rare circumstances to ensure safety of the public. This is set out in the **Initial Statement of Common Ground** (SoCG) with SCC and ESC [[REP2-076](#)].

17.3.3 SZC Co. has sought to minimise temporary closures of the Coast Path and the need for temporary inland diversions and will continue to do so throughout the pre-construction and construction phases. Further detailed design work included in the Additional Submission submitted in January 2021 (which have been accepted by the Examining Authority) has identified that the Coast Path would now be kept open at all times except in rare circumstances where it is considered unsafe to do so. As noted in **Volume 1, Chapter 2** of the **ES Addendum** [[AS-181](#)].

17.3.4 Further detailed design work, which has been carried out since the submission of the Application, has identified measures which would enable the Coast Path to remain open during construction of the permanent BLF, except in rare circumstances where it is considered unsafe to do so. It would therefore now be assumed to remain open for substantially more of the construction period than in the submitted Application. However, shorter

term temporary closures remain possible. (Paragraph 2.10.38 in **Volume 1 Chapter 2** of the **ES Addendum** [[AS-181](#)]).

- 17.3.5 Further detailed design work since the submission of the Application has also identified measures which would enable the Coast Path to remain open at all times during use of the permanent BLF. This is an improvement to the proposals presented in the Application which stated that closure of the Coast Path would be unavoidable at times due to the sea-borne delivery of exceptionally large and heavy materials. (Paragraph 2.10.40 in **Volume 1, Chapter 2** of the **ES Addendum** [[AS-181](#)]).
- 17.3.6 The Coast Path would be kept open during construction of the temporary BLF, except in rare circumstances where it is considered unsafe to do so, and would be kept open during operation of the temporary BLF. (Paragraph 2.10.54 in **Volume 1, Chapter 2** of the **ES Addendum** [[AS-181](#)]).
- 17.3.7 SZC Co. does not anticipate that the Coast Path would need to be closed at any time during the operational phase.
- 17.3.8 The Coast Path is proposed to run along the platform east of the hard sea defence, where the higher hard sea defence to the west will screen lower level buildings and structures within the power station and provide some noise mitigation, allowing people to enjoy the coastal landscape and minimise intrusion by the power station. This is similar to the existing Coast Path's position in relation to the coastal defence alongside Sizewell B.
- 17.3.9 SZC Co. will provide an alternative informal footpath along the top of the hard sea defence. This will be within the permanent coastal margin (permanent accessible coastline which is being established by Natural England) which people will be available to use at all times, including if the lower Coast Path is eroded by extreme sea events. The proposed Coast Path route east of the hard sea defence will be at a higher elevation than the existing PRow, Suffolk Coast Path and Sandlings Walk, and Natural England's proposed route of the future England Coast Path, within the main development site, and the existing routes to the north and south of the main development site. In extreme storm events it is likely that the PRow, Suffolk Coast Path, Sandlings Walk and future England Coast Path to the north and south would be eroded before the proposed permanent Coast Path within the main development site which would, therefore, become isolated should such events occur.
- 17.3.10 SZC Co. will maintain the soft sea defence to minimise likelihood of erosion of the Coast Path.
- 17.3.11 The Coast Path will be above Highest Astronomical Tide level.

- 17.3.12 The Coast Path will have a suitable firm surface and the specification will be agreed with the Highways Authority in relation to the definitive right of way, in addition to Natural England in relation to the England Coast Path.
- 17.3.13 SZC Co. does not plan to constrain the Coast Path by fencing during construction.
- b) **Issue 2 Potential diversion of the Coast Path on to Eastbridge Road**
- 17.3.14 There is likely to be a reduction in pedestrian use of Eastbridge Road between the northern end of the Accommodation Campus and Eastbridge during the construction phase, due to the construction of the Sizewell C Project. A proportion of existing walkers on Eastbridge Road are likely to stop using it and walk elsewhere during construction given the proximity of construction activity.
- 17.3.15 Sandlings Walk currently runs along this section of Eastbridge Road. For the duration of the construction phase (except when the Coast Path within the main development site is temporarily closed) Sandlings Walk would be diverted northwards along the coast north of the main development site and west along PRoW E-363/020/0 to Eastbridge, avoiding this section of Eastbridge Road north of the campus, as shown on Figure 15l.1 in **Volume 2, Chapter 15, Appendix 15l** of the **ES [APP-270]**. This is also likely to lead to a reduction of walkers on this section of Eastbridge Road for the majority of the construction phase.
- 17.3.16 In the rare occasion that the Coast Path needs to be temporarily closed and the inland diversion is required during the construction phase it would follow the route shown on Figure 15l.4 of the updated **Rights of Way and Access Strategy [REP2-035]**. This route is off-road except at road crossings and approximately 470m length on Eastbridge Road between the northern end of the proposed off-road bridleway (Bridleway 19 diversion) north of the accommodation campus and Eastbridge.
- 17.3.17 SZC Co. agrees to monitor pedestrian use to identify if temporary closures of the Coast Path during construction lead to increase in walkers on Eastbridge Road, and if this leads to risks to pedestrian and vehicle safety, and to implement mitigation measures (to be agreed with SCC) which would be put in place should this occur.
- c) **Issue 3 Access improvements**
- 17.3.18 The following additional permanent provision of linear and area access is provided at the main development site and adjoining the green rail route during the construction phase and retained permanently. Paragraph

references refer to the updated **Rights of Way and Access Strategy** [[REP2-035](#)].

- A new approximately 4.5km long offroad bridleway from Sizewell Gap in the south of the accommodation campus in the north (paragraphs 1.2.15 and 1.2.36 of the **Rights of Way and Access Strategy** [[REP2-035](#)]). Part of this would accommodate the temporary Bridleway 19 diversion during the construction phase.
 - A new bridleway link between the above offroad bridleway in the south-east field of Aldhurst Farm and Valley Road (paragraphs 1.2.19 and 1.2.36).
 - A new footpath connection between the offroad bridleway within the northern field in Aldhurst Farm and Bridleway 19 and the permissive footpath network in Kenton Hills from approximately the second year of the construction phase (paragraphs 1.2.20 and 1.2.36). This would be dedicated as a PRow (bridleway) on the commencement of the operational phase. This is Change 15 described at **section b) xii) of Volume 1, Chapter 2** of the **ES Addendum** [[AS-181](#)], and shown on **Figure 2.2.32 of Volume 2, Chapter 2** of the **ES Addendum** [[AS-190](#)].
 - A new informal car park, a surfaced footpath, and approximately 27 hectares of new Open Access land, including areas where dogs will be allowed to be exercised off-lead (paragraphs 1.2.26 and 1.2.38) will be provided through condition 25 of the original Aldhurst Farm planning application (DC/14/4224/FUL). The car park will be increased to 20 spaces early in the construction phase to allow for additional users of the recreational access network, and funding provision for this is to be included in the **draft Deed of Obligation** (Doc. Ref 8.17(D)).
 - Improvements to Kenton Hills car park including additional spaces, management of vegetation and signage (paragraphs 1.2.24 and 1.2.39). This will provide up to 15 additional parking spaces allowing for greater use of the recreational access network including the permissive footpath network in Kenton Hills. This is included within the **draft Deed of Obligation** (Doc. Ref. 8.17(D)).
- d) **Issue 4: Recreational pressures as a result of the public displaced from the beach and from construction workers**

17.3.19 Recreational pressures as a result of displacement of the public from the vicinity of the main development site during construction, and from

construction workers, have been factored into the assessment of effects on recreation receptors in **Volume 2 Chapter 15 (Amenity and Recreation) of the ES** [APP-267]. This work was informed by research on the existing use of the area for recreation including visitor surveys undertaken by SZC Co. in consultation with consultees including SCC, ESC, Natural England, the RSPB, the Suffolk Wildlife Trust and the National Trust. The results of the visitor surveys are in **Volume 2 Appendices 15A, 15B, 15D and 15E** of the **ES** [APP-268, APP-269 and APP-270]. The results from questions on displacement in the **2014 Visitor Surveys (Volume 2, Appendix 15A** of the **ES** [APP-268]) were used to identify the potential for additional recreational pressure at locations named by respondents.

17.3.20 SZC Co. has provided detailed responses on recreational pressure at European sites in response to **ExQ1 AR.1.12** [REP2-100], and further responses to issues raised by the RSPB, Suffolk Wildlife Trust and the National Trust in their responses to **ExQ1 AR.1.12** [REP2-149] at Deadline 3 (Doc Ref. 9.30). SZC Co. refers the Examining Authority to these responses and the detail is not repeated here.

e) **Issue 5 Network of PRow affected by the Sizewell Link Road and the Two Village Bypass**

17.3.21 The principle of both new roads is, of course, supported by the Councils. Some effects on rights of way are inevitable but SZC Co. has worked closely with SCC in particular to develop effective mitigation. Effects on users of the network of PRow at the Sizewell Link Road and the Two Village Bypass are assessed in **Volume 5, Chapter 8** [APP-429] and **Volume 6, Chapter 8** [APP-464] of the **ES** respectively. SZC Co. agree that receptors where there is a minor adverse effect be included in the parameters for consideration under the PRow Fund within the Deed of Obligation. SZC Co. is awaiting a proposal from SCC setting out the PRow to be addressed through the Fund.

f) **Issue 6 Tranquillity**

17.3.22 Effects on tranquillity are assessed as part of the overall assessments of effects on recreational receptors in the Amenity and Recreation chapters of the ES, for the main development site and the associated development sites.

17.3.23 SCC has agreed with the overarching methodology for the assessment of impacts on amenity and recreation, including tranquillity, in the **Initial SoCG** with SCC and ESC [REP2-076], for the main development site (PROW_ES_5), and the associated development sites.

17.3.24 ESC state in their response to **ExQ1 NV.1.5** as follows:

“ESC acknowledges that an appropriate assessment of noise impacts on tranquillity at amenity and recreation receptors has been completed, in that the inputs (noise levels and observation scores) and outputs (tranquillity scores and conclusions) presented in Chapter 15 the ES are in line with ESC’s expectations. The assessment in Chapter 15 necessarily balances various impacts on these receptors, not just noise.”

18. NOISE AND VIBRATION

18.1 Overview

18.1.1 SZC Co. has reviewed Chapter 18 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 18.1** below provides a summary response to the principal points raised.

18.1.2 The detailed comments made in the LIR [[REP1-045](#)] regarding noise and vibration effects are addressed below where appropriate. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

18.1.3 Particular attention is drawn to responses to the first set of Examining Authority questions (ExQ1).

18.1.4 It is noted that a number of points set out in Chapter 18 of the LIR have either been superseded or have evolved through discussions between SZC Co. and the Councils. These points are highlighted where it is considered helpful to inform the ExA’s understanding of the current position.

18.2 Response to issues: summary

18.2.1 Chapter 18 of the LIR sets out a table (**Table 20**), which contains a summary of the impacts drawn out in that Chapter. That approach also provides a convenient basis for providing SZC Co.’s response in summary, whilst certain matters are set out in more detail further below.

Table 18.1: Response to summary of noise and vibration impacts

Ref No.	Impact	Summary of LIR	SZC Co. Response
20a	Adverse to significant adverse noise and vibration impact of construction activity of Main Development Site on residential receptors persisting length of construction period, with some of the construction taking place 24 hours a day	Negative Mitigate/compensate: Noise mitigation and compensation scheme, to be offered to residents at a lower significance value than the current SOAEL – obligation.	The 24-hour nature of the construction works at the Main Development Site was a key factor in the selection of lower thresholds marking the onset of a significant adverse effect, in an EIA context. The mix of activities, which include what might be considered traditional construction activities, rail movements and unloading activities, vehicle movements and earth-moving operations, combined with the extended duration of the overall works programme and 24-hour working during some periods, resulted in the adoption of a precautionary approach in terms of setting assessment criteria, which have in turn been incorporated into the Code of Construction Practice (CoCP) [REP2-056]. Further detail of the proposed noise monitoring and management measures will be set out in the 'Noise Monitoring and Management Plans', which will be subject to agreement with ESC. The provisions of the Noise Mitigation Scheme [REP2-034] remain under discussion between SZC Co. and ESC to determine whether a lower eligibility threshold might be appropriate where works are undertaken over extended periods of time.
20b	Change to the existing rural noise climate around Main Development Site affecting amenity and recreation	Negative Mitigate/compensate: To be reflected in mitigation and compensation measures for amenity and recreation and natural environment (including Natural Environment Fund)	The effects of the construction work on the rural noise climate are temporary, albeit long-term, and those effects will cease when the construction work ceases. Measures to minimise noise during construction are set out in the Code of Construction Practice (CoCP) [REP2-056]. Further measures to minimise effects on recreational receptors due to changes in noise during construction are set out in section 15.5 of Volume 2, Chapter 15 of the ES [APP-267].

Ref No.	Impact	Summary of LIR	SZC Co. Response
			<p>However, there will be residual adverse effects during construction and this is reflected in mitigation and compensation measures in the draft Deed of Obligation [REP2-060].</p> <p>The potential effects of operational noise on the rural noise climate have been considered in detail using the Natural Tranquillity Method.</p> <p>Paragraph 15.6.222 in Volume 2, Chapter 15 of the ES [APP-267] sets out the findings, concluding:</p> <ul style="list-style-type: none"> • Changes to the noise environment due to the operation of the proposed development would have limited effects on recreational receptors. • There would be little change in tranquillity, with only a slight change to users of the Suffolk Coast Path, Sandlings Walk, and future England Coast Path on the coast and the accessible coast adjacent to and near the proposed Sizewell C power station, and a short section of Bridleway 19 on Sandy Lane and a short section of the permissive footpath and Sandlings Walk near the SSSI crossing. <p>On this basis, no mitigation or compensation measures have been identified.</p>
20c	Potential for adverse impact to sensitive receptors from additional noise during operation of the power station	<p>Negative</p> <p>(1) Selection of suitably protective operational night time noise criteria should be the primary control, otherwise;</p>	<p>(1) Discussions between SZC Co. and ESC/SCC are ongoing on the appropriateness of the night-time criterion adopted as the LOAEL for operational power station noise.</p> <p>The LOAEL was based on the 40dB L_{night} value that the World Health Organisation state</p>

Ref No.	Impact	Summary of LIR	SZC Co. Response
		(2) Mitigate/compensate: Noise mitigation and compensation scheme, to be offered to residents at a lower significance value than SOAEL - obligation	<p><i>“should be the target of the night noise guideline (NNG) to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly.”¹³</i></p> <p>Since an external value of 40dB L_{night} is considered to provide sufficient protection to the most vulnerable groups in society, it follows that there is negligible prospect of an adverse effect.</p> <p>The World Health Organisation guideline values are levels below which effects can be assumed to be negligible, and are not limits above which impacts necessarily occur; significant effects are not likely to occur until much higher degrees of exposure.</p> <p>(2) As set out above, there are ongoing discussions on operational noise relating to the LOAEL, which is understood to be the point of concern in respect of operational noise. It is not considered necessary to offer noise insulation below the SOAEL for operational noise.</p>
20d	Continuous plant noise with tonal/other characteristics that would change the sound climate and character of areas on a semi-permanent basis	<p>Negative</p> <p>Mitigate/compensate: To be reflected in mitigation measures for amenity and recreation and natural environment (including Natural Environment Fund)</p>	<p>The existing noise climate in the vicinity contains an audible tone from Sizewell B Power Station. The geographical extent of the audibility of a tonal sound is likely to increase due to the operation of Sizewell C and there is no practical way to reduce this tonality off-site; it is an inevitable consequence of the operation of a power station.</p>

¹³ World Health Organisation ‘Night Noise Guidelines’ (2009), page xviii

Ref No.	Impact	Summary of LIR	SZC Co. Response
			The effects of the operation of the power station on the noise climate in the area have been considered in detail, as described in the reply to 20b above.
20e	Adverse impact from rail freight movements along East Suffolk Line and Leiston Branch Line, particularly night-time noise	<p>Negative</p> <p>(1) Reduce: Engineering and operation solutions including continued welding delivered by Network Rail– obligation</p> <p>(2) Reduce/Mitigate: Wide ranging other mitigation measures in addition to those currently proposed, such as acoustic fencing/boundary treatments or insulation to properties beyond upgraded glazing – obligation</p> <p>(3) Mitigate/compensate: Noise mitigation and compensation scheme, to be offered to residents at a lower significance value than SOEL - obligation</p>	<p>(1) The draft Rail Noise Mitigation Strategy [AS-258] sets out the proposed operational and physical measures to limit railway noise and vibration, which has effect at properties affected by railway noise irrespective of whether they fall above or below LOAEL or SOAEL.</p> <p>(2) Discussions continue between SZC Co. and Network Rail to establish the feasibility of further measures.</p> <p>(2) and (3) The latest version of the Noise Mitigation Scheme [REP2-034] offers noise insulation at a lower level of railway noise than had originally been proposed, and provides a means for considering and addressing solutions that go beyond glazing, for example in historic buildings. These changes have been made following discussion between SZC Co. and ESC/SCC.</p>
20f	Benefits from a reduction in noise and vibration for residents on the A12 in Farnham and Stratford St Andrew, and residents on the B1122 past Middleton Moor and through Theberton	<p>Positive</p> <p>n/a</p>	The permanent, long term noise, and wider environmental, benefits of the two village bypass and the Sizewell link road for the residents of Farnham, Stratford St Andrew, Middleton Moor and Theberton are material and should not be over-looked. The two roads will provide a long-lasting benefit to the residents of these

Ref No.	Impact	Summary of LIR	SZC Co. Response
			villages by reducing the traffic noise on the A12 at these key locations.
20g	Adverse impacts from noise and vibration of constructing Associated Development	Negative Mitigate/compensate: Noise mitigation and compensation scheme, to be offered to residents at a lower significance value than the current SOAEL - obligation	As with any construction works, a level of noise generation and potential disturbance is inevitable, however the mitigation and control measures in the Code of Construction Practice (CoCP) [REP2-056] are considered to be the appropriate steps to mitigate and minimise adverse effects. Further detail of the proposed noise monitoring and management measures will be set out in the 'Noise Monitoring and Management Plans', which will be subject to agreement with ESC. The provisions of the Noise Mitigation Scheme [REP2-034] will apply providing noise insulation to those properties that meet the qualifying criteria.
20h	Adverse noise and vibration impacts resulting from additional road traffic, particularly HGVs, with currently proposed design measures not representing mitigation for reducing road traffic noise at source.	Negative (1) Reduce: Provision for new quiet road surfaces and, if and where applicable, roadside noise barriers, as well as landscaping – obligation (2) Mitigate/compensate: Noise mitigation and compensation scheme, to be offered to residents in line with the Noise Insulation Regulations 1975 (as amended 1988) - obligation	(1) This remains under discussion between SZC Co. and ESC/SCC. Further steps may be taken to mitigate and minimise adverse effects, as is appropriate between LOAEL and SOAEL, as part of the detailed design of the road, which may include the use of a quiet road surface. This was not originally proposed as this road surface is more expensive to maintain. However, this further mitigation measure could be agreed with Suffolk County Council (SCC) within the SoCG. (2) The provisions of the Noise Mitigation Scheme [REP2-034] will apply providing noise insulation to those properties that meet the qualifying criteria. The Noise Mitigation Scheme offers noise insulation based on criteria that are more generous than the Noise

Ref No.	Impact	Summary of LIR	SZC Co. Response
			Insulation Regulations 1975 (as amended 1988) ¹⁴ , as a criterion is included for night-time noise, and the road does not require amendment for eligibility to be established, only the presence of the SZC construction vehicles. These two components of the Noise Mitigation Scheme go beyond the statutory provision.
20i	Potential for legacy benefit if noise reducing rail infrastructure improvements are undertaken.	Positive Noise mitigation and compensation scheme, to be offered to residents at a lower significance value than the current SOAEL – obligation.	The mitigation stated by the councils as necessary does not relate to the stated impact description, which in this instance, is viewed as a benefit. The potential long-term benefits for those living in close proximity to the East Suffolk line will primarily derive from improvements to the track infrastructure.
20j	Sports facilities at Leiston Leisure Centre / Alde Valley Academy	Negative Potential to cause noise impacts on nearby residential properties – mitigation through requirement / obligation including controlling hours of operation	Mitigation is proposed, in the form of an acoustic fence, to reduce noise from the use of the sports facilities, and subject to that mitigation, no adverse effects are expected from the construction or use of the sports facilities.

¹⁴ UK Government. The Noise Insulation Regulations 1975 (as amended 1988) (SI 1988 No 2000)

18.3 Detailed Comments

18.3.1 Paragraph 18.8 of the LIR notes that Appendix 2.6 contains technical memoranda that contain a review of elements of the submitted noise and vibration assessments. SZC Co. has responded to the points raised in these technical memoranda, and others, with the responses set out in **Appendix 11A** of the draft **Statement of Common Ground** with the Councils [[REP2-076](#)]¹⁵.

18.3.2 The answers provided by SZC Co. to the questions raised in the technical memoranda have assisted in resolving a number of issues between the parties, some of which are also raised in the LIR. Without repeating in full the answers set out in **Appendix 11A** of the draft **Statement of Common Ground** [[REP2-076](#)], this section of the document will highlight the key areas where matters have progressed since the LIR was drafted.

18.3.3 Paragraph 8.12 of the LIR notes that there will be a need for:

“...ongoing revisiting of assessments to take account of uncertainty and new information and monitoring in future to ensure the soundness of the current predictions to ensure adequate protection is provided.”

18.3.4 The expectation that the assessments will be revisited is repeated in paragraphs 18.37 and 18.90 of the LIR:

“It is important that assessments are revisited, and monitoring undertaken to validate predictions in order to ensure impacts are not underestimated and mitigation is adequate and appropriately selected and applied.” (para 18.37)

“It is likely there will be a level of impact that must be accepted and that the assessments, however accurate, may underestimate an impact, methodologies may change, or other properties may be affected. Therefore, there must be an acceptance that the assessment for this scheme is an ongoing matter in order to address these uncertainties and ensure impact is addressed.” (para 18.90)

18.3.5 If consented, there are two key controls that will include the facility for reviewing and updating parts of the assessment, but there will not be an ongoing process of updating the entirety of the assessment. The important

¹⁵ It is noted that Appendix 11A was omitted from the draft SoCG submitted at Deadline 2, and will be submitted at Deadline 3.

consequence of updating the assessments, where that is required, is to maintain an appropriate level of mitigation.

- 18.3.6 The two key documents that will facilitate a review and, if appropriate, an update of the assessments are:
- The **Noise Mitigation Scheme** [REP2-034], which requires a refreshed assessment, based on up-to-date information, to identify properties likely to be eligible for noise insulation. The **Noise Mitigation Scheme** also includes provision for further updates should conditions or construction methods change.
 - The 'Noise Monitoring and Management Plans', which form part of the **Code of Construction Practice (CoCP)** [REP2-056], will facilitate the implementation of appropriate mitigation and control measures, recognising any changes to construction methods.
- 18.3.7 At paragraph 18.12 of the LIR the Councils acknowledge that there is a high level of uncertainty in the noise and vibration assessment, however, the Councils suggest that this uncertainty may have led to an under-estimate of the potential noise or vibration levels in the assessments.
- 18.3.8 It is SZC Co.'s opinion that the opposite is more likely, that where there are elements of uncertainty regarding, for example, particular working methods, durations, or timings, the adopted assumptions were generally overly cautious and the resultant calculated noise or vibration levels are likely to be over-estimated rather than under-estimated.
- 18.3.9 An example of this approach is in the potential for phases or sub-phases of construction work to overlap. The noise calculations assume that each activity lasts for the duration of the phase, and that all sub-phases occur simultaneously, as stated in section 1.3.3 in **Volume 2, Appendix 11B** of the **ES** [APP-204] ; this overlapping of phases and sub-phases is unlikely to occur in practice, but leads to an over-estimate of noise or vibration levels and a more robust assessment.
- 18.3.10 The distinction between a significant observed adverse effect on health and quality of life, as described in planning policy, and a significant adverse effect in an EIA context, is discussed in paragraphs 18.17 to 18.24 of the LIR, and SZC Co. has addressed this point in its **Responses to the Examining Authority's First Written Questions (ExQ1)** [REP2-100], most notably at **NV.1.75**, as well as in **section 3** in **Appendix E of Appendix 11A** of the draft **Statement of Common Ground** with the Councils [REP2-076].

- 18.3.11 The documents referred to by the Councils in paragraph 18.21 (Thames Tideway Tunnel decision and Cranford Agreement Appeal for Heathrow Airport), and paragraph 18.23 (Design Manual for Roads and Bridges (DMRB) LA111¹⁶) are relevant because the policy tests are materially the same as those in NPS EN-1¹⁷.
- 18.3.12 In all cases, the policy derives ultimately from the NPSE which provides a common policy framework on this issue across the planning regime. The three aims of the NPSE¹⁸ are the same as the three aims set out at NPS EN-1 paragraph 5.11.9, in the National Policy Statement for Waste Water¹⁹ at paragraph 4.9.9 (relevant to Thames Tideway Tunnel), and in the National Policy Statement for National Networks²⁰ at paragraph 5.195 (relevant to DMRB LA111).
- 18.3.13 Page 4 of the Technical Memoranda M003, which appears in Appendix 2.6 of the LIR, confirms that this equivalence is not disputed by the Councils, and it therefore follows that they must accept the relevance of the highlighted documents to the point being made.
- 18.3.14 The discussions with the Councils suggest that the LIR may no longer reflect their view on this point. It is noted that in its responses to ExQ1 NV.1.75(iv) and NV.1.18, ESC does not actively dispute SZC Co.'s approach on this point.
- 18.3.15 Paragraph 18.26 of the LIR notes:
- “...there is an expectation that there will be cooperation with the Environmental Protection Team at ESC in finding a resolution when these inevitable complaints are received and found to have merit.”*
- 18.3.16 The broad principles of the liaison and cooperation between SZC Co. and their contractors, and the Councils, with respect to the management and control of the construction works have been discussed and the ‘Noise Monitoring and Management Plans’, which form part of the **Code of Construction Practice (CoCP)** [REP2-056], will include provisions to formally document that process. A complaints resolution process will also be included in those documents.

¹⁶ Design Manual for Roads and Bridges (DMRB) LA 111 Noise and vibration
<https://www.standardsforhighways.co.uk/prod/attachments/cc8cfc7-c235-4052-8d32-d5398796b364?inline=true> [Accessed June 2021]

¹⁷ DECC (2011) Overarching National Policy Statement (NPS) for Energy (NPS EN-1)

¹⁸ DEFRA (2010) Noise Policy Statement for England

¹⁹ DEFRA (2012) National Policy Statement (NPS) for Waste Water

²⁰ Department of Transport (2014) National Policy Statement (NPS) for National Networks

- 18.3.17 Paragraph 18.38 of the LIR seeks to relate impacts and mitigation only to the policy tests of LOAEL²¹ and SOAEL, overlooking the important role that significant adverse effects, in an EIA context, play in the assessment.
- 18.3.18 As described in **Appendix E** of **Appendix 11A** of the draft **Statement of Common Ground** [[REP2-076](#)], the emergence of updated Government guidance on road traffic noise in late 2019 resulted in a review of the assessment criteria that had been discussed with the local planning authorities in the period up to May 2019.
- 18.3.19 The Councils' linking of impact identification and mitigation design solely to the policy tests of LOAEL and SOAEL ties in with the previously identified approach, where significant adverse effects, in an EIA context, were directly aligned with SOAEL.
- 18.3.20 Following the release of the updated DMRB in November 2019, it was clear that the significant observed adverse effects on health and quality of life in policy terms, and significant adverse effects in an EIA context, were not equivalent, and previous planning decisions (Thames Tideway Tunnel and the Cranford Agreement Appeal for Heathrow Airport) which drew a distinction between the two, outlined the appropriate approach.
- 18.3.21 The position expressed by the Councils in paragraph 18.38 of the LIR suggests that the policy tests are the sole drivers for impact identification and mitigation, which underplays the role of the EIA Regulations in the process.
- 18.3.22 A significant adverse effect, in an EIA context, is typically identified in the submitted noise and vibration assessments at a lower level than SOAEL, giving importance to effects at that lower level in terms of how and where mitigation is applied.
- 18.3.23 The effect of the LOAEL, which requires mitigation to reduce and minimise adverse effects, is largely unchanged by SZC Co.'s revised approach to significant effects.
- 18.3.24 Overall, differentiating between a significant adverse effect in an EIA context and a significant observed adverse effect on health and quality of life in a policy context has not reduced the rigour of the noise assessment, nor materially affected the conclusions of the ES, but does better reflect the policy framework. Neither has it materially affected the approach to mitigation.

²¹ Lowest observed adverse effect on health and quality of life

18.3.25 The LIR notes at paragraph 18.38:

“If the LOAEL and particularly the SOAEL proposed by the Applicant remain unchanged the Councils would expect that the Noise Mitigation Scheme should be available at a level lower than SOAEL in order to adequately protect residents.”

18.3.26 SZC Co. is content that the values adopted for LOAEL and SOAEL are both robust and appropriate and there is no intention to revise those values. However, at the request of the Councils, the threshold at which properties qualify for noise insulation as a result of railway noise has been reduced in the **Noise Mitigation Scheme** [REP2-034].

18.3.27 The first draft of the **Noise Mitigation Scheme** [REP2-034] proposed a façade L_{AFmax} threshold of 80dB as the trigger value for noise insulation for railway noise, and that has now been reduced to a façade L_{AFmax} threshold of 73dB. This is equivalent to reducing the trigger threshold from the SOAEL to the level at which a significant adverse effect occurs in an EIA context. This approach exceeds the requirements of policy and is in any event, a more generous threshold than is applied in the Noise Insulation Regulations²² for railways, which do not recognise a trigger threshold based on maximum noise levels.

18.3.28 Discussions are ongoing regarding the Councils' desire to reduce the qualifying threshold for construction noise from the Main Development Site, in recognition of the duration of the works. Any necessary updates will be made to the **Noise Mitigation Scheme** to reflect the outcome of those discussions.

18.3.29 Other changes made to the **Noise Mitigation Scheme** [REP2-034] as a result of discussions between SZC Co. and the Councils are:

- The requirement to review or revisit the refreshed assessment at a later date to determine whether other properties have become eligible; it is no longer a pre-commencement task that is not visited again.
- The ability to bring forward mitigation other than glazing and/or ventilation where older properties require improvements to other aspects of their insulation.
- The provision of assistance for those that may require Listed Building Consent, and commencing the process for those properties earlier to allow time for such consents to be secured.

²² The Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996 (SI 1996 No 428)

- 18.3.30 The request for these changes is reiterated at paragraph 18.94 of the LIR and SZC Co. is content that the Councils' requests have been addressed.
- 18.3.31 At paragraph 18.40 of the LIR, the Councils identify certain types of construction work that they would not expect to occur outside normal working hours, including sheet piling, vibratory roller/compaction plant, surface breaking, and bulldozer movements.
- 18.3.32 A process for agreeing the measures required to control such works, including their timing, will be set out in the 'Noise Monitoring and Management Plans', which form part of the **Code of Construction Practice (CoCP)** [[REP2-056](#)].
- 18.3.33 Paragraph 18.53 of the LIR highlights the potential for the proposed sports facilities at Alde Valley Academy to give rise to adverse effects:
- “Use of the expanded sports facilities at the Leiston Leisure Centre / Alde Valley Academy during the construction and operational phase could result in noise impacts, see para 18.35 for details.”*
- 18.3.34 While this matter remains under discussion between the parties, SZC Co.'s position is that adverse effects from the construction or use of the sports facilities at Alde Valley Academy are unlikely, once mitigation that includes a 2m high acoustic fence is taken into account, as set out in **Volume 2, Chapter 11** of the **ES** [[APP-202](#)].
- 18.3.35 Paragraphs 18.63 and 18.65 of the LIR make the same point in relation to the provision of mitigation for railway noise and the **Freight Management Strategy** [[AS-280](#)] respectively, and the need for the **Noise Mitigation Scheme** to take effect for railway noise at a lower level than the SOAEL:
- “We would expect mitigation and minimisation to occur at LOAEL as per policy, avoidance at SOAEL as per policy but also expect that the Rail Noise Mitigation Scheme should be available at a level lower than SOAEL in order to adequately protect residents.”*
- 18.3.36 Whilst there is no policy requirement to avoid LOAEL, ZC Co.'s draft **Rail Noise Mitigation Strategy** [[AS-258](#)] provides a comprehensive suite of measures relating to the physical rail infrastructure and operational controls on trains, and the **Noise Mitigation Scheme** [[REP2-034](#)] has been amended to trigger eligibility at a lower threshold than SOAEL as a result of the Councils' request.
- 18.3.37 Paragraph 18.86 of the LIR comments on the nature of noise mitigation to be applied at source for the roads-based elements of the proposals:

“While a balanced transportation strategy (such as is proposed) is necessary to manage noise and vibration impacts, the Councils consider that the design measures suggested do not represent mitigation for reducing road traffic noise at source. Such measures might include quiet road surfaces and roadside noise barriers.”

- 18.3.38 Road traffic noise, of course, is reduced by the investment in rail and marine transport infrastructure, by investment in sustainable modes for worker transport and by the proposals to bypass particularly affected communities. Further steps may be possible to mitigate and minimise adverse noise effects as part of the detailed design of the roads, which may include the use of a quiet road surface. This was not originally proposed as this road surface is more expensive to maintain. However, this will be discussed with the Councils and an update will be provided on any agreed position reached.

19. AIR QUALITY

19.1 Overview

- 19.1.1 SZC Co. has reviewed Chapter 19 of the Local Impact Report (LIR) and **Table 19.1** below provides a summary response to the principal points raised.
- 19.1.2 The detailed comments made in the LIR [[REP1-045](#)] regarding air quality effects are addressed below where appropriate. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.
- 19.1.3 Particular attention is drawn to responses to the first set of **Examining Authority questions (ExQ1)** [[REP2-100](#)].
- 19.1.4 It is noted that a number of points set out in Chapter 19 of the LIR have either been superseded or have evolved through discussions between SZC Co. and the Councils. These points are highlighted where it is considered helpful to inform the ExA's understanding of the current position.
- 19.1.5 The approach to control and mitigation of air quality effects of construction dust, construction traffic, emissions from Non Road Mobile Machinery (NRMM) and diesel generators has been discussed and agreed between SZC Co. and the Councils; this position is now agreed in the **draft Statement of Common Ground** between the parties [[REP2-076](#)].

19.2 Response to issues: summary

19.2.1 Chapter 19 of the LIR helpfully sets out a table, which contains a summary of the impacts drawn out in that Chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary. Where additional detail is considered to be helpful to address some of the points made in the LIR, these are provided in the table below.

Table 19.1: Summary response to the principal points raised

Ref	Matter / Impact	Summary of LIR	SZC Co. Response
AQ1 (line 21g in the LIR Table 21)	Stratford St Andrew Air Quality Management Area (AQMA) (para. 19.1 of LIR)	The Councils are seeking a cap on the proportion of vehicles that do not meet the latest Euro VI standard, with monitoring secured through the CoCP to avoid significant air quality impacts within the AQMA.	The updated Code of Construction Practice [REP2-056] addresses the request made by the Councils and includes a cap on vehicles that do not meet the Euro VI standard and also monitoring of air quality in the AQMA. The next version of the CoCP will be agreed with the Councils by Deadline 5.
AQ2 (line 21b in the LIR Table 21)	Non-road mobile machinery (NRMM) (para. 19.2 of LIR)	The Councils are seeking a commitment to the use of Stage IV NRMM where practical and available, with a cap on the maximum proportion of non-Stage IV plant to be specified and reasons given.	The updated Code of Construction Practice [REP2-056] addresses the request made by the Councils and includes a commitment to the use of Stage IV compliant NRMM with a cap on vehicles that do not meet the Stage IV standard. The next version of the CoCP will be agreed with the Councils by Deadline 5.
AQ3 (line 21h in the LIR Table 21)	Electrical/diesel powered plant (para. 19.3 of LIR)	The Councils are seeking the use of electrical powered plant and clarity over the use (and regulation) of diesel-fired plant where it is necessary.	The updated Code of Construction Practice [REP2-056] addresses the request made by the Councils and includes a commitment to minimising the use of mobile combustion plant generators for site power through the provision of site electrical power and use of alternative supply sources where possible.

Ref	Matter / Impact	Summary of LIR	SZC Co. Response
AQ4 (line 21a in the LIR Table 21)	Dust management (para. 19.4 of LIR)	The Councils note the ongoing dialogue regarding the Dust Management Plan and related measures set out in the Code of Construction Practice.	The updated Code of Construction Practice [REP2-056] includes a commitment to undertake dust monitoring and report results to the Councils through the Environment Review Group.
AQ5 (line 21e in the LIR Table 21)	Electric charging points	The Councils are seeking a commitment to providing electric charging points for cars.	Chapter 5 of Main Development Site Design and Access Statement [REP2-040] and the Updated Associated Developments Design Principles [REP2-042] include the commitment to electric charging points.
AQ6 (line 21f in the LIR Table 21)	Emissions from HGVs across the network	The Councils are seeking a cap on the number of HGVs (hourly, daily and quarterly)	Please refer to Chapter 15 of this report for a response.

20. FLOOD AND WATER

20.1 Overview

20.1.1 SZC Co. has reviewed Chapter 20 of the Local Impact Report (LIR) [[REP1-045](#)] and **Table 20.1** below provides a summary response to the principal points raised.

20.1.2 The detailed comments made in the LIR regarding the flood and water assessments are addressed below. It should be noted that this section does not repeat matters which are already set out in documents available to the examination.

20.1.3 Particular attention is drawn to responses to the first set of **Examining Authority Questions** ("ExQ1").

20.2 Response to issues: summary

20.2.1 Chapter 20 of the LIR helpfully sets out a table (**Table 22**), which contains a summary of the impacts drawn out in that chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 20.1: Response to summary of flood and water

Ref no.	Impact	Summary of LIR	SZC Co. response
22a	At several sites non-SuDS measures are proposed. Acceptable mitigation measures may not fit within order limits with current designs.	Negative. Change of proposals to implement SuDS measures in all locations – change to design.	The Outline Drainage Strategy [REP2-033] ("ODS") sets out a SuDS-led strategy for the proposed development. The ODS conforms with national and local policy and best practice, such as promoting the drainage hierarchy and drawing on guidance such as the CIRIA SuDS Manual. As foreseen by both the NPPF and the CIRIA SuDS Manual, not every SuDS solution may necessarily utilise green/vegetated techniques. Where there is a rare need to use a non-SuDS approach (e.g. pumping where gravity is not feasible), SZC Co. is continuing to discuss those

Ref no.	Impact	Summary of LIR	SZC Co. response
			<p>circumstances with SCC and ESC.</p> <p>SZC Co. has shared infiltration data and design calculations for the MDS and LEEIE with SCC and ESC, to provide increased confidence that the proposed solutions would fit within the Order Limits.</p>
22b.	No acceptable drainage strategy for LEEIE, with risk of increased surface water flood risk	<p>Negative.</p> <p>Need for change of proposals for the LEEIE to allow for a suitable SuDS system – change.</p> <p>Suitable provisions for control and approval of detailed drainage mitigation measures to ensure suitability and acceptability – requirement.</p>	<p>SZC Co. has shared two design iterations with SCC since the publication of the ODS setting out a SuDS-led strategy within the limits of the site.</p> <p>The FRA [APP-093] clearly concludes that there would be no increased off-site risk with appropriate drainage infrastructure and adherence to the ODS.</p> <p>The designs will be presented to the Councils for approval through Requirement 5 following the grant of the DCO. Further controls on design specification and performance are managed through the permitting process, following the grant of the DCO. Specifically, environmental permits will be required for discharges to the Leiston Drain and Sizewell Drain.</p>
22c.	Potential to increase runoff rates and therefore flood risk at several locations; some also for operational period – particularly LEEIE and	<p>Negative.</p> <p>Suitable provisions for control and approval of detailed drainage mitigation measures to ensure suitability and acceptability – requirement.</p>	<p>Please see the response above to 22b in relation to the construction phase drainage for LEEIE. LEEIE has no function beyond the construction phase and will be reinstated to the original land use.</p> <p>As with MDS and LEEIE (already provided), SZC Co. has committed to sharing infiltration data and design summary reports, setting out</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
	Yoxford Roundabout		<p>the drainage concept designs for the remaining associated development sites.</p> <p>These are well progressed for the Sizewell link road, two village bypass and Yoxford roundabout, due to the need to meet adoptable standards for SCC (as highway authority). Ground investigation data and design solutions are less advanced for the remaining associated development sites, reflecting the associated level of likelihood of effects relating to drainage and flood risk (as concluded by the respective Flood Risk Assessments). The detail is reserved through Requirement 5 of the DCO.</p> <p>No new data will be available during the examination for the park and ride sites, freight management facility and green rail route. On the basis of existing data, SZC Co. is confident that SuDS-led design strategies can be delivered within the Order Limits for these sites.</p>
22d	Green Rail Route potential for legacy benefit. Suitable provisions for control and approval of detailed drainage mitigation measures to ensure suitability and acceptability.	<p>Positive.</p> <p>Suitable provisions for control and approval of detailed drainage mitigation measures to ensure suitability and acceptability – requirement.</p>	<p>There is ongoing positive engagement with SCC regarding how legacy benefit may be incorporated in the design proposals. The designs will be presented to the Councils for approval through Requirement 5 following the grant of the DCO.</p>

Ref no.	Impact	Summary of LIR	SZC Co. response
22e.	Potential for increase of coastal flood risk – linked to coastal processes.	Negative.	Please refer to the coastal change/geomorphology Chapter 11.

20.3 Detailed comments

20.3.1 SZC Co.'s case in relation to the issues raised is extensively set out elsewhere and is therefore not repeated here. There are, however, a limited number of matters raised in the LIR to which SZC Co. wishes to respond, either because they raise additional issues or because SZC Co. does not consider that they are accurately characterised in the LIR. These are:

- Flood risk;
- Use of proprietary drainage solutions;
- Monitoring and maintenance;
- Order limits;
- Operational drainage;
- Legacy benefit; and
- Non-potable water supply.

a) Flood risk

20.3.2 Paragraph 20.49 of the LIR notes that “*properties on Valley Road, Leiston, opposite the proposed development on LEEIE are predicted by the Leiston SWMP to be at high risk from surface water flooding*”. SZC Co. acknowledges the presence of an existing surface water flood risk to properties on Valley Road, and this has been a key consideration in the development of drainage solutions for this site. The **Environment Agency's Written Representation** at Deadline 2 [[REP2-135](#)] demonstrates that they have no concerns with respect to off-site flood risk associated with the proposals for the LEEIE site. A second iteration of the basic drainage design has been provided to the Councils, which demonstrates that the design criteria to manage the 100-year surface water event (plus an allowance for climate change) on site can be achieved,

thereby ensuring there is no increase in the existing flood risk in this location.

20.3.3 More generally, the Environment Agency's Written Representation at Deadline 2 noted that during both the design fluvial and tidal events in future epochs there is a minimal increase in flood depth, i.e. less than 0.02m, to properties already at risk of flooding and that the very small increase in flood depths and no change in flood hazard or numbers of properties flooded could potentially be considered insignificant and not requiring any further mitigation. As such, SZC Co. has confirmed that the proposed development would not result in a negative off-site impact on either residential or non-residential properties.

b) Proprietary drainage solutions

20.3.4 Paragraph 20.58 of the LIR states that "*the submission also includes a reliance on proprietary SuDS treatment systems (such as bypass interceptors). This is not compliant with NPS EN-1 which states that SuDS should be prioritised*". Paragraph 20.72 further states that: "*the use of proprietary treatment measures as a primary method of treatment is not acceptable to the Councils*".

20.3.5 SZC Co. believes that the ODS provides a straightforward commitment to an overarching approach that is consistent with policy and guidance, as well as setting out how the drainage hierarchy is applied for each part of the proposed development. The occasional use of proprietary products is not inconsistent with the prioritisation of SuDS. Green/vegetated solutions are not necessarily the optimum solution in all instances, especially where performance level and consistency (consider environmental receptors), and timeframe (consider establishment timescale), are key parameters.

20.3.6 SuDS quality approaches can take time to establish (sometimes 12 to 18 months) and they tend to be increasingly effective over time. They also need monitoring to prove their effectiveness. Hence, in order to achieve immediate water quality protection a level of pragmatism is needed, and proprietary products will inevitably have a role to play. Protection of the environment is paramount and in time SuDS solutions will become established, but circumstances dictate that they may need help. Consequently, the adoption of proprietary products is not considered to represent a reduction in implementation of SuDS, but instead is seen as complementary.

20.3.7 SZC Co. agrees with the LIR at paragraph 20.27, which states that the "*CIRIA SuDS Manual (C753) is considered industry best practice for SuDS*". The CIRIA SuDS Manual (Part A: Executive Summary (page 6))

confirms that proprietary products can form part of a SuDS solution: “*SuDS can take many forms, both above and below ground. Some types of SuDS include planting, others include proprietary/manufactured products. In general terms, SuDS that are designed to manage and use rainwater close to where it falls, on the surface and incorporating vegetation, tend to provide the greatest benefits. Most SuDS schemes use a combination of SuDS components to achieve the overall design objectives for the site*”.

20.3.8 SZC Co. considers that the application as proposed is entirely consistent with national and local policy, good practice, and current guidance including the CIRIA SUDS Manual.

c) Monitoring and maintenance

20.3.9 The LIR states at paragraph 20.59 that: “*regular monitoring and maintenance of sub-optimal SuDS solutions is not an approach that the Councils support, nor do we believe that it delivers sufficient mitigation*”. As a point of clarity, at no point in SZC Co.’s proposals is monitoring and mitigation proposed to support “sub-optimal” solutions as a form of mitigation. The criticism is not understood or explained in the LIR.

20.3.10 SZC Co. believes the proposals are optimal and based on an appropriate level of data and investigation and supported by robust assessment in accordance with current guidance, undertaken in the context of a risk-based design approach. The proposal to include monitoring and maintenance is considered by SZC Co. as good practice in sustaining the longevity and efficiency of any drainage solution. It is also wholly consistent with an approach to quality, safety and performance that is paramount in the nuclear industry.

d) Order Limits

20.3.11 The LIR states at paragraph 20.59 that: “*The availability of land should not be considered as justification for not prioritising the use of SuDS during construction. The land required for SuDS during construction, alongside other site requirements should have been adequately considered when establishing the applications Order Limits*”.

20.3.12 It is believed that the concern raised relates to a statement within a previous iteration of the LEEIE basic drainage design, which has since been superseded. SZC Co. has since provided to the Councils an updated design document which demonstrates that a SuDS-led drainage strategy can be achieved for the LEEIE site within the Order Limits.

20.3.13 SZC Co. recognises the balance that must be struck between the efficient use of land (including the need to avoid compulsory acquisition unless there

is a compelling need) and the land requirements of extensive SuDS solutions. The lack of good and consistent infiltration at the LEEIE site, for example, is well understood and indicated in infiltration data provided to the Councils. SZC Co. believes that a SuDS-led strategy can be delivered efficiently for this site, negating any need to extend the Order Limits.

e) Operational drainage

20.3.14 The LIR identifies that there is less information provided on operational drainage arrangements than for the construction phase, although acknowledges that the nuclear island would not be subject to the usual surface water disposal hierarchy. Specifically, paragraph of the LIR states: *“the Goose Hill car park, and Main Development Site ancillary development (as per Sizewell B relocated facilities), will be expected to comply with national and local policy, guidance, and best practice for the disposal of surface water”*.

20.3.15 The ODS provides the overarching principles and approach for the operational drainage arrangements. SZC Co. acknowledges that these designs are less advanced as the associated likelihood of effects on people and the environment is considerably smaller than the wider catchment and drainage requirements during construction and because the detail is reserved to be approved by the authorities at the appropriate time. The knowledge brought from developing the construction phase drainage designs will be used to inform the eventual operational designs, which will be presented to the Councils for approval through Requirement 5 following the grant of the DCO.

f) Legacy benefit

20.3.16 SZC Co. notes the opportunity set out in paragraph 20.64 of the LIR, that indicates the potential to mitigate existing surface water flood risk to residential properties. SZC Co. is proactively engaging with the Councils on the development of these designs and the opportunity for legacy benefit to be realised. The designs will be presented to the Councils for approval through Requirement 5 following the grant of the DCO.

g) Non-potable water supply

20.3.17 Technical studies being carried out in parallel by Northumbrian Water Limited and SZC Co. on the water supply for Sizewell C are at an advanced stage and are on track to be completed in June 2021. Based on these studies, which include potable and non potable water, SZC Co. will submit an updated Water Supply Strategy for the Sizewell C Project into the examination at Deadline 5.

21. SUSTAINABILITY

21.1 Overview

21.1.1 SZC Co. has reviewed the LIR and notes Chapter 21 [REP1-045] focuses on environmental sustainability in relation to climate change only. The aspects relating to social and economic sustainability are addressed elsewhere within the **LIR**.

21.1.2 **Table 21.1** provides a response to the principal points raised where a response is appropriate.

21.1.3 SZC Co's position in relation to sustainability is set out in the **Sustainability Statement** [APP-617].

21.2 Response to issues; summary

21.2.1 Chapter 21 of the LIR helpfully sets out a table (Table 23), which contains a summary of the impacts drawn out in that chapter. That approach also provides a convenient basis for providing SZC Co.'s response in summary, whilst certain matters are set out in more detail further below.

Table 21.1: Responses to LIR summary of sustainability impacts

Ref no.	Impact	Summary of LIR	SZC Co. response
23a	Greenhouse gas emissions from construction activity	Negative Minimise need for construction traffic and maximise sustainable transport modes.	Construction traffic impacts have been assessed in detail and the proposals include a number of significant mitigation measures to minimise disruption. This includes a commitment to transport at least 40% of construction materials to site by sustainable modes (rail and sea). The January 2021 change submission [AS-105] includes

Ref no.	Impact	Summary of LIR	SZC Co. response
			proposals for a temporary BLF (Change 2) to maximise the amount of bulk aggregate transported by sea.
23b	Use of resources and generation of waste during construction (particularly materials)	Negative Consideration of off-setting impacts	SZC Co. has sought to minimise its carbon emissions through the measures embedded into the proposals and will continue to identify measures throughout the construction phase, where practicable.
23c	Low carbon energy generation	Positive	No response required

21.3 Detailed comments

21.3.1 SZC Co. notes that Chapter 21 focuses on environmental sustainability in relation to climate change. The social and economic aspects of sustainability are addressed elsewhere within the LIR.

21.3.2 The Councils state that the main adverse impacts relate to carbon emissions and resources during construction, seeking compensation/mitigation to off-set impacts. SZC Co.'s response to the ExA's written questions in relation to carbon, in particular question **EXQ.G.1.21** confirms that the carbon emissions saved by Sizewell C replacing a CCGT would be enough to offset the Sizewell C construction emissions in 4 to 5 months. SZC Co. has sought to minimise its carbon emissions through the measures embedded into the proposals and will continue to identify measures throughout the construction phase, where practicable.

21.3.3 SZC Co. welcomes that the Councils' note that once operational there will be sustainability benefits of generating low carbon energy at Sizewell C.

22. MAJOR ACCIDENTS AND DISASTERS

22.1 Overview

- 22.1.1 SZC Co. has reviewed Chapter 22 of the LIR [[REP1-045](#)] and has no further comments to make with regards to the Councils' consideration of the Major Accidents and Disasters assessment presented within **Volume 2, Chapter 27** of the **ES** [[APP-344](#)].
- 22.1.2 SZC Co. has noted the Councils' request for a new DCO requirement on emergency planning. A new Requirement 5A was included within the **Draft DCO** [[REP2-015](#)] submitted at Deadline 2.
- 22.1.3 SZC Co. will continue discussion with the Councils to agree the wording of the new Requirement and will seek to agree this through the Statement of Common Ground.

23. ECONOMIC, SKILLS AND EMPLOYMENT STRATEGY

23.1 Overview

- 23.1.1 SZC Co has reviewed Chapter 23 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Annex D [[REP1-049](#)].
- 23.1.2 **Table 23.1** below provides a response to the principal points raised where a response is appropriate, with further details set out at Section 23.3 where relevant.
- 23.1.3 SZC Co's position in relation to economic, skills and employment strategy is extensively set out at:
- **Volume 2, Chapter 9 (Socio-economics)** of the **ES** [[APP-195](#)]; and
 - The **Economic Statement** [[APP-610](#)] including appendices:
 - Employment, Skills and Education Strategy; [[APP-611](#)]; and
 - Supply Chain Strategy [[APP-611](#)].

23.2 Response to Issues (Summary)

- 23.2.1 Chapter 23 of the LIR sets out the context for the Councils' response to issues across all economic development areas including skills, training and employment, business effects, supply chain and tourism.
- 23.2.2 It is accompanied by an Annex D [\[REP1-049\]](#) – “Sizewell Economic Principles” – which sets out the opportunities identified by the Councils related to the Sizewell C Project in the context of Suffolk’s regional pipeline of projects and economic environment.
- 23.2.3 Paragraph 5.12.7 of EN-1 states that “*the IPC [PINS] may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)*”.
- 23.2.4 SZC Co. notes that the Councils have provided little or no evidence to support the position set out in this chapter of the LIR in terms of potential adverse effects. In most cases, the Councils rely on assertion of effects which have not been evidenced, have not been experienced elsewhere, or are outside of the remit of the planning system to regulate.
- 23.2.5 SZC Co. considers that the economic effects of the Sizewell C Project are overwhelmingly positive. Where there is an identified risk of adverse effects – such as vacancies being harder to fill – appropriate mitigation has been identified.
- 23.2.6 Fundamentally, SZC Co. considers that it is not the job of the planning system to regulate the economy, particularly when the Sizewell C Project brings so many positive benefits and opportunities.
- 23.2.7 The Project has set out a detailed and extensive suite of best practice measures, supported by information-led Workforce Development Strategies and regular review, Implementation Plans and monitoring to ensure that the Project enhances its benefits in terms of supply chain, skills, education and employment activities.
- 23.2.8 The Project’s approach to economic development, business and employment is to primarily deliver the Project, but to do so in a way that reduces the risk of any adverse effects on the local economy, which is set to deliver a number of other major construction projects including several NSIPs over the coming decades. As such, the measures that the Project has put forward for the improvement of the labour market and supply chain are considered to be aligned with regional objectives to provide a legacy of skilled employment and a competent supply chain for the construction of energy and other infrastructure Projects.

- 23.2.9 Together, these initiatives have the benefit of avoiding risks of adverse effects, ensuring that the Sizewell C Project is delivered effectively, ensuring that effects related to NHB workers are minimised, and supporting the region's skills infrastructure for the benefit of the Project and other regional demands on labour by delivering a pipeline of legacy skills.

Table 23.1: Summary of Response to Economic, Skills and Employment Strategy

Ref	Issue / Impact	Summary of LIR	SZC Co Response
23.3	Employment, Skills and Education Commitments	<p>The Councils note that they expect that economic, skills, education and employment opportunities for the local area are maximised, and the Applicant's ambitions in this area further increased.</p> <p>The Councils note that the Applicant is in agreement with the Councils on a number of mitigation funds related to skills, employment and education, although the detail and size of these funds is still to be confirmed.</p>	<p>It should be noted that the 'Applicant's ambitions' for local employment are different from the assessment case set out in Volume 2, Chapter 9 of the ES [APP-195]. The peak home-based workforce identified for assessment purposes is considered conservative, in order to provide precautionary mitigation for the effects of the non-home-based workforce.</p> <p>SZC Co recognises the importance of promoting the opportunities that the Sizewell C Project will bring to local people and businesses in terms of the ability to gain access to employment, skills and training and to win contracts to deliver parts of the Project. These matters are also important to the successful delivery of the Project and SZC Co. believes it has developed and initiated a nationally leading approach to these matters. The evidence from Hinkley Point C is that these measures have been highly successful in maximising home based employment and the success of the local supply chain.</p> <p>All parties have worked closely during the pre-application and examination phase to understand the scale of economic benefits, and to develop the right measures to enhance them, which will be governed and monitored for effectiveness, in collaboration.</p> <p>While the principles for measures related to employment, skills, training and education – currently set out in the draft Deed of Obligation (Doc Ref.8.17(D)) at Schedule 7 – are broadly agreed, all parties are working to further finalise the detailed arrangements and the appropriate scale of the funds attached.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
			See also SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at G.1.24 (and by extension G.1.26), SE.1.4 , SE.1.15 , SE.1.17-25 .
23.4	Churn, Displacement and Other Sectors	The Councils highlight that there are also a number of negative impacts from the development. These include churn issues and resulting displacement of the workforce of other sectors, and disruption to the supply chain of other sectors.	Please refer to Chapter 25.
23.5	Tourism	The Councils note that For tourism, the impact of construction is considered to potentially be significantly negative, and this needs to be reflected in mitigation through the proposed tourism fund.	Please refer to Chapter 26.
23.18 ANNEX D	Economic Development Principles	The Councils have prepared a document to set out the principles for economic development in relation to the Sizewell C Project. This document outlines the principles and priorities for action related to maximising the socio-economic benefit of the proposed Sizewell C development. It references and describes the significant opportunities and challenges for Suffolk's businesses, and how with a clear strategy it can make a definitive contribution to Suffolk's education and skills priorities for the area.	SZC Co. recognises the 'principles document' (Annex D [REP1-049] to the Local Impact Report) put forward by Suffolk County Council and East Suffolk Council and agrees that overall it represents a strong and sensible set of activities that would enable the region to maximise the Project's economic benefits. SZC Co. would like to point out a number of inconsistencies and inaccuracies in Annex D [REP1-049] , set out below in Section 23.3(a).
23.20	Scale of Regional/Local Benefits	The Councils refer to The Sizewell C Consortium (a group of over 200 leading companies and organisations from across the country, guided by its goal to deliver Sizewell C and to ensure that the priorities of levelling up and net zero are met) and that they identify a	SZC Co. recognises and welcomes the Memorandum of Understanding, underpinned by an independent estimate of regional economic benefits, that has been produced by the Sizewell C Consortium. The findings of that assessment are aligned with SZC Co.'s own economic assessment (set out in

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>possible UK spend of £14.4 billion, £2 billion will be spent in Suffolk alone.</p> <p>The Councils note that the Applicant predicting the Project will put at least £100 million a year into the regional economy during peak construction and £40 million per year during its 60 years of operation.</p>	<p>the Economic Statement [APP-610]) but reflect a broader definition of economic effects.</p> <p>The consortium estimates that the Sizewell C Project may exceed the local/regional supply chain benefit estimated by SZC Co within the Economic Statement [APP-610], predicting that £4.4bn may be retained in the East of England. This demonstrates market confidence in the supply chain capacity available, and proves that potential Tier 1 contractors are willing to make a commitment to local and regional investment.</p>
23.21	Age and Economic Profile	<p>The Councils note that:</p> <p>The local area has an ageing population with a persistent decline in working age population, with the largest age group being aged 70-74 and the most overrepresented age group being those aged 85 and above.</p> <p>The District is reliant on attracting inward migration to sustain an accessible working age population.</p> <p>Despite this, skills levels and wages are lower, with more jobs than the national average in lower paying industries.</p>	<p>SZC Co. considers that part of the reason for an under-represented and declining economically active and working age population is the lack of a pipeline of jobs.</p> <p>The Sizewell C Project will create at least 2,410 roles at the peak of construction likely to be filled by existing residents, and up to 900 opportunities in the operational power station, which will contribute substantially to reversing the trends identified here.</p> <p>In order to promote the uptake of employment opportunities for local people on the Project, and to ensure those people gain skills that offer them sustainable, long-term careers, SZC Co. has identified a range of measures currently set out in Schedule 7 of the draft Deed of Obligation (Doc Ref.8.17(D))</p>
23.23	Legacy of Sizewell B	<p>The Councils consider that despite being host to two nuclear power stations for six decades, the immediate nearby towns and villages have not been enabled to maximise the benefits of their presence in the town as would be expected and still have substantial socio-</p>	<p>See SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.5 – in summary:</p> <p>SZC Co. agrees that there was a positive benefit in the construction phase of Sizewell B in terms of employment and supply chain activity.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>economic difficulties and the town's population and reputation has suffered as a result.</p> <p>However – Sizewell C offers the opportunity for those geographically closest to the site and the Applicant must be a catalyst for this, as well as having a local presence in the vicinity of the development that is not on the site</p>	<p>Deprivation in Leiston is not evidentially related to Sizewell B, and the counterfactual by definition cannot be estimated. Sizewell B contributes over 700 jobs to the local area and provided legacy benefits through investment in community programmes and social infrastructure investment.</p> <p>SZC Co. agrees with SCC in terms of the opportunities that will be delivered by Sizewell C, and has set out in response to SE.1.5 [REP2-100] how the opportunities will be enhanced for local residents through measures set out in the DCO (in terms of embedded mitigation) and the draft Deed of Obligation (Doc Ref.8.17(D)).</p>
23.24 to 23.26	Spatial Direction of Mitigation / Enhancement	<p>The Councils consider that: Appropriate strategies e.g., Workforce Development Strategy and Employment, Skills and Education Strategy require full support and delivery commitment by the Applicant to ensure the local opportunities, including access to training and employment are enabled and delivered, to truly deliver on our joint social mobility and legacy aspirations; and</p> <p>This intention should be emphasised and clear in the Applicant's plans, and in the S106 documentation, with adequate financial mitigation to deliver the economic benefit to the local area.</p> <p>In addition, there will be residual impacts of the development on the local community that cannot be mitigated, and this needs to be very carefully managed, so that the benefits of having such a development on their doorstep do not pass those communities by and every effort must be taken to realise the potential for</p>	<p>SZC Co. agrees that plans for joint social mobility and legacy aspirations to ensure the local opportunities – including access to training and employment – are enabled and delivered, requires delivery commitment by the Applicant. These plans also require support from the local skills infrastructure, and co-operation from Suffolk County Council and East Suffolk Council.</p> <p>SZC Co. considers that the approach to mitigating impacts where they arise has been demonstrated through the approach to EIA and within the draft Deed of Obligation (Doc Ref.8.17(D)), and that measures to enhance the benefits of the project are focused on these areas too.</p> <p>SZC Co. believes that the set of measures to be secured by the draft Deed of Obligation, Schedule 7 (Doc Ref.8.17(D)), including both the provision of funds and commitment to SZC Co. delivery of a Jobs Service and Young Sizewell C promotes this approach.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		social mobility for Leiston and other local East Suffolk communities.	
23.27	Detail on Proposals	The Councils consider that the application includes several strategic proposals and opportunities in relation to the project but does not include significant detail in any of the areas.	<p>SZC Co. is content that the strategies [APP-611] within the application for Development Consent contain the appropriate level of detail to give confidence that the mitigation and enhancement measures set out can deliver their proposed outcomes.</p> <p>This is not the limit of detail that will be developed throughout the Project. To take the example of employment, skills and education measures, SZC Co. has set out and committed to proposals within Schedule 7 of the draft Deed of Obligation (Doc Ref.8.17(D)) to prepare and review Workforce Delivery Strategies on an ongoing basis, which will support the Councils to generate Annual Workforce Delivery Implementation Plans to deliver effective distribution of proposed funding and measures.</p>
23.32 to 23.37	Monitoring	<p>The Councils refer to Hinkley Point C and consider that the monitoring system employed for the project does not have appropriate granularity, noting that these are important observations which need to be addressed when setting up the monitoring framework for Sizewell C.</p> <p>The Councils raise concerns related to the findings of the Hinkley Point C Nuclear Power Stage: Monitoring and Auditing Study Final Report (Appendix 2.1) – noting that:</p> <p>Mitigation and enhancement measures appear to be working well; but</p>	<p>SZC Co. recognises that Hinkley Point C's monitoring and reporting has generated some lessons to be learnt to improve effectiveness at Sizewell C, and has included this within proposed approaches to workforce survey, monitoring, governance and reporting.</p> <p>With specific reference to clarity of definitions, and the application of the workforce survey, these have been set out within Volume 2, Chapter 9 of the ES [APP-195] and within the draft Deed of Obligation (Doc Ref.8.17(D)), respectively.</p> <p>Schedule 7 of the draft Deed of Obligation (Doc Ref.8.17(D)) provides the opportunity for detailed annual monitoring of the economic outcomes of the Project – for example on local</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>There is some debate about the actual level of total workforce numbers, set against predictions, about disaggregated employment impacts (e.g. skills analysis for HB and Non-Home-based (NHB) workforce, opportunities for various disadvantaged or under-represented groups), and long-term sustainability implications; and that</p> <p>There has been a lack of clarity on definition of some indicators (definition of worker, predicted average HB workforce over the construction period).</p> <p>There is also concern that:</p> <p>The monitoring system is not delivering enough accurate and disaggregated employment information, especially on local content by skill category and by disadvantaged and under-represented groups; there is a lack of disaggregated data on supply chain impacts in Somerset and districts; and full, transparent and publicly available Workforce Survey needed to underpin the better auditing of many socio-economic impacts.</p>	<p>content by skill category, and social mobility outcomes for disadvantaged and under-represented groups.</p> <p>SZC Co. disagrees that supply chain monitoring is not disaggregated sufficiently. Hinkley Point C's approach to monitoring for BEIS and SEAG has the ability to provide granular detail on contract value and location by type. In any case, specific provision on monitoring has been set out at Paragraph 3.2 of Schedule 7 of the draft Deed of Obligation (Doc Ref.8.17(D)) in this regard.</p>
23.29 Appendix 2.9	Recommendations for Mitigating Actions	<p>The Councils commissioned an Economic Impact Assessment 2018 (Appendix 2.9 to the LIR). This includes recommendations for mitigating actions:</p> <p>Commitment from the Applicant and all supply chain businesses to the recruitment of local workers;</p> <p>Ensuring sufficient campus accommodation to manage the number of non-home-based workers in tourist accommodation;</p>	<p>SZC Co. notes that at Paragraph 23.29 (i. to v.) of the LIR, the Councils refer to the Economic Impact Assessment 2018 (Appendix 2.9) which includes recommendations for mitigating actions.</p> <p>SZC Co. considers that all of these actions are within the scope of proposed mitigation and enhancement measures, where it is anticipated that there is a risk of an adverse effect. In response to specific measures requested:</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>Providing support to local businesses to help them to identify and develop to fulfil supply chain opportunities and achieve accreditation to be able to win work in the supply chain;</p> <p>Providing investment in attracting inward investors to the local area supporting them via an effective investor development programme; and</p> <p>Providing investment in marketing and business support to the tourism sector to minimise the loss of visitors to the local area.</p>	<p>SZC Co. cannot mandate that its contractors recruit local workers, but inevitably they will, and measures are proposed to enhance supply chain engagement to support local businesses, employing local residents, to win work on the Project.</p> <p>SZC Co. and the Councils agree that the proposed project accommodation is of an appropriate scale to help mitigate effects on other accommodation sectors. SZC Co. has proposed a Housing Fund (including a Tourist Accommodation Market Supply element) to mitigate for localised adverse effects, which is agreed in principle with the Councils.</p> <p>Local businesses will be supported to help them to identify and develop to fulfil supply chain opportunities and achieve accreditation to be able to win work in the supply chain through the measures set out in the Supply Chain Strategy [APP-611].</p> <p>It is primarily the role of the public sector economic development function to attract inward investment to the area. Where practicable and proportionate, SZC Co. will support the Councils and NALEP with their programme, but this is not required to mitigate for an adverse effect of the Sizewell C Project.</p> <p>SZC Co. has proposed a Tourism Fund that includes investment in marketing and business support to the tourism sector.</p>

23.3 Detailed Response - Annex D "Sizewell C Economic Principles"

- 23.3.1 SZC Co. has reviewed the document Annex D [\[REP1-049\]](#) "Sizewell Economic Principles". It reflects a largely sensible and pro-active position for the Councils' economic development function and identifies the substantial opportunities for the region to benefit from the Sizewell C Project. In some cases, it provides good examples of the outcomes that can be achieved through effective use of measures to be secured under Schedule 7 of the **draft Deed of Obligation** (Doc Ref.8.17(D)).
- 23.3.2 SZC Co. notes that Annex D [\[REP1-049\]](#) refers to the Norfolk and Suffolk Economic Strategy which outlines the aim "*to maximise the opportunities associated with the proposed Sizewell C nuclear power station in terms of supply chains, employment and skills opportunities and inward investment*". This suggests that the Councils have a policy direction to undertake activities themselves to maximise the Project's opportunities.
- 23.3.3 SZC Co wishes to note that it plans to work collaboratively with the Councils and other economic development partners to help the Councils achieve their economic objectives.
- 23.3.4 There are a number of minor inconsistencies and inaccuracies within Annex D [\[REP1-049\]](#). By way of clarification:
- Page 1 - Figure 1 sets out data on home-based employment by skill/role, employment at the accommodation campus, and the accommodation breakdown for NHB workers. Most of these figures are wrong – please instead refer to SZC Co's application documents, specifically **Volume 2, Chapter 9** of the **ES** [\[APP-195\]](#) and its appendices [\[APP-196\]](#) for correct figures.
 - Page 2, second paragraph – this refers to SZC Co's estimate of £1.5bn supply chain spend over the construction period (as set out in the **ES** [\[APP-195\]](#) and **Economic Statement** [\[APP-610\]](#)) being a "*business as usual*" scenario and identifies a level of local benefit that would likely accrue without major intervention. The challenge is to deliver this and then an additional benefit on top through a targeted intervention programme. This is not correct: it is not a "business as usual" scenario. The estimate is based on experience from Hinkley Point C, where substantial investment and activity has been undertaken by EDF Energy in developing the supply chain, which is intended to be replicated by SZC's **Supply Chain Strategy** [\[APP-611\]](#).

- Page 3, fifth paragraph – The report states that “the use of tourist accommodation by non-home-based workers could generate £1 million of impact in the local economy at the peak of the construction process, or £6 million impact over the entire construction period”. As set out within the **Economic Statement** [APP-610], SZC Co considers this to be a substantial underestimate of the benefit. See also SZC Co’s clarification of potential scale of economic effect of workers using tourist accommodation set out at **Chapter 26** (Section 26.3(b)).
- Page 6 refers to a “Sizewell C Site Preparation Works Section 106 Agreement” which is erroneous.
- Page 6 states that “Over the lifetime of the construction project it is estimated that overall approximately 25,000 employment opportunities would be created”. The Project will in fact generate over 40,000 person years of construction (rather than ‘employment opportunities’, the definition of which is unclear) as set out at **paragraph 1.3.2** of the **Economic Statement** [APP-610].

24. ECONOMIC AND SUPPLY CHAIN

24.1 Overview

- 24.1.1 SZC Co. has reviewed Chapter 24 of the Local Impact Report (LIR) [REP1-045].
- 24.1.2 **Table 24.1** below provides a response to the principal points raised where a response is appropriate.
- 24.1.3 In some cases, responses signpost to SZC Co.’s submission documents, or SZC Co.’s **Responses to the ExA’s First Written Questions** [REP2-100] (and comments on responses by SCC and ESC), Relevant Representations, or other examination materials including the **Initial Statement of Common Ground** [REP2-076], and the **draft Deed of Obligation** (Doc Ref. 8.17(D)).
- 24.1.4 SZC Co.’s position in relation to economic and supply chain effects is extensively set out within the Environmental Statement, and supporting documents within the application as follows:
- **Volume 2, Chapter 9 (Socio-Economics)** of the **ES** [APP-195]; and
 - The **Economic Statement** [APP-610] including appendices:

- Employment, Skills and Education Strategy [[APP-611](#)]; and
- Supply Chain Strategy [[APP-611](#)].

24.2 Response to Issues (Summary)

- 24.2.1 Paragraph 5.12.7 of EN-1 states that “*the [Secretary of State] may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)*”.
- 24.2.2 SZC Co. notes that the Councils have provided little or no evidence to support the position set out in this chapter of the **LIR**. In most cases, the Councils rely on assertion of effects which has not been evidenced, has not been experienced elsewhere, or is outside of the remit of the planning system to regulate.
- 24.2.3 SZC Co. considers that the economic effects of the Sizewell C Project would be overwhelmingly positive. Where there is an identified likely adverse effect – such as vacancies being harder to fill – appropriate mitigation has been identified including a Sizewell C Jobs Service, and funding for outreach and skills enhancement measures, as well as to support the transition from education to work via a bespoke bursary scheme and the Young Sizewell C programme (based on the successful Young Hinkley Point C programme in Somerset).
- 24.2.4 For example, at paragraph 24.10 the Councils state that “*Whilst there are many significant economic opportunities arising from the Sizewell C development, given the scale of the development and the resulting demand by the project for workforce resources, it is equally likely that there will be several negative impacts for the local economy*”. That this is ‘equally likely’ is not evidenced, and SZC Co. considers that apart from risks of some vacancies being harder to fill (which is a consequence of a positive effect – higher skilled jobs being created) – there are no likely significant impacts in this area.
- 24.2.5 This suite of measures would be supported by information-led Workforce Development Strategies (WDS) and regular review, Implementation Plans and monitoring to ensure that the Sizewell C Project enhances its benefits in terms of supply chain, skills, education and employment activities.
- 24.2.6 Together, these initiatives would avoid or minimise likely significant adverse effects, ensuring that the Sizewell C Project is delivered effectively, that effects related to non-home based (NHB) workers are minimised, and supporting the region’s skills infrastructure for the benefit of the Project and other regional demands on labour by delivering a pipeline of legacy skills.

Table 24.1: Summary of Response to Economic and Supply Chain

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
24.5	Maximising Supply Chain Benefits	<p>The Councils consider that the Applicant's activities are only focused on adding local businesses into its supply chain - the Councils see this as too-narrow a focus and as such a missed opportunity for the local economy.</p> <p>A more proactive approach would mean that, in addition to adding those local businesses into the supply chain, the Applicant would support to enable them, through investment and expert advice, to grow their offer so they can supply the Applicant's project as well as service their existing markets, by expanding and employing more local people.</p> <p>The Councils continue to encourage the Applicant to work with partners (particularly NALEP) to make this happen by developing an effective business growth and investor development service.</p>	<p>The Sizewell C Project will offer a substantial opportunity for local and regional firms to provide goods and services to the Project, becoming part of the supply chain as contractors.</p> <p>In most cases, those businesses would expand to deliver on existing contracts as well as supply chain opportunities within the Sizewell C Project. If not – that economic activity would not disappear, as new providers would most likely fill the residual demand for those contracts/goods/services. This is the normal function of an economy. Businesses can make these choices themselves, they do not need the Applicant to be involved, other than making the opportunity available.</p> <p>A Supply Chain Strategy will support businesses to win contracts on the Project. This support includes a range of activities including for skills and accreditation, networking and engagement activities, information sharing and mapping and promotion of potential opportunities raised by Tier 1 Contractors.</p> <p>In order to provide clarity and transparency regarding the high-level activities set out in the Supply Chain Strategy, SZC Co. has appended a list of activities to the Draft Deed of Obligation (Doc Ref. 8.17(D)) to serve as an action plan subject to future review of its effectiveness.</p> <p>It is the role of the Local Authorities and NALEP to promote economic development opportunities that are presented by the Sizewell C Project, and, while not a requirement of the Deed of Obligation, SZC Co. remains fully committed to working with local stakeholders and its Tier 1 and 2 contractors to promote inward investment and business growth.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			See also SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.38 and SE.1.27 .
24.12 24.9	Supply Chain 'Displacement'	<p>The Councils consider that disruption within the supply chain for existing companies (displacement) could occur when goods in the nuclear supply chain are also needed in local businesses and they become more expensive or difficult to obtain, thus disrupting local markets.</p> <p>The Councils note that local businesses can grow from new opportunities afforded, but may then not expand and just supply to the new nuclear market, which is in the area for a time limited period.</p>	<p>Please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.37 and SE.1.28.</p> <p>There is no evidence for this position – the Councils note that it just “could occur”. The Sizewell C Project’s supply chain is national and international. There is no reason why the Project would cause local supply chain issues of the nature suggested by the Councils.</p> <p>Businesses are free to supply who they wish and in the unlikely event they stop supplying existing customers, other companies will step in.</p>
24.11	Workforce 'Displacement'	<p>The Councils consider that if it becomes substantially harder for businesses to fill roles over a longer period, this is indicative of displacement</p> <p>The development may lead to disruption to businesses that are not within the supply chain that may suffer negative workforce churn from displacement, whereby employees leave to seek employment in the supply chain.</p>	<p>Please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.37 and SE.1.28.</p> <p>SZC Co. disagrees that hard-to-fill vacancies are indicative of displacement - there are always hard-to-fill vacancies, and they increase and decrease with the economic cycle. There is no evidence that this leads to displacement.</p> <p>Moving job is very common, and businesses cope with this and are best placed to know how to cope.</p>
24.8 (i) to (viii)	Opportunities for Maximising Benefits	<p>The Councils set out a detailed list of “Opportunities for the local economy from the construction of the project which need to be supported in order to be maximised”.</p>	<p>SZC Co. has considered the proposed list of opportunities set out at LIR paragraph 24.8 (i) to (viii) and agrees that these are all good opportunities for the local and regional economy to benefit from Sizewell C’s construction phase.</p> <p>SZC Co. is pro-actively pursuing some of these opportunities through activities secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), where they relate to promoting opportunities for local and regional businesses to join the Project’s supply</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<p>chain in construction and non-construction work packages (for example points (i), (ii) and (iv)).</p> <p>In some cases, the opportunities identified will not require any further catalyst, and regulation of activity through the planning system is not appropriate (for example points (iii) and (v)).</p> <p>In some cases, it is more appropriate for the public sector or business organisations – such as the Chamber of Commerce or NALEP – to lead in innovation, business development and inward investment (for example points (vi) and (vii)).</p>
24.6	Long-term Benefits	The Councils recognise that the experience, accreditation and expertise that suppliers for Sizewell C will gain during the construction phase will be exportable, enabling local companies to compete for nuclear/clean energy contracts globally.	SZC Co. welcomes this recognition and considers this an important legacy benefit of the Project. This would lessen the likelihood of there being a 'boom and bust', as set out at LIR paragraph 24.20.
24.7	Workforce Spending	The Councils consider that to maximise opportunities workers need to be informed of businesses and suppliers to meet their needs on their doorstep and encouraged via their employers and by the Applicant to use them	<p>It is the free choice of workers where and how to spend their money. Naturally, workers are more likely to spend locally on convenience goods and services.</p> <p>The Councils and NALEP may wish to work with SZC Co. to promote their local businesses to workers.</p>
24.10 24.13	Replication of HPC	The Councils are concerned that a "lift and shift" of parts of the Hinkley Point C supply chain, may risk undermining local economic opportunities, noting that redeploying the same companies used at Hinkley Point C at Sizewell C is clearly a threat to generating genuine local benefits for Suffolk and reduces opportunities for local companies to enter the supply chain, for local people to be trained, and to leave legacy benefits.	Please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at G.1.25, SE.1.27.

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
24.14 to 24.15	Economic Cost of Congestion	<p>The Councils note that:</p> <ul style="list-style-type: none"> Economic congestion, which has been modelled using the VISSUM and VISIM models, is likely to cause notable disruption for businesses operating time-dependent activity across the A12; and Increased journey times, increased congestion and reduced reliability on the routes affected by construction traffic (principally any journey that involved part of the A12 north of Seven Hills interchange) may cause a perception amongst businesses and investors that the area is an inconvenient location for travel and businesses, and may result in considerations to relocate away from the district or development area as they are incurring significant costs from delays. 	<p>SZC Co. notes that SCC has provided a technical report on the economic cost of congestion as an appendix to its Responses to the ExA's First Written Questions [REP2-192] at SE.1.42. SZC Co. has provided comments on that response and the technical report as part of SZC Co.'s Comments on ExQ1 Response submitted at Deadline 3.</p> <p>SZC Co. does not consider that the evidence presented results in 'notable disruption' for businesses operating time-dependent activity across the A12. The outcome of the transport modelling reported in the Consolidated Transport Assessment [REP2-045] does not support the asserted effects. The Consolidated Transport Assessment [REP2-045] sets out that in the AM peak period (6-9am) the increase in journey time on the A12 corridor between Seven Hills and Melton is:</p> <ul style="list-style-type: none"> 2-19 seconds northbound 1-23 seconds southbound <p>In the PM peak period (3-6pm) the increase in journey time on the A12 corridor is:</p> <ul style="list-style-type: none"> 1-2 seconds northbound 0-7 seconds southbound <p>On a typical day at peak construction, in the AM peak period (6-9am) the increase in journey time on the A12 corridor between Seven Hills and Melton is:</p> <ul style="list-style-type: none"> 13-32 seconds northbound 0-21 seconds southbound <p>In the PM peak period (3-6pm) the increase in journey time on the A12 corridor is:</p>

NOT PROTECTIVELY MARKED

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<ul style="list-style-type: none"> 6-20 seconds northbound 13-23 seconds southbound
24.16	Accommodation / Housing Market	<p>The Councils identify risks of</p> <ul style="list-style-type: none"> Pressure on housing market as not all workers will want to live on the campus accommodation provided, despite it being offered Pressure on holiday accommodation, which despite being occupied all year round, will not reach the income levels from tourists that it will from workers on the site 	<p>SZC Co. agrees that not all workers will want to live at the accommodation campus – not all NHB workers at peak will be able to (it provides 2,400 rooms for a peak NHB workforce of c. 5,900). This is set out in the Accommodation Strategy [APP-613]. However, SZC Co. is confident that given the design, quality, location, pricing and facilities of the campus - and based on observed occupancy at Hinkley Point C - that the campus will be filled.</p> <p>SZC Co.'s assessment provides confidence that there would not be undue pressure on the tourist accommodation sector – at peak it is estimated that workers could occupy 4% of tourist accommodation stock in East Suffolk. There may be localised effects on occupancy in areas very close to the site, but that these would be mitigated through the Housing Fund. Across the construction phase and across seasons, this should represent an economic opportunity for providers.</p> <p>Further information is set out at Sections 26.3(b) with respect to effects on tourist accommodation and estimates of economic effect of workers spending, and 26.3(c) with respect to the Housing Fund's Tourist Accommodation Market Supply measures (see also Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D))).</p>
24.20	Boom and Bust	<p>The Councils consider that there could be a “boom and bust” effect for the local economy, with the substantial contracts for local businesses and the large sized construction workforce being wound down – the Councils consider that if not carefully managed by</p>	<p>The businesses that have been involved in the Project will have gained skills, competencies and experience and will have benefitted financially from contracts which, when entered into, will have an agreed finite length, allowing the businesses to</p>

NOT PROTECTIVELY MARKED

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		ensuring that there is a proactive focus on legacy and on supporting businesses to flourish after the end of the construction period there could be a significant negative impact on the viability of local businesses and the employment opportunities in the local area.	appropriately plan for activity beyond the Sizewell C construction phase.
24.21 to 24.27	Proposed Mitigation / Enhancement	<p>The Councils suggest the following measures as part of a clear, realistic, and positive mitigation strategy with key targets and quantum for financial investment that the Applicant is proposing for each economic area affected:</p> <ul style="list-style-type: none"> a) Support to local businesses to help them to identify and develop to fulfil supply chain opportunities and achieve accreditation to be able to win work in the supply chain b) Investment in attracting inward investors to the local area supporting them via an effective investor development programme c) Clean Energy Innovation Centre d) Consideration of locating a regional base for the Applicant or office in Suffolk e) Early implementation of a robust and properly resourced mitigation plan to increase local economic benefits and reduce negative effects including displacement f) Substantial and creative package of measures to support upskilling local companies - needs to be formalised so that training programmes can be planned and delivered in time to ensure that local 	<p>SZC Co. continues to engage with the Councils on the potential for support in delivering economic development activities related to the Sizewell C Project. SZC Co. considers that:</p> <ul style="list-style-type: none"> a) Local businesses will be supported to help them to identify and develop capability to fulfil supply chain opportunities and achieve accreditation to be able to win work in the supply chain through the measures set out in the Supply Chain Strategy [APP-611]. b) It is primarily the role of the public sector economic development function to attract inward investment to the area. Where practicable and proportionate, SZC Co. will support the Councils and NALEP with their programme, but this is not required to mitigate for an adverse effect of the Project. c) SZC Co. is supportive of local aspirations for a Clean Energy Innovation Centre. However, provision of funding for this is not required to mitigate for adverse effects of the Project, or to deliver the Project. d) If SZC Co. and/or contractors consider that additional office space outside of that applied for within the DCO is beneficial, this will be sought through relevant channels. Provision of funding for this is not required to mitigate for adverse effects of the Project, or to deliver the Project.

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>Small Medium Enterprises have the competencies and capabilities to fulfil work package requirements of the early groundworks and civils phases</p> <p>g) Partnership strategies focused on other potential areas of economic benefit such as inward investment and supply chain; co-ordination of business support activities to maximise local economic benefit (the Councils note that Local Authorities are best placed to provide this local leadership role within Economic Development teams, supported by NALEP)</p> <p>h) Innovative schemes to encourage non-home-based workers to spend money with local retailers</p> <p>i) Additional funding to provide economic development officer and business support in order to manage issues associated with the economic impact and maximising the local economic benefit of Sizewell C</p> <p>j) A fund to mitigate/compensate for economic cost of congestion</p>	<p>e) SZC Co. has developed a detailed and robust set of measures to support supply chain engagement and skills, education and employment to deliver a local workforce and reduce the risk of labour market concerns raised by the Councils.</p> <p>f) Measures to support skills in the supply chain are inherent within the proposed Supply Chain Strategy [APP-611], with additional detail provided as an Annex to the Draft Deed of Obligation (Doc Ref 8.17(D)). Measures set out to deliver skills, training and employment will also benefit the skills of prospective employees of companies that may be within the Project's supply chain.</p> <p>g) SZC Co. agrees that the Councils are best placed to provide the local leadership role within Economic Development teams, supported by NALEP.</p> <p>h) See above ('Workforce Spending' – 24.7).</p> <p>i) SZC Co. will engage further with the Councils to understand whether there is an evidenced need for additional funding for an economic development officer and business support.</p> <p>j) As set out above ('Economic Cost of Congestion' - 24.14 to 24.15) SZC Co. does not consider that there is evidence that a significant adverse effect in this regard is likely, either real or perceived. It is not clear how a mitigation/compensation fund would be scaled or justified, or how it would be distributed to mitigate effects identified by the Councils.</p>

25. SKILLS, EMPLOYMENT, EDUCATION

25.1 Overview

25.1.1 SZC Co. has reviewed Chapter 25 of the Local Impact Report (LIR) [[REP1-045](#)].

25.1.2 **Table 25.1** below provides a response to the principal points raised where a response is appropriate.

25.1.3 In some cases, responses signpost to SZC Co.'s submission documents, or SZC Co.'s **Responses to the ExA's First Written Questions** [[REP2-100](#)] (and comments on responses by SCC and ESC), Relevant Representations, or other examination materials including the **Initial Statement of Common Ground** [[REP2-076](#)], and the **Draft Deed of Obligation** (Doc Ref. 8.17(D)).

25.1.4 SZC Co.'s position in relation to economic, skills and employment strategy is extensively set out at:

- **Volume 2, Chapter 9** (Socio-economics) of the **ES** [[APP-195](#)]; and
- The **Economic Statement** [[APP-610](#)] including appendices:
 - Employment, Skills and Education Strategy; [[APP-611](#)]; and
 - Supply Chain Strategy [[APP-611](#)].

25.2 Response to Issues (Summary)

a) Positive Effects and Opportunities

25.2.2 SZC Co. welcomes the recognition from the Councils of the opportunities that the Sizewell C Project would bring to East Suffolk and Suffolk, including:

- Positive impacts on employment levels - employment opportunities across a broad range of careers and occupations at a time when the county is seeking to recover from the impacts of the coronavirus pandemic (25.2 and 25.3);
- Catalytic opportunity increased; sustainable employment; enhanced local skills; investment in local skills; school engagement (STEM) (25.1-2);

- Opportunities for locals to improve their jobs, gain new skills and training, increase their pay and enhance (or change) careers, which will have both benefits for the individuals and for the Suffolk economy (25.4);
- Legacy benefits (25.3 and 25.19) - If a focus on skills legacy is maintained, the gained skills and experience and career progression of the home-based workforce during the construction of Sizewell C would have a positive legacy for Suffolk's employment market;
- Opportunity for positive change in improving the equality, diversity, and inclusion across the engineering and construction sectors. Increasing equality, diversity, and inclusion would bring significant benefits to organisations and this project can be a catalyst for sustainable change (25.6);
- Agglomeration benefits - benefit from the significant long term and highly productive employment that the nuclear sector supports (25.7);
- STEM opportunity for inclusive growth (25.8 to 25.9);
- Skills and supply chain opportunity of the Project as a catalyst for improving the skills and competency of individuals within local businesses, and an opportunity for the Suffolk workforce to gain new skills and training to help them progress into higher level work with enhanced career prospects moving forward (25.10);
- Opportunity for enhancement of the regional training offer building on the innovative and additional training already developed through programmes such as the New Anglia Skills Deals. Developing and delivering new innovative training, valued by the local economy, would strengthen the regional offer and the specific institution offering the provision (25.11);
- opportunities for local apprenticeship recruitment supporting Suffolk's growth sectors of construction and engineering (25.12); and
- Economic benefits linked to operational jobs (25.17), and rolling outages making Suffolk an attractive location for outage workers to be based in (25.18).

b) Evidence of Adverse Effects

25.2.3 Paragraph 5.12.7 of EN-1 states that "*the [Secretary of State] may conclude that limited weight is to be given to assertions of socio-economic impacts*

that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)”.

- 25.2.4 SZC Co. notes that the Councils have provided little or no evidence to support the position set out in this chapter of the LIR. In most cases, the Councils rely on assertion of effects which has not been evidenced, has not been experienced elsewhere, or is outside of the remit of the planning system to regulate.
- 25.2.5 SZC Co. considers that the economic effects of the Sizewell C Project would be overwhelmingly positive. Where there is an identified likely adverse effect – such as vacancies being harder to fill – appropriate mitigation has been identified.
- 25.2.6 This forms part of a detailed and extensive suite of measures, supported by information-led Workforce Development Strategies and regular review, Implementation Plans and monitoring to ensure that the Project enhances its benefits in terms of supply chain, skills, education and employment activities.
- 25.2.7 Together, these initiatives would avoid or minimise likely significant adverse effects, ensuring that the Project is delivered effectively, ensuring that effects related to non-home based (NHB) workers are minimised, and supporting the region’s skills infrastructure for the benefit of the Project and other regional demands on labour by delivering a pipeline of legacy skills.

Table 25.1: Summary of Response to Skills, Employment, Education

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
25.5	Early Engagement with Local Workforce	The Councils consider that the Applicant needs to work with partners to recruit and train local people in the early stages of the construction period which will ensure that they develop their skills and are enabled to move between roles and different types of contracts, and to higher skilled roles, throughout the construction period.	<p>Please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.23 and SE.1.18.</p> <p>As set out in the Draft Deed of Obligation (Schedule 7) (Doc Ref 8.17(D)), SZC Co. has committed to the production of Workforce Delivery Strategies (WDS) for the Site Operations / Site Services / Enabling Works Phase of construction on or before commencement.</p> <p>Further Workforce Delivery Strategies would be produced for the Main Civils / Mechanical, Electrical and Heating (MEH) / Operational Phase prior to the beginning of that phase. WDSs would be reviewed at least every three years during the construction of the Sizewell C Project.</p> <p>These WDSs would set the strategic approach for developing the workforce requirements for the Project and shaping a legacy for the region, and set out the scale of opportunity for each phase, including skills prospectus and apprenticeship strategy.</p> <p>In this way, WDS would be information-led, and lead in to the annual creation of Annual Workforce Delivery Implementation Plans, which would direct measures towards meeting the needs of each WDS and thereby promoting the development of skills and enabling local residents to access the Project's higher and lower skilled opportunities throughout the construction period.</p>
25.2	Information Sharing to Maximise Opportunities	The Applicant will need to share detailed skills and job information in advance and provide funding to ensure measures that will support this activity are enhanced.	As referred to above, SZC Co. is committed to the production of WDS, in a timely manner, to ensure they are effective in delivering outcomes. Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) details the content of each WDS

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<p>and their role in developing Annual Workforce Development Implementation Plans.</p> <p>The Skills Prospectus would be key in providing detailed skills information for each phase, and the Jobs Service would generate labour market information related to the specific opportunities available at each phase, and provide access to them for local people.</p>
25.14	Labour Market Churn	<p>The Councils note that whilst opportunity for individuals to access jobs with better pay and enhanced career paths is welcomed, this comes with its challenges to the wider Suffolk economy, with concern about high levels of churn, where skilled labour prematurely leaves their current local employment to work on the project, that will lead to a damaging reduction in Suffolk's economic activity.</p> <p>The Councils expect the Applicant to put forward measures to mitigate such adverse impacts on the local economy and employment market.</p> <p>The Councils are particularly concerned that churn will negatively impact the deliverability of adult social care services and community health care provision, but the impact will equally affect the wider business community.</p>	<p>It is not clear what 'prematurely' means in this instance, or how that is determined. As set out in the Economic Statement [APP-610], average job tenures in the UK are relatively short, and are determined by the level of opportunity across the economy.</p> <p>There is no evidence at all to suggest that increased labour market churn "will lead to a damaging reduction in Suffolk's economic activity".</p> <p>SZC Co. considers that people changing job is not an adverse impact – it is a normal part of the economy, and a benefit to the resident/worker who will have moved jobs independently and for personal benefit.</p> <p>In terms of deliverability of adult social care services and community health care provision, please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.37 and SE.1.28. SZC Co will provide support for workforce resilience for the social care sector as part of the Public Services Resilience Fund.</p>
25.15	Cumulative Labour Market Demand for Skills	<p>The Councils remain concerned that due to the unprecedented level of development planned, including other key NSIPs that will also require a similar labour force, the region will have significant cumulative labour</p>	<p>SZC Co. recognises the importance that the region places on appropriately planning for the delivery of skills, given the scale of infrastructure construction likely to come forward in the region over the next decade.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		churn issues if not correctly mitigated. Sizewell C, alongside large-scale infrastructure projects, such as East Anglia Offshore Wind, National Grid Electricity Transmission Bramford to Twinstead and further projects, are all fuelling demand for skills in the infrastructure sector locally.	<p>It is not clear however that labour market churn will increase substantially or result in adverse effects – there is no evidence for this.</p> <p>SZC Co. considers that the range of infrastructure projects in the region offers a significant opportunity for local people to gain skills and employment, and develop sustainable careers across more than one project. This has been taken into consideration in SZC Co.'s plans for the provision of employment, skills and education measures as set out at Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p> <p>Please also refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at CU.1.16 and Appendix 23B, and SE.1.39 which consider in detail the proposed demand for skills – particularly the Councils' concerns over civils construction skills.</p>
25.16	Achieving Home based (HB) worker predictions	<p>Mitigation provided to other themes is based on the “worst case” impact scenario of numbers of non-home-based workers.</p> <p>The Councils are concerned that the Applicant may not achieve the home-based worker predictions in this model, with these shortfalls then being met by increasing non-home-based workers. If this occurs mitigation may not be sufficient.</p>	<p>Please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at G.1.24(i) which sets out the reliance that can be placed upon SZC Co.'s estimate of home-based recruitment on the main development site at peak.</p>
25.21	Post-construction legacy	<p>The Councils are concerned that there is a risk that unemployment will increase as the project demobilises.</p> <p>This impact may be mitigated or at least reduced if the employment opportunities are linked to sustainable 'legacy' employment in the region. Legacy infrastructure</p>	<p>Providing for the needs of the Project and the needs of the region in terms of legacy skills is a key component of SZC Co.'s proposed employment, skills and training measures set out at Schedule 7 of the Draft Deed of Obligation (Doc Ref 8.17(D)).</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>skills are identified as those which will be of most value to Suffolk and the region after the Sizewell C project has been completed.</p> <p>Therefore ensuring that, as the Sizewell C project demobilises, sustainable and continuous employment is provided through mobilisation into the next infrastructure project.</p>	<p>The definition of the WDS includes “<i>setting out in respect of each Construction Phase and the Operational Phase the strategic approach for developing the workforce requirements for the Project and shaping a legacy for the region</i>”.</p> <p>Through the Regional Skills Co-ordination Function, the region will be able to direct funding e.g. from the Asset Skills Enhancement and Capability (ASEC) Fund towards skills infrastructure for legacy skills, as long as they also meet the needs of the Project.</p> <p>The ASEC Fund would deliver initiatives that “<i>enhance the supply of skills related to the Project and regional needs and aspirations, by investing in skills and training provision (such as apprenticeships) within the region’s existing further education, training provider and higher education sectors</i>”.</p>
25.22 25.24 (i) to (ix)	Proposed Approach to Mitigation / Enhancement	<p>The Councils identify the following approaches to mitigation and enhancement:</p> <ul style="list-style-type: none"> i. Prioritisation of activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into higher skilled roles. ii. SMART targets that will ensure the minimum level of home-based recruitment is met and this employment will benefit the local population in terms of legacy, as defined above, and support the outcome of increasing the proportion of local people in higher skilled roles. iii. Commit to maximising the employment of local residents to fill the 900 permanent operational roles 	<p>With regard to proposed approaches to mitigation and enhancement set out here:</p> <ul style="list-style-type: none"> i. This is a core function of the employment, skills and education measures set out at Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(D)). ii. Targets would only be met if local people apply for roles, which to some extent is beyond SZC Co.’s control. However, working together, the Regional Skills Co-ordination Function will set annual targets based on Project information on skills requirements from the WDS, which should be SMART. iii. SZC Co. will produce an Operational Phase WDS, which will set out the relevant opportunities for local employment with enough lead-in time for local residents to access

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>through establishing a training pathway that develops a local talent pipeline.</p> <p>iv. An ambition for 5% of the roles required by the Sizewell C project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people.</p> <p>v. Tangible mechanisms for ensuring that the skills base developed for Sizewell C is as transferable as possible to other key sectors in the local economy.</p> <p>vi. Activity to increase the size and diversity of the labour market pool.</p> <p>vii. Clear plans (e.g., commitments within contracts) to drive the behaviours of the Sizewell C supply chain to achieve skills and employment outcomes.</p> <p>viii. The creation of social value as a measure of quantifying the success of any interventions and to drive commitment and delivery by local contractors and suppliers to recruit locally and provide apprenticeships where feasible.</p> <p>ix. A strategic approach to developing and supporting the Sizewell C project's workforce requirements. The strategic approach should take into account each</p>	<p>opportunities. Not all of the 900 roles will be taken by local residents.</p> <p>iv. The Project will not be committing to 5% of roles filled through 'earn and learn' positions, though its contractors may individually be members of 'the 5% club'. It is important that the local apprenticeship pipeline is able to support the delivery of apprenticeships, which will be identified by each WDS via an embedded apprenticeship strategy. The Project has publicly committed to providing 1,500 apprenticeships²³.</p> <p>v. As set out above (in response to 25.21) this is a core element of the proposed approach.</p> <p>vi. SZC Co. proposes that an Outreach Fund and SZC Bursary are provided to improve social mobility and target areas where there are more barriers to the labour market in order to promote diversity and employability particularly in deprived areas. SZC Co. is already working with Access Community Trust and Inspire Suffolk Work on this and welcomes the written representation from Inspire Suffolk [REP2-468] which states: <i>'I am writing in support of the work that the EDF - Sizewell C team are doing in engaging with ALL members of society in the wider Suffolk area in which my charity operates. Inspire Suffolk works to transform the lives of young people (particularly those between 16-24 years) who are in need of support and guidance either into education or the workplace. It is VITAL that ALL individuals, irrespective of background or circumstance, have the ability to transform their lives and I truly believe that the EDF - Sizewell C team share our goals to make sure that this happens. Thank you.'</i></p>

²³ <https://www.edfenergy.com/energy/nuclear-new-build-projects/sizewell-c/news-views/sizewell-c-aims-to-employ-1500-apprentices>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region.	<p>vii. SZC Co. has committed to produce a Supply Chain Work Plan (an example has been appended to the Draft Deed of Obligation (Doc Ref. 8.17(D)) that will be shared with the Councils and NALEP, to detail the activities to be delivered in each six month period post-commencement.</p> <p>viii. As set out above, apprenticeships and local recruitment are fundamental aspects of the Project's drive to deliver a HB workforce, and SZC Co. is open to defining measurable outcomes in terms of social value, subject to further discussion with the Councils on appropriate metrics.</p> <p>ix. The approach to WDS and Annual Implementation Plans set out within Schedule 7 of the Draft Deed of Obligation (Doc Ref 8.17(D)) is centred around a strategic approach to plan-monitor—manage the approach to skills development for each distinct phase of the Project.</p>
25.24(x)	Monitoring	The Councils suggest that the Applicant should fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and Labour Market Information (LMI) to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat churn effects.	SZC Co. agrees that a dynamic approach to monitoring outcomes for skills, employment and education is important, and this would be funded and delivered through the proposed measures in Schedule 7 of the Draft Deed of Obligation (Doc Ref 8.17(D)), through the definition of WDS, AWDIP, and the Regional Skills Co-ordination Function.
25.25 (i) to (ix)	Proposed Requirements and Obligations	<p>The Councils set out proposals for requirements and obligations for the Project as follows:</p> <p>i. Employment outreach fund for deprived places.</p> <p>ii. Capital and revenue fund for local training legacy.</p>	As first proposed in the Employment, Skills and Education Strategy [APP-611] and subsequently set out within Schedule 7 of the Draft Deed of Obligation (Doc Ref 8.17(D)), SZC Co. proposes to deliver against each of these proposed measures by obligation – specifically committing to:

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<ul style="list-style-type: none"> iii. Funded job service – local talent + flow to other projects + mitigate churn. iv. Apprenticeship Strategy. v. Fund Suffolk’s ‘educational inspiration offer.’ vi. A funded “skills for supply chain” programme. vii. Provision of a bursary scheme aimed at supporting the removal of barriers to training and employment. viii. Funding for a regional skills coordination function embedded in the system to provide a focal point of coordination and skills planning and legacy. 	<ul style="list-style-type: none"> i. A Sizewell C Employment Outreach Fund; ii. An Asset Skills and Enhancement and Capability Fund; iii. A Sizewell C Jobs Service; iv. Apprenticeship Strategies embedded into each WDS; v. Promoting Young Sizewell C as a bridge from education to employment; vi. A supply chain skills programme within the Supply Chain Strategy; vii. A Sizewell C Bursary; and viii. Contribution towards funding for a Regional Skills Co-ordination Function.

26. TOURISM IMPACTS

26.1 Overview

26.1.1 SZC Co has reviewed Chapter 26 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Appendices 2.7, 2.8 and 2.9.

26.1.2 **Table 26.1** below provides a response to the principal points raised where a response is appropriate, with further details set out at **Section 26.3** where relevant. In some instances, references are made to tourist sector accommodation, which cross-cut this Chapter 26 and Chapter 29 (Accommodation and Housing).

26.1.3 SZC Co's position in relation to effects on tourism and the approach to mitigation is extensively set out at:

- **Volume 2, Chapter 9 (Socio-economics)** of the **ES** [[APP-195](#)] between paragraph 9.7.63 and paragraph 9.7.96, with a summary of effects between 9.7.90 and 9.7.96.
- **Economic Statement** [[APP-610](#)].
- **Responses to the ExA's First Written Questions** (ExQ1), Volume 1 - SZC Co. Responses [[REP2-100](#)] and **Appendix 23A** (Response Paper – Tourism – Ex-ante Stated Preference Surveys) [[REP2-112](#)].
- **Draft Deed of Obligation** (Doc Ref. 8.17(D)), which sets out the proposed scope, governance and implementation of the Tourism Fund. SZC Co notes that this position reflects discussions held with stakeholders through engagement and consultation, but until agreement can be reached, reflects SZC Co's own position on the Tourism Fund. SZC Co, ESC and SCC continue to engage on an appropriate approach to the Tourism Fund.

26.2 Response to Issues (Summary)

26.2.1 SZC Co notes that the NPS EN-1²⁴ states that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts and that "*the [Secretary of State] may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)*" (paragraph 5.12.7).

²⁴ Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1) (London: The Stationery Office, 2011)

- 26.2.2 The Councils have raised concerns that the Sizewell C Project's construction phase may lead to a reduction in visitor numbers and therefore their spending, affecting the overall output of the tourist economy and businesses within it.
- 26.2.3 Empirical evidence on this that meets the test in NPS EN-1 is difficult to extricate from the many other factors that influence tourism, and would be based on ex-ante perception which may not translate to actual effects. SZC Co's position is that ex-ante stated preference surveys are inappropriate to predict even binary choices – let alone predict outcomes with multiple variables like tourism, and that it is inappropriate to then use that output to make further assumptions about spend (which is dependent on factors like length and location of stay, demographic etc.).
- 26.2.4 The Councils have identified a number of risks, but there is limited empirical evidence to support the position that these would lead to likely significant effects.
- 26.2.5 **Volume 2, Chapter 9** of the **ES** [[APP-195](#)] sets out that engagement with local tourism stakeholders, review of environmental effects and mitigation identified across this ES, and SZC Co.'s understanding of perceived visitor sensitivities based on quantitative survey of previous and potential visitors, has identified that without mitigation there is potential for:
- very local effects on businesses and activities where there is a combination of significant residual environmental effects; and
 - perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project (the potential for perception of changes to for example traffic, where this is already an influencer on propensity to visit).
- 26.2.6 The ES concludes that, in some locations, times and for some visitors, there is the potential for a minor to moderate adverse effect to arise on factors that contribute to tourist visitor sensitivity (including but not limited to traffic) that has the potential to be significant at the local level, without mitigation in the early years of construction.
- 26.2.7 Any assessment must necessarily take account of the best understanding of the likely effects of the Project having regard to the latest information from studies such as the Transport Assessment. The assessment identifies any likely significant effects, for example in terms of transport effects, and then applies the proposed mitigation measures before identifying any residual effects.

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- 26.2.8 SZC Co.'s focus is influenced by evidence from Hinkley Point C – where despite similar pre-commencement concerns, adverse effects on tourism have not materialised. There are differences in the local tourism offer between Somerset and Suffolk. However, on the basis that this is the nearest comparable example of potential effects, there are helpful lessons to be drawn from Hinkley Point C about the way in which a pre-development opinion survey has turned out to be a poor indicator of actual effects.
- 26.2.9 This is likely to be due in part to the mitigation in place at Hinkley Point C. SZC Co. has sought to understand through qualitative and quantitative research, and engagement with stakeholders, how the Tourism Fund – which in principle is agreed between SZC Co, East Suffolk Council and Suffolk County Council as having the potential to reduce significant adverse effects – can most effectively do the same here.
- 26.2.10 SZC Co. and stakeholders recognise that a Tourism Fund is a reasonable and sensible way to be precautionary about risks, given the strong link between people's certainty of intention and their level of knowledge. The Fund should be used to promote, enhance and market the area.

Table 26.1: Summary of Response to Tourism Issues

Ref	Issue / Impact	Summary of LIR	SZC Co Response
26.4 to 26.6	Defining Tourism Value	<p>The Councils consider that the tourism economy can be defined in terms of its volume and value. They estimate that in East Suffolk this totals £695m per annum (LIR Appendix 2.9) and supports approximately 11,000 FTE jobs (15% of employment).</p> <p>The Councils suggest that this provides a robust and longitudinal picture of the tourism economy for all of Suffolk and any local areas within.</p> <p>The Councils also suggest that using Office of National Statistics (ONS) Standard Industrial Classification (SIC) sector data to estimate tourism employment does not provide a complete picture of the tourism economy, as this data does not include small and micro tourism and tourism related businesses that do not register on ONS datasets (if not using Pay As You Earn (PAYE) for example).</p>	<p>Appendix 2.9 to the LIR refers to the value and volume of tourism in the Suffolk Coast and Heaths AONB rather than East Suffolk, and identifies 5,056 jobs supported by spending from overnight and day visitors.</p> <p>SZC Co. recognises that the tourism economy can be defined in terms of its volume and value and refers to a number of metrics for doing so at Section 9.5(a)(xi) of Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195].</p> <p>SZC Co. notes that while the Value and Volume studies referred to in the LIR represent a longitudinal dataset, they are only one way of defining the scale of the tourist economy and its variation over time. SZC Co. has presented further evidence on the significant variability of tourism over time in terms of employment indicators at Section 6.1(c) of the Economic Statement [APP-610].</p> <p>Additionally, datasets presented in Appendix 23A [REP2-112] to SZC Co.'s Response to the ExA's First Written Questions [REP2-100] SE.1.7, SE.1.13 and SE.1.36 set out National Statistics for local tourism spend and employment to evidence the behaviour of the tourism economy within Sedgemoor and West Somerset during the construction phase at Hinkley Point C.</p> <p>The use of SIC codes to estimate employment in the tourist sector is an accepted approach by the ONS to measure tourist sector employment, and allows for direct comparison of employment in comparable areas. This is defined by the ONS and referenced in Volume 2, Chapter 9 of the ES (at Ref. 9.22 - Office for National Statistics. Economic value of tourism:</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
			Guidance Note 1: Definitions of tourism (Version 2, 2012) [APP-195]).
26.7	Tourism Surveys	<p>The Councils consider that: SZC Co's commissioned (Ipsos MORI) visitor survey used both qualitative and quantitative method to collect and assess visitor attitudes towards visiting the Suffolk coast area during construction of Sizewell C.</p> <p>Its results almost exactly mirrored the headline results from the 2019 visitor and business energy projects survey commissioned by the Suffolk Coast DMO.</p> <p>Namely there was a forecast 17% reduction in overall willingness to visit which, in the DMO survey, equated to a significant negative economic loss every year during construction.</p>	<p>SZC Co. considers that the methodological differences mean that the two surveys are not comparable, and disagree with the findings of the DMO survey where it translates stated preference into economic effects (noting SZC Co.'s position that ex-ante stated preference surveys can accurately predict behaviour - as set out in Appendix 23A [REP2-112] to SZC Co.'s Response to the ExA's First Written Questions [REP2-100]).</p> <p>SZC Co. also has a number of methodological concerns with the survey commissioned by the DMO - see the detailed response under Section 26.3 a) of this chapter.</p> <p>The forecast reduction of 17% in overall willingness to visit is not reliable or translatable to a reduction in visitors or spending. It is based on asking people how the images and information they have been shown about the project (or in this case, other Projects – Hinkley Point C and East Anglia Hub onshore cabling) would impact their hypothetical holiday plans over a period of 10 years in the future. Very few people can accurately predict their behaviour or how it will change over that period of time. An equivalent impact was predicted by the Councils at Hinkley Point C, and none has been observed.</p>
26.9 to 26.10 and 26.1 to 26.3	Positive Long-term Effects	<p>The Councils state that no clear positive impacts on the tourism sector are anticipated, but note the provision of the visitor centre as a new/enhanced tourist attraction, and that some of the investments made through the Tourism Fund may have legacy benefit.</p> <p>The Councils also note that there may be some short-term positive benefits on workers using tourist accommodation all year round and some small-scale</p>	<p>SZC Co. welcomes the recognition that the Visitor Centre and Tourism Fund activities may have a legacy effect. SZC Co. has been careful to structure the governance set out within the Draft Deed of Obligation, Schedule 15 (Doc Ref. 8.17(D)) to require that any activity funded by the Tourism Fund demonstrates value for money, with the effectiveness of measures to be monitored by the Tourism Working Group.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>construction tourism, but that this is not anticipated to make up in any significant way for the negative tourism impacts.</p>	<p>SZC Co. welcomes the recognition that there is likely to be positive benefit from workers using tourist accommodation, and has set out under Section 26.3b) of this chapter that even in a very conservative scenario, there is not likely to be a significant change in tourist sector expenditure as a result of workers staying in local tourist accommodation.</p>
<p>26.11 to 26.12 and 26.4</p>	<p>Neutral and Negative Long-term Effects</p>	<p>The Councils suggest that once the tourism sector has recovered from the construction period and visitors who may have been put off visiting during the construction period are returning, it can be expected that the long-term tourism impact can be considered as neutral.</p> <p>The Councils suggest that accommodation providers may during the construction period have become reliant on business related to the construction workforce of Sizewell C, and that this will, at least to a degree, have displaced regular tourist visitors who may have stayed previously at these businesses.</p> <p>The Councils summarise that the immediate impact on the sector could potentially be severe.</p> <p>The Councils are concerned that it could take several years after the end of construction to attract back visitors who may have been put off visiting during the construction period.</p>	<p>SZC Co. disagrees that – with the Tourism Fund in place – visitors would be put off visiting the Suffolk coast during the construction phase. There is no evidence to suggest that this will happen, and it has not happened as a result of Hinkley Point C construction phase (see Appendix 23A [REP2-112] to SZC Co's Response to the ExA's First Written Questions [REP2-100] SE.1.7, SE.1.13 and SE.1.36).</p> <p>There is no evidence that workers would displace tourists, and no likelihood either. Even at the peak of construction, workers are assumed to use only 4% of current capacity in East Suffolk, and that capacity is likely to grow (either independently or supported by the Housing Fund).</p> <p>Accommodation providers may choose to alter their business model to accommodate workers, or a mix of workers and tourists, during the construction phase. That is a commercial decision for the operator, and there is no evidence to suggest that following the ramp-down in construction activity, those providers would be less likely to attract visitors.</p> <p>Nonetheless, SZC Co. has committed to supporting local tourist accommodation providers through the Tourist Accommodation Market Supply element of the Housing Fund (Paragraph 2.8, Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)), and where applicable, through the Tourism Fund, in order to reduce these risks.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
			SZC Co. does not anticipate that there would be a residual effect at the end of the construction phase. For the last few years of construction, there would be a considerable reduction in project effects including the scale of workforce, road movements, and construction-related environmental effects. During this time, re-instatement of landscape would occur. SZC Co. will continue to engage with the Councils on how the Tourism Fund can be structured to work most effectively for the Suffolk coast.
26.12, 26.16, 26.17 and 26.20	Tourism Fund	<p>The Councils suggest that:</p> <p>The Tourism Fund should include provision to mitigate the impacts at the post-construction period;</p> <p>The Applicant has issued their own draft proposals for a Tourism Fund including a proposal to fund capital and revenue investment to improve the visitor economy offer and to provide support for a tourism strategy and action plan;</p> <p>The Tourism Fund proposal should include a firm commitment from the Applicant to support marketing and promotion activities to be undertaken by the DMO; and</p> <p>Proposals should also include direct support for attractions and events.</p> <p>The Councils note that evidence from the Economic Impact Assessment (LIR Appendix 2.9) suggests that early mitigation has been highly effective in preventing negative impacts on tourism in the South West.</p>	<p>SZC Co. and local stakeholders have worked together to design a flexible approach to the Tourism Fund to enable local partners to set, implement, monitor and review activities that meet the proposed scope, principles and governance of the Tourism Fund set out in the Draft Deed of Obligation (Schedule 15) (Doc Ref. 8.17(D)). Provided they align with the above, this does not preclude any of the proposals set out by the Councils in the LIR.</p> <p>SZC Co. welcomes the recognition that evidence from the Economic Impact Assessment (LIR Appendix 2.9) suggests that early mitigation has been highly effective in preventing negative impacts on tourism in the South West.</p>
26.14 Appendix 2.8	Other Mitigation Measures	The Councils suggest recommendations for the Tourism Fund within LIR Appendix 2.8 , primarily achieved	In terms of the recommendations proposed by the Councils: SZC Co. will provide an on-site accommodation campus and caravan park at LEEIE to reduce pressure on the tourist

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		<p>through the accommodation strategy, and the Tourism Fund, as follows:</p> <p>Sufficient campus accommodation to be provided by the Applicant to manage the number of non-home-based workers in tourist accommodation; and</p> <p>Investment in marketing and business support to the tourism sector to minimise the loss of visitors to the local area.</p>	<p>accommodation sector. SZC Co.'s response to the ExA's First Written Questions [REP2-100] CI.1.4 sets out why SZC Co. considers that the amount of project accommodation proposed is sufficient.</p> <p>SZC Co. has identified business support and marketing/promotional activities as potential activities to be delivered by the Tourism Fund, subject to the principles of the Tourism Fund set out within the Draft Deed of Obligation, Schedule 15 (Doc Ref. 8.17(D)).</p>
26.18	Governance / Delivery of Tourism Fund	<p>The Councils strongly recommend that the mitigation referenced in both the Applicant's and the Councils' own tourism mitigation fund proposals are properly and fully funded, managed, and delivered through existing tourism partnerships between the Councils, the DMO, the AONB, RSPB and the National Trust.</p>	<p>SZC Co. recognises the importance of appropriately scaling the Tourism Fund to deliver the measures set out within the Draft Deed of Obligation, Schedule 15 (Doc Ref. 8.17(D)) and will continue to work with stakeholders to agree this.</p> <p>As currently drafted, the proposed governance arrangements for the Tourism Fund allow for the Councils – via the Tourism Programme Manager – to identify and implement or commission activities, which may work through third parties including The Suffolk Coast Ltd (DMO), AONB Partnership, RSPB Minsmere or National Trust Dunwich Heath among others. Those named bodies would be members of the Tourism Working Group and would therefore help to direct and monitor the effectiveness of activities under the Tourism Fund.</p>

26.3 Detailed Comments

26.3.1 There are some issues raised in the LIR that warrant additional comment, either because they raise additional issues, because SZC Co. does not accept the way in which they are characterised in the LIR, or because additional information may clarify the position. These are:

- the use and comparison of Tourism Surveys commissioned by SZC Co and the Suffolk Coast DMO;
- the potential effect of workers' use of tourist accommodation leading to changes in local expenditure; and
- the role of the Tourist Accommodation Market Supply element of the Housing Fund.

a) Use and Comparison of Tourism Surveys

26.3.2 SZC Co. does not consider that the effect of the Sizewell C Project on the tourist economy can be quantified by an ex-ante perception survey, and has always been clear that the survey commissioned from Ipsos MORI cannot and does not quantify the effect.

26.3.3 SZC Co. commissioned a survey to understand more about the perceptions of people who have either previously visited or intend to visit the area, in order to gain an understanding of the sensitivities that should be tackled to prevent the risk of perceptions of reduced likelihood to visit materialising into an economic effect.

26.3.4 Ex-ante perception surveys seeking stated preferences about future decisions, particularly when based on limited and fundamentally unrelatable stimulus, are poor predictors of future activity and cannot be used to quantify actual changes in visitor behaviour – this is a function of all surveys of this type, not just the DMO/Ipsos MORI surveys. Most people do not know where they will go on holiday in seven years time, so asking them how their behaviour will change will not produce accurate responses.

26.3.5 It is not appropriate to simply assume that a stated preference not to visit (or to visit less) would translate directly into an actual reduction in visitor numbers. Even if it was, then applying this % reduction in visitor numbers to an average spend per day trip / holiday is not appropriate. There is no evidence to suggest that those reporting a lower likelihood to visit would visit for X days or spend Y per trip.

26.3.6 The Councils make specific reference in the LIR (Paragraph 26.7) to the results of SZC Co's survey 'mirroring' the headlines from the survey commissioned by the DMO (Appendix 2.7 to the LIR). SZC Co. has a number of methodological concerns regarding the DMO's survey, which also preclude it from being used to provide a quantifiable estimate of cost to the tourist economy, and make it incomparable to SZC Co.'s commissioned survey – particularly:

- The survey considers the combined effect of the Sizewell C Project and onshore cabling for Scottish Power Renewable (SPR) Projects (such as East Anglia ONE North, East Anglia TWO and East Anglia THREE). However, SZC Co. considers that it is misleading and confusing for the survey to do this because the projects have substantially different effects, construction periods and locations of effect.
- Respondents were shown images of the location of SPR cabling, with little context, and no attempt to consider the relative influence of this compared to Sizewell C.
- The DMO survey uses a video of Hinkley Point C's construction site. SZC Co has not seen the video but understands that this shows an aerial or birds-eye view (drone survey) that is not consistent with how the site would be experienced on-the-ground by tourists and would therefore represent biased and unrepresentative material. In addition, the layout of the Sizewell C construction site would be different from the Hinkley Point C site with the temporary construction area set back from the main platform area on the coast.
- The respondents were not presented with any of the actual environmental, transport or socio-economic effects of Sizewell C, as reported in the ES – and importantly were not presented with the Project's embedded and additional mitigation measures which in every case are designed to avoid or reduce significant effects – this is particularly important for ecology and transport, which are reported as sensitivities by respondents.
- The quantification does not account for frequency, length or any other type of visit.

26.3.7 Fundamentally, it is not appropriate to promote the idea that visitors may be deterred and then to conclude that they definitely would be, and go on from that to assume a stated preference not to visit (or to visit less) would translate directly into an actual reduction in visitor numbers.

26.3.8 SZC Co. and the Councils met on 9 March 2021 to discuss this issue.

b) Workers' use of Tourist Accommodation/Economic Effects

26.3.9 The **ES (Volume 2, Chapter 9)** [APP-195], and **Accommodation Strategy** [APP-613] take a conservative approach to the assessment of effects by:

- Assessing the peak demand from workers, at the peak of tourist accommodation occupancy – in reality the peak would likely be short-lived with far fewer workers seeking tourist accommodation for the majority of the construction phase;
- Assuming a static market – in reality, the market will respond to demand, as it is inherently responsive and flexible and driven by demand and market influences. This assessment does not take into account the responsiveness and flexibility of the market – it assumes it is static and reflects the situation as presented in the baseline in **Section 9.5 of Volume 2, Chapter 9 of the ES**) [APP-195]; and
- Taking conservative assumptions that reduce the supply of accommodation considered available and affordable to workers. On the advice of ESC, 'holiday parks' were not considered to be available to workers²⁵, and the following discounts were applied to other sectors:
 - 85% of serviced accommodation would not be affordable for workers;
 - 90% of self-catering accommodation would be affordable to workers; and
 - While all caravan accommodation is likely to be affordable, there are planning restrictions for the year-round use of caravans, some providers would not want to accommodate workers or would want to limit the proportion of stock occupied by workers – engagement with ESC suggests this could reduce availability to workers by 50%.

26.3.10 This effectively reduces the amount of tourist accommodation considered available and affordable to workers by around 70% (to c. 7,600 in the 60-minute area and c. 5,700 in East Suffolk).

²⁵ Providers listed as 'holiday parks' – which account for another 200 bedspaces in the Local Ward area (in Snape) but outnumber caravan/camping sites by 2:1 across the District.

- 26.3.11 The ES concludes that at a wider scale, the effect is not likely to be significant given the size and occupancy rates (particularly in off-peak seasons) of the sector at a District and 60-minute area scale.
- 26.3.12 At the peak, workers are anticipated to account for about 4% of the total tourist accommodation stock in East Suffolk or 3% in the 60-minute area. Applying conservative reductions for the amount of overall stock that is considered unavailable or unaffordable to workers, this rate increases to c. 14% in East Suffolk and 11% of stock accessible to workers in the 60-minute area, respectively.
- 26.3.13 Based on peak season occupancy rates, the demand for tourist accommodation from workers would at no point exceed the existing level of spare capacity, even at the peak of tourist season and the peak of the non-home based construction workforce, and would in fact only represent a third of the scale of usually unoccupied bedspaces.
- 26.3.14 Even if the assessment were to consider that Visit Britain's figures for accommodation were more accurate²⁶ (11,005 bedspaces), demand from Sizewell C Project workers would only represent 50% of already unoccupied bedspaces at the peak (of both the tourist season and workforce profile).
- 26.3.15 As such, even adopting conservative assumptions, the assessment does not predict an adverse effect at the East Suffolk District or 60-minute area scale.
- 26.3.16 At a local scale, **Table 9.43 of Volume 2, Chapter 9** of the **ES [APP-195]** sets out that potential adverse effects are identified in Leiston (major adverse) and Aldeburgh (moderate adverse) prior to mitigation if the workforce concentrates as predicted by the Gravity Model – again this is a snapshot effect at the very peak of demand; and would be mitigated by the Housing Fund.
- 26.3.17 Some concern has been expressed through consultation and engagement – and within the Councils' LIR - around the potential displacement of tourists from accommodation, who are likely to have higher average non-accommodation daily expenditure than workers.

²⁶ Visit Britain provide a District-level estimate of tourist accommodation annually, with the latest available showing 11,005 bedspaces in East Suffolk, but also stating that "*because the business landscape is constantly changing, not all businesses are listed in the sources we use and it's not always possible to source detailed information about numbers of rooms and bed-spaces. It's difficult to know the exact size of the sector because there's no compulsory registration scheme for accommodation establishments in the UK*".

26.3.18 Destination Research²⁷ identify that spending from overnight tourists to East Suffolk comprises 33% on accommodation, 13% on shopping, 28% on food and drink, 9% on attractions and 17% on travel:

Table 26.2: Tourist Spending – Staying Visitors to East Suffolk

	£ spent in 2019	%
Accommodation	£49,385,000	33%
Shopping	£19,965,000	13%
Food and Drink	£42,160,000	28%
Attractions	£13,442,000	9%
Travel	£26,242,000	17%
Total	£151,194,000	100%

26.3.19 This spending represents about 29% of the £522,281,000 Destination Research identifies that visitors spent in East Suffolk in 2019.

26.3.20 If all workers at peak were to take accommodation otherwise occupied by tourists, they would still be expected to spend the same amount on accommodation and travel, and would also contribute to a proportion of spending on food and drink and retail – together these account for 91% of spend by staying tourists.

26.3.21 If workers (at peak) take up to 4% of the tourist accommodation market in East Suffolk as set out above, that part of the market is equivalent to just over £6m of spend by staying tourists, based on rates of spending set out above. That is equivalent to 1% of total tourist spending in East Suffolk each year. Workers' spend is likely to be around 75%²⁸ of that of staying tourists.

26.3.22 The fact that workers' spend will be spread throughout the year and less seasonal than staying visitors would offset this to a certain extent. In addition, the disparity identified here only applies to the peak month, in the peak year, of the workforce profile, should that interact with the peak tourist season. In reality, this may not occur.

26.3.23 As set out in the **Accommodation Strategy** [APP-613] and **Economic Statement** [APP-610], the gross economic effect of worker spending on accommodation alone during the construction period is estimated at around £24 million.

²⁷ <https://www.thesuffolkcoast.co.uk/shares/Economic-Impact-of-Tourism----East-Suffolk-Report-2019.pdf>

²⁸ Lower end assumes a slight reduction in shopping and food/drink spend compared to tourists.

- 26.3.24 At Hinkley Point C, similar concerns were raised through representations that *“the construction workforce would take up all available tourist accommodation during the peak season and thus deprive visitors to the area of suitable places to stay”* (ExA Recommendation Report, para 4.136). The ExA was not convinced of this for several reasons set out at paragraph 4.137 of the Recommendation Report²⁹:
- *Firstly, the price of tourist accommodation varies throughout the year and increased prices would potentially deter workers looking for accommodation in this sector during peak season;*
 - *Secondly, there could be a mismatch between tourist accommodation which is often focused on family units and the profile of the incoming workforce, which would be largely single, unaccompanied males; and*
 - *Thirdly, locations chosen would generally be restricted to those areas that would be easily accessible to the park and ride network or to the bus routes ferrying workers to the main site.*
- 26.3.25 The ExA for the Hinkley Point C application concluded that (Paragraph 4.137) *“As such it is our view that whilst some use might be made of available local tourist accommodation by workers, this would be unlikely to have a significant impact on the availability of accommodation for tourists”*.
- 26.3.26 This is demonstrated to have been the case based on monitoring of economic effects through public datasets and the Hinkley Point C Socio-Economic Advisory Group (SEAG) monitoring data (see **Appendix 23A [REP2-112]** of the **Responses to the ExA's First Written Questions SE.1.7, SE.1.13 and SE.1.36 [REP2-100]**).
- c) **Tourist Accommodation Market Supply element of the Housing Fund**
- 26.3.27 SZC Co.'s assumptions about the availability of caravan accommodation to workers is limited by planning and licencing factors which reduce availability in modelling terms by nearly 740 bedspaces in the five Local Wards around the site. These restrictions relate to the ability of sites to operate all year round, and to allow people to stay for extended periods.
- 26.3.28 As caravans are likely to be the most popular type of tourist accommodation for workers, and based on Hinkley Point C experience, there is potential to use the Housing Fund to make better and more use of (particularly) caravan

²⁹ The Planning Inspectorate (2012) Panel's Report to the Secretary of State.

accommodation currently considered 'unavailable' within the assessment, in a sustainable way.

26.3.29 It is likely that the sector will expand in response to increased demand as has been seen at Hinkley Point C. However, ESC has raised concerns that it will not be able to do so sufficiently quickly or effectively without additional support from the Sizewell C Project, and that unlicensed caravan sites and fly-parking of caravans may occur.

26.3.30 As a result, SZC Co. has proposed a Tourist Accommodation element of the Housing Fund for a range of measures that could include boosting supply or access to accommodation:

- The provision of information through regular communication with existing and potential new tourist accommodation providers on expanding or building new provision.
- Support with planning, licencing, pre-application advice and development, for example funding for ESC to investigate / administer amendments to licencing for year-round occupancy.
- This could include a Management Strategy setting out the principles and guidelines for conversion of sites, licence amendments and planning to support the delivery of bedspaces in a sustainable way to support the Sizewell C Project and local accommodation providers. This would also enable ESC to set time limits on licences and changes in occupancy to avoid long-term issues of residential use of such accommodation.
- Support for tourism providers to increase capacity or re-design sites to accommodate additional provision, subject to consultation with ESC. This could be through annual loans/grants for potential providers to bring properties / rooms up to standard, in exchange for priority for construction workers / obligation to market accommodation to workers through the Accommodation Management System.
- Help to manage and reduce unintended adverse effects that may arise – such as enforcement if unlicensed sites spring up.

27. PUBLIC SERVICES

27.1 Overview

27.1.1 SZC Co. has reviewed Chapter 27 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Annex N [[REP1-059](#)].

27.1.2 **Table 26.1** below provides a response to the principal points raised where a response is appropriate, with further details set out at **Section 26.3** where relevant.

27.1.3 SZC Co.'s position in relation to effects on public services is extensively set out at:

- **Volume 2, Chapter 9 (Socio-economics) of the ES** [[APP195](#)]; and
- The **Community Safety Management Plan** [[APP-635](#)].

27.2 Response to Issues (Summary)

27.2.1 SZC Co., SCC and ESC have worked collaboratively to each understand the potential effects related to the Sizewell C Project, risks to public service delivery and community safety issues, and have developed a position with regards to precautionary mitigation through a Public Services Resilience Fund (PRSF), and measures related to children and young people (school and early years capacity and resilience measures).

27.2.2 As set out within the **Initial Statement of Common Ground** [[REP2-076](#)], subject to final agreement of details of the scope and scale of these measures, the parties agree that in principle it will be capable of reducing identified risks by allowing the providers of existing public services and community safety programmes to expand their work where there is a reasonable expectation that the Project's non-home based (NHB) workforce could increase risks. Importantly, these measures can be delivered on a multi-agency basis.

27.2.3 SZC Co. notes that these comprise additional mitigation and considers that there are measures embedded within the Project that would also reduce demand for public services and risks of community safety, and these have been referenced throughout.

Table 27.1: Summary of Response to Public Services

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
27.8(iii) 26f	Worker Code of Conduct / Workforce Management / Community Liaison	<p>The Councils consider that the Worker Code of Conduct should be secured as a requirement.</p> <p>The Councils consider that they need to better understand how “enforcing a strict worker Code of Conduct and drug and alcohol testing policies” will reflect the nature of substance misuse in the county (for example multi-drug use, increasing use of prescription drugs) and how this will be enforced and monitored given the number of contractors and sub-contractors on site.</p>	<p>SZC Co. does not consider it appropriate to directly secure the Worker Code of Conduct. This forms part of the conditions of employment and therefore the Sizewell C Project needs the flexibility to alter the terms from time to time, following engagement with Union partners and continuing lessons learnt from Hinkley Point C.</p> <p>The Sizewell C Worker Code of Conduct will however be shared with the Community Safety Working Group for comment ahead of finalisation and may be updated, if required, throughout the construction phase in response to issues raised by the Group.</p> <p>Feedback from Hinkley Point C suggests that the Worker Code of Conduct is an important deterrent of community safety effects and can be amended from time to time to address issues that arise. For example, the Hinkley Point C Worker Code of Conduct [APP-636] stipulates that <i>'Workers should not work under the influence of prescription drugs if they could reasonably expect that there may be effects on their work performance or on the safety of themselves or others.'</i> SZC Co. is happy to discuss further with the Councils how the Worker Code of Conduct would be enforced and how drug and alcohol testing is carried out, noting that this will include pre-placement, for reasonable suspicion and random testing.</p>
27.9 to 27.21 and 26a	School and Early Years Capacity	The Councils note potential impacts of non-home-based workers on school capacity and Early Years provision – noting specifically that:	SZC Co. broadly agrees with this position, and has set out the proposed mitigation within Schedule 5 of the Draft Deed of Obligation (Doc Ref 8.17(D)).

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<ul style="list-style-type: none"> • SCC forecasting is limited to 2024 and pressures on school places are expected over the coming years as a result of additional dwellings being proposed in the catchment areas (e.g. 800 new homes in Saxmundham). • Only Leiston appears to be an area where additional early years accommodation will be needed to meet demand – but will need to be monitored as families begin to apply for places. Leiston has been identified as an area where this additional accommodation would be best placed. • Additional demand on school transport will also need to be mitigated to ensure that any additional capacity required on routes is available when increased demand arrives in the schools. 	<p>Further discussions are required between SZC Co. and SCC in order to set the appropriate scale of funds linked to the provision of additional temporary capacity for primary and early years capacity in Leiston.</p> <p>SZC Co. considers that additional school transport will not be required and is not proposing this as part of the package of mitigation measures.</p>
27.22 to 27.23 and 26b	School and Early Years Resilience	The Councils note impact/risk for the wellbeing and learning of pupils at school, as a result of safeguarding concerns, emotional wellbeing and children with English as Additional Language.	<p>SZC Co. considers that there is no evidence for the potential for a significant effect from the Project relating to the wellbeing and learning of pupils at school as a result of safeguarding concerns, emotional wellbeing and children with English as an Additional Language.</p> <p>Nonetheless, given the importance of safeguarding for children and the potential risks raised by SCC through engagement, SZC Co. has committed to providing precautionary mitigation in the form of School and Early Years Resilience Measures through Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
26a and 26b 27.51 27.52	School and Early Years Mitigation	<p>The Councils suggest that mitigation could include:</p> <ul style="list-style-type: none"> Supporting the Personal, Social and Health Education curriculum and/or funding training for school staff and governors; and Any impacts and related costs to schools arising from children of workers with limited English language skills/English as an Additional Language (EAL) would need to be addressed with schools directly. 	<p>This is noted and these measures could be supported through the School and Early Years Resilience Measures through Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p>
27.53, 27.57, 27.58 26c	Family Services / Health Visitors, Community Health and District Nursing	<p>The Councils consider that the NHB workforce could result in an increase in demand for under 5s and family services, particularly Health Visitor Services.</p> <p>The Councils estimate that:</p> <ul style="list-style-type: none"> to safely deliver a service to the additional under 5s and their families living in the Leiston area arising from the Sizewell C workforce, an additional 1.5 FTE of Health Visitor resource is required, which should be funded by the Applicant (27.53); and that The impact of the additional children, based on the same data used for school place modelling is at peak construction year and estimated additional 0.3 FTE Health Visitors are required to be able to safely deliver a service to the under 5s and their families living in the Leiston area (27.58). 	<p>SZC Co. understands that there is a rate of around 0.002 health visitors per child in Suffolk. This is based on 76 health visitors³⁰ employed in Suffolk, with an estimated under-5 population (based on 2019 ONS Mid-Year Estimates) of 40,103 children.</p> <p>As set out in Table 27 of the LIR, a reasonable peak estimate of the number of NHB workers with families with children aged under 5 is approximately 150, of which around 25 are anticipated to be in Leiston, as this element of the workforce is likely to be spread widely across the 60-minute area.</p> <p>This would translate to an increase in demand (based on existing service levels) of 0.05 Health Visitors in the Leiston area, or 0.28 for the entire County.</p> <p>SZC Co. considers this level of demand to be not significant, and in any case would be reasonably funded over time through general taxation.</p>

³⁰ [More health visitors axed by Suffolk County Council | East Anglian Daily Times \(eadt.co.uk\)](https://www.eadt.co.uk/news/2019/04/24/more-health-visitors-axed-by-suffolk-county-council/)

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
27.24	Care Homes	<p>The Councils are concerned that:</p> <ul style="list-style-type: none"> Residents may not want to access care in the Leiston area due to negative perceptions, which could exacerbate the reason for independent care providers who own premises used to provide care to decide it is more financially viable to either sell or convert their premises into accommodation to rent out to the construction workforce. <p>There is a risk that the development will inflate purchase and/or development costs in the area which will reduce the care sector's ability to develop and provide suitable provision in the area for local residents</p>	<p>There is no reason to suggest that this is a likely significant effect – an independent care provider would be motivated primarily by the incentive of providing care, and it is not clear why residents in Leiston would be less likely to seek access to care.</p> <p>If a private care provider is minded to sell their property for conversion to residential use, that is their commercial decision. The recipients of care would create market demand that would be provided for by the market. Residential care homes are no less financially attractive than private accommodation for workers – and the latter would be a temporary effect during the construction phase of Sizewell C, and as a result the identified risk is unlikely.</p> <p>There is no evidence that purchase and/or development costs would increase as a result of the Project – please refer to SZC Co.'s Responses to the ExA's First Written Questions [REP2-100] at SE.1.2 for SZC Co.'s position in this regard, and to Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130] (Section 4) for evidence of effects on the housing market in Somerset as a result of Hinkley Point C.</p>
27.25 to 27.27, 27.55 and 26f	Transport effects on Social Care and Community Healthcare	<p>The Councils are concerned that the pressure on transport infrastructure resulting from the development has impacts on the deliverability of social care and community health services:</p> <ul style="list-style-type: none"> Care providers are not paid for travel time between social worker / community health visits. 	<p>The Consolidated Transport Assessment [REP2-052] includes an A12 VISSIM micro-simulation model to assess the effects of the Sizewell C Project on the A12 corridor between Seven Hills and A1152, which is susceptible to peak period congestion. It concludes that the impacts on journey times over a 14km corridor are not considered to be significant (i.e. up to 37 seconds increase during the peak construction busiest day for the preferred freight strategy, with all other scenarios and</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<ul style="list-style-type: none"> Increased traffic congestion, resulting in increased travel time between visits, could make runs in the area non-viable for care providers to deliver This could lead to a degradation of service in the area on current rates. In order to protect levels of service, rates may have to be increased which would increase financial pressure on Adult Social Care Services and Community Health. <p>Increased travel time between visits could also result in delays in delivery of care at scheduled times. This may affect medication schedules or customers' choice and experience of care. It could lead to increased demand for more complex care if routines are disrupted.</p>	<p>time periods experiencing less increase in journey time on the corridor for the preferred freight strategy) and no highway improvements are proposed for this section of the A12. Instead demand management measures are proposed for this section of the A12, which includes, but is not limited to, the delivery management system and freight management facility at Seven Hills to enable the control of HGVs on the highway network as well as a direct bus strategy to reduce car trips. The sensitivity of the A12 corridor is recognised by SZC Co. and should the HGV trips be more than assessed, particularly during the network peak periods, then unmitigated impacts may arise. It is for this reason that the peak hour HGV limits are proposed.</p> <p>Due to the above, SZC Co. does not predict that there will be any impact on social care or community health visits and no additional mitigation is proposed.</p>
27.56	Compensatory Reactive Measures	<p>The Councils consider that the following measures are necessary to compensate for effects:</p> <ul style="list-style-type: none"> Cover for emergency care arrangements if providers hand care runs back to commissioning bodies until substantive provision can be resumed. Provision for compensation to be paid to customers of care services where severe or life-threatening impacts to their service have occurred. 	<p>As set out above, this effect is not predicted, and even if it were, it is the role of the statutory service to adequately commission services.</p> <p>SZC Co. will support resilience to workforce planning within Suffolk County Council's Adult Social Care and Children's Services including support for recruitment, training and retention of staff as set out through the Public Services Resilience Fund at Schedule 5 of the Draft Deed of Obligation (Doc Ref 8.17(D)).</p>
27.28 to 27.31 and 26f	Workforce effects on Social Care and Community Healthcare	<p>The Councils are concerned that due to the fragility of workforce in the care sector (low pay, anti-social hours and high turnover), recruitment and retention of staff will be made more difficult and consider it essential to agree with the Applicant and implement effective</p>	<p>SZC Co. considers that it is not the role of the planning system or the Sizewell C Project to mitigate for underlying issues of recruitment and retention of workforce in the care sector, which as the Councils state, is fragile due to low pay, anti-social hours and high turnover.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>mitigation measures for the impacts arising, to ensure that statutory services can continue to be delivered safely and to the current quality standards.</p> <p>This could result in commissioners having to deploy resources from other areas and could leave people in the local area without care in the private care sector or require the local authority to provide expensive care resources required to cover emergency circumstances.</p>	<p>SZC Co. recognises that there is potential for workers in these sectors to seek employment on the Sizewell C Project. This is a positive benefit for the workers, and a normal part of labour market churn that all employers are subject to.</p> <p>Nonetheless, given the importance of the sector, SZC Co. has committed to providing for resilience measures to support resilience in workforce planning within Suffolk County Council's Adult Social Care and Children's Services including support for recruitment, training and retention of staff as set out through the Public Services Resilience Fund at Schedule 5 of the Draft Deed of Obligation (Doc Ref 8.17(D)).</p>
27.45 and 26i	Transport effects on Emergency Services	The Councils raise concern of delayed emergency services response times as a result of traffic congestion, including abnormal loads, and expect that, because of the increase in traffic, there will be more road traffic accidents, which will increase the service demand for emergency services.	<p>Please refer to the response to 27.25 to 27.27, 27.55 and 26f above with regards to increase in journey times. SZC Co. is proposing a permanent beach landing facility (BLF) to enable the heaviest/largest AILs to be delivered by sea rather than road. In addition, the proposed management of road-based AILs is set out in the CTMP [REP2-054], which includes timing of the AIL deliveries outside of the peak hours as well as likely escort requirements in terms of police escort, self-escort, no escort. With regards to an increase in road traffic accidents, the Consolidated Transport Assessment [REP2-045] includes analysis at Chapter 10, which demonstrates that there is not expected to be a significant residual impact on road safety. A package of highway, transport and environmental mitigation measures are proposed to be secured through requirements in the DCO or obligations in the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. will continue to liaise with the authorities with regard to the specific details of the proposed mitigation measures. In addition, a transport contingency fund is to be secured through the Draft Deed of Obligation (Doc</p>

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			Ref. 8.17(D)), which the Transport Review Group can direct be drawn down in the event that further mitigation is required to address significant adverse transport impacts, including road safety impacts.
26i 27.65 27.66	Proposed Mitigation for Transport effects on Emergency Services	<p>The Councils expect that a robust incident management protocol for the main access routes is developed by the Applicant in co-operation with the emergency services, national and local highway authorities, with appropriate levels of funding by the Applicant.</p> <p>The Councils consider that Creative solutions need to be considered to mitigate such a potential delayed response time. Some will require bilateral discussions between the Applicant and the service providers, others could be considered on a wider basis, such as whether improvements to the existing mobile telephone network coverage may help with response time and attendance by emergency services.</p>	<p>The management of Sizewell C traffic in the event of an incident on the highway network is to be managed via the TIMP [REP2-053], which is to be secured through an obligation within the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. continues to liaise with the stakeholders, including the emergency services, to finalise and agree the protocols set out in the TIMP [REP2-053].</p>
27.36 to 27.41	Sexual Health, Drugs and Alcohol	<p>The Councils raise concerns about the increased risk of sexually transmitted infection (STI), demand for primary and acute care, and sexual health services.</p>	<p>Volume 2, Chapter 28 (Health and Wellbeing) of the ES [APP-346] sets out that the Project will provide a comprehensive occupational health service "Sizewell Health" in Schedule 6 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) (see Volume 2, Appendix 28A [APP-347] for description). This will address most of the healthcare needs of the NHB workforce, including sexual health, and provide complementary care to the home-based workforce. Demand outside this, including for the NHB workers families (should they also move to the area), will be addressed through a residual healthcare contribution. SZC Co.'s proposed approach to calculating this is set out in</p>

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			Volume 2, Chapter 28, Appendix 28B of the ES [APP-347] but this is subject to further discussions with the Ipswich and East Suffolk Clinical Commissioning Group and the Councils.
27.32 26g	Sexual Health - Mitigation	<p>The Councils are concerned with the risk of increase of issues resulting from unsafe sexual activity of the workforce, with impacts on the sexual health of the resident population.</p> <p>The Councils note that additional activity could result in significant cost pressure on local sexual health services and that if not mitigated for, caps on local services would have to be applied and the ability to test for sexually transmitted across the whole of the county will be affected.</p> <p>The Councils suggest that sexual health promotion campaigns for Sizewell C workforce are secured by obligation.</p>	<p>As set out in Volume 2, Appendix 28A [APP-347], Sizewell Health will run a range of health promotion campaigns which aim to maintain and improve the health and wellbeing of the workforce by: raising awareness of both work and non-work-related health issues; and encouraging healthy behaviours within and outside of the workplace. These will include but not be limited to occupational health promotion; mental health; sexual health; general health; lifestyle screening; and targeted health education. Engagement with the Sizewell Health Working Group will be undertaken to ensure alignment with local priority and seasonal campaigns to maximum effect. SZC Co. does not consider it appropriate or necessary to secure individual campaigns by obligation.</p> <p>Sizewell Health will also offer regular sexual health clinics and SZC Co. is discussing with SCC the possibility of contracting these out to SCC's sexual health provider (mirroring the approach at Hinkley Point C). This would be undertaken via a separate commercial agreement with the Sizewell C occupational health provider, once appointed, and the Council.</p>
27.32 to 27.35 and 26e	Safeguarding	Councils note risk of direct safeguarding impact on young people as victims and an indirect impact on dependent children and children of partners with whom the Sizewell C workforce form relationships.	<p>SZC Co. recognises the risk that the Councils identify in terms of safeguarding for young people, and is proposing a range of embedded and additional mitigation measures in order to reduce these risks.</p> <p>The Public Services Resilience Fund includes measures to support and expand existing safeguarding measures currently</p>

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Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<p>being provided by East Suffolk Council and Suffolk County Council through the Community Safety Partnerships and Safer Stronger Communities Board, as set out in Schedule 5 of the Draft Deed of Obligation (Doc Ref 8.17(D)).</p> <p>The issue of safeguarding has been addressed in SZC Co.'s response to Relevant Representations, and in Responses to the ExA's First Written Questions [REP2-100], particularly HW.1.14, HW.1.15 and HW.1.16.</p>
27.46 and 26j	Fire and Rescue Service	<p>The Councils consider the following likely effects:</p> <ul style="list-style-type: none"> • Growth in population and in traffic increases demand in Fire and Rescue services, to attend incidents and undertake preventative work. • Increase in houses in multiple occupation may increase fire risk. • Fire Service will be required to visit the project site and to devise strategies and conduct specific training to manage the unique risks presented by the project. • Councils expect a package of mitigation measures and funding, to include mitigation of increase in service demand, preventative work, and working with the Applicant to devise strategies and conduct specific training to manage the unique risks presented by the project, to be secured as an obligation. 	<p>SZC Co. has engaged with Suffolk Fire and Rescue Service, and set out an assessment of likely significant effects requiring mitigation within Volume 2, Chapter 9 of the ES [APP-195].</p> <p>Mitigation will be secured in Schedule 4 of the Draft Deed of Obligation (Doc Ref. 8.17(D)). The scope and quantum of the proposed mitigation remains under discussion.</p>
27.47 and 26k	Police	<p>The Councils support Suffolk Constabulary's assessments and highlight some of the key impacts, noting that specific additional resource demands have</p>	<p>SZC Co. recognises the Council's position and are working with Suffolk Constabulary directly to agree a proportionate approach to mitigation noting that SZC Co. has identified a significant</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>been identified, supported by modelling, in the provision of custody, Command and Control Room and Crime Co-ordination Centre resourcing and local policing resources.</p> <p>The Councils consider that demands are predicted using a robust methodology based on demographic weightings applied to the increase in population from the Sizewell C workforce.</p> <p>The Councils note that there are impacts arising from substantial increases to traffic which will impact on roads policing.</p> <p>Councils expect a package of mitigation measures and funding to be agreed between Suffolk Constabulary and the Applicant as an obligation.</p>	<p>adverse effect prior to mitigation within Volume 2, Chapter 9 of the ES [APP-195].</p> <p>Further information regarding the position of SZC Co. and Suffolk Constabulary is set out in both parties' responses and comments to the Examining Authority's First Written Questions [REP2-100], [REP2-166] at CI.1.14, CI.1.15, and CI.1.16, SZC Co.'s response to Suffolk Constabulary's Written Representation, and the Initial Statement of Common Ground [REP2-081] between SZC Co. and Suffolk Constabulary.</p> <p>While the scope and quantum of mitigation is yet to be agreed, this will include contributions for local community and roads policing.</p>
26e, 26f 27.54 27.61 27.63 27.64 27.68 ANNEX N	Public Services Resilience Fund	<p>The Councils have identified that through a Public Services Resilience Fund (PSRF):</p> <ul style="list-style-type: none"> Funding should be provided towards multi-agency preventative and responsive measures; for example, specific Social Worker, Family Support Practitioner and Young Persons Worker posts and service provision that will work with vulnerable families and young people in a preventative and, if necessary, reactive manner. Funding for a Young Person / Family Support Officer should be made available to work across public sector and local community services to monitor impacts, including bringing together data, on children, young people and families with a specific priority on more vulnerable groups 	<p>In the case of community and public service issues, SZC Co. has undertaken engagement to understand – based on community consultation and the concerns of providers of statutory services such as Adult Social Care and Children and Young Peoples Services – the potential for effects to arise and the potential need for appropriate precautionary mitigation, as part of the Public Services Resilience Fund.</p> <p>The proposed approach to additional mitigation gives control to the providers of community safety services in the area to direct funding, where it can be reasonably linked to a Project effect, to the areas that the Council consider most likely to be at increased risk, based on their judgement.</p> <p>SZC Co. recognises that Community Safety Partnerships and the Safer Stronger Communities Board currently undertake a programme of community safety initiatives, and agrees that use</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>including children known to social care, youth justice and other vulnerable groups including children with special education needs and disabilities, Care Leavers, black, Asian, and minority ethnic groups (BAME), and lesbian, gay, bisexual, transgender, queer (or sometimes questioning), and others (LGBTQ+).</p> <ul style="list-style-type: none"> • Demand for additional sexual health services should be paid for through the PSRF. <p>At Annex N, the Councils have set out a list of proposed areas of activity that could be funded by the Public Services Resilience Fund, building on existing activities and programmes being delivered by the Community Safety Partnerships and Safer Stronger Communities Board.</p>	<p>of the Public Services Resilience Fund to support the extension / amendment to some of these programmes – where there is a risk related to the Sizewell C Project – is appropriate.</p> <p>SZC Co. considers that the definition and scope of the Public Services Resilience Fund as set out within Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) is appropriate to respond to potential risks related to the Project and its workforce raised through engagement with the Councils, including increased demand for sexual health services should this arise.</p> <p>As set out within the Initial Statement of Common Ground, Section 12 [REP2-076], at SE32, SE34 and SE42), SZC Co., ESC and SCC are agreed on the principle of a Public Services Resilience Fund and the largely autonomous role of the Local Authorities in directing the Fund appropriately, subject to further discussion on the scope and scale of funds.</p>

28. COMMUNITY IMPACTS

28.1 Overview

28.1.1 SZC Co has reviewed Chapter 28 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Annex P.

28.1.2 **Table 28.1** below provides a response to the principal points raised where a response is appropriate.

28.1.3 SZC Co's position in relation to effects on community impacts is extensively set out in:

- **Volume 2, Chapter 9 (Socio-economics)** of the ES [[APP-195](#)]; and
- The **Community Safety Management Plan** [[APP-635](#)].

28.2 Response to Issues (Summary)

28.2.1 SZC Co. notes that the Councils have provided little or no evidence to support the position set out in this chapter of the LIR in terms of the scope and scale of community issues. In most cases, the Councils rely on assertion of effects which has not been evidenced, has not been experienced elsewhere, or are perceived effects which are unlikely to manifest.

28.2.2 SZC Co. welcomes the recognition at paragraph 28.60 of the LIR that “*the Applicant's employment-related ambitions, particularly for vulnerable and deprived communities (see the skills section), may alleviate some of the potential community safety issues*”.

28.2.3 SZC Co. agrees with the Councils' position that “*provision of a broad range of jobs and employment opportunities within local communities would contribute to positive community cohesion by enabling integration, aspirations and fostering a sense of equal opportunity*”.

28.2.4 Nonetheless, SZC Co. has – through engagement with the Councils and emergency services – understood that there are concerns of risks in relation to community safety and has considered these within the application documents listed above.

28.2.5 As a result, SZC Co. has developed a range of precautionary mitigation measures – both embedded and additional – to address these identified risks.

- 28.2.6 SZC Co. recognises that, in the case of community and public service issues, evidence specific to the effects of the Sizewell C Project can be limited. It has as such undertaken engagement to understand – based on community consultation and the concerns of providers of statutory services such as Adult Social Care and Children and Young Peoples Services – the potential risks and potential need for appropriate precautionary mitigation, as part of the Public Services Resilience Fund.
- 28.2.7 This approach to additional mitigation gives control to the providers of community safety services in the area to direct funding, where it can be reasonably linked to a Sizewell C Project effect, to the areas that the Councils consider most likely to be at increased risk, based on their judgement.
- 28.2.8 Evidence from Hinkley Point C is important and has helped to suggest where mitigation at Sizewell C can be replicated and improved for the benefit of the community in East Suffolk, which is reflected in the application documents listed above.
- a) [Experience/Evidence from Hinkley Point C](#)
- 28.2.9 The Councils note that (paragraph 28.13 of the LIR) within the Oxford Brookes Study of Hinkley Point C (Appendix 2.1 to the LIR), the report states (page 59):
- “for community safety, there appears to be good management of potential project impacts through a combination of mitigation measures, including the implementation of the Worker’s Code of Conduct, and some resourcing has been provided towards community liaison and policing.”*
- 28.2.10 This supports SZC Co.’s position that, with embedded and additional mitigation, the non-home based (NHB) workforce is not likely to result in significant impacts on crime or community safety.

Table 28.1: Summary of Response to Community Impacts

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
28a 28.64 28.1 28.23 to 28.24 28.27 to 28.28	Leiston Sports Facilities	<p>Subject to agreement of detailed design (lighting, noise, surface water drainage and shared use agreement), the Councils recognise the benefit of the proposed sports facilities.</p> <p>The Councils consider that funding for construction of the sports facilities at Leiston and a 'sink' fund for refurbishment at the end of the construction phase should be secured by obligation, with provision for the Councils to design and build the facilities at Leiston Leisure Centre incorporated in the Deed of Obligation, as well as the commitment to re-surface the 3G pitch prior to ESC taking on full responsibility for future maintenance and management.</p>	<p>SZC Co.'s position on the delivery and commitments around the Leiston Sports Facilities is set out in Responses to the ExA's First Written Questions (ExQ1) [REP2-100] at AR.1.0 and AR.1.1.</p> <p>The provisions for the Leiston Sports Facilities are currently set out within the Draft Deed of Obligation, Schedule 10 (Doc Ref. 8.17(D)). These remain subject to agreement on detail with ESC and SCC - see current position in the Initial Statement of Common Ground, Section 12 between SZC Co., ESC and SCC [REP2-076].</p>
28b 28.67 28.2 28.25	Worker Integration, Worker Code of Conduct	<p>The Councils suggest that the Worker Code of Conduct should be secured by requirement.</p> <p>The Councils request that the Applicant develop a comprehensive strategy of integration of workers with the local community in order that the influx of workers to the Leiston area have a neutral impact on community cohesion and integration; and</p> <p>The Councils consider that if the workers are willing to assimilate into the local area by shopping locally, using local facilities including sports facilities, the swimming pool and Leiston Film Theatre as examples, this would encourage them to feel an ownership of the town and thereby respect its residents. Workers who are here</p>	<p>SZC Co. does not consider it appropriate to directly secure the Worker Code of Conduct. This forms part of the conditions of employment and therefore the Sizewell C Project needs the flexibility to alter the terms from time to time, following engagement with Union partners and continuing lessons learnt from Hinkley Point C.</p> <p>The Sizewell C Worker Code of Conduct will be shared with the Community Safety Working Group for comment ahead of finalisation and may be updated, if required, throughout the construction phase in response to issues raised by the Group.</p> <p>SZC Co. welcomes the recognition that workers could have a neutral effect on community cohesion and integration. Workers would be provided a welcome pack on induction and many would be living in the community. Workers would have free</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		longer term may be keen to be involved in local events for example film festivals or the local Park Run.	choice as to where they shop, undertake recreation, and socialise – most would likely act as existing members of the community, for example shopping, eating and drinking locally. SZC Co. has committed to ongoing community and stakeholder liaison, as set out in the Code of Construction Practice [REP2-056] and this will support the integration of workers and residents. As part of this, SZC Co. could make workers aware of local recreational opportunities, such as Park Run and the Leiston Film Theatre. It is envisaged that some workers will want to join Leiston Leisure Centre to make use of the swimming pool, exercise classes and gym, and SZC Co. has already discussed with ESC that a worker membership deal may be agreed with Places Leisure who operate the centre.
28.19 and 28.50	Workforce Profile and Demographic Change	The Councils refer to “a population of HGV and LGV drivers in the area (predicted to be up to 440 per year), as well as visitors (up to 200 per year) and workers’ families (1168 per year)”	This is factually incorrect and has been made clear to Suffolk Constabulary through engagement on their approach to modelling of crime and non-crime incidents: <ul style="list-style-type: none"> It is unlikely that these drivers would be non-home-based (NHB) i.e. move to the area temporarily to work on the Sizewell C Project – they would more likely be either home-based (HB) i.e. already living within the 90-minute daily commuting zone from the main development site, or living outside of this area but driving within it. Both – but LGV drivers in particular – would operate a range of routes in local catchments, for a range of clients (not just Sizewell C). Where there is potential for the increase in journeys / vehicles (rather than people) to lead to road traffic incidents, this has been assessed through the Transport Assessment [REP2-045] and mitigation set out through the Traffic Incident Management Plan [APP-607].

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<ul style="list-style-type: none"> Visitors to the site would include non-site based SZC Co. contractor and other staff who may be based within or outside the area, and a range of other visitors including service engineers, educational visitors and regulatory visitors. There will be a wide range of origins – with some living close to the site and therefore already be home-based, and some national or international visitors who may arrive and stay overnight. Volume 2, Chapter 9, Appendix 9B (Demographic Benchmarks and Workforce Characteristics) of the ES [APP-196] sets out estimates for the number of family members per NHB worker at peak, based on observed ratios of NHB workers to non-worker family members from workforce surveys. This data is based on the proportion of workers at Hinkley Point C who stated they had brought families when surveyed (pre-peak), scaled up to the peak NHB workforce at Sizewell C, to estimate the gross, peak effects. The ratio of NHB workforce without families to NHB workers with families is therefore predicted to track the proportion identified through Hinkley Point C surveys across the workforce profile, so it is not appropriate to apply the peak absolute number to years where there will be a much smaller workforce.
28.15	Pre-existing Conditions and Comparison to HPC	The Councils consider that it is important to understand the issues that have occurred in recent years in the area, and that the Community Safety Partnerships, Suffolk Constabulary and other local agencies have needed to address, including county lines, gang related violence, and drug and alcohol misuse.	It is not clear or evidenced how the Sizewell C Project's NHB workforce would increase impacts and risks based on the different demographic in the area compared to the area around Hinkley Point C, or the difference in pre-existing community safety impacts.

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Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>The Councils consider that these are a clear indication that the existing demographic already creates the environment for criminality and risk-taking behaviours, and that Sizewell C will only increase those impacts and risks to a higher level and this needs to be mitigated.</p> <p>The Councils consider that this is very different to the Hinkley area and demographic.</p>	<p>The NHB workforce at Sizewell C is anticipated to act in a similar way to that which has been observed at Hinkley Point C in terms of crime and non-crime incidents, as they would be subject to the same management and mitigation measures (including the Worker Code of Conduct and security vetting) and in some cases will actually be the same people.</p> <p>The key demographic difference between Suffolk and Somerset is the age profile – particularly in East Suffolk, which is weighted towards older age groups.</p> <p>A comparison of the differing rates of types of crime between Bridgwater (in 2015) and Leiston (in 2019)³¹ suggests that:</p> <ul style="list-style-type: none"> • There were far lower rates of almost all types of crimes in Leiston in 2019 than there were in Bridgwater in 2015, per 1,000 residents; • Rates of anti-social behaviour in 2019 in Leiston were less than a quarter of the rate in Bridgwater prior to commencement of Hinkley Point C's construction; and • Drug-related crime was 25% less prevalent in Leiston in 2019 compared to Bridgwater in 2015, and public order offences were also less prevalent. <p>It is therefore not clear why pre-existing differences in types of community safety issues, or demographics, would translate to differences in the type or overall rate of crime related to NHB workers.</p> <p>SZC Co. has engaged with the Councils to understand concerns of risks associated with the NHB workforce and has developed a Public Services Resilience Fund to address identified issues.</p>

³¹ Police.uk

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Ref	Issue / Impact	Summary of LIR	SZC Co. Response
28.4 / 28c 28.30 / 28d 28.35 to 28.43 28.46 28.47	Community Safety Risks	The Councils raise concern about increased risk of criminal exploitation (County Lines and modern slavery), violence against women and girls, men and boys (including domestic abuse and sexual violence), radicalisation, hate crime, increased anti-social behaviour, crime and non-crime community safety issues in locality, night time economy / alcohol risks, missing persons, mental health incidents, and increased community tensions as result of incoming workforce, to be mitigated through Public Services Resilience Fund.	SZC Co. recognises that these risks have also been raised through engagement with the Councils, and this has led to the current scope of the proposed mitigation measures set out at Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(D)). SZC Co. notes that these are potential risks rather than identified likely significant adverse effects and that mitigation is being provided on a discretionary, precautionary basis.
28.32	Community Cohesion Risks	The Councils raise concerns about community cohesion tension, as a result of, for example, fly parking (unauthorised parking), littering, noise, over-demand on existing services, some of which are at capacity, and leisure activities and congestion. These all have the potential to negatively impact on community cohesion.	SZC Co. does not agree with the assertion that the Sizewell C Project would cause over-demand on existing services and leisure activities. Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] does not identify any residual effects on existing services. Where effects have been identified, these have been addressed through the proposed mitigation. This includes the provision of the off-site sports facilities at Leiston (Schedule 10), the Public Services Resilience Fund (Schedule 5) and the Residual Healthcare Contribution (Schedule 6), as set out in the Draft Deed of Obligation (Doc Ref. 8.17(D)). In addition, consultation with ESC has indicated that there is plenty of capacity at Leiston Leisure Centre and that Places Leisure are anticipated to welcome new members. Similarly, Leiston Football Club has previously indicated that it would welcome new players or social members, as happened during the Sizewell B construction. SZC Co. also notes that elsewhere in the LIR the Councils propose that workers using local facilities, such as sports facilities, the swimming pool and Leiston Film Theatre, could help assimilation.

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Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<p>In terms of community tensions, SZC Co. will put in place a number of measures to address issues which may arise. The Community Safety Management Plan [APP-635] and Section 9.7(ix) of Volume 2, Chapter 9 of the ES [APP-195] set out how the Sizewell C Project's range of measures would contribute towards community cohesion and integration.</p> <p>SZC Co. has committed to ongoing community and stakeholder liaison, as set out in the Code of Construction Practice [REP2-056]. This includes a procedure for dealing with complaints and sets out how the community will be able to contact the Sizewell C Project and how SZC Co. will acknowledge, investigate and respond to complaints, liaising with relevant authorities, such as the Councils, where appropriate.</p> <p>Workers will be required to sign the Worker Code of Conduct, which sets out the standards of behaviour expected both on and off site. Failure to comply with Worker Code of Conduct may lead to dismissal from the Sizewell C Project.</p> <p>The Hinkley Point C Worker Code of Conduct [APP-636] is appended to the Community Safety Management Plan [APP-635] for reference. This includes the stipulations that workers: <i>'ensure that personal noise levels are appropriate to the time of day and location'; 'do not fly park at any time'; 'understand that anti-social behaviour, will not be tolerated on or off site'; 'ensure no damage of any kind is caused to property on and off site'; 'ensure that workers accommodation is maintained in a tidy state with the proper disposal of rubbish'.</i></p> <p>The Sizewell C Worker Code of Conduct will be developed and put in place ahead of the start of construction of the Sizewell C Project. This will be very similar to the Hinkley Point C Worker Code of Conduct but will be subject to any updates following</p>

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			<p>engagement with Union partners and continuing lessons learnt from Hinkley Point C. The Sizewell C Worker Code of Conduct will be shared with the Community Safety Working Group for comment ahead of finalisation and may be updated, if required, throughout the construction phase.</p> <p>The Worker Code of Conduct will be reinforced through ongoing communication, such as tool-box talks.</p> <p>SZC Co has provided a specific response on the Sizewell C Project's position relating to fly parking, in Responses to the ExA's First Written Questions (ExQ1) [REP2-100] at TT.1.36, and in relation to congestion at AL.1.17 and TT.1.98.</p>
28.21	Location of Risks/Impacts	The Councils consider that some of the community safety impacts may occur in a wider geographical area than the local community in East Suffolk, given that community safety issues often occur outside of the home, where individuals may pass their leisure time.	There is no evidence to suggest that significant effects would occur outside of East Suffolk, where the vast majority of the NHB workforce would live (noting that many NHB workers would return to their permanent homes during their non-working periods).
28.14	Deprivation and Sizewell B's Legacy	The Councils state that when considering the impacts, the demographic and indices of deprivation across the towns to be most affected and impacted by Sizewell C in East Suffolk by the Sizewell C construction need to be taken into account; and that they are conscious of the issues, risks, and community safety impacts that were experienced across east Suffolk, particularly Leiston and Lowestoft, during the construction of Sizewell B.	<p>SZC Co. has undertaken a detailed baseline assessment including local socio-economic, housing and demographic characteristics of local wards, set out within Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195], and has engaged with stakeholders to ensure that mitigation and enhancement is responsive and adaptable to be effective for those affected.</p> <p>SZC Co. has provided a specific response relating to the comparability of Sizewell B and Sizewell C, and the legacy effects of Sizewell B, in Responses to the ExA's First Written Questions (ExQ1) [REP2-100] at SE.1.5.</p> <p>SZC Co. notes also that the Councils consider that (LIR 28.18): <i>"There is a clear intent by the Applicant to learn from the</i></p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<i>previous Sizewell B development and more recently from the mitigation measures adopted at Hinkley Point C. These include the Community Safety Management Partnership and worker code of conduct, along with mandatory drug and alcohol testing”.</i>
28.44	Rent levels and Vulnerability to Homelessness	<p>The Councils consider that the potential of landlords putting up rent is of particular concern for families and vulnerable households, which may put them into difficulty and may result in homelessness, and that landlords often do this with no checks, some of whom may be vulnerable themselves, e.g., single mothers and older people due to need for extra income.</p> <p>The Councils suggest that a programme of awareness-raising is recommended as mitigation.</p>	<p>SZC Co. has worked closely with ESC on their concerns regarding families and vulnerable households, particularly in Leiston. Specific meetings held to discuss this are set out in Table 2.2 of the Accommodation Strategy with detail on the local effects (Leiston case study) set out in paragraphs 4.3.35-4.3.53 [APP-613].</p> <p>The has informed the scope of the mitigation, including the 'Housing and Homelessness Services Resilience Measures' within the Housing Fund, as set out in Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p> <p>SZC Co. recognises the importance of reducing any safeguarding risks as a result of the NHB workforce seeking to rent rooms in existing households. Workers would be subject to pre-employment checks and security vetting and must comply with the Worker Code of Conduct. In addition, SZC Co agrees with the Councils that awareness-raising would be helpful. Therefore, the Accommodation Management System would provide information to prospective landlords, including on tenancy guidance, regulations and legislation (see Schedule 3, Draft Deed of Obligation (Doc Ref. 8.17(D))).</p> <p>More widely, there is no evidence that rent levels would increase as a result of the Sizewell C Project – please refer to Responses to the ExA's First Written Questions (ExQ1) [REP2-100] at SE.1.2 for SZC Co's position in this regard, and to Section 4 of its Written Submissions in Response to Oral</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130] for evidence of effects on the housing market in Somerset as a result of Hinkley Point C.
28.45 to 28.46	Multi-agency Response	The Councils consider that a multi-agency response may be needed, particularly in relation to mental health and missing persons incidents, and safeguarding against the exploitation of vulnerable groups.	SZC Co. agrees with this position, and this is reflected in the measures set out within Schedule 5 (Public Services and Community Safety of the Draft Deed of Obligation (Doc Ref. 8.17(D))).
ANNEX P 28.56 28.55 28.51 28.52 28.20 28.3 28.8 28.10 28c 28d	Public Services Resilience Fund / Community Safety Measures	The Councils set out a range of potential measures that they consider would require contributory funding from SZC Co to mitigate for identified risks set out in Chapter 28 of the LIR, and Annex P. The Councils note that these measures would be delivered by existing community safety organisations including Community Safety Partnerships and the Safer Stronger Communities Board, building on existing programmes and activities.	SZC Co. recognises that Community Safety Partnerships and the Safer Stronger Communities Board currently undertake a programme of community safety initiatives, and agrees that use of the Public Services Resilience Fund to support the extension/ amendment to some of these programmes – where there is a risk related to the Sizewell C Project – is appropriate. SZC Co. considers that the definition and scope of the Public Services Resilience Fund as set out within Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) is appropriate to respond to potential risks related to the Sizewell C Project and its workforce raised through engagement with the Councils. As set out within the Initial Statement of Common Ground, Section 12 (SE32, SE34 and SE42) [REP2-076], SZC Co, ESC and SCC are agreed on the principle of a Public Services Resilience Fund and the role of the Local Authorities in directing the Fund appropriately, subject to further discussion on the scale of funds and the scope in relation to partner organisations following receipt of LIR Annex P.
28.53	Community Liaison and Outreach	The Councils consider that provision of outreach or community workers promoting community cohesion between local communities and non-home-based	As set out in response to 28b, 28.67, 28.2 and 28.25 above:

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		workers and their families and delivering diversionary activities would mitigate some of the concerns held by local communities; and would welcome more detail about the proposed community liaison activities and what these would consist of; ideally the Applicant would work with the Councils' community officers to put together a programme of suitable activities for the local area, and provide resources to embed additional community workers within that team.	<ul style="list-style-type: none"> SZC Co has committed to ongoing community and stakeholder liaison, as set out in the Code of Construction Practice [REP2-056]. Workers would most likely act as existing members of the community, for example shopping, eating and drinking locally. SZC Co could make workers aware of local recreational opportunities, such as Park Run and the Leiston Film Theatre. <p>In addition, the Leiston Sports Facilities (Schedule 10, Draft Deed of Obligation (Doc Ref. 8.17(D))) would be for joint worker and community use and could support cohesion for example through league games.</p> <p>Finally, as set out in Responses to the ExA's First Written Questions (ExQ1) [REP2-100] at CI.1.2, the accommodation campus would aim to create a welcoming environment where workers could relax, with sufficient on-site entertainment to encourage them to stay on the campus for the majority of their leisure time during their working week (noting that many will return to their permanent homes to see family during rest periods).</p>
28.61	Faith Groups	The Councils consider that the Applicant should give consideration and support regarding the various faith groups likely to be present on site e.g., provision of prayer rooms	As set out in the Equality Statement [APP-158], paragraph 1.6.56, ' <i>SZC Co is committed to recruiting a diverse workforce and understands the evidence that links inclusivity to safety: diverse teams are safer and perform better because members bring different perspectives and feel respected and able to share their opinions.</i> ' Paragraphs 1.6.57-1.5.69 set out some ways in which this would be supported.

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			<p>As part of this, SZC Co. would aim to create an inclusive and welcoming environment for workers of all faiths and none.</p> <p>Appendix A of the Design and Access Statement [APP-587] sets out at paragraph A.25.1 that the two storey recreation building on the campus would include a prayer / quiet room. Additional facilities would be made available on the main development site. SZC Co. anticipates that it will follow the Hinkley Point C model of providing 'Time to Talk' rooms around the main development site. These are for the mental health first aiders to encourage conversations and offer additional help but are also available for workers wanting private space for prayer or reflection.</p>
28.62	Mitigation for Suffolk Constabulary	The Councils consider that increased provision of Police Community Support Officers, police officers, and an additional Sergeant dedicated to mitigating the potential community safety risks, ASB and increased crime within the hot spot areas (Leiston and Saxmundham in particular) would go some way to alleviate the fears and concerns of communities.	SZC Co is engaging with Suffolk Constabulary to determine the scope, scale and implementation of mitigation to reduce any significant adverse effects identified at a local scale, related to crime and community safety, in Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] and Volume 1, Chapter 2 , section 2.4 of the ES Addendum [AS-181].
28.4, 28.63 and 28.68	Community Impact Reports	<p>The Councils note that they expect to be involved in delivering Community Impact Reports and ensuring the correct mechanisms are in place to minimise adverse effects on social cohesion, community impacts, and equality impacts.</p> <p>The Councils consider that this includes, where appropriate, the provision of additional local services including doctor surgery places and school places and improvements to local infrastructure including provision of educational and visitor facilities.</p>	<p>SZC Co. does not consider it necessary, and therefore does not intend, to produce Community Impact Reports. It has not identified this as a form of mitigation, monitoring or reporting under the terms of delivery of the proposed mitigation set out in the Draft Deed of Obligation.</p> <p>Support for local services, where required, is set out within the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
28.26	Positive Community Cohesion Effects	<p>The Councils consider that wider funding arrangements, such as through the proposed Sizewell C Community Fund, may provide opportunities for refurbishment and improvements to other local community facilities in Leiston, including the Sports and Social Club, Waterloo Centre, and local youth hubs including CYDS, as well as potentially creating opportunities for additional facilities for young people to be provided in Leiston.</p> <p>Such facilities could be used for diversionary activities for young people and could provide community cohesion between the local communities and the non-home-based workers.</p>	<p>As set out in Schedule 14 of the Draft Deed of Obligation (Doc Ref. 8.17(D)), <i>'The Sizewell C Community Fund shall be for the purpose of mitigating the intangible and residual impacts of the Project on the communities in the Area of Benefit'</i>. This would be through <i>'schemes, measures and projects which promote the economic, social or environmental well-being of those communities and enhance their quality of life'</i>.</p> <p>The Suffolk Community Foundation will administer the Community Fund, but SZC Co. considers that the sort of measures suggested by the Councils would be very good candidates for the Fund.</p> <p>SZC Co. also welcomes this recognition that there are many ways to promote community cohesion, particularly in areas with pre-existing deprivation and issues with social mobility.</p>
28.4 28c 28.13	Monitoring	<p>The Councils consider that monitoring of community impacts is key to enable swift responses to any impacts which do occur, and to adjust the strategy if required.</p> <p>The Councils note that the indicators being monitored for Hinkley Point C are limited, with a focus on official crime data, which will not cover lower-level community safety issues, and that it is also important to note the differences to the Hinkley Point C area and demographic.</p>	<p>SZC Co. notes the Councils' comments on monitoring and will work with them to agree appropriate monitoring measures for the Sizewell C Project. Any monitoring will need to be proportionate, relevant to the Project and its potential effects, and practically measurable to ensure reasonable agreement that the effects may be related to the Project. Monitoring will be secured in the Deed of Obligation.</p> <p>It is not correct that Hinkley Point C focuses on official crime data. The Community Safety Dashboard also provides quantitative monitoring data on reported non-criminal activity; self-reported fear of crime; fire and road safety incidents; number of the group's actions delivered or on track; number of community engagement activities; and number of events/campaigns/initiatives outside the group's action plan.</p>

29. ACCOMMODATION AND HOUSING

29.1 Overview

29.1.1 SZC Co. has reviewed Chapter 29 of the Local Impact Report (LIR) [[REP1-045](#)], and associated Appendix 2.10.

29.1.2 **Table 29.1** below provides a response to the principal points raised where a response is appropriate.

29.1.3 SZC Co.'s position in relation to effects on accommodation and housing (including project accommodation, private rented sector housing, tourist sector accommodation and vulnerability to housing need and homelessness) is extensively set out at in:

- **Volume 2, Chapter 9** of the **ES (Socio-economics)** [[APP-195](#)]; and
- the **Accommodation Strategy** [[APP-613](#)].

29.2 Response to Issues (Summary)

29.2.1 SZC Co. and the Councils are in broad agreement that through a combination of embedded and additional mitigation, subject to finalisation of the scale and delivery of the Housing Fund, that identified significant adverse effects on housing and accommodation can be adequately mitigated to a not significant level.

29.2.2 SZC Co. welcomes the position that the Councils *“support the proposed Housing Fund to mitigate impacts, and recognise that the Tourism Fund and the Public Services Contingency Fund may contribute to mitigating some of the wider impacts”* and that the Councils note that:

- The Housing Fund will boost supply in East Suffolk. This should ensure that the housing stock of East Suffolk is increased and, post-construction of Sizewell C, able to accommodate future growth.
- There is a potential legacy from tourism providers in the vicinity if they can improve their facilities using funding from the Housing Fund, and indirectly as a result of the Tourism Fund.
- Providing additional accommodation at existing providers will avoid adverse impacts on their “normal” business and provide additional income throughout the construction phase of Sizewell C as well as extended facilities post construction of Sizewell C (dependent on planning and licencing).

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- 29.2.3 SZC Co. and the Councils both support the principle of a Housing Fund providing it is robust and flexible to meet the needs of a potentially changing housing market, and agree that:
- The majority of the Fund would be required to be spent and invested in the first 7 years of the construction; and
 - There is a need to ensure that it is sufficiently robust to meet the anticipated needs of East Suffolk during the build-up to peak construction.
- 29.2.4 SZC Co. recognises and welcomes that the Councils identify positive effects in terms of the legacy of Housing Fund projects of an increase in housing stock and investment for tourist accommodation.
- 29.2.5 The remaining points identified in **Table 29.1** refer to areas of clarification.

Table 29.1: Summary of Response to Housing and Accommodation Issues

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
29.2 and 29.42	Overspill of Effects / Focus on home based ("HB") workers	The Councils consider that the non-home based ("NHB") workforce has the potential to significantly adversely impact on housing availability around the site with potential overspill into adjacent authorities. The Councils would prefer the Applicant to focus on using HB workers to minimise impact on the local housing market.	<p>SZC Co.'s assessment of potential significant effects on the housing market identifies negligible effects at wider (60-minute area) scale, with localised significant adverse effects (prior to secondary mitigation). Following application of secondary mitigation (via the Housing Fund), residual effects are anticipated to be reduced to not significant. In the case of effects on the private rented sector, SZC Co. anticipates that the Housing Fund is capable of fully mitigating effects by providing over 1,000 bedspaces. It is therefore considered unlikely that effects would be experienced in adjacent local authorities.</p> <p>SZC Co. is aware that Ipswich Borough Council has raised the potential for accommodation of workers through its submission to PINS on the Adequacy of Consultation [AoC-004]. SZC Co.'s position is that the Socio-economic chapter of the ES (Volume 2, Chapter 9) [APP-195] sets out the scale of significant effects on wards and relevant service-provision bodies e.g. District and County Councils. Despite the scale of accommodation in Ipswich, the distance / travel time from the site and the supply of accommodation closer to the site (in Leiston for example) means that the Gravity Model distributes very few NHB workers to Ipswich's private rented sector (56 workers). This compares to a large supply of over 26,000 properties (2011 Census), which would result in a negligible effect.</p> <p>SZC Co. agrees that focus on recruiting a HB workforce would reduce the scale of potential effects related to NHB workers. However, Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] uses a conservative assessment case for assumptions about HB and NHB workers - this is to ensure mitigation for the NHB component is sufficiently robust.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
29.3 and 29.53 to 29.54	Principle of Project Accommodation	<p>The Councils “recognise that the proposed workers’ caravan site at LEEIE and the Accommodation Campus will reduce the pressure on the local housing market” but consider that despite this, a residual impact remains.</p> <p>The Councils note that:</p> <ul style="list-style-type: none"> • Subject to these being provided in an appropriately timely fashion in the construction programme, the Councils are satisfied that these two measures will provide a good basis for mitigating adverse impacts arising from influx of workers to the local area to work on the project; and that • Phasing of development requirement will be essential in ensuring that the campus and caravan park are appropriately scheduled in the construction programme to ensure they are in place at an appropriate time 	<p>See also SZC Co.’s Responses to the ExA’s First Written Questions (ExQ1) [REP2-100] G.1.24(i), Cl.1.4 and SE.1.33.</p> <p>SZC Co. welcomes the recognition that the proposed project accommodation would reduce the pressure on the local housing market. The ES [APP-195] and Accommodation Strategy [APP-613] consider the effect following primary (embedded) mitigation and agree with the Councils that significant adverse effects are likely in local areas, before mitigation.</p> <p>The residual effect – after consideration of secondary mitigation including the Housing Fund – is not considered to be significant.</p> <p>The Councils agree with SZC Co. on the principle of a Housing Fund to mitigate the identified effects, which suggests that finalisation on the scope, scale and implementation of measures currently set out at Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) [REP2-060] will result in an agreed position of no likely significant residual impact.</p> <p>The delivery of the campus and timings are set out in Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) [REP2-060], with reference to the Implementation Plan [REP2-044]. Paragraph 3.1.1 reads: ‘Unless otherwise agreed with the Accommodation Working Group, SZC Co shall use reasonable endeavours to deliver the Accommodation Campus in accordance with the Implementation Plan’.</p> <p>The Implementation Plan [REP2-044] indicates that the caravan park is planned to open at the end of year 1 of construction and the campus towards the end of year 3 of construction. Figure 5.1 [APP-614] of the Accommodation Strategy shows the interaction between the build-up of the NHB workers requiring accommodation in the local area, and the indicative opening dates of the campus and caravan park. This shows that the gap between</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
			the availability of project accommodation and the total amount of accommodation required is never greater than the number of bedspaces which SZC Co. assesses to be the minimum amount of spare capacity available in the 60-minute area.
29.24 to 29.25; 29.29 to 29.30 and 29.45	Accommodation Campus	<p>The Councils state that:</p> <ul style="list-style-type: none"> The proposal is an efficient way of housing a large proportion of the workers adjacent to the Main Development Site; They agree with the description of the accommodation campus site location and context contained in DCO Submission; They are satisfied that locating a campus in either Ipswich or Lowestoft (which could have provided potential legacy benefit in the form of hotel conversion or student accommodation provision) would not meet the needs of the Applicant and the required ability for the workforce to be close to the Main Development Site; The campus should be available, preferably on a phased basis, before peak levels of construction workers are on the site; The phasing of the accommodation campus needs to be such that it is operational at the late stages of the Early Years of construction as non-home-based worker numbers begin to rise to peak workforce numbers to ensure that the local housing market of ESC is not adversely impacted; To deal with the size of the peak workforce, and changes to the size of the workforce over time, the 	<p>SZC Co. welcomes the Councils' position regarding the Accommodation Campus and is in broad agreement with all of the points raised here – this is set out within the Statement of Common Ground, Section 12 (SE12 and SE13) [REP2-076].</p> <p>The delivery of the Accommodation Campus is addressed in the row above. In terms of flexibility, the Accommodation Strategy [APP-613], paragraph 5.3.3 sets out that 'SZC Co would work closely with contractors and ESC to consider lead-in times for booking, and potential phased opening and closing of the accommodation to ensure it can respond quickly to demand when it is online'. This means that SZC Co. will open rooms on a phased basis if at all possible and may also close the campus on a phased based as demand drops following the peak of construction.</p> <p>However, it should be noted that the campus will not be able to be increased above the proposed 2,400 rooms, as a limitation of the development consent and given the considerations of the site design. Flexibility in reducing the size of the campus within the proposed detailed design parameters would be possible if agreed with the Accommodation Working Group.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		Councils would welcome consideration of opportunities for flexibility in being able to increase / reduce the size of the accommodation campus as and when required.	
29.31 to 35 and 29.44	LEEIE Caravan Site	<p>The Councils set out that:</p> <ul style="list-style-type: none"> The LEEIE Caravan Site will reduce pressure on the private rented and tourist accommodation sectors in East Suffolk and the submitted layout for the caravan site meets the environmental health requirements for licensed caravan park provision; The Applicant has revised the layout and the Councils are satisfied from a health and safety perspective that 400 pitches could be provided on the site; Capacity may be 400 due to workers not being willing or able to share; It is not clear if workers will bring caravans at peak (MEH) – need to investigate change to statics and flex to Housing Fund if accommodation drops to unacceptable levels; and The Site needs to be available prior to start of construction to avoid unauthorised caravans. 	<p>SZC Co. has set out its position related to these points on the LEEIE caravan park in the Responses to the ExA's First Written Questions (ExQ1) [REP2-100] CI.1.0, CI.1.6, and AR.1.2.</p> <p>SZC Co. welcomes the Councils' position regarding the principle, capacity and layout of the LEEIE caravan park site, and notes that the parties are in broad agreement subject to agreement of the Implementation Plan [REP2-044], and this is set out within the Statement of Common Ground, Section 12 (SE14 and SE15) [REP2-076]. SZC Co. recognises the concern that workers may not be willing or able to share caravan accommodation at the LEEIE caravan site. SZC Co. will commit to monitor the uptake of caravan plots and occupancy of the caravans at the LEEIE caravan park.</p> <p>SZC Co. notes the Councils' wish for the caravan park to be open at the start of construction. SZC Co. does not consider this necessary but will continue to discuss this with the Councils, including sharing expressions of interest from local caravan parks which indicate that the market is willing to accommodate workers ahead of the LEEIE caravan park opening, which should provide comfort.</p>
29.3 and 29.43 29b	Effect on Vulnerable Residents	<p>The Councils identify concerns related to:</p> <p>Potential effects on vulnerable young people and care leavers, some of whom are in housing need or vulnerable to homelessness;</p>	<p>As set out in the Statement of Common Ground, Section 12 (SE27 and SE29) [REP2-076], SZC Co., ESC and SCC agree that risks associated with points (a), (b) and (c) would be addressed through the Housing Fund. Principally, this would be through boosting supply in the sector, and through Housing and</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>Potential increase in rents in the Private Rented Sector and impact on families and vulnerable households, potentially resulting in financial difficulty and homelessness;</p> <p>Potential effects on housing for key workers as a result of increase in rents, which may impact on availability of key workers in the local area;</p> <p>Safeguarding issues associated with renting out rooms (awareness raising programme may be required);</p> <p>Economic incentives for care providers to change use of premises from specialist housing to general market housing, which could increase costs of delivering care and cause shortages of suitable accommodation.</p>	<p>Homelessness Services Resilience Measures as defined by the Draft Deed of Obligation, Schedule 3 (Doc Ref. 8.17(D)) [REP2-060].</p> <p>There is no evidence that rent levels would increase as a result of the Project – please refer to SZC Co.'s response to the Responses to the ExA's First Written Questions (ExQ1) [REP2-100] - Question SE.1.2 - for SZC Co.'s position in this regard, and to Section 4 of its Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021. [REP2-130] for evidence of effects on the housing market in Somerset as a result of Hinkley Point C.</p> <p>SZC Co. will discuss with the Councils whether measures that SCC consider relate to housing but that are without the scope of the Housing Fund could be accommodated in the Public Services Resilience Fund (points (d) and (e)). However, SZC Co. considers that the risk of (d) would be mitigated in part through the security vetting and Worker Code of Conduct applied to workers, and the ability of the Accommodation Management System to support prospective landlords with information.</p> <p>See also SZC Co.'s Responses to the ExA's First Written Questions (ExQ1) [REP2-100], CI.1.11, HW.1.14 and HW.1.15.</p>
29.3, 29.20, 29.36 and 29.46 to 29.47 29c	Effects on Tourist Accommodation	<p>The Councils predict an adverse impact on availability of holiday accommodation for tourists, which they consider may result in a “boom and bust” effect for the accommodation market.</p> <p>The Councils also note that:</p> <ul style="list-style-type: none"> 800 workers at peak living in tourist accommodation – including caravan sites, holiday rentals, hotels and chalet sites - could have a 	<p>NHB workers are only estimated to use 4% of tourist accommodation in East Suffolk at construction peak, well below the observed tourist peak season vacancy levels in the East of England which is 15% (see Accommodation Strategy [APP-613], paragraph 4.2.7),</p> <p>The Councils suggest that an element of the Housing Fund should be ring-fenced specifically to address and negate adverse impacts on the tourist market of East Suffolk, and further mitigation could be provided through the Tourism Fund, in order to avoid adverse</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>negative impact on availability for tourists of holiday accommodation;</p> <ul style="list-style-type: none"> • SZC Co.'s estimate of 800 workers living in the tourist sector at the peak of the workforce profile is unlikely to be during the peak holiday season as workers would be priced out of the market; • With the drive in the tourist economy for year-round promotion of the region, this could have a negative impact on availability for tourists of holiday accommodation; • Demand for tourist accommodation in Leiston could occupy 84% of available stock. This would impact on the tourism sector in Leiston; • During summer months the Sizewell C workers could displace tourists, who it is suggested have higher average daily expenditure than workers, and impact on the local economy; and • There may be an impact on tourism accommodation as some holiday makers not willing to stay at a site that also accommodates transient construction workers. 	<p>impact on availability of holiday accommodation for tourists, which may result in a “boom and bust” effect for the accommodation market.</p> <p>SZC Co. considers that the mitigation currently proposed through the Tourist Accommodation Market Supply element of the Housing Fund, defined by the Draft Deed of Obligation, Schedule 3 (Doc Ref. 8.17(D)) [REP2-060] and described at Section 26.3(c) of this document, is appropriate.</p> <p>SZC Co. does not consider that there is any evidence that workers would be priced out of tourist accommodation. Workers in different roles and contracts would seek a range of accommodation, but caravans would always be affordable based on the average nightly subsistence and accommodation allowance for workers, and there is an abundant supply in the area.</p> <p>Section 26.3(b) of this document addresses concerns around wider tourist sector availability and comparability of spending.</p> <p>There is no evidence that tourists and workers would not share tourist accommodation sites.</p>
29.9 and 29.10, 29.42	HB / NHB workers	<p>The Councils note that of the 7,900 workers, 35% are projected to be home-based, with all 600 workers on Associated Development sites home-based. This means 3,444 of 8,500 workers are projected to be home-based.</p> <p>The Councils have requested that the Applicant should aim to increase this projected forecast for home-based workers but for the purposes of this submission, the</p>	<p>Please refer to SZC Co.'s Responses to the ExA's First Written Questions (ExQ1) [REP2-100] SE.1.33 for clarification on the number and proportion of HB and NHB workers. At construction peak, there would be 7,900 workers at the main development site and 600 workers on the associated development sites (which includes the accommodation campus). Of the 8,500 (7,900 plus 600), 2,400 would be home-based construction workers; c. 5,900 would be non-home-based construction workers and the</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		worst-case scenario of 5,056 workers being non-home based has been considered (the Applicant's definition for a non-home-based worker is one living over 90 minutes from the site).	remainder will be operational staff, some of whom would be home-based but for assessment purposes all of which have been considered non-home-based. SZC Co. agrees that focus on recruiting a HB workforce would reduce the scale of potential effects related to NHB workers. In order to be conservative, Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] uses a conservative assessment case for assumptions about HB and NHB workers - this is to ensure mitigation for the NHB component is sufficiently robust. See also SZC Co.'s Responses to the ExA's First Written Questions (ExQ1) [REP2-100] G.1.24(i), Cl.1.4 and SE.1.33.
29.36 and 29.56	Tourism element of Housing Fund	The Councils suggest that measures that the tourism element of the Housing Fund could be used for includes grants to enable local providers to gain planning consent for expansion and grants to enable local providers to seek extensions to their current licences. The Councils would welcome the Housing Fund being used to match fund or give loans to providers. An example would be a loan or match funding to enable a caravan park provider to expand their offering for Sizewell C workers by constructing a new toilet / shower block for worker use separate from holiday maker facilities.	SZC Co. accepts and agrees this position. Further information on the scope and approach to this element of the Housing Fund is set out at Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) [REP2-060] , and described at Section 26.3 (Tourism Impacts) of this document.
Table 29	Approach to Mitigation	In addition to mitigation set out elsewhere in this table, the Councils request the following obligations: Housing Fund to focus on provision of housing for vulnerable groups;	SZC Co. agrees with the provisions suggested by the Councils here: <ul style="list-style-type: none"> The Housing Fund would provide for "Housing and Homelessness Services Resilience Measures" as defined by the Draft Deed of Obligation (Doc Ref. 8.17(D))

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>Provision of preventative work with landlords and renters to reduce safeguarding risks – through housing fund or other means;</p> <p>Additional measures to prevent impacts on vulnerable people receiving social care support through Public Services Resilience Fund; and</p> <p>An element of the Housing Fund to be ring-fenced specifically to address and negate adverse impacts on the tourist market of East Suffolk.</p>	<p>[REP2-060] to support the East Suffolk Council's statutory housing advice and homelessness prevention service, which inherently includes support for vulnerable groups.</p> <ul style="list-style-type: none"> • The Accommodation Management System would include information and support for prospective landlords to help reduce risks associated with tenancies. • The Public Services Resilience Fund would provide for a wide range of measures to prevent risks on vulnerable people receiving social care, where this may be reasonably considered to be exacerbated by the effects of the Sizewell C Project. • The Housing Fund would provide a ring-fenced element for Tourist Accommodation Market Supply.
29.11 to 29.23 Appendix x 2.10	Gravity Model	<p>The Councils note – via a report by AECOM (LIR Appendix 2.10) that:</p> <p>Housing availability is not a constraint on the housing model, so if job numbers were to increase, there could be a situation where the number of workers in an area exceeded available accommodation. This could lead to undue pressure in certain areas that may require additional mitigation measures</p> <p>At the macro level the Accommodation Strategy uses assumptions on number of workers and types of accommodation required to demonstrate that there is available accommodation within the east Suffolk area. However, there may be issues with accommodation supply when smaller spatial areas are considered</p> <p>The Councils summarise that:</p>	<p>SZC Co. agrees that additional pressure could occur if the NHB workforce were greater or more concentrated. However, as set out in response to the Responses to the ExA's First Written Questions (ExQ1) [REP2-100] G.1.24(i), Cl.1.4 and SE.1.33., the assessment of NHB workers is considered to be conservative (and Suffolk County Council agree this); and local significant effects are identified and mitigation provided.</p> <p>The Housing Fund as detailed in Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(D)) [REP2-060] allows for monitoring to inform the distribution of the Housing Fund, which is largely within the control of East Suffolk Council as the statutory body for housing need and homelessness.</p> <p>There are a number of reasons why the approach to accommodation supply – as well as demand – are considered</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p><i>“The submitted Accommodation Strategy [APP-613] considers that a conservative approach has been adopted in assessing where demand for Sizewell C workers may impact on available accommodation within the local area. As a result of this conservative approach, the Councils consider that the figures in the gravity model are likely to be an underestimation of potential impacts. However, this is a limitation of the available datasets”</i></p>	<p>conservative. For tourist sector accommodation, these are set out at Section 26.3(b). For private housing, it is noted that:</p> <ul style="list-style-type: none"> • The private rented sector has grown substantially since the 2011 Census, upon which the Gravity Model is based. • It does not include any latent accommodation bedspaces (e.g. spare rooms), which are proving popular at Hinkley Point C, and which would likely reduce the demand identified in the assessment case for private rented accommodation. <p>SZC Co. considers that the Councils’ summary at LIR paragraph 29.23 is a misinterpretation. The conservative approach means that the figures in the Gravity Model are more likely to be an overestimation of potential effects, in order to provide for a precautionary level of mitigation related to the effects of the NHB workforce.</p>
29.37 to 29.38	Evidence from Hinkley Point C	<p>The Councils note that actual locations of NHB workers at Hinkley Point C do seem to be closer to the site, and more concentrated in Sedgemoor (esp. Bridgwater) than predicted, and more in the Private Rented Sector (PRS) tenure category.</p> <p>The Councils note that it is difficult within the constraints of publicly available data, to identify housing impacts on local vulnerable groups, although there does not seem to have been to date a noticeable impact on homelessness in Somerset.</p> <p>The Councils consider it important to ensure that predictions contain longitudinal timelines, showing predicted evolution of impacts over key phases of the construction stage, and into full operation, for example</p>	<p>SZC Co. has submitted a review of housing market effects at Hinkley Point C to-date at Section 4 of its Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130].</p> <p>The accommodation and spatial distribution assumptions for Sizewell C’s socio-economic assessment are based partly on observed (pre-peak) evidence from Hinkley Point C, and include more workers in PRS than tourist accommodation (a change from earlier in the consultation period).</p> <p>SZC Co. has assessed the peak effect, and developed an approach to mitigation that enables East Suffolk Council to apply the Housing Fund proportionally over the period leading up to peak, in order to mitigate for adverse effects appropriately.</p>

Ref	Issue / Impact	Summary of LIR	SZC Co. Response
		<p>for topics such as home-based and non-home-based workforce numbers, accommodation tenure and distribution.</p>	<p>A workforce survey (described at Schedule 3, paragraph 6.2 of the Draft Deed of Obligation (Doc Ref. 8.17(D))) will be undertaken, based on lessons learnt from Hinkley Point C, to monitor the accommodation tenure, distribution and number of NHB workers. Reports from this survey will be used by the Accommodation Working Group to review the effectiveness of measures delivered by the Housing Fund and re-direct them if necessary (see Schedule 3, Draft Deed of Obligation (Doc Ref. 8.17(D))).</p>
<p>29.52 and 29d</p>	<p>Outages</p>	<p>The Councils note that: With two reactors at Sizewell C, and the existing Sizewell B station, there could be scheduled outages every six months at Sizewell, this can result in up to 1000 more workers at the site. This has implications for accommodation in the local area. Some of the legacy provision arising from bringing additional homes back into use and possible expansions at existing tourist accommodation sites, could support the regular outages. However, this will have ongoing impacts in the local area, some of which are economic benefits, the outputs from the Housing Fund should support accommodation impacts in the future The Councils also note that the outage workforce (during construction) may put continued pressure on the housing market, but that the Housing Fund may have provided sufficient resilience in the existing housing market, enabling it to be in a better position to offer accommodation to an outage workforce</p>	<p>SZC Co. welcomes the Councils' position that the Housing Fund may have provided sufficient resilience in the existing housing market, enabling it to be in a better position to offer accommodation to an outage workforce, and there would be economic benefits as a result. SZC Co. has addressed issues related to the outage workforce in Responses to the ExA's First Written Questions (ExQ1) [REP2-100] CI.1.5, CI.1.10, and SE.1.1.</p>

30. QUALITY OF LIFE AND WELLBEING

30.1 Overview

30.1.1 SZC Co. has reviewed Chapter 30 of the Local Impact Report (LIR) [[REP1-045](#)].

30.1.2 SZC Co. notes the Councils' position that the lived experience of people in the area/overall quality of life is covered by many different topic areas addressed elsewhere in the LIR, including environmental and landscape quality, amenity and recreation, noise and vibration, air quality, traffic and transport, health, perceived and actual community safety, and the economy and access to public services; all of which are issues that affect day-to-day life in communities. This section will not repeat responses provided elsewhere.

30.1.3 **Table 30.1** below provides a response to the principal points raised where a response is appropriate and not covered elsewhere in the response to the LIR.

30.1.4 SZC Co.'s position in relation to effects on quality of life and wellbeing is set out **Volume 2, Chapter 28** (Health and Wellbeing) of the **ES** [[APP-346](#)].

30.2 Response to Issues (Summary)

Table 30.1: Responses to LIR Summary on Quality of Life and Wellbeing

Reference	Issue/impact	Summary of LIR	SZC Co. Response
30.2, Table 30, 30f, 30.35-30.40	Health and wellbeing	Councils suggest there would be residual adverse impact on quality of life and wellbeing. Suggests Community Fund would be an appropriate tool to address effects on quality of life and wellbeing.	The result of the assessment reported in Volume 2, Chapter 28 of the ES [APP-346] is that there would be a likely minor adverse impact on health and wellbeing that would not be significant (see paragraphs detailed comments below). However, SZC Co. agrees that the Community Fund would be an appropriate tool to address residual effects on quality of life and wellbeing during the construction phase.
30n, 30o	Quality of life impacts will vary across the population.	The Councils notes that some residents may not feel personally affected by the construction activities, and as a result would not consider their quality of life and wellbeing to be changed; others may improve their quality of life e.g. through securing a role on the project; others would be more negatively impacted.	Volume 2, Chapter 28 of the ES [APP-346] sets out that there are a number of factors which influence an individual's quality of life, which include emotions such as stress and anxiety. As set out in SZC Co.'s Responses to the ExA's First Written Questions (ExQ1) at ExQ1 HW.1.1 [REP2-100] , with regards to sensitivity, inequality and the potential for disproportionate impacts, Volume 2, Chapter 28, paragraph 28.3.16 of the ES [APP-346] sets out how sensitivity can vary within a community and can further vary by individual health pathway. The rationale is then provided as to why a precautionary approach has been applied, where every resident is considered

Reference	Issue/impact	Summary of LIR	SZC Co. Response
			<p>highly sensitive to every health pathway.</p> <p>In short, the assessment works on the basis that every resident is vulnerable to everything. As a consequence, any inequality or vulnerability that may not be reported within demographic, health and health care statistics is still accounted for in the professional judgment on significance. Therefore, applying a consistently precautionary approach that considers a uniformly high burden of poor health for the entire population neither masks or underplays the degree of effect in any circumstance.</p>

31. IMPLEMENTATION AND DELIVERABILITY RISKS

31.1 Overview

31.1.1 SZC Co. notes the Councils' recognition in this chapter of **the LIR** [[REP1-045](#)] that:

“In a project as complex and extensive as Sizewell C, the sequence and timing of different parts of the project are likely to be difficult to achieve precisely in the order that is anticipated in this proposal. This is the case even in a very well-run development and not achieving this could be a consequence of any number of unexpected circumstances from unpredicted adverse ground conditions to the failure of sub-contractors and the supply chain consequences of completely external factors such as we have seen with the recent pandemic and transport delays.” (LIR paragraph 31.1)

31.1.2 Both SZC Co. and the Councils have been alive to the issues that arise as a result from the early stages of project development. The need to monitor and manage the development of SZC has therefore been a central theme in the evolution of the proposals and in the extensive discussions held on

control measures, requirements and obligations. Whilst the LIR sets out a series of concerns, many of those relate to matters where agreement has been reached on the principle (and often the detail) of the necessary measures that need to be put in place to ensure the orderly development of the Project and its resilience against changing circumstances.

31.1.3 Perhaps understandably, the LIR draws out the risks and suggests measures to be put in place to address them. SZC Co. agrees that it is important to work through these matters and carefully construct a form of DCO that can enable the efficient delivery of the Project whilst providing effective monitoring and mitigation.

31.1.4 It would also be fair, however, to recognise the work that has been done in this respect and the care that has been taken to design both the development and the DCO to achieve these objectives. For example, the LIR contains at Appendix 2.1 the 'Glasson report' on experiences at Hinkley C. The LIR emphasises the lessons to be learnt and paragraph 31.5 plus Table 32 concentrate on the '*factors behind some of the negative findings*' within the report. The LIR, however, does not record the high degree of accuracy recognised in the report when comparing the predictions in the HPC DCO Environmental Statement with practical experience from Hinkley's implementation (Glasson Report Table 1) and neither does it cite the following from the report:

"There are many positive findings, often resulting from the effective implementation of mitigation and enhancement measures. They include the transformational skills, training and education provision; the on-site campus with its Medical Centre; the Workers Code of Conduct and community safety initiatives; the provision of Park and Ride facilities, the Cannington Bypass, and the bus to site system; plus a whole array of management plans and, primarily EDFE, funding initiatives."

31.1.5 EDF Energy was pleased to play its part in contributing to the Glasson Report and SZC Co. set itself a key objective to learn lessons from Hinkley C and apply them at Sizewell. The experience from Hinkley C (which was pioneering without a close example to follow) should provide a great deal of confidence that SZC Co.'s predictions of likely effects are robust and that the DCO application can and has put forward a strong set of appropriate measures and controls.

31.1.6 It is reasonable also to observe that the Councils have been fully aware of the Glasson Report and its recommendations when providing their comments on the draft DCO, requirements and obligations, which are now reasonably mature.

31.1.7 The LIR helpfully summarises the issues and the Councils' suggestions in a table (Table 31), an abridged version of which is produced below and annotated to record SZC Co.'s position on the matters raised:

Table 31.1: summary of implementation and deliverability risks

Ref	Issue	SZC Co response
31a	<p>Failure to achieve provision of rail or marine facilities, in the time proposed by the Applicant, is likely to result in increased pressure upon road transport. This could result in levels of traffic which then exceed those set out in the ES.</p> <p>Caps on the number of HGVs accessing the site; contingency funding for additional mitigation measures – obligation/requirement.</p>	<p>HGV caps are proposed in the CTMP, whilst the draft Deed of Obligation at (Doc Ref. 8.17(D)) sets out provisions for monitoring and contingent mitigation. The caps are enforceable and the risk identified will not arise.</p>
31b	<p>Delay in delivery of Park and Ride sites, direct bus services, and changes to the number of workers travelling directly to site could result in additional traffic, resulting in additional congestion and pressure on communities.</p> <p>Limits to maximum number of workers employed on main site – obligation/requirement Monitoring and contingency measures - obligation Workforce should not exceed Early Year assessed figures until park and ride sites are completed - obligation/requirement.</p>	<p>SZC Co. does not accept the need for caps on worker numbers: see below.</p>
31c	<p>Delays in delivery of Two Villages Bypass and Sizewell Link Road and other highway mitigation may prolong and exacerbate impacts on local communities.</p> <p>Limits to maximum number of workers employed on main site – obligation/requirement Monitoring and contingency measures - obligation Workforce should not exceed Early Year assessed figures until park and ride sites are completed - obligation/requirement.</p>	<p>As above: see below</p>
31d	<p>Delay in delivery of road safety schemes may heighten accident risks at those locations.</p>	<p>Agreed in principle – monitoring and contingency provisions are set out in the CTMP [REP2-054] and the draft</p>

Ref	Issue	SZC Co response
	Temporary measures as contingency - obligation Monitoring-obligation.	Deed of Obligation (Doc Ref. 8.17(D)).
31e	Late delivery of accommodation campus and/or workers caravan site puts further pressure on housing market. Limit to the number of people that can be employed on the site until each of the accommodation facilities is completed unless further effective mitigation measures can be put into place – requirement.	Limits on workers are not accepted but monitoring and mitigation is proposed to protect against housing market pressures.
31f	Late delivery of ecological mitigation measures may increase the adverse impact on species/habitats. If translocation sites or foraging areas are not judged to be adequately established, development of sites where species would be adversely affected should not be able to go forward unless and until other contingency measures have been put into place - obligation.	The substantial delay inherent in this suggestion makes it impractical but contingency measures are proposed – see below.
31g	Project over-run would prolong disruption to local communities. Mitigations and compensation funding to be set in a way that they continue until the end of the construction period rather than having fixed sums or timeframes – obligation.	This is directly provided for in the relevant schedules of the draft Deed of Obligation (Doc Ref. 8.17(D)).
31h	Late delivery of the B19 and coast path diversion. Requirement or Obligation that neither BW19 nor the coast path can be closed prior to opening of the diversion route.	This is directly provided for within the Rights of Way and Access Strategy [REP2-035] secured by Requirement 6A of the draft DCO [REP2-015].

31.1.8 The relatively limited number of matters that are not agreed is a reflection of the care with which the application has been constructed. Those matters are addressed further below.

31.1.9 It is first relevant, however, to record that the **Implementation Plan** [REP2-044], which was updated at Deadline 2, provides a substantial (and it is understood largely agreed) degree of comfort and control to ensure the

timely, sequential implementation of the Project and, in particular, its principal components of mitigation. Schedule 9 of the **draft Deed of Obligation** (Doc Ref. 8.17(D)) commits SZC Co. to use reasonable endeavours to deliver the Project in accordance with the **Implementation Plan** and to a regime of monitoring and notification of its plans and programme for such implementation. Consistent with the recognition in the LIR (see paragraph 31.1.1 above) that it would be unrealistic to assume absolute precision in the roll out of any development of this scale and complexity, it would be both unrealistic and impractical to impose a greater degree of specificity. Instead, attention should appropriately turn to other forms of limitation or control which may take effect if matters turn out differently.

31.2 Limiting worker numbers

31.2.1 One of the significant benefits of the Project is the scale of employment that it generates. Limiting the number of construction workers should therefore only be considered as a last resort but, even more importantly, limiting the number of construction workers would:

- handicap and delay the delivery of nationally significant infrastructure for which there is an urgent need;³²
- place unrealistic and unacceptable constraints on the Project's contractors and investors who need a clear degree of certainty and confidence with which to plan at scale for the deployment of resources and their programme of recruitment;
- extend the construction period and its related impacts; and
- fail the tests set for planning controls in NPS EN-1.

31.2.2 NPS EN-1 provides at paragraphs 4.1.7 and 4.1.8 that any requirements or obligations should only be imposed or taken into account if they meet a number of tests, including that they should be "necessary".

31.2.3 Limiting the number of construction workers is not necessary when other effective and more proportionate controls are available and proposed to ensure that any adverse effects arising from delays in transport or accommodation infrastructure are properly mitigated and managed.

³² The urgency of the need is confirmed in NPS EN-1 at paragraph 4.1.2 and conformed in the analysis recorded in the Planning Statement Update at Appendix A (REF).

31.2.4 These matters are addressed further below by reference first to accommodation impacts and then by reference to transport impacts.

a) **Workforce Numbers and Accommodation**

31.2.5 East Suffolk Council and Suffolk County Council have suggested that there should be a cap on the number of workers, linked to the delivery of the proposed Project Accommodation (Campus and LEEIE Caravan Site), in order to limit the effects on the housing market before the project accommodation is delivered.

31.2.6 SZC Co. considers that this approach would limit the economic benefits of the Project, and extend the length of construction (and associated adverse environmental effects). The proposed cap would also be unnecessary, as:

- SZC Co. has committed to use reasonable endeavours to deliver the project accommodation campus by the end of Y3 of construction and the LEEIE caravan site by the end of Y1;
- The approach to assessment of effects of the Non-Home-Based (NHB) workforce has been conservative – both in terms of demand and supply;
- There is an agreed and demonstrably deliverable approach to providing additional stock in the private market using the Housing Fund;
- The workforce and its effects on accommodation will in any case be monitored, with the ability to review the approach to delivery of the Housing Fund, and a special 'resilience' element to reduce the likelihood of effects by bolstering the Council's housing service and supporting existing residents in potentially vulnerable tenancies.

b) **Delivery of the Project Accommodation**

31.2.7 SZC Co. has committed to delivery of the Project Accommodation through reasonable endeavours via the Implementation Plan – with the accommodation campus planned to open at the end of Year 3 of construction and the LEEIE Caravan Site planned to open at the end of Year 1 of construction.

31.2.8 **Figure 5.1** of the **Accommodation Strategy** [[APP-614](#)], shows the interaction between the build-up of the NHB workers requiring accommodation in the local area, and the indicative opening dates of the campus and caravan park.

31.2.9 This shows that the gap between the availability of project accommodation and the total amount of accommodation required is never greater than the number of bedspaces which SZC Co. assesses to be the minimum amount of spare capacity available in the 60-minute area.

31.2.10 This is considered to be a conservative assumption due to the likely underestimate of the HB workforce as a percentage of the total workforce as set out in the next section.

c) **Conservative Approach to Assessment**

31.2.11 **Volume 2, Chapter 9 (Socio-economics)** of the ES [APP-195] uses a conservative assessment case for assumptions about Home-Based (HB) and NHB workers - this is to ensure mitigation for the NHB component is sufficiently robust.

31.2.12 SZC Co. initially assessed a workforce profile with a peak of 5,600 workers, of which 2,000 would be HB at peak. Following Stage 3 Consultation this increased to a peak of 7,900 workers, with proportional increases across each element of the workforce throughout the profile. Full details of this are set out in **Volume 2, Chapter 9, Appendix 9A (Workforce Profile)** of the ES [APP-196].

31.2.13 This change did not result in a change to the absolute number of HB workers across the profile – all 'additional' workers were assessed as NHB. Some of the additional workforce (resulting from changing assumptions about the scale of workforce required as presented through Stage 2 and Stage 3 Consultation, with the peak rising from 5,600 to 7,900) may be HB, but the assessment has taken a conservative position with regards to knock-on effects on socio-economic factors.

31.2.14 In reality, Sizewell C will seek to maximise the level of home-based (HB) workforce, but considered that this 'assessment case' approach was needed in order to test and develop a robust and conservative Housing Fund.

31.2.15 The proportion of home-based workforce is expected to vary over time during the Sizewell C Project, as it depends on the broad occupations within the workforce profile. For example, it is expected that some enabling, civils and site services roles would have a higher proportion of home-based labour, whilst professional and management roles would have a relatively low proportion.

31.2.16 This expected variation is reflected in the assessment case. **Volume 2, Chapter 9, Figure 9.3 (Sizewell C Construction Workforce (Home-Based/Non-Home-Based Workforce Breakdown))** of the ES [APP-197]

shows how the HB and NHB workforce varies over the construction period, while **Volume 2, Chapter 9, Appendix 9A** (Workforce Profile) of the **ES [APP-196]**, **Table 1.9** (*Predicted average breakdown of home-based and non-home-based workers by year of construction period by role (non-operational)*) provides additional detail.

- 31.2.17 This suggests an average rate of 29.5% HB workforce over the first four years of construction.
- 31.2.18 By comparison, Hinkley Point C has achieved an average rate of 45% HB workforce between 2017 and 2020 inclusive, and at its lowest point was 36%, still well-above Sizewell C's conservative estimate.
- 31.2.19 The 'assessment case' used in the **Accommodation Strategy [APP-614]** assumes that:
- The LEEIE caravan site is delivered when the NHB workforce is around 800 – similar to the normal NHB workforce at a Sizewell B outage, which is readily absorbed by the market; and
 - The campus is delivered when the NHB workforce is around 2,500 (of which around 600 would be in the LEEIE caravan site, so translates to 1,900 NHB workers in the private market). This is well below the peak level of NHB workers in the private market (2,900). If the Housing Fund delivers 50% of its target by the end of year three (c. 500-600 bedspaces) then the residual reduces even further to around 1,300-1,400, split between different tenure types, which would be below significance thresholds for adverse effects. Further, this does not take into account natural, background growth in the private rented housing sector.
- 31.2.20 If the assessment case – which as demonstrated is conservative – is in reality more akin to Hinkley Point C's HB recruitment levels, then the NHB curve would be much shallower, and levels of residual demand set out in 1.2.19(b) would be reached later – around the end of Year 4.
- 31.2.21 Once the campus is delivered, the residual effect returns to a low level in the build up to peak, by which time the Housing Fund would have had full effect.
- 31.2.22 As well as being conservative about the demand for accommodation (driven by the number of non-project accommodation-based NHB workers), the assessment is also conservative about the 'baseline' amount of available accommodation in the area.

- 31.2.23 The baseline set out within Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] sets out a conservative assumption about the overall quantum of stock in the PRS and the tourist accommodation sectors – using data that has since been updated to show an increase the supply of accommodation.
- 31.2.24 Overall, there are three broad areas of conservatism in the ‘supply’ side of the assessment:
- the amount of PRS accommodation – which for assessment purposes has been assessed as ‘static’ when in reality there is natural growth of the PRS each year;
 - the use of other ‘latent’ accommodation - including accommodation that exists now as spare rooms, which the Housing Fund will help bring to the market; and
 - assumptions about the amount and availability of tourist sector accommodation.
- 31.2.25 Latent accommodation can be defined as any accommodation that is new to the market since the baseline (for PRS, the baseline is 2019 estimated stock). This includes un-rated (i.e. not included in Visit East Anglia’s database used to inform the Gravity Model) tourist accommodation, rooms for let in private homes, currently empty homes, and accommodation new to the market each year as a result of new development and change in tenure.
- 31.2.26 SZC Co.’s assessment of effects on accommodation **makes no** allowance for the likelihood of workers using any latent accommodation.
- 31.2.27 Monitoring from Hinkley Point C suggests that spare room accommodation is very popular with workers, with at least 11% and up to 31% of NHB workers reporting that they were staying in the PRS actually using spare rooms in existing homes.
- 31.2.28 As such, the figures presented in **Volume 2, Chapter 9** of the ES [APP-195] and the **Accommodation Strategy** [APP-614] for worker uptake of accommodation in the PRS and tourist sectors may be considered an upper-estimate should uptake of latent accommodation currently being observed at Hinkley Point C be achieved.
- 31.2.29 In addition, the housing market is not static, but **Volume 2, Chapter 9** of the ES [APP-195] and the **Accommodation Strategy** [APP-614] only assess the effect at peak – which is at least eight years from now – based on an estimate of stock in 2019, in order to be conservative.

- 31.2.30 Based on the rate of growth of the PRS identified in **Volume 2, Chapter 9** the **ES (Table 9.41)**, it can be expected that the 60-minute Area could have over 30,000 more PRS bedspaces by the peak which have not been taken into account. The spare rooms referred to above are likely to account for a small proportion of that, but most would already exist within current stock.
- 31.2.31 By the time the campus is open (three years post-construction), based on a steady annual increase, up to 20,000 new PRS bedspaces could be available to workers (and residents).
- 31.2.32 **Volume 2, Chapter 9** of the **ES [APP-195]** and the **Accommodation Strategy [APP-614]** assess effects on tourist sector accommodation conservatively and realistically/practically by:
- Assessing the peak demand from workers, at the peak of tourist accommodation occupancy based on best available public datasets – in reality the peak of demand from workers will be short-lived with far fewer workers seeking tourist accommodation for the majority of the construction phase.
 - Assuming a static market – in reality the market will respond to demand, as it is inherently responsive and flexible and driven by demand and market influences. This assessment does not take into account the responsiveness and flexibility of the market – it assumes it is static and reflects the situation as presented in the baseline.
 - Taking conservative assumptions that reduce the supply of accommodation considered available and affordable to workers. On the advice of ESC, ‘holiday parks’ were not considered to be available to workers³³, and the following discounts were applied to other sectors:
 - 85% of serviced accommodation would not be affordable for workers;
 - 90% of self-catering accommodation would be affordable to workers;
 - While all caravan accommodation is likely to be affordable, there are planning restrictions for the year-round use of caravans, some providers would not want to accommodate workers or would want to limit the proportion of stock occupied by workers – engagement with East Suffolk Council suggests this could

³³ providers listed as ‘holiday parks’ – which account for another 200 bedspaces in the Local Ward area (in Snape) but outnumber caravan/camping sites by 2:1 across the District

reduce availability to workers by 50%. The assessment takes a conservative approach to discounting for year-round occupancy for caravan sites, reducing assumed availability by 50%, though it is likely that in most cases occupancy is allowed for most of the year.

31.2.33 This effectively reduced the amount of tourist accommodation considered available and affordable to workers by around 70% (to c. 7,600 in the 60-minute area and c. 5,700 in East Suffolk).

31.2.34 In addition, SZC Co recognises that there is a limitation on the use of local data – while ward-based data gives a detailed database of local capacity, the dataset used is 10 years old. In order to review the baseline for robustness, SZC Co has undertaken to review and update key elements of the position. In summary:

- A review of Local Authority Caravan/Camping Licence data from 2020 highlights that the EIA baseline is very conservative in terms of caravan accommodation – with up to 22% more bedspaces in the 5 local wards, and 110% more bedspaces in East Suffolk now in the market.
- There may be at least 446 more self-catering bedspaces in latent sectors such as Airbnb in the 5 Local Wards which would not have been counted in the original dataset.

d) Delivering Capacity - Housing Fund

31.2.35 As set out above, the assessment of effects on the housing market, and particularly the illustrative assessment set out at **Figure 5.1** of the **Accommodation Strategy** [APP-613], does not include accommodation that will be brought to the market by the Housing Fund.

31.2.36 As set out above the Housing Fund is designed in such a way that it provides for early delivery of new accommodation in a range of initiatives, as described in the **Accommodation Strategy** [APP-613].

31.2.37 The **Draft Deed of Obligation** (Doc Ref. 8.17(D)) stipulates that the Housing Fund must be applied before the peak, and there are a number of measures that can deliver new accommodation within 6 months (for example small grants and loans) to 3 years (for example empty homes). East Suffolk Council will be able to monitor and review the approach annually.

31.2.38 HPC's Housing Fund has been very effective in providing additional capacity to the housing market around HPC, as has been reported publicly

via 6-monthly Socio-economic Advisory Group (SEAG) dashboards. This shows that – to date – the Hinkley Point Housing Fund has delivered 2,533 bedspaces (at January 2021).

- 31.2.39 This represents a substantial increase in accommodation stock – far more than anticipated at the outset (around 1,000 bedspaces by the peak), and one and a half times more bedspaces than the total number of workers living in private rented accommodation in January 2021.
- 31.2.40 The HPC Housing Fund has seen particular success in early and quick delivery of bedspaces through minor improvement grants and loans to home-owners and landlords, to improve the quality of accommodation and bring previously uninhabitable spaces to the market. By the end of March 2019 (less than three years after the commencement of DCO works), the local authorities had (between them) delivered over 1,500 bed spaces using this type of initiative.
- 31.2.41 The local authorities (primarily Sedgemoor District Council and Somerset West and Taunton Council) advise that over 3,900 additional bed spaces are anticipated to be delivered by the peak of construction.
- 31.2.42 As such, the evidence shows that the approach to delivering bedspaces through the Sizewell C Housing Fund can fairly be characterised as both conservative in its overall scale, and deliverable in the early years in particular.
- 31.2.43 The tourist accommodation sector also represents an opportunity for accommodation of the early years workforce, particularly during enabling and civils works, when experience of other projects (Hinkley Point C, 2012 Olympics, Heathrow Terminal 5) suggests workers will want to bring caravans.
- 31.2.44 A number of local accommodation providers have already expressed an interest in accommodating workers, and will be able to do so through the Accommodation Management System which will be launched ahead of commencement as described within the **Draft Deed of Obligation**, Schedule 3 (Doc Ref. 8.17(D)).
- 31.2.45 To further boost supply, and encourage providers to accommodate workers, SZC Co. has worked with East Suffolk Council (as detailed in the **Accommodation Strategy** [[APP-613](#)]) to understand limitations and opportunities, and the potential for review of licence restrictions and support for expansion, re-configuration or improvement of tourist sector accommodation sites through an element of the Housing Fund, as described within the **Draft Deed of Obligation**, Schedule 3 (Doc Ref. 8.17(D)).

- 31.2.46 This includes resourcing for East Suffolk Council to support any additional planning or licensing advice and support that providers require in order to increase supply of tourist sector accommodation, subject to such increases being sustainable, in-line with local policy, and temporary (where appropriate).
- 31.2.47 The use of such resourcing would be guided by a Tourism Accommodation Plan to be produced by ESC. At Hinkley Point C, Sedgemoor District Council produced a management plan to this effect in the early years of the Hinkley Point C Project, which offers a guide to good practice here to support East Suffolk Council and provide confidence that more new capacity will be forthcoming in the early years to reduce pressure. At Hinkley Point C, the management plan produced by the Councils has generated capacity for around 600 workers to-date.
- 31.2.48 Given interest in the market, it is likely that workers seeking tourist accommodation – particularly low-cost accommodation such as plots for touring caravans, can be delivered in the early years.
- e) **Monitoring, Review and Resilience**
- 31.2.49 The approach to mitigation – set out within **Volume 2, Chapter 9** of the **ES [APP-195]** and the **Accommodation Strategy [APP-613]** includes planning for uncertainty, flexible and responsive governance, and a Housing Fund that is able to fully mitigate the anticipated additional demand for PRS accommodation.
- 31.2.50 It includes the ability to monitor not only the NHB workforce by location and accommodation type, but also indicators of housing market stress, which would lead to the release of the '*Housing and Homelessness Services Resilience Measures*' element of the Housing Fund to address issues and reduce pressure.
- 31.2.51 Where it is shown that there is stress which is reasonably related to the Project, this element of the Fund provides the ability to deliver measures to support East Suffolk Council's statutory housing advice and homelessness prevention service. The measures include (but are not limited to):
- staff resourcing, training and projects including but not limited to floating support, tenancy sustainment, outreach, family liaison and issue-specific projects; (b)
 - temporary and emergency accommodation support; (c)
 - landlord engagement and support; and

- management of houses in multiple occupation including support for licencing, enforcement and maintenance support.

31.3 Workforce numbers and transport

In relation to transport, even if there were delays in the provision of the two bypass routes and/or the park ad ride sites (and notwithstanding the powers available to enforce the Implementation Plan), limiting the number of workers would be unnecessary because the terms of the **CWTP** [[REP2-055](#)] contain a series of relevant measures, including:

- a limit on the number of parking spaces available at LEEIE and the main development site;
- ensuring that parking permits are only available to those living east of the A12;
- commitments to monitor and address fly parking;
- measures to encourage car sharing;
- commitments to bus services and to the funding of measures to enable active travel.

31.3.1 The **Draft Deed of Obligation** (Doc. Ref 8.17(D)) at Schedule 16 also contains provisions for monitoring and the ability to draw down contingent mitigation funding in the event of unforeseen impacts.

31.3.2 In these circumstances, imposing limitations on the number of workers that can be employed at any one time and bringing about the unacceptable consequences of such a limitation (see above) would be wholly disproportionate, unnecessary and contrary to the NPS.

31.3.3 It is not considered that the LIR (or any other evidence) would justify imposing wholly exceptional restrictions on the number of workers who can be engaged on the Project, hampering its timely and economic delivery and restricting the substantial employment-related benefits that it would deliver.

31.4 Ecological mitigation

31.4.1 Delaying construction until new replacement habitats are fully established would also fail the relevant tests in NPS EN-1. A number of the new or improved habitats proposed would take some time (potentially years) to establish and it would be directly contrary to national policy to delay delivery of the Project for any such period. Such an approach would delay the delivery of the nationally important benefits of the Project and extend the

period of uncertainty and construction affecting the local community unnecessarily.

31.4.2 To address the sort of concerns expressed in the LIR, SZC Co. has taken a number of proportionate measures, including:

- anticipating the need for early mitigation by pre-committing to the restoration and enhancement of Aldhurst Farm, i.e. as advance mitigation for impacts on the Sizewell SSSI;
- searching for and committing to sites and mitigation for other principal impacts, such as impacts on Fen Meadow, Wet Woodland and marsh harrier habitat;
- committing to an Implementation Plan to use reasonable endeavours to deliver ecological mitigation in a timely manner;
- providing a comprehensive TEMMP [[REP1-016](#)] to monitor and respond to impacts that may arise beyond those anticipated and addressed in the submitted application;
- committing to a comprehensive set of measures which collectively will provide for a significant Biodiversity Net Gain across the Project; and
- committing to contingent measures in the event the proposed mitigation is not sufficient, for example in relation to the Fen Meadow Strategy, marsh harrier habitat creation strategy and the provisions of the European Sites monitoring and management plans described in Schedule 12 of the **draft Deed of Obligation** (Doc Ref. 8.17(D)).

31.4.3 This comprehensive suite of measures is appropriate to protect against and address the concerns expressed in the LIR.

32. CUMULATIVE IMPACTS

32.1 Overview

32.1.1 SZC Co. has reviewed Chapter 32 of the LIR [[REP1-045](#)] and completed a review of the cumulative schemes and local plan allocations referenced therein. This review is presented within **Section 32.2** of this report.

32.1.2 **Table 32.1** provides SZC Co.'s comments on the key matters raised within Chapter 32 of the LIR. The table below discusses each point raised within

the LIR for the construction and operation phases and provides a response. Numbers in the Description column below relate to the paragraph numbers within Chapter 32 of the LIR.

Table 32.1: Cumulative Impacts - SZC Co.'s Comments on Chapter 32 of the Councils' LIR

Ref. No.	Issue	Description	SZC Co. Response
Construction Phase			
Cu.1	Project-wide effects on bats.	32.18 Project wide effects on foraging and commuting bats arising from the main development site and the Sizewell link road have not been fully assessed and insufficient mitigation has been provided.	Please refer to the responses provided in Section 8 of this report, as this discusses impacts upon bats across the Sizewell C Project.
Cu.2	Cumulative effects on farmland birds.	32.19 Mitigation for the cumulative impact with EA1N and EA2 on farmland birds during early years construction has not been mitigated and it does not appear that mitigation could be fully incorporated within the existing site boundary, therefore, separate mitigation funding may be required.	Separate mitigation funding would be appropriate in this instance. Whilst there are surrounding habitats and food sources available in the wider landscape, there will be a temporary loss of foraging habitat and increased levels of disturbance for farmland birds and given the footprint of the developments, mitigation provisions within the site boundaries will be limited although it is acknowledged some measures could be implemented.
Cu.3	Coastal processes, CPMMP.	32.20 Not clear how Sizewell C concludes that management and mitigation measures ensure no significant negative effects. The scope of the CPMMP must be designed to include capability for such impacts to be identified and for mitigation to be applied.	Extensive high frequency monitoring of the coastal system using the established methods is proposed to continue covering the entire Sizewell bay (Minsmere outfall to the frontage south of Sizewell Hall) throughout construction. These methods are comparable with those employed to establish the baseline. This will allow the identification of any impacts arising and for appropriate mitigation to be applied. The CPMMP [AS-237] details the methodology and adaptive management plans and is designed to detect impacts and to identify and apply agreed mitigation measures.
Cu.4	Potential cumulative impact on Thorpeness	32.26 Coastal defence works at Thorpeness need to be considered as a cumulative	Following an extensive review of the evidence, no pathway to impact on Thorpeness village has been identified. Ongoing monitoring at both

Ref. No.	Issue	Description	SZC Co. Response
	Village with planned ESC coastal defence works at Thorpeness starting in 2025.	scheme as there is the potential for cumulative impact.	sites continues to reinforce the evidence that there is no functional link between the shorelines. The village frontage lies outside the envelope of impacts from all Sizewell C infrastructure development and so no cumulative impact was identified after an extensive review of the evidence.
Cu.5	Cumulative impacts on the A12.	32.32 Cumulative schemes including Brightwell Lakes, EA1N and EA2, A12 Friday Street and other schemes along the A12 could cause disruption, driver delay and road safety. Unforeseen or unplanned highway works could also cause disruption. The Councils request that there is coordination of likely highway projects and proposed project delivery programmes so that disruption is minimised.	SZC Co. recognise the importance of regular and effective communication between SZC Co., Scottish Power Renewables (SPR) and Suffolk County Council (SCC) to co-ordinate the delivery of highways mitigation, so as to minimise the impact on the community and travelling public, avoid duplication and abortive works. A commitment to regular engagement during design and construction phases is set out in the Statement of Common Ground (SoCG) between SZC Co. and SPR. SZC Co. [REP2-092] .
Cu.6	Freight management strategy too difficult to deliver.	32.36 Risk that sea and rail freight is too difficult to deliver, exacerbating cumulative road impacts.	Sea and rail infrastructure is included as part of the Application because SZC Co. believes it to be necessary and deliverable. Whilst questions have been raised about the timely deliverability of the rail component, SZC Co. is not aware of any expressed concern related to the marine infrastructure. The infrastructure is not complex, it is within SZC Co.'s control and SZC Co. is fully incentivised to deliver it for the benefits it brings to the Project. The latest position regarding the delivery of the rail infrastructure is set out in the Statement of Common Ground with Network Rail [REP2-074] , which expresses mutual confidence in its delivery. Measures are available through the Implementation Plan [REP2-044] to ensure the delivery of the infrastructure.

Ref. No.	Issue	Description	SZC Co. Response
			In the unlikely event that delivery is delayed there are a number of measures embedded in the DCO to prevent adverse effects, including particularly the binding limits on HGV numbers.
Cu.7	Delay to the delivery of A12 improvement.	32.37 Councils want to avoid a scenario in which the A12 improvements cannot be delivered before the start of Sizewell C construction as this would have negative impacts.	See above in response to Cu.5.
Cu.8	Delay to the delivery of rail mitigation.	32.39 Councils are looking for evidence that delays to delivery of mitigation on the rail line will not increase pressure on the rail paths or increase HGVs on the road. Councils are looking for evidence that the programme for rail delivery has been assessed to address these concerns and contains contingency proposals.	See above in response to Cu.6.
Cu.9	Unresolved noise mitigation from overnight rail movements.	32.40 Unresolved or mitigated issue of noise on sensitive receptors from overnight rail paths (further detail in noise section).	This is a matter to be embedded in the DCO. The Councils are jointly engaged with SZC Co. over all matters related to noise control and mitigation and no party should doubt that a clear, robust set of measures will be set out in the rail noise mitigation strategy which will be approved by ESC under requirement 25 of the draft DCO [REP2-015]. Refer to Section 18 of this report for a further response.
Cu.10	Rail impacts on the Port of Felixstowe.	32.41 Reassurance needed that rail paths to Sizewell will not impact the increasing number of trains serving the Port of Felixstowe (Westerfield Junction to the south West to Ipswich).	The Statement of Common Ground with Network Rail (in section 4) [REP2-074] identifies capacity for the Sizewell C trains and confirms that capacity is available for Felixstowe operations.
Cu.11	Assessment of cumulative impacts on skills demand is incomplete.	32.44 The assertion that there will not be a significant effect on demand for civil engineering skills has not been tested in the ES. Further detail is available for EA1N and EA2 and more detail is known about other projects coming forward such as Bramford	SZC Co's response to the Examining Authority's question Cu.1.16 (and supporting Appendix 23B), along with SE.1.39 [REP2-100 and REP2-112] consider in detail the proposed cumulative demand for skills – particularly the Councils' concerns over Civils construction skills, and

Ref. No.	Issue	Description	SZC Co. Response
		to Twinstead reinforcement. Due to cumulative schemes in the area, there is a reasonable expectation that there will be pressure on the regional civils workforce in the near to medium term.	<p>consideration of new and changed projects since the assessment was submitted.</p> <p>It should be noted that there is a distinction between the region's plan for skills development, and formal EIA assessment of cumulative effects.</p> <p>SZC Co. consider that the range of infrastructure projects in the region offer a significant opportunity for local people to gain skills and employment, and develop sustainable careers across more than one project. This has been taken into consideration in SZC Co.'s plans for the provision of employment, skills and education measures as set out at Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17 (D)).</p>
Cu.12	Accommodation	32.47 Concern that unauthorised encampments across the district could appear if pressures on the local market are not alleviated by the Housing Fund measures.	<p>SZC Co. consider – and the Councils broadly agree – that the proposed Housing Fund would in principle mitigate for adverse effects on the availability of accommodation, subject to agreement on the scale of the Housing Fund. There are specific elements of the Fund, and embedded into the DCO, to address concerns about unauthorised encampments – particularly the provision of a Caravan Site at LEEIE after 12 months, and the Tourist Accommodation element of the Housing Fund, which will enable funding for enforcement issues. This will be secured through the draft Deed of Obligation (Doc Ref. 8.17(D)).</p>
Cu.13	Perception of ongoing development – impacts on tourism and quality of life.	32.49 Perception of lots of ongoing development in the area could have an impact on tourism as well as on quality of life for residents. Funding to assist the tourism industry from other projects would need to be added to the tourism fund provided by the Sizewell C Project while	<p>It is not the responsibility of the Sizewell C Project to mitigate for adverse effects of other Projects. However, SZC Co. has identified mitigation including a Tourism Fund and Community Fund – broadly agreed in principle with the Councils – that would reduce the significance</p>

Ref. No.	Issue	Description	SZC Co. Response
		further provision of community funding would allow some compensation for the quality of life issues.	of and provide compensation for these impacts. Please refer to SZC Co.'s comments within Section 26 of this report, and SZC Co's response to the Examining Authority's First Written Questions, see Appendix 23A to SZC Co's response to SE.1.7 , SE.1.13 and SE.1.36 [REP2-100 and REP2-112] for further information regarding SZC Co's position on Tourism impacts.
Operational Phase			
Cu.14	Impact on Minsmere Sluice outfall.	32.53 Management of Minsmere Sluice outfall disrupts natural longshore sediment movement and may trap sediment that would otherwise disperse over Sizewell bay. The end of life of the Minsmere Sluice outfall is predicted 2050 – 2075 and it is not anticipated to be rebuilt, this could positively impact Sizewell C.	These potential end of life impacts of the sluice outfall have been discussed throughout the impact assessment development. However, no detailed plans for the future sluice management are yet formulated and, as a positive effect to the future shoreline, it does not represent worst-case, so has not been directly assessed in the ES.
Cu.15	Management of Blyth harbour entrance structures.	32.54 If piers at Blyth harbour are allowed to deteriorate and fail, the coastal control point will move potentially to Southwold town increasing sediment volumes that may benefit the Sizewell C frontage.	Likewise, this has also been identified throughout the evidence used for the assessments, but benefits to the frontage from 3rd party structures are not considered in the ES as these are not considered to be worst case impacts of the development.
Cu.16	Decommissioning of Sizewell B nearshore outfall.	32.55 Decommissioning of Sizewell B nearshore outfall is likely to lead to dispersal of retained material over the Sizewell B and C frontages, having a positive impact.	As for Cu14 and Cu15, the ES assessments assumed prolonged retention of shoreline-controlling structures as the worst case, excluding potential positive impacts such as this.
Cu.17	Removal of Sizewell A and B platforms and flood defences.	32.57 Sea defences may be reached by a retreating shoreline within the lifetime of Sizewell C. Removal of these defences represents a worst case for Sizewell C and pre-decommissioning studies are required for each site, but it is considered unlikely that a negative impact will be allowed to occur on Sizewell C.	Noted. Removal of Sizewell A and B platforms and defences does not form part of any planned works and so cannot be incorporated into formal cumulative assessments, because, as identified, there is no defined plan. Assessment of impacts from these works would be required as part of the planning application for the decommissioning works, rather than

Ref. No.	Issue	Description	SZC Co. Response
			as part of the Sizewell C development proposals.
Cu.18	Management of Minsmere coastal frontage.	32.60 Minsmere will be managed as coastal retreat. It is understood that Sizewell C has been designed to be resilient to the potential of low lying land to the north becoming tidally or permanently flooded, as well as open sea wave and current conditions.	Flooding and consequential potential changes to the management of Minsmere levels as described were identified as a possibility when assessing the future impacts of SZC. For the ES, it was noted that these conditions (breaching and flooding of the levels) would not represent the coastal configuration leading to the worst case impact from Sizewell C, instead the worst-case arises from interruption of the longshore transport pathway by an exposed HCDF. A permanent breach leading to flooding or open sea conditions on present low-lying lands would represent a natural break in the longshore transport pathway adjacent to the SZC site – as a result, the magnitude of any SZC impact arising from an exposed HCDF (which in any case will be avoided by SCDF mitigation) on this already broken pathway would be relatively reduced. Furthermore, the Sizewell C island does not alter the southern limit of these low-lying coastal lands, which is presently marked by the mound of the Sizewell Bent Hills, so the dynamics of this particular future marine scenario would be similar with or without SZC.
Cu.19	Dunwich Village geotextile-bag defence.	32.65 Buried geotextile-bag defence at Dunwich Village will slow but not prevent long term coastal change. The local community is promoting works to slow natural change which have the potential to alter sediment release and alongshore movement. If this is taken forward, they will be the subject of consultation with SZC Co.	The potential for sediment supply from Dunwich cliffs to restart in future and generate positive (sediment supply) benefits to Sizewell C has been noted throughout the development of evidence for the ES. Again, worst-case assessment in the ES presumed present-day conditions without this potential additional supply of sediments.
Required mitigation (construction and operation)			
Cu.20	A12 corridor.	32.67 Incumbent on all parties to coordinate the provision of all transport mitigation and have well	See response to Cu.5.

Ref. No.	Issue	Description	SZC Co. Response
		developed contingency plans in place based on detailed risk assessments, if delivery is delayed etc.	
Cu.21	Transport communication plan	32.67 A robust communication plan which promotes and identified the delivery of works, including delays, to be part of a wider promotional programme to promote east Suffolk.	The Construction Traffic Management Plan (CTMP) [REP2-054] includes a commitment for SZC Co. to establish an email notification process whereby interested parties and stakeholders can register for email notifications with regards to transport updates for the Sizewell C Project during the construction phase, such as, but not limited to, programme updates for planned highway improvements, temporary traffic management measures, timing of any Special Order or VR1 AIL movements by road and the proposed AIL route.
Cu.22	Economic development and skills	32.68 The Councils consider that the Applicant's assessments should be updated to split out the defined work phases (Enabling, Main Civils, Mechanical, Electrical and Heating, ventilation and air conditioning), Commissioning and Operation) and then cumulative demand assessed against the same and similar phases of all in scope projects and projects that have come forward since this assessment.	SZC Co has provided more detailed information in terms of the phases of construction in response to the Examining Authority's question Cu.1.16 (and supporting Appendix 23B), along with SE.1.39 [REP2-100] and [REP2-112] .

32.2 Review of Cumulative Schemes

a) Energy Related Projects

32.2.2 **Table 32.2** presents a review of the energy related projects identified within Table 33 of the LIR against the Sizewell C Cumulative Effects Assessment (CEA) presented in **Volume 10, Chapter 4** of the **ES** [\[APP-578\]](#), as updated by **Volume 1, Chapter 10** of the **ES Addendum** [\[AS-189\]](#) and **Appendix 13A** of **SZC Co. Responses to Examining Authority's First Written Questions** [\[REP2-110\]](#).

Table 32.2: Energy Related Projects

Project	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Comment
Galloper Offshore Wind Farm	22	Yes	No	This project is complete and operational and, therefore, has been considered to form part of the existing baseline within the technical assessments of the ES.
Greater Gabbard Offshore Wind Farm	N/A	N/A	No	This project is complete and operational and, therefore, has been considered to form part of the existing baseline within the technical assessments of the ES.
East Anglia ONE Limited Offshore Wind Farm	574	Yes	No	This project was considered in the technical assessments of the ES, to form part of the future baseline, as construction was completed in 2020.
East Anglia THREE Offshore Wind Farm	757	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
East Anglia ONE NORTH Offshore Wind Farm	13	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
East Anglia TWO Offshore Wind Farm	14	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
Galloper Extension (Five Estuaries) Offshore Wind Farm	A114	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
Greater Gabbard Offshore Wind Farm extension (North Falls)	A113	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
Offshore Wind Farms seabed leasing	N/A		No	Sufficient information is not available to provide an assessment of cumulative effects. No EIA Scoping

NOT PROTECTIVELY MARKED

Project	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Comment
				Reports, consultation documents or applications have been published for this project yet.
Nautilus Interconnector	A111	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
Eurolink	A112	Yes	Yes	This project has been considered as a cumulative scheme within the ES.
SCD1	N/A		No	Sufficient information is not available to provide an assessment of cumulative effects. No EIA Scoping Reports, consultation documents or applications have been published for this project yet.
Bramford to Twinstead	N/A		No	This project is located outside of the Zone of Influence (Zol) of the Sizewell C Project as it is further than 20km away from the main development site, and further than 5km from any associated development. The project is approximately 14km from the freight management facility and approximately 40km from the main development site.
AENC Bramford to Norwich	N/A		No	Sufficient information is not available to provide an assessment of cumulative effects. No EIA Scoping Reports, consultation documents or applications have been published for this project yet. It is also likely this project would be located outside of the Zone of Influence (Zol) of the Sizewell C Project.

NOT PROTECTIVELY MARKED

b) Suffolk Coastal and Waveney Local Plans

32.2.3 Table 32.3 and Table 32.4 below present a review of the significant housing and employment site allocations of the Suffolk Coastal and Waveney Local Plans identified within Tables 34 and 35 of the LIR against the Sizewell C CEA presented in **Volume 10, Chapter 4** of the **ES [APP-578]**, as updated by **Volume 1, Chapter 10** of the **ES Addendum [AS-189]** and **Appendix 13A of SZC Co. Responses to Examining Authority's First Written Questions [REP2-110]**.

Table 32.3: Significant housing site allocations in the Suffolk Coastal and Waveney Local Plans

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
Suffolk Coastal Local Plan				
Policy SCLP2.1 Growth in the Ipswich Strategic Planning Area				This is reference to a policy rather than to a specific application site/development. It has therefore not been considered within the long or short listing process, but has been considered within the employment and household projections for the assessment of socio-economic impacts. In addition, the traffic modelling takes account of planned growth in housing and jobs in the area, as set out in local planning policies. The local authorities have agreed the level of traffic growth applied to the Reference Case models.
Policy SCLP12.3 North Felixstowe Garden Neighbourhood	A115	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.4 Land North of Conway Close and Swallow Close, Felixstowe	A65	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
Policy SCLP12.19 Brightwell Lakes	A118	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.24 Land at Humber Doucy Lane	A120	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.25 Suffolk Police HQ, Portal Avenue, Martlesham	A121	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Leiston -Neighbourhood Plan made 2017 – SA1	ID29	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Leiston -Neighbourhood Plan made 2017 – SA2	ID21	Yes	Yes	This project was considered in the technical assessments

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
				of the ES, to form part of the future baseline, as construction is due to be completed prior to the construction of Sizewell C.
Leiston -Neighbourhood Plan made 2017 – SA3	ID28	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Leiston -Neighbourhood Plan made 2017 – SA4	ID30	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Leiston -Neighbourhood Plan made 2017 – IN1	N/A	No	No	Due to the scale and nature of the allocation, this scheme was not included within the long listing process as it did not meet the cumulative schemes criteria agreed with ESC and SCC.
Leiston -Neighbourhood Plan made 2017 – TC2	N/A	No	No	Due the scale and nature of the allocation, it is not considered that there would be potential for cumulative effects.
Policy SCLP12.32 Former Council Offices, Melton Hill	A123	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
Policy SCLP12.47 Land to the South of Darsham Station	A130	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.60 Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)	A141	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.64 Land off Howlett Way, Trimley St Martin	A67	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.65 Land adjacent to Reeve Lodge, High Road, Trimley St Martin	A142	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
Policy SCLP12.33 Land at Woodbridge Town Football Club	A124	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.29 South Saxmundham Garden Neighbourhood	A122	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Waveney Local Plan				
Policy WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood	N/A	No	No	This allocation is located outside of the Zone of Influence (ZoI) of the Sizewell C Project, approximately 28km from the main development site.
Policy WLP2.13 13 North of Lowestoft Garden Village	A27	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
				schemes before the ES was finalised.
Policy WLP2.16 Land South of The Street, Carlton Colville/ Gisleham	A32	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy WLP2.14 Land North of Union Lane, Oulton	A29	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy WLP2.15 Land Between Hall Lane and Union Lane, Oulton	A30	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy WLP3.1 Beccles and Worlingham Garden Neighbourhood	A36	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA	Justification
				short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy WLP3.2 Land West of London Road, Beccles	A37	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Total housing growth 2014 – 2036 by settlement in the Waveney Local Plan				This is reference to a policy rather than to a specific application site/development. It has therefore not been considered within the long or short listing process, but has been considered within the employment and household projections for the assessment of socio-economic impacts. In addition, the traffic modelling takes account of planned growth in housing and jobs in the area, as set out in local planning policies. The local authorities have agreed the level of traffic growth applied to the Reference Case models.

Table 32.4: Significant employment site allocations in the Suffolk Coastal and Waveney Local Plans

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Justification
Suffolk Coastal Local Plan				
Policy SCLP12.7 Port of Felixstowe	A69	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Justification
				cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.10 Land at Haven Exchange, Felixstowe	A72	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.21 Ransomes, Nacton Heath	A18	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.29 South Saxmundham Garden Neighbourhood, employment land to the west of the A12	A122	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.

NOT PROTECTIVELY MARKED

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Justification
Policy SCLP12.35 Former Airfield, Debach	A21	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.
Policy SCLP12.36 Carlton Park, Main Road, Kelsale cum Carlton	A23	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Policy SCLP12.39 Former Airfield, Parham	A20	No	No	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list

NOT PROTECTIVELY MARKED

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Justification
				of cumulative schemes before the ES was finalised.
Policy SCLP12.40 Bentwaters Park, Rendlesham	A22	Yes	Yes	This allocation has been assessed as a cumulative scheme within the ES.
Waveney Local Plan				
Policy WLP2.2 PowerPark, Lowestoft	N/A	N/A	No	This allocation is located outside of the Zone of Influence (Zol) of the Sizewell C Project, approximately 30km north of the main development site.
Policy WLP2.5 East of England Park, Lowestoft	N/A	N/A	No	This allocation is located outside of the Zone of Influence (Zol), approximately 30km north of the main development site.
Policy WLP2.17 Land at South Lowestoft Industrial Estate	A34	No	Yes	This allocation was reviewed as part of the long list of cumulative schemes within the ES, however, it was not short-listed for inclusion within the CEA, as no potential for significant cumulative effects was identified for any of the technical assessments of the ES. This decision was recorded and presented to ESC as part of the consultation on the list of cumulative schemes before the ES was finalised.

Policy	Long List ID	Taken forward to short list?	Considered in the Sizewell C CEA?	Justification
Policy WLP3.3 Land South of Benacre Road at Ellough Airfield, Ellough	N/A	N/A	No	This allocation is located outside of the Zone of Influence (Zol), approximately 24km north of the main development site.

c) Relevant Allocations in Neighbouring Local Plans

i. Ipswich Borough Council

32.2.4 As identified on **Volume 10, Figure 1.1** of the **ES** [APP-574], the 5km Zone of Influence (Zol) from the freight management facility is the only Zol that extends into Ipswich Borough Council.

32.2.5 **Section 32.11** and **32.12** of the **LIR** set out the following allocations for consideration;

- Ipswich Borough Council adopted Local Plan 2011 – 2031 includes Policy CS10: Ipswich Garden Suburb of 3,500 dwellings.
- The Emerging Ipswich Local Plan Review 2018 – 2036 has been Examined and includes for this period at least 8,010 new homes.
- Employment: as set out in the emerging Local Plan one of the objectives is the creation of approximately 9,500 additional jobs to be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.

32.2.6 These schemes have been considered within the employment and household projections for the assessment of socio-economic impacts.

32.2.7 In addition, the traffic modelling takes account of planned growth in housing and jobs in the area, as set out in local planning policies. The local authorities have agreed the level of traffic growth applied to the Reference Case models.

ii. Babergh and Mid Suffolk District Councils

32.2.8 As identified on **Volume 10, Figure 1.1** of the **ES** [APP-574], the 5km Zol from the freight management facility is the only Zol that extends into

Babergh and Mid Suffolk District Councils. **Section 32.11** and **32.12** of the **LIR** set out the following allocations for consideration;

- Gateway 14, Stowmarket. 63 hectares logistics and business park with up to 2.36 million sq. ft of floor space;
- Valley Ridge (previously known as SnOasis), Great Blakenham. Staycation resort with a focus on year-round leisure and short breaks for families. Up to one million visitors per year. The complex is set to create around 2,000 jobs during construction and about 1,800 once open;
- Eastern Gateway, Sproughton. 14 hectares Enterprise Zone which forms part of a larger 36 hectares regeneration site with up to 1 million sq.ft of floor space;
- Freeport East, centred upon the Port of Felixstowe and Harwich International Port. One of the eight new freeports announced by the Chancellor in March 2021. Estimated to create 13,000 new jobs over the next five year.

32.2.9 These schemes have been considered within the employment and household projections for the assessment of socio-economic impacts.

32.2.10 In addition, the traffic modelling takes account of planned growth in housing and jobs in the area, as set out in local planning policies. The local authorities have agreed the level of traffic growth applied to the Reference Case models.

iii. **Proposed national transport schemes**

32.2.11 As referenced in paragraph 32.15 of the LIR, proposed national transport schemes across the Ipswich Strategic Planning area may have cumulative effects with the Sizewell C Project on the surrounding road network. There are RIS2 schemes on the A12, which SZC Co. have taken note of and during their construction will co-ordinate with Highways England. This is one of the functions of the Transport Review Group, that Highways England will be a member of, so that SZC Co. can closely co-ordinate with the highway authorities on the implementation of the highway schemes proposed by SZC Co. and other parties including the highway authorities themselves.

33. SUMMARY OF PROJECT-WIDE IMPACTS

33.1 Overview

33.1.1 SZC Co. has reviewed Chapter 33 of the LIR [[REP1-045](#)], which summarises the Councils' review of the project-wide impacts, mitigation, DCO requirements and obligations. SZC Co. notes that the approach used to summarise project-wide impacts within the LIR is slightly different to the assessment of project-wide effects adopted within **Volume 10, Chapter 3** of the **ES** [[APP-577](#)]. Chapter 33 of the LIR summarises impacts which occur across the project and are not site-specific, whilst the ES considered overlapping impacts on individual receptors within the project-wide effects assessment. Both of these approaches are valid, however, it may not be possible to make direct comparisons.

33.1.2 SZC Co. comments on the topic specific impacts and mitigation requirements identified within Chapter 33 of the LIR have been provided within the issue specific sections of this report, as follows:

- Landscape and visual impacts - refer to **Section 6** of this report;
- Ecology and biodiversity impacts - refer to **Section 8** of this report;
- Impacts on soils and agriculture– refer to **Section 9** of this report;
- Impacts on minerals and waste– refer to **Section 10** of this report;
- Coastal change / geomorphology impacts - refer to **Section 11** of this report;
- Impacts on historic environment – refer to **Section 12** of this report;
- Impacts on archaeology - refer to **Section 13** of this report;
- Traffic and transport impacts - refer to **Section 15** of this report;
- Impacts on access (PRoW), amenity and recreation– refer to **Section 17** of this report.
- Noise and vibration impacts - refer to **Section 18** of this report;
- Air quality impacts from increased traffic - refer to **Section 19** of this report;
- Flood risk and water impacts – refer to **Section 20** of this report;

- Sustainability impacts – refer to **Section 21** of this report;
- Major accidents and disasters impacts – refer to **Section 22** of this report;
- Supply chain and economic development – refer to **Section 24** of this report;
- Employment, skills and education - refer to **Section 25** of this report;
- Tourism impacts – refer to **Section 26** of this report;
- Impacts on public services – refer to **Section 27** of this report;
- Communities impacts - refer to **Section 28** of this report;
- Impacts on housing – refer to **Section 29** of this report; and
- Quality of life impacts – refer to **Section 30** of this report.

33.1.3 Chapter 33 of the LIR does not identify any additional issues or mitigation requirements to those already covered within the issue specific sections of this report, therefore, no further response has been provided.

34. MAIN DEVELOPMENT SITE

34.1 Overview

34.1.1 SZC Co. has reviewed Chapter 34 of the LIR [[REP1-045](#)] which summarises all of the impacts associated with the main development site, as identified in the issue specific sections within the LIR.

34.1.2 As these impacts have all been addressed in the issue specific sections of this document, they have not been repeated in this section.

34.1.3 The main concerns raised and the locations of SZC Co's responses are set out in **Table 34.1** below:

Table 34.1: Location of responses to Main Development Site key concerns raised

Summary of Councils' key areas of concern	Signpost to SZC Co's. response
Power station platform / beach (including SSSI crossing and BLFs)	
Impacts on local landscape character.	Chapter 6, Table 6.1, Ref no. 1a (Landscape and Visual Impact Assessment)
Loss of and disturbance to Sizewell Marshes SSSI.	Chapter 8, Table 8.1, Ref no. 3c – 3e (Ecology and Biodiversity)
Coastal process impacts on Sizewell Beach.	Chapter 11, Table 11.1 (Coastal Change/Geomorphology)
Amenity impacts on Sizewell Beach.	Chapter 17, Table 17.1, Ref no. 19a (Access, Amenity and Recreation)
Temporary Construction Area (including accommodation campus)	
Various impacts of the proposals on the environment.	Chapter 6, Table 6.1 (Landscape and Visual Impact Assessment) Chapter 8, Table 8.1 (Ecology and Biodiversity) Chapter 9, Table 9.1 (Soils and Agriculture) Chapter 12, Table 12.1 (Historic Environment) Chapter 13, Table 13.1 (Archaeology) Chapter 14, Table 14.1 (Design) Chapter 15, Table 15.1 (Traffic and Transport) Chapter 17, Table 17.1 (Access, Amenity and Recreation) Chapter 18, Table 18.1 (Noise and Vibration) Chapter 19, Table 19.1 (Air Quality) Chapter 20, Table 20.1 (Flood and Water)
Land East of Eastlands Industrial Estate, including Lovers Lane	
Noise and vibration impact of the rail sidings.	Chapter 18, Table 18.1, Ref no. 20e (Noise and Vibration)
Surface water flooding.	Chapter 20, Table 20.1, Ref no. 22b and 22c (Flood and Water)

35. ASSOCIATED DEVELOPMENT SITES

35.1 Overview

35.1.1 SZC Co. has reviewed Chapter 35 of the LIR [REP1-045] which summarises the main identified impacts on each of the Associated Development (AD) sites. The issue specific impacts of the AD sites are detailed in the chapters above and in Chapter 36 below. As these impacts have been addressed in the issue specific sections of this document, they have not been repeated in this section.

35.1.2 **Table 35.1** provides an overview of each Associated Development (AD) site, a summary of the Councils' position on issues not raised elsewhere in the LIR, and SZC Co.'s comments on these issues.

Table 35.1: Responses to AD sites key concerns

Ref	Summary of councils' position	Comments from SZC Co.
Two village bypass		
Para. 35.5	Councils' overview Being a major scheme, the Two Village Bypass despite its overwhelmingly positive impact, given it is a road will inevitably have some negative impacts on landscape, ecology and heritage, as well as residential amenity of properties close to the route of the bypass. The Councils consider that the merits of the bypass far outweigh the negative aspects.	The principle of the 2VBP has been agreed in the initial Statement of Common Ground (SoCG) with the Councils (Doc Ref 9.10.12(A)) [REP2-076]. Topic specific issues are considered in the earlier chapters of this document.
40a	Construction of 2VBP <u>Transport</u> Online works of A12/A1094 roundabout and new roundabout to west of Stratford St Andrew would lead to additional delay on A12. Road safety impacts prior to the completion of the A12 / A1094 roundabout, as result of additional HGV traffic and construction workforce traffic moving through the junction.	The AD road interfaces (including the tie-ins on the temporary AD sites) to the existing roads will be designed to: <ul style="list-style-type: none"> • Reduce construction duration on live road networks where much of the works are undertaken off-line. • Reduce interface duration with existing road users during tie-in works between proposed and existing road networks. The construction phase will require detailed consultation with Suffolk County Council in the development and approval of Traffic Management Plans for all

Ref	Summary of councils' position	Comments from SZC Co.
		<p>interventions on the existing highway network. The following traffic management principles have been broadly agreed with Suffolk County Council:</p> <ul style="list-style-type: none"> • Proposed roundabouts and junctions will be prioritised and constructed early in the construction programme subject to construction access dates. • All highway interventions will be developed, approved and programmed in consultation with Suffolk County Council prior to commencement of working on the existing road network. • A12 and B1122 interventions such as tie-in works will be undertaken during off-peak travel times (night time or weekends). • All interventions on the existing highway network will always aim to maintain one way traffic flow under traffic light signal traffic management arrangement. Where necessary, road closures will be planned and coordinated with Suffolk County Council with alternative diversion routes communicated with road users and other impacted stakeholders. • Use the new roundabouts for site access following their construction. • Access to and from the A1094 to the A12 to be maintained during construction of Friday street roundabout. <p>For more detail please refer to the response to Cu.1.22.ii of the ExA's First Written Questions submitted at Deadline 2 [REP2-100].</p>
40b	Construction of power station following completion of 2VBP	Discussion regarding the use of a quiet road surface is ongoing and an update will be provided in the

Ref	Summary of councils' position	Comments from SZC Co.
	<p><u>Noise and vibration</u></p> <p>Significant adverse noise effects are anticipated at number of properties along the line of the new Bypass. Further noise mitigation measures will be required</p>	<p>SoCG at Deadline 5. See the response to NV.1.37 and NV.1.48 of the ExA's First Written Questions at Deadline 2 [REP2-100] for consideration of a quiet road surface.</p>
40d	<p>Required mitigation</p> <p>Further compensation measures to address the loss of veteran trees.</p>	<p>The Examining Authority has requested further information on the veteran trees on the two village bypass site, including their exact location in relation to the order limits and alignment, showing precisely which such trees will or may be felled. This information will be provided at Deadline 4.</p>
40e	<p>Requirements / Obligations</p> <p><u>Archaeology</u></p> <p>Archaeology requirement to be amended and S106 to include suitable resourcing for SCC archaeological services.</p>	<p>Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).</p>
Sizewell Link Road		
Para. 35.8	<p>Whilst both Councils consider a new Link Road necessary to mitigate the impacts of construction traffic, SCC and ESC have come to different conclusions as to the merit of permanency of the Sizewell Link Road: SCC as the Highway Authority prefer for the Sizewell Link Road to be removed on completion of the Sizewell C project as the ongoing long-term environmental damage is not justified by transport benefits once the construction period is concluded. However, ESC considers the long terms benefits of the Sizewell Link Road as a dedicated and purpose-built HGV route to Sizewell A, B and C and easier access to Leiston justifies its permanency particularly as a replacement for a long stretch of the B1122 bringing benefits to residents of that stretch of highway and enabling its promotion as a cycle friendly route from Sizewell towards the A12. Both Councils agree that, if the ExA takes the view that the</p>	<p>The principle of the SLR has been agreed in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076].</p> <p>Topic specific issues are considered in the earlier chapters of this document.</p> <p>Issues relating to the permanency of the link road are addressed in SZC Co.'s response to the SCC Written Representations (please see Doc. ref 9.28).</p>

Ref	Summary of councils' position	Comments from SZC Co.
	Sizewell Link Road is to be retained, a number of additional measures need to be put in place to mitigate and manage impacts.	
41a	Construction of SLR <u>Transport</u> Online works (roundabout at A12 and four locations tying in the new road with the existing B1122) will lead to driver delays and road safety impacts.	See response to 40a.
41d	If Sizewell Link Road is to be retained, existing B1122 to be downgraded as a quiet road. Further noise mitigation measures required for properties adjacent to new road in both construction and operational periods	Discussion regarding the use of a quiet road surface is ongoing and an update will be provided in the SoCG at Deadline 5. See the response to NV.1.48 of the ExA's First Written Questions at Deadline 2 [REP2-100] for consideration of a quiet road surface.
41e	Requirements / Obligations <u>Archaeology</u> Archaeology requirement to be amended and S106 to include suitable resourcing for SCC archaeological services.	Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).
Northern park and ride		
Para. 35.9	Councils' overview The principle of the northern park and ride is supported by the Councils as a sustainable transport approach. The location of the Northern Park and Ride Site is accepted by the Councils as appropriate, and the Councils consider for this site that the benefits of having a Park and Ride site outweigh its negative impacts. The Park and Ride site will only be available during the construction period; therefore, during operation of the power station, once the site has been restored to its former state, the impact will be neutral.	The principle of the NPR has been agreed in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076] . Topic specific issues are considered in the earlier chapters of this document.
42a	Construction of NPR <u>Transport</u>	See response to 40a.

Ref	Summary of councils' position	Comments from SZC Co.
	Additional delay on the A12 due to online highway works for construction of new roundabout.	
42b	<p><u>Transport</u> Proposed new A12 roundabout will lead to a minor increase in delay on the road network.</p> <p><u>Flood and water</u> Further clarification on the drainage proposals is required to confirm compliance with policy.</p>	<p><u>Transport</u> The Consolidated Transport Assessment [REP2-045] summarises the junction capacity assessment of the proposed northern park and ride facility site access roundabout on the A12. Table 9.120 of the Consolidated Transport Assessment [REP2-045] shows that the largest increase in delay for any arm of the roundabout across all scenarios and time periods assessed is forecast to be 5 seconds, which is considered to be not significant.</p> <p><u>Flood and Water</u> The final drainage strategy is to be submitted for approval pursuant to DCO Requirement 5 but indicative strategies are being prepared for all AD sites to be shared with the Councils and agreed through the SoCG, to be updated at Deadline 5.</p>
42d	<p><u>Transport</u> Requirements / obligations to include: bond against cost of relevant highway works, including reinstatement of existing highway; funding for additional traffic management; controls for management and monitoring.</p> <p><u>Archaeology</u> Archaeology requirement to be amended to effectively secure further assessment, mitigation, post-excavation analysis, reporting, publication and archive deposition. S106 – suitable resourcing for SCC archaeological services.</p>	<p><u>Transport</u> A transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO.</p> <p>Monitoring of compliance with the HGV caps is proposed through the Construction Traffic Management Plan CTMP [REP2-054], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). Monitoring of compliance with the mode share targets is proposed to be undertaken through the Construction Worker Travel Plan</p>

Ref	Summary of councils' position	Comments from SZC Co.
		<p>CWTP [REP2-055], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p> <p><u>Archaeology</u></p> <p>Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc. Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).</p>
Southern park and ride		
Para. 35.10	<p>The principle of the southern park and ride is supported by the Councils as a sustainable transport approach. The location of the Southern Park and Ride Site is accepted by the Councils as appropriate. During the pre-application period, the Councils queried whether the site should be located further south towards Ipswich, but they are content that the proposed location is acceptable to reduce traffic impacts. The Councils consider for this site that the benefits of having a Park and Ride site outweigh its negative impacts. The Park and Ride site will only be available during the construction period; therefore, during operation of the power station, once the site has been restored to its former state, the impact will be neutral.</p>	<p>The principle of the SPR has been agreed in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076].</p> <p>Topic specific issues are considered in the earlier chapters of this document.</p>
43a	<p>Construction of SPR</p> <p><u>Transport</u></p> <p>Increased congestion and delay and reduced road safety on local road network as result of HGV and car trips to construction site, particularly for B1078/B1116 roundabout and slips.</p> <p><u>Air Quality</u></p> <p>Risk of significant in-combination air quality impacts from HGVs in Stratford St Andrew pre-completion of bypass, limits on HGV emission standards under discussion.</p>	<p><u>Transport</u></p> <p>The Consolidated Transport Assessment [REP2-045] summarises the junction capacity in the vicinity of the proposed southern park and ride facility. Table 9.120 of the Consolidated Transport Assessment [REP2-045] shows that the largest increase in delay for any arm of the B1078/B1116 roundabout across all scenarios and time periods assessed is forecast to be 2 seconds, which is considered to be not significant.</p> <p><u>Air Quality</u></p>

Ref	Summary of councils' position	Comments from SZC Co.
		<p>The Updated Code of Construction Practice [REP2-056] addresses the request made by the Councils and includes a cap on vehicles that do not meet the Euro VI standard and also monitoring of air quality in the Stratford St Andrew AQMA. SZC Co. will continue to work with the Councils in seeking agreement on the outstanding matters for the CoCP. Monitoring of HGV emissions will be undertaken as part of the monitoring of the Construction Traffic Management Plan CTMP [REP2-054], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p>
43b	<p><u>Flood and water</u> Further clarification on the drainage proposals is required to confirm compliance with policy.</p>	<p><u>Flood and Water</u> The final drainage strategy is to be submitted for approval pursuant to DCO Requirement 5 but indicative strategies are being prepared for all AD sites to be shared with the Councils and agreed through the SoCG, to be updated at Deadline 5.</p>
43d	<p>Requirements / obligations <u>Transport</u> Requirements / obligations to include: bond against cost of relevant highway works, including reinstatement of existing highway; funding for additional traffic management; controls for management and monitoring. <u>Archaeology</u> Archaeology requirement to be amended to effectively secure further assessment, mitigation, post-excavation analysis, reporting, publication and archive deposition. S106 – suitable resourcing for SCC archaeological services.</p>	<p><u>Transport</u> A transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO. Monitoring of compliance with the HGV caps is proposed through the CTMP [REP2-054], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). Monitoring of compliance with the mode share targets is proposed to be undertaken through the CWTP [REP2-055], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). <u>Archaeology</u></p>

Ref	Summary of councils' position	Comments from SZC Co.
		Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc. Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).
Freight Management Facility		
Para. 35.11	<p>Councils' overview</p> <p>The Councils support the principle of a Freight Management Facility as it is considered to increase the likelihood of better management of the approach of freight vehicles to the site and on the A12 north of Seven Hills. Whilst the proposed location of the Freight Management Facility is considered by the Councils in principle acceptable subject to resolution of the issues raised, the Applicants have failed to properly evidence that this location is optimal in terms of managing HGVs particularly in the case of closures of the Orwell Bridge, and that a potential alternative location to the west of the Orwell Bridge with possible increased benefit was not feasible.</p>	<p>The principle and location of the FMF has been accepted in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076].</p> <p>Topic specific issues are considered in the earlier chapters of this document.</p>
44b	<p>Construction of power station – operation of FMF</p> <p><u>Transport</u></p> <p>In-combination impact with construction traffic for Brightwell Lakes housing development.</p> <p>Safety impacts on cyclists using Felixstowe Road.</p> <p><u>Flood and water</u></p> <p>Further clarification on the drainage proposals is required as the Outline Drainage Strategy is not compliant with policy.</p>	<p><u>Transport</u></p> <p>Traffic generated by the consented Brightwell Lakes development is included within the Reference Case traffic models. Therefore, the incombination transport impacts of the Sizewell C Project and Brightwell Lakes consented development is summarised within Consolidated Transport Assessment [REP2-045]. Highways England has confirmed in the Statement of Common Ground [REP2-069] that they are “reasonably satisfied that the Sizewell C Project will not have a material impact on the SRN and no highway improvements are required over and above the improvements committed as part of the Brightwell Lakes development at the A12/A14 Seven Hills</p>

Ref	Summary of councils' position	Comments from SZC Co.
		<p><i>Interchange. However, the predicted impacts will be contingent upon robust management protocols as defined through the CWTP, CTMP and TIMP which are not yet fully agreed."</i></p> <p>SZC Co. continues to liaise with Highways England to reach agreement on the CTMP [REP2-054], CWTP [REP2-055] and TIMP [REP2-053].</p> <p>With regards to the safety impacts on cyclists using Felixstowe Road, part of Felixstowe Road, east of Strattonhall Drift, which will not be used by Sizewell C HGVs, forms part of National Cycle Route 51. However, it is recognised that some cyclists do use the section of Felixstowe Road that is to be used by Sizewell C HGVs. As set out in the CTMP [REP2-054], HGV drivers will be required to adhere to Driver Rules and HGVs will be tracked using GPS technology on their route to and from the freight management facility, which will also act as a road safety measure.</p> <p><u>Flood and water</u></p> <p>The final drainage strategy is to be submitted for approval pursuant to DCO Requirement 5 but indicative strategies are being prepared for all AD sites to be shared with the Councils and agreed through the SoCG, to be updated at Deadline 5.</p>
44d	<p>Requirements / obligations</p> <p><u>Transport</u></p> <p>Requirements / obligations include: bond against cost of relevant highway works, including reinstatement of existing highway; Traffic Incident Management Plan to be submitted, including proposals for use of FMF during incidents; monitoring of operation of Seven Hills Junction.</p>	<p><u>Transport</u></p> <p>A transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO.</p>

Ref	Summary of councils' position	Comments from SZC Co.
	<p><u>Archaeology</u></p> <p>Archaeology requirement to be amended to effectively secure further assessment, mitigation, post-excavation analysis, reporting, publication and archive deposition. S106 – suitable resourcing for SCC archaeological services.</p>	<p>Monitoring of compliance with the HGV caps is proposed through the CTMP [REP2-054], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)). Monitoring of compliance with the mode share targets is proposed to be undertaken through the CWTP [REP2-055], which is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)).</p> <p><u>Archaeology</u></p> <p>Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).</p>
Green Rail Route		
Para. 35.12	<p>Councils' overview</p> <p>The Applicant proposes to extend the Sizewell Branch Line into the Main Development Site. As this will facilitate the delivery of the rail element of the freight management strategy, the Councils are supportive of the principle of this proposal and consider that negative impacts are outweighed by the transport benefits.</p>	<p>The principle of the green rail route has been agreed in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076].</p> <p>Topic specific issues are considered in the earlier chapters of this document.</p>
45a	<p><u>PRoW</u></p> <p>Significant adverse impacts on the amenity and recreation value of the public footpaths affected by the green rail route.</p> <p><u>Flood and water</u></p> <p>Potential to increase existing surface water flood risk to residential properties on Abbey Road, Leiston.</p>	<p><u>ProW</u></p> <p>Volume 9, Chapter 8 of the ES [APP-558] assesses the impact of the proposed development on Footpath E-363/003/0, south-west of Buckleswood Road. The proposed diversion to Footpath E-363/003/0 is intended to facilitate construction and operation of the proposed rail extension route while ensuring that users continue to have access to a safe, well connected PRoW network. The assessment in the ES notes that this diverted footpath would be subject to noticeable visual changes, affecting users' recreational amenity and resulting in significant effects. However, surveys of users of Footpath E-</p>

Ref	Summary of councils' position	Comments from SZC Co.
		<p>363/003/0 recorded a relatively small number of users, and it is not anticipated that the number of people using this route would increase, see Volume 2, Appendix 15C of the ES [APP-269]. In all cases, diversions have been kept as short as possible to minimise disruption.</p> <p><u>Flood and Water</u></p> <p>The final drainage strategy is to be submitted for approval pursuant to DCO Requirement 5 but indicative strategies are being prepared for all AD sites to be shared with the Councils and agreed through the SoCG, to be updated at Deadline 5.</p>
45c	<p>Requirements / Obligations</p> <p><u>Archaeology</u></p> <p>Archaeology requirement to be amended to effectively secure further assessment, mitigation, post-excavation analysis, reporting, publication and archive deposition. S106 – suitable resourcing for SCC archaeological services.</p>	<p><u>Archaeology</u></p> <p>Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).</p>
Yoxford Roundabout		
N/A	<p>Councils' overview</p> <p>None provided.</p>	<p>No overview is provided by the Councils in Chapter 35 of the LIR but the principle of the Yoxford Roundabout has been agreed in the initial SoCG with the Councils (Doc Ref 9.10.12(A)) [REP2-076].</p>
46b	<p>Construction of power station – after Yoxford Roundabout is constructed.</p> <p><u>Transport</u></p> <p>Minor increase on delay to A12 southbound movements.</p> <p><u>Flood and water</u></p> <p>Potential to increase existing surface water flood risk to residential properties.</p>	<p><u>Transport</u></p> <p>The Consolidated Transport Assessment [REP2-045] summarises the junction capacity assessment of the proposed Yoxford roundabout on the A12. Table 9.120 of the Consolidated Transport Assessment [REP2-045] shows that the largest increase in delay for any arm of the Yoxford roundabout once complete and operational is forecast to be 4 seconds, which is considered to be not significant.</p>

Ref	Summary of councils' position	Comments from SZC Co.
		<p><u>Flood and Water</u></p> <p>The final drainage strategy is to be submitted for approval pursuant to DCO Requirement 5 but indicative strategies are being prepared for all AD sites to be shared with the Councils and agreed through the SoCG, to be updated at Deadline 5.</p>
46d	<p>Requirements / Obligations</p> <p><u>Transport</u></p> <p>Requirements / obligations include: bond against cost of relevant highway works.</p> <p><u>Archaeology</u></p> <p>Archaeology requirement to be amended to effectively secure further assessment, mitigation, post-excavation analysis, reporting, publication and archive deposition.</p> <p>S106 – suitable resourcing for SCC archaeological services.</p>	<p><u>Transport</u></p> <p>A transport contingency fund is to be secured through the Draft Deed of Obligation (Doc Ref. 8.17(D)), which the TRG can direct be drawn down in the event that mitigation is required to address significant adverse transport impacts that were not mitigated through the DCO.</p> <p><u>Archaeology</u></p> <p>Please refer to the response at DCO.1.154 to the ExA's First Written Questions at Deadline 3 (Doc Ref. 9.30) regarding the archaeology requirement (DCO Requirement 3).</p>

36. IMPACTS ON COMMUNITIES

36.1 Overview

36.1.1 SZC Co. has reviewed Chapter 36 of the Local Impact Report (LIR) [[REP1-045](#)].

36.1.2 **Table 36.1** below provides a response to the principal points raised where a response is appropriate.

36.1.3 SZC Co.'s summary of effects in relation to specific communities, drawing on the relevant assessments within the ES, is set out in the **Community Impact Report**. [[APP-156](#) with figures in [APP-157](#)]. The response does not cover detailed traffic related issues, which are addressed in **Chapters 15 and 16**.

36.2 Response to Issues (Summary)

Table 36.1: Summary of Response to Impacts on Communities

Ref	Issue / Impact	Summary of LIR	SZC Co Response
Leiston			
36.14(v)	Community Facilities	Address additional demand for community facilities in Leiston. With over 80% of the construction and virtually all the workforce residing or using the facilities in the Parish this almost doubles the population and the pressures this will bring, albeit unpredictable at the moment, must be monitored.	<p>The effect of the Project on Public Services and Community Facilities is addressed from Paragraph 9.7.159 of Volume 2, Chapter 9 of the ES [APP-195].</p> <p>It is noted that some workers may contribute to demand for some services temporarily, including school and early years provision, and SZC Co. has sought to agree mitigation with Suffolk County Council which will be directed towards facilities in Leiston.</p> <p>The Sizewell C Project will provide a substantial investment in local sports and leisure facilities, with the provision of a full-sized artificial turf (3G) pitch and two Multi-Use Games Areas in Leiston, which will be accessible to the community.</p>
36.14(vii)	Community Fund	Would like to ensure that the Community Fund recognises and ringfences IP16 for a significant portion of the Fund, and would welcome investment in the revamped Waterloo Centre via the Community Fund to provide facilities and services for local families and workforce families that make the move to Leiston.	<p>As set out in Schedule 14 of the Draft Deed of Obligation (Doc Ref. 8.17(D)), <i>'The Sizewell C Community Fund shall be for the purpose of mitigating the intangible and residual impacts of the Project on the communities in the Area of Benefit'</i>. This would be through <i>'schemes, measures and projects which promote the economic, social or environmental well-being of those communities and enhance their quality of life'</i>.</p> <p>The Suffolk Community Foundation will administer the Community Fund but SZC Co. considers that the sort of measures suggested would be very good candidates for the Fund.</p>
36.14(vii)	Skills / Employment	Welcome measures for skills and education and would like a significant number of apprenticeships and other skills initiatives to be in partnership with Alde Valley Academy and College on the Coast.	<p>Please refer to Chapters 23, 24 and 25 of this report for more details.</p> <p>SZC Co. will provide measures including an Asset Skills Enhancement and Capability (ASEC) Fund and Outreach Fund, and a Sizewell C Bursary that will be directed towards areas where social mobility can be enhanced, including Leiston.</p> <p>The ASEC Fund in particular would be used to develop resources for existing local skills infrastructure including local colleges.</p> <p>SZC Co. has already set up Young Sizewell C, which works with young people in education to</p>

Ref	Issue / Impact	Summary of LIR	SZC Co Response
			promote opportunities for skills development related to the Project.
Theberton and Eastbridge			
36.20(ix)	Housing	No additional planning for accommodation to address increase in maximum workforce – this could adversely impact the rental sector and tourism and social housing sectors	Please refer to Chapter 29 for a summary of SZC Co.'s approach to assessment of effects on the accommodation market. In order to be robust, Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] uses a conservative assessment case for assumptions about home-based and non-home based workers - this is to ensure mitigation for the non-home based component is sufficient. See also SZC Co.'s Responses to the ExA's First Written Questions (ExQ1) [REP2-100] G.1.24(i), Cl.1.4 and SE.1.33.
36.20(xi)	Community Facilities	Concern for impacts on two pubs in Theberton and Eastbridge	It is likely that the pubs in Theberton and Eastbridge may experience an increase in trade as a result of the non-home based workforce living close to the area. This is considered a socio-economic benefit for the businesses and the local economy.
Middleton-cum-Fordley			
36.28(iv)	Employment	No net gain for employment for local people	The Sizewell C Project will create in the region of 2,400 jobs for local residents at the peak of construction. This means employment for currently unemployed or economically inactive people and for school leavers, as well as additional work via supply chain contracts for existing local firms. Please refer to Chapters 23, 24 and 25 for more details. See also SZC Co's Responses to the ExA's First Written Questions (ExQ1) [REP2-100] G.1.24(i), Cl.1.4 and SE.1.33.
36.28(vi)	Tourism	Serious Threat to Tourism	Please refer to Chapter 26 . SZC Co. does not agree that there is a serious threat to tourism, but is cognisant of risks identified by some local communities. SZC Co. has worked with stakeholders including the Councils, AONB and Suffolk Coast DMO to develop a Tourism Fund which, based on evidence from Hinkley Point C, is likely to reduce risks related to tourism.
Yoxford			
36.37(i)	Tourism	Adverse impact on tourism resulting from the	Please refer to Chapter 26 of this report.

Ref	Issue / Impact	Summary of LIR	SZC Co Response
		Applicant's unacceptable reliance on roads for transport	SZC Co. recognises concern related to the perception of traffic congestion, which is identified as a sensitivity of potential returning visitors. However, there is no evidence to suggest that significant effects on traffic congestion will occur. SZC Co. has worked with stakeholders including the Councils, AONB and Suffolk Coast DMO to develop a Tourism Fund which, based on evidence from Hinkley Point C, is likely to reduce risks related to tourism.
36.37(vii)	Housing	Accommodation need will distort the private rented sector of the local housing market making it harder for local people to secure housing.	Please refer to Chapter 29 . SZC Co. has set out a full assessment of likely local effects on the private rented sector within Volume 2, Chapter 9 of the ES [APP-195], and the Accommodation Strategy [APP-613]. SZC Co. and the Councils are in broad agreement that, through a combination of embedded and additional mitigation, subject to finalisation of the scale and delivery of the Housing Fund, identified significant adverse effects on housing and accommodation can be adequately addressed and mitigated to a not significant level.
36.37(viii)	Tourist Accommodation	Housing need will reduce the number of tourist beds available in the future	Please refer to Chapter 29 . The Councils suggest that an element of the Housing Fund should be ring-fenced specifically to address and negate adverse impacts on the tourist market of East Suffolk, and further mitigation could be provided through the Tourism Fund, in order to avoid adverse impact on the availability of holiday accommodation for tourists. SZC Co. considers that the mitigation currently proposed through the Tourist Accommodation Market Supply element of the Housing Fund, defined by the Draft Deed of Obligation, Schedule 3 (Doc Ref. 8.17(D)) and described at Section 26.3(c) of this document, is appropriate.