



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 3 – 24 June 2021

Comments on any additional submissions received at D2

East Suffolk Council (ESC) has reviewed a number of the additional submissions into the Examination at D2 and has tabulated our comments for reference.

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[Bat Roost Surveys in Trees – Main Development Site \[REP2-120\]](#)

The results of the survey are noted, as is the primary purpose of the survey being to inform the Natural England licence process rather than the DCO examination process. East Suffolk Council do not consider that the submitted survey work addresses our concern about establishing the impact of roost loss on bat populations using the roost resource approach set out in the DCO Environmental Statement. This concern is set out in full in LIR paragraphs 8.52 to 8.56.

Para 3.1.4 – Whilst the tree inspections were undertaken at an appropriate time of year following best practice guidance (Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn). The Bat Conservation Trust, London), it should be noted that as this is the winter/early spring period (dependent on weather conditions) there is less chance of encountering bats in tree roosts. The number of confirmed roosts will therefore be lower than the actual number of roost features used by bats throughout the year. This is recognised in paragraphs 4.1.3 and 6.1.2 of the survey report.

As set out in Section 6 of the report, the latest survey work has significantly reduced the number of trees considered to have potential bat roost features (e.g. trees of confirmed roost, high or moderate value in Goose Hill reduced from 111 in 2020 to 20 in 2021). Whilst the use of additional survey techniques (particularly tree climbing inspections) could have resulted in the reduction, Appendix A Figure 1 (Main Development Site Bat Tree Roost Inspection Results 2021) is missing from the 2021 report and therefore it is not possible to see how these results relate spatially to those presented in 2020 survey report [[AS-021](#)]. As recognised in the 2021 report (paragraph 6.1.5) the removal of clusters of roost features is likely to have a greater degree of impact than removing the same number of equally spread features. Notwithstanding our primary concern about how the ‘roost resource’ assessment approach has been interpreted (please see paragraphs 8.52 to 8.56 of the LIR [[REP1-045](#)]), the absence of information on the spatial distribution of the trees to be removed means that it is not possible to provide further comment at this stage.

Bat Roost Surveys in Trees – Associated Development Sites [[REP2-121](#) and [REP2-122](#)]

The Council has no specific comments to make on this survey report, beyond reiterating the concerns raised in the LIR [[REP1-045](#)] in relation to consideration of impacts on bats arising from the Main Development Site and Sizewell Link Road in-combination (LIR paragraph 8.126).

Bird Survey Report (Wintering Birds) – Green Rail Route [[REP2-127](#)]

The ES for the Green Rail Route [[APP-555](#)] does not consider that wintering birds are an Important Ecological Feature (IEF) in relation to this development and therefore does not provide an assessment of the impact of the Green Rail Route on them. It is therefore unclear what is meant by paragraph 5.1.5 of the survey report which states that the results of the surveys “do not affect the conclusions of the ES”. Even if the impact on wintering birds was considered to be *Minor Adverse, Not Significant*, it appears that there will still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Bird Survey Report \(Wintering Birds\) – Sizewell Link Road \[REP2-126\]](#)

The ES for the Sizewell Link Road [\[APP-461\]](#) does not consider whether wintering birds should be an Important Ecological Feature (IEF) in their own right, although it does consider that farmland birds are an IEF and they are assessed accordingly. It is therefore unclear what is meant by paragraph 5.1.3 of the survey report which states that the results of the surveys “do not affect the conclusions of the Environmental Statement”. With regard to the wintering bird species recorded which are part of the farmland bird assemblage, the Council maintains its comments as set out in paragraph 8.128 of the LIR [\[REP1-045\]](#).

For other wintering bird species recorded which are not part of the farmland bird assemblage, even if the impact of the Sizewell Link Road was considered to be *Minor Adverse, Not Significant*, it appears that there will still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Bird Survey Report \(Wintering Birds\) – Two Village Bypass \[REP2-125\]](#)

The ES for the Two Village Bypass [\[APP-425\]](#) does not consider that wintering birds are an Important Ecological Feature (IEF) in relation to this development and therefore does not provide an assessment of the impact of the Two Village Bypass on them. It is therefore unclear what is meant by paragraph 5.1.10 of the survey report which states that the results of the surveys “do not affect the conclusions of the Environment Statement”. Even if the impact on wintering birds was considered to be *Minor Adverse, Not Significant*, it appears that there will still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Bird Survey Report \(Wintering Birds\) – Northern Park and Ride \[REP2-123\]](#)

The ES for the Northern Park and Ride [\[APP-363\]](#) does not consider that wintering birds are an Important Ecological Feature (IEF) in relation to this development and therefore does not provide an assessment of the impact of the Northern Park and Ride on them. It is therefore unclear what is meant by paragraph 5.1.8 of the survey report which states that the results of the surveys “do not affect the conclusions of the Environment Statement”. Even if the impact on wintering birds was considered to be *Minor Adverse, Not Significant*, it appears that there will still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Bird Survey Report \(Wintering Birds\) – Southern Park and Ride \[REP2-124\]](#)

The ES for the Southern Park and Ride [\[APP-394\]](#) does not consider that wintering birds are an Important Ecological Feature (IEF) in relation to this development and therefore does not provide an assessment of the impact of the Southern Park and Ride on them. It is therefore unclear what is meant by paragraph 5.1.5 of the survey report which states that the results of the surveys “do not affect the conclusions of the Environment Statement”. Even if the impact on wintering birds was considered to be *Minor Adverse, Not Significant*, it appears that there will still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Bird Survey Report \(Wintering Birds\) – Freight Management Facility \[REP2-128\]](#)

The ES for the Freight Management Facility [\[APP-523\]](#) does not consider that wintering birds are an Important Ecological Feature (IEF) in relation to this development and therefore does not provide an assessment of the impact of the Freight Management Facility on them. It is therefore unclear what is meant by paragraph 5.1.4 of the survey report which states that the results of the surveys “do not affect the conclusions of the Environment Statement”. Even if the impact on wintering birds was considered to be *Minor Adverse, Not Significant*, it appears that there will

still be some local residual impact for which mitigation is not proposed. The Council considers that this must be addressed, the proposed Natural Environment Fund may provide a suitable mechanism to achieve this if additional onsite mitigation measures are not available.

Also, as with many of the other ecological survey reports submitted at this Deadline, Appendix A is missing from the submission and in the absence of the survey figures it is difficult to make comments on the spatial results of the survey.

[Shadow Habitats Regulations Assessment \(sHRA\) Second Addendum \[REP2-032\]](#)

East Suffolk Council note the contents of the sHRA Second Addendum in relation to the prediction of displaced visitors to the area as a result of construction works, the impacts this might have on European designated sites and the applicant's position on the precautionary nature of the assessment submitted. Whilst we primarily defer comments on this matter to Natural England, the RSPB and the National Trust, we would emphasise that given the acknowledged uncertainties within the predicted changes in visitor distribution, it is essential that a precautionary approach is taken to the application of the integrity test within the Habitats Regulations Assessment. This is in line with requirements of the Conservation of Habitats and Species Regulations (2017) (as amended) and current relevant case law (e.g. Decision of the ECJ in Waddenzee (C-127/02)).

[Minsmere Monitoring and Mitigation Plan \[REP2-118\]](#)

As this plan is for mitigating impacts on European designated sites, we primarily defer detailed comment to Natural England (as the statutory nature conservation organisation) and those organisations with responsibility for managing the sites (particularly the RSPB, National Trust and Forestry England), however we have following comments on several sections of the submitted Plan:

Paragraph 1.1.4 – The survey data for Aldhurst Farm referenced in this paragraph pre-dates the access improvements that have now been made at site which will have made it more attractive for use by existing residents of the local area. We therefore do not consider that the visitor figure quoted necessarily represents a true reflection of the current use of the site. The visitor surveys being undertaken this year (referenced in the Shadow Habitats Regulations Assessment (sHRA) Second Addendum) must also include the Aldhurst Farm area to give an up to date understanding of current visitor use of the site and its capacity to absorb more visitors.

Paragraph 4.5.2 (fourth bullet) – It appears likely that more than one year of monitoring will be required post-construction to determine how patterns of usage have changed following the construction works, and whether they have returned to the observed pre-construction patterns. Surveys every two years for the first 5 years post-construction (i.e. years 1, 3 and 5 post construction) may be an appropriate level.

[Marsh Harrier Habitat Report \[REP2-119\]](#)

The submission is noted, as this relates to mitigation for impacts on European designated sites we defer comment on this matter to Natural England.

[9.12 TR544 Ed. 2 Preliminary design and maintenance requirements for the Sizewell C Soft Coastal Defence Feature \[REP2-115\]](#)

Presented in table form, this document constitutes East Suffolk Council’s review and findings of the SZC Co. report TR543 Ed.2. The review is confined to the subject matter of the impacts of the proposed structures on coastal processes and morphology. In particular, the Review considers the sufficiency of the information provided in TR544 Ed.2 and highlights any particular aspects where clarification, confirmation or further information is sought.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from TR544 Ed.2, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

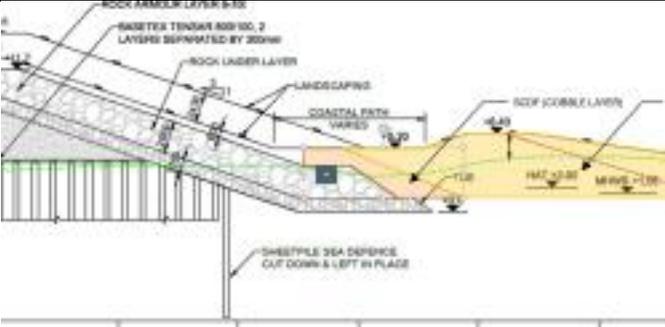
Pg No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
8	ES	<i>The Sizewell C Soft Coastal Defence Feature (SCDF) is a maintained and volumetrically enlarged beach seaward of the hard coastal defence feature (HCDF). Its large (c. 200,000 m3), supratidal, sedimentary mass is designed to avoid disruptions to longshore transport (and the impacts to local beaches) which, in its absence, would occur if the landward HCDF were exposed.</i>	Seaward and on top of the HCDF toe (see Fig 4 pg. 20/39) Statement admits that exposure of HCDF would occur without it. Avoid doesn't imply prevention- what other mitigation options are available to ensure LST prevails throughout Sizewell C lifetime?	Change report text for accuracy. Confirm whether there is a secondary backstop for prevention of disruption to LST, in the CPMMP (i.e. beach recharge downdrift)
9	ES	<i>a large volume (sufficient to withstand severe storms) achieved by a profile with a high crest, erosion resistant sediments and maintenance (primarily beach recharge) to replace any losses from the Sizewell C frontage.</i>	This statement acknowledges the unnaturally large feature; relative to the existing backshore and berm levels.	Access and amenity related query: Is it expected that the SCDF will be part of the 'public open space'? or will walkers be asked to keep to the footpath?
9	ES	<i>This is in line with UK experience and guidance and intentionally designed to increase sediment retention and therefore prolong longevity.</i>	How will the sediment retention affect the ESC policy aim for continuation of sediment movement across the frontage? Will the larger particle size effect LST rates?	Confirm that using coarser beach material than the native sediment has no implications on LST.
8	ES	<i>ditto</i>	Here and subsequently in the document, it needs to be explained what is meant by "erosion resistant". Cobbles would not be as erosion resistant as the rock armour over which they would lie. Clarify purpose?	Further information.
9	ES	<i>Conservative estimates of the notional recharge interval across the operational phase (up to seven interventions) and the relatively small volumes (140,000 – 150,000 m3; preliminary worst case c. 270,550 m3)</i>	Assessment period is limited to ~ 2100.	Include period to removal of HCDF ~ 2140 (or 2160 tbc)

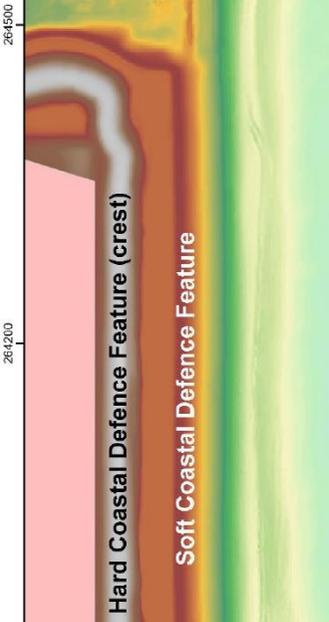
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
9	ES	<i>The large SCDF volume, relatively low number of predicted recharge events and relatively small recharge volumes (based on very conservative measures) indicate that the SCDF is viable for at least the operation phase of the station.</i>	The SZC Co. position on viability should be clearly stated.	We request for SZC Co. to confirm that the site lifetime investment plan includes an allowance for all mitigation arising from the CPMMP including SCDF replenishment of the nature described but not limited to the frequency / volume stated in this report. If there is a limit on SZC Co. mitigation investment SZC Co. should declare now.
9	ES	<i>Longer timescales will be considered in future versions of this report, once modelling results are available.</i>	Covers the concern noted above.	
9	ES	<i>spatial patterns in erosion may trigger recharge in some areas (e.g., near the permanent Beach Landing Facility (BLF) where volumes are lowest) and not others.</i>	Will the monitoring plan be designed to cover these expected hotspots for depletion?	Confirm that the location of monitoring (RTK GPS) or remote sensing will include profiles from these erosion hot spots?
9	ES	<i>The monitoring set out in the CPMMP is designed to detect such changes, as the monitoring techniques are spatially continuous.</i>	Spatially continuous.- what does that mean...broad scale covering all area in Zol? The choice of location i.e., for beach profiles is important. Use site with highest variability to ground truth the remote sensing techniques	Confirm that the CPMMP will analyse sites that are forecast to have variability in beach levels. (as above).
9	ES	<i>The preliminary design presented will undergo further refinement including modelling to incorporate longshore sediment transport, SLR at longer timescales and sensitivity to particle size (to refine the target size distribution), and to set the recharge threshold volume in the Coastal Processes Monitoring and Mitigation Plan (BEEMS Technical Report TR523).</i>	In respect of the preliminary design undergoing further refinement incorporating longshore transport, together with other parameters: a key feature of this will be how to schematise longshore transport trends in the future, allowing for the very wide range of possible scenarios, including sea changes for instance.	Further information sought on how future longshore transport trends (alongside other factors) are to be schematised.

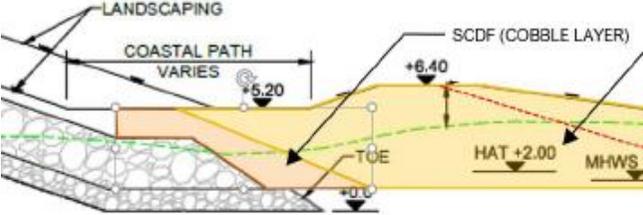
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
9	ES	<i>The preliminary design presented will undergo further refinement including modelling to incorporate LST.</i>	Caveat noted	When is the refinement expected? Will it be submitted to PINS?
10	Fig 1	<i>HCDF / SCDF profile sac and buffer envelopes shown.</i>	There is no consideration in report of SCDF viability with adapted HCDF profile.	Include a Section in the report (or TR545) for design and viability of SCDF fronting adapted profile.
10	Fig 1	<i>HCDF / SCDF profile sac and buffer envelopes shown.</i>	Two points in relation to “landscaping”: <ul style="list-style-type: none"> • The coastal path runs beneath the landscaping. • The landscaping runs over the crest at a thickness of 2m or 2.9m if the unlabelled layer beneath it is also landscaping. If not removed before the HCDF becomes an active defence, this material could seriously affect the hydraulic performance of the HCDF (run up and overtopping). 	Clarification on the location of the landscaping in relation to the coastal path. Further information regarding long term future management of the landscaping layer.
11	1	<i>Its large (c. 200,000m³) supratidal, sedimentary mass is designed to avoid disruptions to longshore transport and the impacts to local beaches which, in its absence, would eventually occur if the landward Hard Coastal Defence Feature (HCDF) were to be exposed.</i>	The text rightly points to exposure of the HCDF as being an unwanted thing. Is there, however, a subtle contradiction in the line of reasoning – being that if the SCDF is retarding the natural progression of the Sizewell C shoreline (by design), whilst unrestrained shores and cliff lines to the north are retreating, that the SCDF itself could potentially become the impedence to longshore transport? The conundrum is emphasized by the process of SCDF recharge which, every 10 years of so, would restore the position of the erosion resistant SCDF (Figure i).	Clarification on the merits of the SCDF as an enabler and/or impediment to longshore sediment transport.
11	Fn 6	6 The SCDF would be maintained until (at least) around 10 years before the end of the decommissioning phase, when the CPMMP Cessation Report is due.		Confirm that the SCDF viability assessment will be extended to this

				date assumed ~ 2140 – 10 = 2130 tbc.
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
12	1.1	<p><i>...the SCDF will include several erosion resistant features:</i></p> <ul style="list-style-type: none"> • <i>a large volume</i> • <i>high crest</i> • <i>coarse particle size and</i> • <i>vegetation</i> 	As noted on p11 Section 1, these erosion resistant features would all appear to hinder natural shoreline retreat and hence natural longshore transport of beach sediment.	As noted on p11, Section 1: See above.
12	1.1	<p><i>Over time, SCDF sediments may also contribute to reducing erosion rates and promoting an increase in supratidal shingle on the immediately neighbouring frontages.</i></p>	<p>Does a coarse SCDF sediment grading reduce its capacity to benefit adjacent frontages (compared with a natural beach) by slowing the alongshore transfer of shingle?</p> <p>Much is made of the need for a resilient SCDF to minimise replenishment. Taken to the extreme a robust SCDF becomes an extension of the HCDF. Would a more fragile SCDF deliver a better outcome from an alongshore transport perspective? How will SZC Co. balance these two competing attributes?</p>	Answer questions in box to left.
13	Sediments	<p><i>..coarser and/or denser particles are desirable as they are more difficult to mobilise and therefore have a longer residence time before being transported to neighbouring shores...</i></p>	<p>Quite so, but this attribute if applied here could, by design, inadvertently reduce the rate of sediment transport past the site (undesirable). Application of the Recharge could be construed as advancing the line by pushing seawards to partial blockage of the SCDF itself.</p> <p>Note: There are various other references in the same vein.</p>	See p12 1.1 (same argument)

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
12	1.1	<i>...would imply some disturbance, this would be in naturally eroded areas where sediment and vegetation had been lost, and therefore restoring the supratidal area would allow potential re-colonisation (which doesn't occur where supratidal deposits are lost).</i>	Would the re-colonisation occur on the larger sediment that is not native to Sizewell's supratidal beach?	Confirm that using more coarse sediment than is native to Sizewell, will not affect the re-colonisation potential of the back beach.
13		<i>Until that time, unless there is additional shingle deposited to widen the supratidal zone, it is unlikely to sustain a drift line vegetation habitat.</i>		Confirm that it is beach width opposed to any other factors such as trampling, that inhibit vegetation on supratidal shingle.
		<i>The gains in the neighbouring beaches' sediment budget are SCDF losses, which would need to be occasionally replenished by way of beach recharge.</i>	Are there no re-gains to the SCDF if LST direction reverses?	Are there no scenarios where the SCDF budget could re-gain sediment?
16	2.2	<i>The SCDF respects Pye and Blott's (2018) guidance that management of shingle features for FCERM purposes does not disrupt regional coastal processes and does not have negative impacts on other shingle feature interests such as vegetation, fauna, geomorphology, landscape quality and visitor appeal</i>	This is a sweeping and general statement	Are the sites in the P&B study that have informed their view directly comparable with this location?
17	2.2	<i>The relative volume of sand in the SCDF would be kept low, to increase permeability and erosion resistance.</i>	The avoidance of beach cliffing is understood. However, this adds to the other features, in particular shingle grading, that all seem to be geared towards making the SCDF erosion resistant.	Please comment and clarify the intent.
16	2.2	<i>That is, SCDF recharge would occur in areas where vegetation is naturally lost, replenishing the sediment there and facilitating potential re-colonisation of the supratidal habitat within the county wildlife site.</i>	Why is there a combination of building (BLF's) features in areas where the vegetation is naturally lost ? This brings in to question the placement and justification of site components. Ambitious to think that renourishment and hence re-colonisation in these dynamic areas will occur.	Justify chosen sites for BLFs and marine components in light of known erosion/vegetation depletion spots.

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
17	2.2	Artificially increasing the sediment supply from the SCDF to this area (south of the Minsmere sluice outfall) (during south-easterly storms) has the potential to slow erosion rates. With sufficient time, this by-product of the SCDF could delay or avoid breaching on the southern Minsmere frontage (whilst the SCDF is maintained) and may widen the supratidal shingle zone.		Is the slowing of erosion at Minsmere a good thing in the light of SMP intentions and the RSPB management plan? Has confidence in the likelihood of this beneficial impact altered?
17	2.2	ditto	Again, the emphasis is on slowing down the natural progression of coastal erosion/breaching. But could this, by the same token be throttling the LST.	Clarification required in connection with previous points of similar concern.
18	2.3.1	..therefore, the slope of the SCDF was adjusted to gradually meet the natural topography before the site boundary.	Presumably, in practice, this can only be achieved by control of the shingle grading, itself adjusted over a transition section to meet the cross-shore positional targets. How practicable is this to form and maintain?	Further information on how the precise slope shape of the SCDF is to be obtained.
19	Fig 4 B		It appears that Cobbles will be exposed at Coastal Path surface level.	In alignment with SCC PRoW team we continue to seek the PROW to be on the top of the sea defence.
20		An initial suggested working value for V_{buffer} is 2 – 3 times the conservative storm erosion value of 40 m ³ /m. At 80 – 120 m ³ /m, V_{vac} would be in the range 42 – 477 m ³ /m. Note that there may be rationale to raise the value of V_{buffer} in the	Avoiding shoreline curvature around the north face - a new issue.	Explain the concern and potential for shoreline curvature – is this suggestive of the higher erosion rate to the north of the main

		<i>northern SCDF sections to avoid shoreline curvature around the north face, however that matter is considered a refinement and is not resolved in this initial study.</i>		development site/ around northern mound?
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
21 22	Fig 6 Fig 7		The HCDF plan position, and SCDF volume calcs, do not show the latest HCDF design seen in the Engineering report (3/6) that has a seaward kick out at the South end.	Update plans and SCDF volume calculations based upon latest Engineering Report content.
21	Fig 6		<p>The colour contours clearly show how the SCDF would wrap around the north end of the HCDF, turning westwards / landwards at the end of the developed site.</p> <p>Clearly from the safety perspective the coastal defence cannot be allowed to be breach should shoreline retreat progress up to and beyond the HCDF (outflanking). Were this situation to arise then continuity of natural longshore transport towards Thorpeness would be interrupted (notwithstanding secondary mitigation).</p>	Please clarify/comment on the how this situation might develop and be countered if/when the situation occurs.
23	2.3.2	<i>Overtopping per se is not of direct concern for the SCDF to achieve its purpose of avoiding disruption to longshore shingle transport due to HCDF exposure, however overwashing of quantities of sediment sufficient to alter or mobilise the crest could lead to breaching and affect integrity and maintenance frequency.</i>		Please explain how 'breaching' of the SCDF crest, that is at 5m ODN, could affect integrity and maintenance frequency.

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
23	2.3.2	<p><i>(cont'd) ..The crest elevation should be high enough to avoid heavy overwashing of the crest. It is worth noting that any natural event mobilising or overtopping the 6.4m ODN SCDF crest would also be expected to cause severe overwashing, roll-back and breaching across the Minsmere frontage, owing to the lower shingle ridge crest there – 85% of the natural Minsmere ridge is lower than the SCDF crest would be.</i></p>	<p>This passage is effectively saying that the natural frontage to the north is expected to roll back, i.e. retreat, relative to the SCDF. This suggests that any protuberant part of the Sizewell C defence (e.g. SCDF) will become a blockage to longshore sediment transport, ahead of the HCDF.</p> <p>A general observation – the section refers to shingle transport only. Sediment transport should be taken to include the range of sediment grades occurring at the site (i.e. shingle and sand components), being relevant to the whole longshore sediment transport corridor.</p>	<p>Further information is sought regarding the implied impact of differential retreat (SCDF vs Minsmere) of the frontage.</p> <p>Clarification is requested regarding the scope of the modelling as regards whole sediment transport corridor considerations.</p>
24	2.4.2	<p><i>Option B also uses very coarse pebbles across the majority of the SCDF, to prolong longevity deep within the SCDF (see Figure 4B) to further restrict erosion in the unlikely event that the buffer and sacrificial SCDF layers had been fully removed.</i></p>  <p><i>(footnote 22: The cobble size class has a diameter of 6.4 – 25.6 cm)</i></p>	<p>It is not clear what the principal purpose of this layer is.</p> <p>As part of the coast protection system it would seem to be incidental to the 6-10 tonne rocks that it sits upon.</p> <p>It would appear to be an extension of the HCDF. If as such, then it would constitute a further incursion into the shore.</p> <p>The line that says “...and reduce the risk of HCDF exposure” suggests that this is a primary objective, however by effectively increasing the footprint of</p>	<p>Clarification (the rationale) requested regarding the principal purpose of the cobble layer and how it would achieve its objective without detriment to other considerations.</p>

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
			the toe structure would surely just aggravate this concern.	
24	2.4.1	<i>Its function as a supratidal reservoir of sediment can be directly compared with the successful Sand Bay scheme (Weston-super-Mare, UK), which created a steep mixed sand-gravel berm on a sandy-muddy foreshore in 1983-4 (Rogers et al., 2010) and which has only recently January 2021) needed maintenance.</i>	This is a different coastline to Sizewell C? – estuarine, muddy, tidal dominated.	Are the physical attributes of the site at Sand Bay and Sizewell close enough to say this scheme is transferable?
		<i>Numerical modelling will be undertaken to refine the target pebble sizes.</i>	What about pebble sorting/ angularity/shape/roundness/hydraulic conductivity?	Are there factors other than pebble size to model/consider? (angularity etc)
25	2.4.2	<i>Were the SCDF's cobble sediment layer to be exposed, it would still function as mitigation, allowing native pebbles to pass over it and to dissipate wave energy into its porous matrix. It would prevent HCDF exposure and thereby avoid wave reflection, turbulence and scour from the HCDF. During severe storm, cobble beaches tend to steepen and undergo landward transport, increasing the ridge height, which means that the SCDF cobbles would remain local and would not need to be recharged as volume loss is not expected.</i>	This appears to constitute a seaward extension of a hard and very resilient structure. It also represents a loss of sacrificial sediment that would otherwise be mobilised. Is it protection for the HCDF to avoid toe undermining? If it avoids the need for an adapted HCDF then it has benefits for coastal processes.	Provide a more comprehensive pros and cons assessment of the Cobble Sediment Layer to allow an informed view to be formed.
26	3	<i>SCDF recharge frequency is considered in this report using two variations on the historical beach volume method (Section 3.1.1), and numerical modelling of sediment loss during a major storm (Section 3.1.2). The profile design method (Powell, 1993) assumes placement directly into the active beach, rather than as a supratidal reservoir like the SCDF, and so is not considered here.</i>	Might this situation arise later in the site life (2100-2130) at narrow SCDF frontages i.e. BLF and maybe southern end tbc. It is also likely to apply if the adapted HCDF profile is required.	Reconsider the use the Profile Design method in light of potential future shoreline changes and SCDF design for an Adapted HCDF profile.
29	3.1.1.2	<i>Data presented in BEEMS Technical Report TR223 suggests that change in beach volume above mean sea level (0.11m) is</i>	Unsurprising perhaps?	

		<i>strongly correlated with movement landward or seaward of the beach contours.</i>	<p>In simple/approximate terms, the whole active beach the +/- volume change could be estimated from the vertical depth of the active beach x the lateral movement in the beach contours.</p> <p>Your analysis is considering only a part of the active profile (shingle dominated?). The rationale for the selected limits, which sound narrow, needs to be explained further. How do these findings relate to whole active profile gains/losses?</p>	Further information/clarification on the method for calculating beach loss.
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
31	3.1.2	<i>The modelling predicted 30-40 m³/m of erosion for a 0-0.4m SLR, whereas the observed worst case loss along the frontage was less than 1m³/m...</i>	<p>The exercise is complex and on the face of it would appear to be thorough. A flow diagram accompanied by the step-by-step procedure would help the reader. Particular points to explain further would include:</p> <ul style="list-style-type: none"> • Inclusion of longshore effects m(understood to follow) • rationale for selection of cross-shore limits • recognition of whole active beach profile gains and losses • scenario testing extending to the long term outlook • sensitivity testing (to assumptions). 	Further information/clarification sought.
32	3.1.2	<i>Additional RI estimates will be made from further numerical modelling described in BEEMS Technical Report TR545 (due....June 2021) that considers longshore transport (2d model), more severe storm conditions, SLR in 2099 and eroded shorelines either side of the maintained SZC frontage.</i>	This sounds like a logical and very useful next step.	Additional estimates are requested.

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
29	3.1.1.2	<p><i>BEEMS Technical Report TR403 (Table 4) also calculated the peak erosion rate over a 10 year period, which captured a phase of more rapid shoreline change at S1B5 (SZC). The fastest retreat rate observed was 2.23 m/yr (6 m³/m per year), which is higher than the persistent erosion hotspot between SZC and Minsmere Sluice Outfall (S1B5: average and peak (10-year) retreat rates of 1.01 and 2.07 m/yr respectively).</i></p> <p><i>Using the peak 10-year retreat rate (2.23 m/yr) as a preliminary worst case by assuming it persists across the station life rather than cyclical behaviour, and applying $V_{sac,mon} = 42 \text{ m}^3/\text{m}$ as previous, gives a recharge interval (RI) of 7 years = $42/6$. Although there is no persistent historical trend at SZC, and noting the 2.23 m/yr rate is worse than the average and peak rates of erosion at the S1B5 erosion hot spot (between SZC and Minsmere Sluice; 1.01 and 2.07 m/yr respectively), the total recharge requirement would be c. 270,550 m³ across the operation phase.</i></p>	<p>Consideration of how a retreating baseline shoreline profile will affect the function, management and viability of the SCDF is key issue for ESC. We are not yet satisfied that this has been given proper consideration and will take up with SZC Co. via the Tech Review meetings.</p> <p>We are also concerned at the disparity between worst case shoreline change assumptions included in this report, i.e. 1.01 to 2.23m/yr, and those in the Design Report i.e. 20-40m total over the station life (assumed 120 years) giving a max rate of 0.33m/yr.</p> <p>We have made similar comments in our feedback on the Design Report.</p> <p>We note the peak 10 year retreat rate is used. We suggest comparison with the 2016 to present day erosion rate extracted from profiles.</p>	<p>Add forecast eroded baseline beach profiles, extrapolated to years 2050, 2080, 2110 and 2140 to all drawings that are relevant to the assessment of HCDF toe resilience and SCDF management. This is necessary to demonstrate how a retreating baseline shoreline will affect SCDF degradation and replenishment actions.</p> <p>Please compare the identified retreat rates with those from 2016 to present collected by topo survey on ground.</p>
31	3.1.1.2	<p><i>Figure 11. Beach volume changes as function of absolute position for separate EA profiles (1991 – 2018), with indicative lines shown for a number of data sets to illustrate their uniformity.</i></p>	<p>It is difficult to see which points on the graph are from what survey. R2 indicates a positive change of volume over time above MHWS.</p>	<p>The aim of the figure is assumed to illustrate uniformity. It could be better explained.</p>
31	3.1.2	<p><i>predictions for reductions in Sizewell’s wave climate suggest no increase of wave climate or storms</i></p>	<p>Accepted but the report could briefly explain why, as it goes against popular anticipation.</p>	<p>Why is there a drop in wave heights, power and event frequency?</p>

32	3.1.3	<i>It is worth noting that the volumetric assessment for recharge will be made in 50-m longshore cells, which would capture any localised erosion that might mean smaller more frequent intervention in some areas and very little or none in others.</i>	What is the justification for using 50m longshore cells?	Explain the survey layout. Are the cells arranged so that profiles are extracted from key locations of expected variability?
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
33	4	<i>The monitoring set out in the CPMMP is designed to detect such changes, as the monitoring techniques are spatially continuous.</i>	It is good to compare the remote sensing with the direct monitoring data.	Will remote monitoring of the HCDF/SCDF be ground-truthed with topo surveys?
33	4	<i>Footnote 29. Compared to other beach recharge events at high-value frontages in the region e.g., Sea Palling at 1,300,000 m³ (Dolphin et al., 2012) and 1,500,000 m³ at Bacton (Gary et al., 2018).</i>	These nourishment/recharge case studies are of predominantly sand sized particles so volumes will be greater as the extent of sand placement is much larger. They don't provide a useful comparator here.	It is misleading to compare the SCDF to these recharge events as they use sand instead of cobbles.

9.13 Sizewell C Coastal Defences Design report June 2021. [\[REP2-116\]](#)

Presented in table form, this document constitutes East Suffolk Council’s review and findings of the SZC Co. Design report. The review is confined to the subject matter of the impacts of the proposed structures on coastal processes and morphology. In particular, the Review considers the sufficiency of the information provided in the Design Report and highlights any particular aspects where clarification, confirmation or further information is sought.

The table comprises:

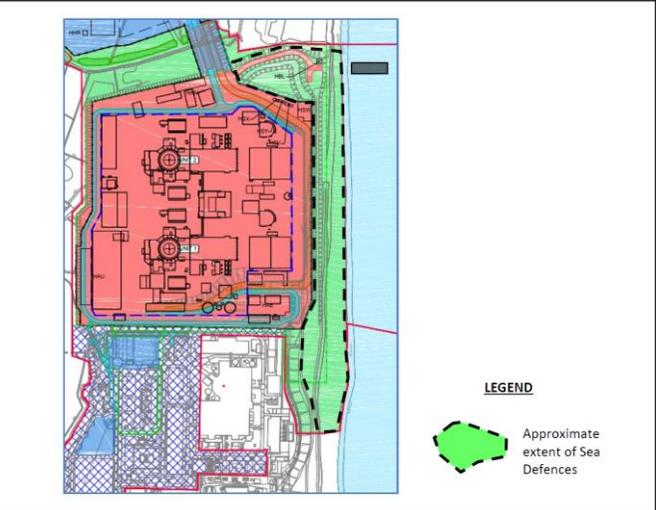
- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from the Design Report, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	Observations and Concerns	Requested:
1	1.1.3	<i>In light of the response by stakeholders, in the preliminary hearings, the ExA requested 'Design details and plans for Hard Coastal Defence Feature (HCDF)', to be provided to the examination at Deadline 2 on 2nd June. <u>This 'Sizewell C Coastal Defences Design Report' has been prepared in response to this information request and is not for approval</u></i>	To Note for Information.	N/a
2	1.1.4	<i>All levels given in this Technical note are designed finished levels including for the future effects of settlement</i>	Noted and assumed that this is up-to-date re incremental changes, e.g. Adaptive Design and later changes.	Clarification: Advise only if assumption is incorrect.

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
3	2.1.3	<p>Figure 2-1 - Sea Defence Layout, May 2020 DCO submission</p>  <p>LEGEND Approximate extent of Sea Defences</p>	For information and comparison with Fig. 3-1	N/a
	2.2.1	<p>Design parameter changes. Life 80 years (2110) increased to 120 years (2140) Climate Change UKCP09 updated to UKCP18. To be seismically qualified.</p>	To Note	N/a
	2.2.3	<p>The modified sea defence comprises the following...</p> <ul style="list-style-type: none"> Up to 2m thickness of landscaping over the revetment on the seaward slope giving a maximum total height of 14.6m OD. An adaptive sea defence height of +16.4m OD excluding landscaping with a maximum height of +18.0m OD including landscaping 	This issue is returned to later in this critique. Our concern is how these landscaping features are allowed for both in terms of their influence on hydraulic performance of the revetment and/or the logistics/practicality of their removal.	Further information: more detailed questions to follow later in the critique.

	<p>Fig 3.1</p>	<p>Figure 3-1 - Sea Defence Layout</p>	<p>The south end overlap with SZB has moved seaward possibly beyond the easting of the BLF promontory.</p> <p>The 'typical' section location is not at the most critical point that would be either the BLF or the Southern kick-out.</p> <p>The temp piled defence moves outside the perm defence footprint at the N end.</p> <p>The SCDF width varies and the seaward line is not straight / even. Is it defined by the MHWS contour?</p>	<p>Further information and clarifications:</p> <p>Provide additional sections at BLF and Southern extent showing Temp HCDF, H&SCDFs plus unconstrained shoreline profiles at 2020, 2050, 2080, 2110 and 2140.</p> <p>Provide legible underlying bed contours across the whole frontage, not just confined to the north end. Extend to show a portion of Minsmere.</p> <p>Provide a legible scale and identify the easting/northing lines.</p> <p>Why do the south ends of the HCDF and SCDF not coalesce with the structure and alignment of the SZB bund?</p> <p>Is the HCDF toe detail at the BLF at the Adapted profile level (-1.5m ODN)? If yes should same precautionary approach apply at the now more seaward (and vulnerable) S end?</p>
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				<p>Explain why the temp piled defence moves outside the perm defence footprint at the N end.</p> <p>Will the temp piled defence outside the footprint be fully removed when decommissioned?</p> <p>How has the SCDF width and seaward extent been determined?</p>
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
	3.3.1	<i>The Adaptive Design will only be implemented if mean sea level rise exceeds the reasonably foreseeable design value during the operational life of the structures from approximately 2030 to 2140 (see Section a) et seq. for further details of trigger criteria for the implementation of the Adaptive Design).</i>	<p>ESC is not convinced that there is no risk of erosion affecting the HCDF toe, at a level of ODN, before 2140.</p> <p>If this occurs, does it trigger construction of the Adaptive design?</p>	<p>Are there any Credible Maximum coastal change scenarios to year 2140 that would trigger construction of the Adapted profile top protect the HCDF toe from undermining failure?</p>
3	Fig 3.3	<p>The diagram shows a cross-section of a coastal defence structure. It includes labels for 'EXISTING (m)' and 'PROPOSED LEVELS (m)'. Key components shown include 'ROCK ARMOUR', 'LANDSCAPING LAYER', 'GEOTEXTILE', 'FILTER LAYER', 'SOIL', and 'CONCRETE'. The structure is shown on a slope with various layers and materials. A narrow extension of the SCDF is indicated.</p>	<p>As noted in previous reviews, what is the rationale for the design, maintenance and ultimate plight of the Landscaping layer that would be placed over the rock armour with an estimated overall thickness (including the narrow extension of the SCDF) of about 2.9m.</p> <p>The hydraulic efficiency (run up and overtopping amelioration) of rock armoured slopes depends (inter alia) upon energy dissipation with the voids of the rock matrix. Filling them with soil plus nearly three metres</p>	<p>Clarifications required regarding:</p> <ul style="list-style-type: none"> • At what point will be the landscaping soil/vegetation be removed so that the rock revetment can perform efficiently when needed? • Is it the case that the hydraulic performance is premised on the basis of the landscaping being kept in place? If so, what additional height of crest is thus required (and allowed for?)

			above the rock level would, on the face of it, be detrimental to performance.	<p>to offset the lost efficiency in slope performance?</p> <ul style="list-style-type: none"> Regarding the latter being affirmative, what impact would this have on footprint? <p>Latter point is our main concern in respect or coastal processes.</p>
<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	<i>Observations and Concerns</i>	<i>Requested:</i>
	3.3.3	<i>The seaward toe of the sea defence in the January 2021 Change submission extends approximately 8m further east (seaward) than in the original DCO submission. This change in seaward extent is driven by the change in crest level of the Permanent Sea Defence (+10.2mOD in May 2020 submission, increasing to +12.6mOD in the change submission) and the minimum 5m standoff to the outer SZC site fence that fixes the landward (western) boundary.</i>	See related comment in 3.9.11.	How far has the HCDF toe extended seaward at amended south end SZB overlap detail?
	3.3.4	<i>The design considers a number of constraints and interfaces, including: Minimising seaward extent of HCDF commensurate with engineering function.</i>		Explain what design changes have been applied since May 2020 that have moved the seaward extent of the works to landward or limited its movement to seaward?
10	Tbl 3.1	<i>Reasonably Foreseeable. Long-term coastal erosion of 0 – 20m</i>	<p>20m / 120 years = retreat rate of 0.17m/yr. At 1:10 slope (tbc) = up to 1.7m drop in level at current MHWS contour as beach profile moves landward.</p> <p>This retreat rate differs significantly from assumptions in TR544 3.1.1.2 that identifies a</p>	Add forecast eroded baseline beach profiles, extrapolated to years 2050, 2080, 2110 and 2140 to all drawings that are relevant to the assessment of HCDF toe resilience and SCDF management. This is necessary to demonstrate how a retreating baseline shoreline will affect SCDF

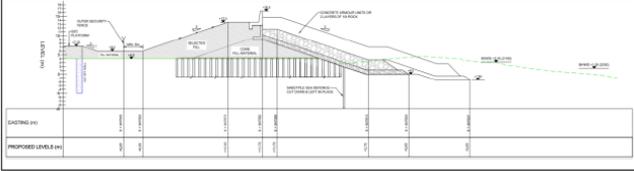
			range of 1.01 to 2.23 m/yr as worst case scenarios.	degradation and replenishment actions. Why does the RF erosion rate differ from the range used in TR544?
<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	Observations and Concerns	Requested:
10	Tbl 3.1	<i>Credible Maximum.</i> <i>Long-term coastal erosion of 20m to 40m</i>	40m / 120 years = retreat rate of 0.33m/yr. At 1:10 slope (tbc) = up to 3.3m drop in level at current MHWS contour as the beach profile moves landward. This retreat rate differs significantly from assumptions in TR544 3.1.1.2 that identifies a range of 1.01 to 2.23 m/yr as worst case scenarios.	Add forecast eroded baseline beach profiles, extrapolated to years 2050, 2080, 2110 and 2140 to all drawings that are relevant to the assessment of HCDF toe resilience and SCDF management. This is necessary to demonstrate how a retreating baseline shoreline will affect SCDF degradation and replenishment actions. Why is the 2.23 m/yr worst case erosion rate identified in TR544 not used as the CM retreat value in this report?

Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:									
10	Table 3-1	<p>Table 3-1 - Design Parameters</p> <table border="1"> <thead> <tr> <th data-bbox="421 300 555 363">Climate Change/ Timescale</th> <th data-bbox="555 300 824 363">Design Cases (Design Basis)</th> <th data-bbox="824 300 1111 363">Design Case: Cliff Edge (Beyond Design Basis)</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 363 555 555">Reasonably Foreseeable (RF) 2110-2140</td> <td data-bbox="555 363 824 555">1 in 10,000 year return period storm event (95%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks</td> <td data-bbox="824 363 1111 555">1 in 100,000 year return period storm event (50%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks</td> </tr> <tr> <td data-bbox="421 555 555 719">Credible Maximum (CM) 2110 -2140</td> <td data-bbox="555 555 824 719">1 in 10,000 year return period storm event (95%ile) H++ sea level rise – BECC Upper Long-term coastal erosion of 20m to 40m Hydraulic roughness 0.5 Storminess Wave Height Increase 10%</td> <td data-bbox="824 555 1111 719">1 in 100,000 year return period storm event (50%ile) H++ sea level rise – BECC Upper Long-term coastal erosion of 20m to 40m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Offshore banks lowered in height</td> </tr> </tbody> </table>	Climate Change/ Timescale	Design Cases (Design Basis)	Design Case: Cliff Edge (Beyond Design Basis)	Reasonably Foreseeable (RF) 2110-2140	1 in 10,000 year return period storm event (95%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks	1 in 100,000 year return period storm event (50%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks	Credible Maximum (CM) 2110 -2140	1 in 10,000 year return period storm event (95%ile) H++ sea level rise – BECC Upper Long-term coastal erosion of 20m to 40m Hydraulic roughness 0.5 Storminess Wave Height Increase 10%	1 in 100,000 year return period storm event (50%ile) H++ sea level rise – BECC Upper Long-term coastal erosion of 20m to 40m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Offshore banks lowered in height	<p><i>In all cases given, Hydraulic Roughness is given as 0.5. Advise definition of Hydraulic Roughness (of sea bed, of revetment slope, proxy factor for run up/overtopping ...?)</i></p>	<p>Further information sought on the Hydraulic roughness parameter (stated dimensionless 0.5).</p>
Climate Change/ Timescale	Design Cases (Design Basis)	Design Case: Cliff Edge (Beyond Design Basis)											
Reasonably Foreseeable (RF) 2110-2140	1 in 10,000 year return period storm event (95%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks	1 in 100,000 year return period storm event (50%ile) UKCP18, RCP8.5 – 95%ile SLR Long-term coastal erosion of 0 – 20m Hydraulic roughness 0.5 Storminess Wave Height Increase 10% Existing protection from offshore banks											
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12	3.4.1	<p><i>The HCDF comprises a rock revetment with a double armour layer of 6 to 10 tonne quarried armour stone rock over a rock underlayer, granular core and ground improvements (where needed).</i></p>	<p>Layer thicknesses based on this grading are: Mean 8 tn rock has Dn50 of ~1.45m. 2 layer thickness = 1.8 * 1.45 = 2.6m plus underlayer of ~ 1m?. Total thickness 3.6m? Looks like ~ 4m ODN on profile.</p>	<p>Confirm that the upper surface of the rock layer at the HCDF toe is at 4m ODN that is ~1m below the existing 5m berm and above the level of the shingle back beach landward of the berm.</p>									
12	Table 3-2	<p>Re armour size: <i>A concrete armour solution is frequently considered when a larger rock size is required. A concrete armour solution is not required for the HCDF but may be required for the Adaptive Design.</i></p>	<p>This is not very informative. Please provide the rationale for selecting very large rock armour over concrete armour units in this case. Generally, concrete armour units can be placed to a steeper slope than rock, thus reducing footprint (in fact the steeper slope can be preferred to obtain higher friction forces between units). It is understood that a higher crest may be required to obtain the target overtopping limit. However, we would like to see that this topic has been assessed and the</p>	<p>Further information is required as explained in the comment box to the left.</p>									

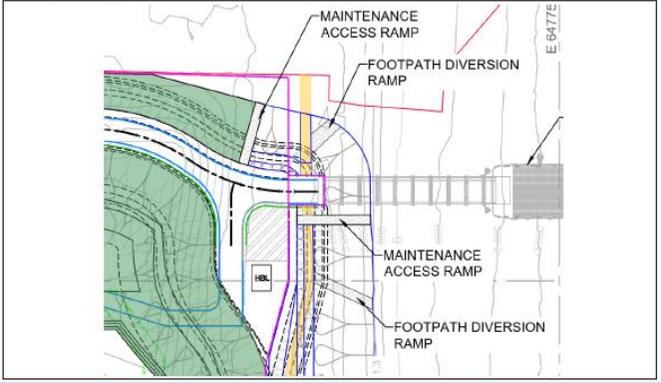
		<p><i>design basis 1 in 10 000 year storm event provided it is set at 0.0m OD or lower. This modelling is based on the 2140 climate change parameters (RCP8.5, 95%ile).</i></p> <p><u><i>These profiles will be subject to further study and modelling work during the detailed design.</i></u></p>	<p>There is potential for further changes that may move the toe lower and seaward.</p>	<p>up to 2140?) nor assumptions on presence/absence of a SCDF?</p> <p>What is the basis of the modelling and hence justification of the toe depth. For example, if storm induced beach scour then how does this figure with the long term beach lowering (as above mentioned), the local geology, and scour arising from interference with the then old HCDF. More detail needed.</p>
<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	<i>Observations and Concerns</i>	<i>Requested:</i>
14	3.4.5	<p><i>SZB tie-in. (Illustrated below)</i></p> <p><i>The design of the interface with the SZB defences has been refined since the design phase underpinning the May 2020 DCO submission. The SZC Permanent Sea Defences are to be seismically qualified, whereas it has been confirmed that the existing SZB sea defences are not seismically qualified. It is therefore necessary to separate the two defence structures from one another. The proposed SZC sea defence included in the January 2021 change submission overlaps the SZB defence rather than merging into it.</i></p>	<p>The HCDF at the S end has moved seaward and may now be closer to the MHWM than the BLF promontory.</p> <p>The SCDF at this point is reduced in width from the DCO and Change submissions.</p> <p>The SCDF transition to south of it appears modest and potentially preliminary? Tbc.</p> <p>There appears to be a small valley between the SCDF and the HCDF slope behind.</p>	<p>Provide additional sections at SZB tie in showing Temp HCDF, H&S CDFs plus unconstrained shoreline profiles at 2020, 2080 and 2140.</p> <p>The impact of this seaward movement on coastal processes and SCDF design and operation should be assessed in the appropriate report and included in TR544.</p>

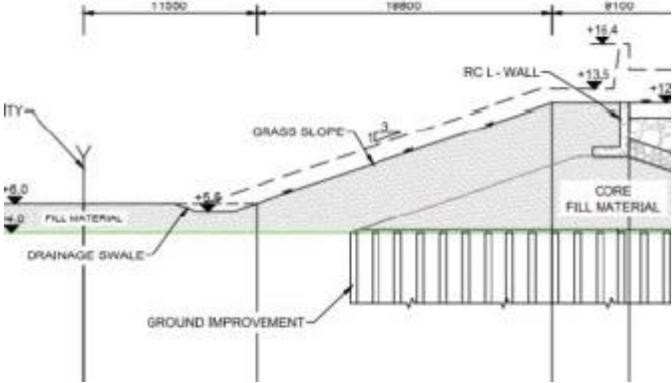
		<p>Figure 3-6 - SZB Interface - Plan</p>		
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
14	3.5.2	<p><i>Landscaping material placed above the functional crest level of +12.6mOD is not considered to contribute to the claimed performance of the HCDF. However, it is recognised that the presence of this material will in practice provide some beneficial effect</i></p>	<p>The statement is almost implying that the landscaping material will be detrimental to performance of the HCDF, without saying as much.</p>	<p>This is the same argument as noted re p3 Fig. 3.3. Clarification is needed on the performance/impact of landscaping, demonstrating definitively that there will be no additional incursion of the HCDF into the coastal regime as a result of it.</p>
15	3.6	<p><i>Drainage Swale</i></p>		
	3.6.1	<p><i>The swale is included as a beneficial feature, <u>but is not strictly necessary in order to meet drainage requirements.</u></i></p>	<p>See below</p>	<p>See below</p>
	3.6.2	<p><i><u>The swale would not be present in the Adaptive Design configuration.</u> The landward slope of the Adaptive Design is set at the 5m minimum offset from the outer fence line and it is this which defines the seaward extent of the HCDF.</i></p>	<p>This feature presents an opportunity for the SZC Co. design team to compensate for continuing seaward movement of the HCDF toe.</p>	<p>If the swale is not required for the baseline HCDF and the Adapted profile is not certain to be required why not set the baseline HCDF rear slope face back to the 5m outer</p>

		<i>exposed in a design basis storm event. <u>Again, the exact shape/volume of this profile will be determined at detailed design stage.</u> The SCDF would be recharged to ensure that the lower maintained profile is not realised.</i>		the red line unless / until the HCDF is removed? Update this drawing to show the impact of CM erosion forecasts in table 3.1 on an unconstrained shoreline and on SCDF maintenance actions.
<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	<i>Observations and Concerns</i>	<i>Requested:</i>
	3.7.13	<i>The profiles shown on Figure 3-8 will be subject to further study and modelling work during the detailed design phase, and the lower maintained profile indicated in red on the figure would be revised accordingly.</i>		See above.
	3.8	<i>Adaptive design.</i>		
	3.8.2	<i>Owing to the inherently uncertain nature of climate change, it is recognised that the RF climate change scenario may be exceeded, leading to more onerous climate change effects becoming prevalent. ONR and EA guidance therefore requires that the sea defence be capable of adaptation to a Credible Maximum (CM) sea level rise. The CM scenario is defined as the H++ climate change scenario as defined in UKCP09, as UKCP18 refers back to the UKCP09 estimates and does not provide updates estimates (refer to section 3.3.4a) et seq). <u>The sea defences have therefore been designed to allow for future adaptation to accommodate the CM scenario, should it develop.</u> The modified defences that would be delivered through implementing these future adaptations is termed the “Adaptive Design”.</i>	The principle is understood together with the general approach of an Adaptive Design. However, the driver for the Adaptive Design appears to be substantially/wholly based around sea level rise. Coastal morphological changes will need to be treated with equal importance, being key to the survival of the HCDF (being what it sits on).	Further information sought on the inclusion of coastal processes in the design basis for the Adaptive Design. This would cover both security of the HCDF (foundings), and the impact on coastal processes, i.e. continuity of sediment transport.

	3.8.3	<p>Figure 3-9 shows the Adaptive Design, with tidal levels shown reflecting RF sea level rise to 2140. A larger-scale section is provided at Appendix A.5. <u>The Adaptive Design of the HCDF would retain the SCDF in front of it.</u></p>	A SCDF to seaward of an Adaptive profile would be ~15m further east than for the basic HCDF design and would be location in the intertidal beach.	Demonstrate that retention of a SCDF to seaward of an Adaptive profile is viable.
		<p>Figure 3-9 - Adaptive Design, Typical Cross-section of HCDF</p> 		
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
	3.8.4	<p>In the Adaptive Design, concrete armour units would be overlaid on the previously placed rock revetment, and the toe section extended further seaward to a lower level. A toe level of -1.5mOD would be required, i.e. 1.5m deeper compared to when the proposed HCDF is originally built.</p>		Explain the basis of the -1.5m toe level with the Adapted design.
20	3.9.1	<p>Opportunities to reduce the eastward extent of the Permanent Sea Defence fall into two general groups:</p> <ul style="list-style-type: none"> • Move the HDCF further inland. • Reduce the overall width of the HCDF. 	Included as background to comment in 3.9.5	N/a
20	3.9.3	<p>The HCDF construction is constrained by the minimum 5m standoff from the outer security fence to the landward toe of the sea defence in the Adaptive Design configuration, refer to Section 3.6, Figure 3-9 and Appendix A.5.</p>	Included as background to comment in 3.9.5	N/a
21	3.9.4	<p>Moving the perimeter fence to the West could only be achieved through either compressing the East West extents of the of the SZC platform or moving the entire platform further west</p>	Included as background to comment in 3.9.5	N/a
21	3.9.5	<p>....Further East-West compression of the platform layout is therefore not considered feasible. It is also not considered feasible to relocate the entire SZC platform further west as this</p>	Nor is it considered appropriate to (repeatedly) extend incursion of the coastal defence into the shore.	Clarification sought on how avoidance of incursion of the defence across the shore is included

	3.9.9	<p>would further increase land take from Sizewell Marshes SSSI which would not be appropriate.</p> <ul style="list-style-type: none"> A slope steeper than 1 in 3 would be difficult to establish grass on and maintain as motorised machinery could not be used. This applies to both seaward and landward slopes. 		<p>in the Design Basis, and evidence of how it is being acted on.</p> <p>Sections 3.9.4 to 3.9.9 is effectively a list of “reasons not to”. Further information is sought on pro-active (imaginative?) approaches to minimise incursion of the HCDF into the shoreline regime:</p> <p>E.g. re 3.9.9: have you considered gradually sloping terraces? sheep? other...?</p>
Pg. no.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
22	3.9.11	<p>At the Permanent BLF the seaward line of the sea defences <u>has not changed from the first DCO submission.</u></p>	<p>SZC Co. previously stated that at the Permanent BLF the seaward line of the sea defences had moved seaward by 10m (compared with the May 2020 information) because the adapted toe detail (with a lower level of -1.5m ODN) would be used at this more vulnerable promontory.</p> <p>The statement to the left is not consistent with that.</p>	<p>Provide a plan showing the May 2020 DCO and Current HCDF toe lines over full frontage.</p> <p>Clarify if the adapted toe detail is to be used at any location on the Sizewell C HCDF and North Mound frontage and illustrate where on a plan.</p>
22	3.9.12	<p>However, the updated design drawings show additional features, refer to Figure 3-11 (below). These include:</p>	<p>1 The new Mnt ramp to S of BLF has potential to alter the function of the SCDF by acting as a groyne to impede sediment movement.</p>	<p>Provide profile drawings to show the Mnt ramp and Pile Abutment wall in</p>

		<p>1 Maintenance access ramps: required to maintain the soft sea defence and repair the hard sea defence. <u>These will be permanent structures.</u></p> <p>2 Coast Path diversion ramps for when the Permanent BLF is use. These are intended to be a soft feature created using shingle/sand beach material and temporary in nature.</p> <p>3 A sheet pile abutment wall that replaces the end span on the <u>Permanent BLF</u>. This allows the Coast Path to cross the Permanent BLF at grade.</p>	<p>2 The Coastal Path diversion ramps will be vulnerable to erosion. This detail has been brought to the attention of the SCC RoW officer.</p> <p>3 The Sheet Pile Abutment Wall also appears to protrude above the HCDF slope and therefore has potential to impede sediment movement.</p>	<p>relation to the HCDF and SCDF slopes.</p> <p>Provide an assessment of the potential impact of the Mnt access ramp and sheet pile abutment wall on i) the function of the SCDF and ii) the potential for the structures to impede alongshore sediment movement.</p> <p>Identify any new monitoring and mitigation issues that these structures create and add them to the CPMMP.</p>
Pg. No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
22		<p>Figure 3-11 – Permanent BLF Interface</p> 	This figure is relevant to the item above.	N/a

<i>Pg. No.</i>	<i>Section Ref.</i>	<i>Relevant Text / illustration</i>	Observations and Concerns	Requested:
24	Fig 3-12		<p>Compares May 2020 profile with Jan 2021. The common datum appears to be the Outer Main Site Fence at E647545. The 2021 HCDF toe is shown as 8m further seaward than 2020. Note the huge increase in scale of SCDF.</p> <p>Extract is relevant to the point made opposite.</p>	<p>Explain why it is not possible to move the basic HCDF rear slope landward to match the Adaptive rear slope profile – that may not be required? This would retreat the toe by ~6m and correct most of the 2021 8m toe advance. It would also reduce seaward intrusion by the Adaptive slope toe – if built.</p>

8.6 Traffic Incident Management Plan Rev. 02 [\[REP2-053\]](#)

East Suffolk Council’s comments on the Traffic Incident Management Plan (TIMP) submitted at D2 are not many as we are not the highway authority. However, we would like the ExA to take these comments into consideration.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from the TIMP, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

Pg No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
5 / 6	1.3	Incident Management Area – Plate 1.1	The Incident Management Area does not go east from Junction 58. ESC is not convinced that this will be acceptable given the potential for impacts affecting the Port of Felixstowe.	Clarification / revision
15	4.2.4	Delivery Management System: <i>If a scheduled delivery is cancelled, it would not be counted as HGV delivery/movement number as no delivery/movement would have occurred</i>	Surely this will depend on where it is at the time it is cancelled?	Clarification / revision
16	4.3.2	HGV routes: <i>During both the early years and peak construction phases, HGVs arriving from the south would be required to route via the SRN on their journey to/from the main development site.</i>	However, after Seven Hills heading towards the site northwards, HGVs are no longer on the SRN.	Clarification
16	4.3.3	HGV routes: <i>Route 2a: HGV route from Lowestoft Port via the A12 to the A12/B1122 junction and then along the B1122 and Lover’s Lane to the secondary site entrance or continue along Sizewell Gap to the Sizewell B access.</i>	If there are proposals to use Lowestoft Port then ESC’s preference would be for movements to take place via the sea to the site.	Further information / clarification
21	4.3.13	Park and Ride facilities: <i>Two park and ride facilities are proposed: a southern park and ride facility at Wickham</i>	Please add ‘Market’, Wickham is an entirely different place to Wickham Market.	Clarification
24	5.2.7	Operation Stack: <i>During Operation Stack, SZC Co. would route Sizewell C HGVs direct to the main development site, with no HGVs routing via the freight management facility in order to relieve pressure on Old Felixstowe Road. This would continue until SZC Co. is notified that the port is open.</i>	ESC needs to understand the implications of this and how any such HGVs would be monitored at these times. This could be problematic.	Further information / clarification

8.7 Construction Traffic Management Plan Rev. 02 [REP2-054]

East Suffolk Council’s comments on the Construction Traffic Management Plan (CTMP) submitted at D2 are not many as we are not the highway authority. However, we would like the ExA to take these comments into consideration.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from the CTMP, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

Pg. No.	Section Ref.	<i>Relevant Text / illustration</i>	Observations and Concerns	Requested:
20	3.4.7	<i>HGV routes: Route 2a: HGV route from Lowestoft Port via the A12 to the A12/B1122 junction and then along the B1122 and Lover’s Lane to the secondary site entrance or continue along Sizewell Gap to the Sizewell B access.</i>	Please confirm what is anticipated to be arriving at Lowestoft Port and requiring transport via HGV to the site	Clarification
61	9.5.11	<i>Contingent Effects Fund 1: The level of Contingent Effects Fund 1 to be drawn down for any scheme approved to be funded will be agreed by the TRG. Suffolk County Council will be provided with</i>	ESC welcome this Fund and look forward to being on the TRG who will review and agree any payments.	•

		<i>the funding to implement the measures in their capacity as the local highway authority.</i>		
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Air quality response to the updated construction traffic management plan:

- **Section 4.4.17 and Table 8.1:** a commitment is made to actively monitor compliance with Euro VI standards for HGVs travelling to/from the main development site. ESC welcomes this, but requests that the Euro emissions standards of all HGVs being used at the main development site and associated developments should be monitored and recorded. Monthly reporting for three months followed by three monthly reporting is acceptable in principle. It is expected that an additional document will be submitted providing more detail on how HGV emission will be monitored.
- **Section 4.4.45:** This states *“SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority.”* ESC requests that this is revised to be consistent with the CoCP as follows: *“SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible. The HGVs non-compliant with Euro VI will not exceed more than 8% of the total annual HGVs, and must meet Euro V standards where possible.”*

The following issues are considered unlikely to result in a local air quality impact, but are important for the Council in seeking to encourage and facilitate low emitting transportation in East Suffolk:

- **General :** A commitment has been made to electric vehicle charge points. This is welcome but we would support SCC in their request for increased provision: ‘EV Charging guidance for Park and Ride and FMF sites is considered to be closest to B1 Business and B2 General Industrial uses in the Suffolk Guidance for Parking. This requires 20% of all spaces to be fitted with a charging system, with an additional 20% of parking spaces with the infrastructure in place for future connectivity. This should be increased to 25% fitted spaces and 25% future connectivity for the site accommodation campus (i.e. C1 Hotel use).’
- **General:** ESC requests that buses used for Sizewell C are either electric or ultra-low emission vehicles, to minimise the air quality impacts of the bus fleet.

8.8 Construction Worker Travel Plan [\[REP2-055\]](#)

East Suffolk Council’s comments on the Construction Worker Travel Plan (CWTP) submitted at D2 are not many as we are not the highway authority. However, we would like the ExA to take these comments into consideration.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from the CWTP, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

Pg No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
33	4.7.15	<i>Electric Vehicle Parking: The following electric vehicle charging spaces are proposed at the main development site (construction phase) and associated development sites: • 1,000 car parking spaces are proposed at the main development site, of which 5% are proposed to have electric vehicle charging points and 5% with passive electric vehicle provision; • 600 car parking spaces are proposed at the temporary park and ride facility at the LEEIE, of</i>	This is too low – ESC expect there to be at least 20% provision at the main development site and the Park and Rides and 25% passive provision.	Further information

		<i>which 5% are proposed to have electric vehicle charging points and 5% with passive electric vehicle provision; • 1,250 car parking spaces are proposed at each of the northern and southern park and ride facilities, of which 5% are proposed to have electric vehicle charging points and 5% passive electric vehicle provision; • 12 car parking spaces for staff and visitors are proposed at the freight management facility, of which 5% to be equipped with electric vehicle charging points and 5% passive electric vehicle provision.</i>		
47 /48	6.5.19	<i>Contingent Effects Fund 2: Junction capacity / driver delay - If the evidence suggests that there is a significant increase in delay at the junction and that this is due to Sizewell C traffic, the transport co-ordinator will put forward proposals for mitigating the impact.</i>	ESC is keen to understand the monitoring and evidence that would be required to support such a claim.	Clarification / further information

8.5 Consolidated Transport Assessment Rev. 03 [\[REP2-045\]](#)

East Suffolk Council’s comments on the Consolidated Transport Assessment submitted at D2 are not many as we are not the highway authority. However, we would like the ExA to take these comments into consideration.

The table comprises:

- First column: the relevant page number (document, not pdf page);
- Second column: a reference (section, figure or table number);
- Third column: relevant source document extract (text or Figure snapshot)
- Fourth column: our observations and concerns on the cited extract
- Fifth column: our requested action upon SZC Co. (see below).

All extracts from the Consolidated Transport Assessment, including page, section number, text and footnotes etc. are shown in *italics* in first three columns, including references elsewhere as appropriate.

In Column 5 the requested advice from SZC Co. takes one of the following three forms, or a combinations thereof:

- Clarification
- Confirmation
- Further information.

Pg No.	Section Ref.	Relevant Text / illustration	Observations and Concerns	Requested:
8	Table 1	Transport Strategy: <i>Permanent beach landing facility (BLF) and potential for a second temporary BLF for primarily bulk construction materials</i>	ESC is concerned at the use of the word 'potential' here as the temporary second BLF is essential for taking HGVs off the road network.	Clarification
18	-	Road Safety and Off-site highway improvements: <i>The Sizewell link road would remove nearly all traffic from the B1122 and would reduce collisions.</i>	The evidence behind this statement is not clear. HGVs will be compelled to use the SLR but there will be no controls for LGVs and private cars. The solution is to make the B1122 unattractive to these users by introducing cycle lanes, better pedestrian walkways, pedestrian crossings etc.	Further information
20	-	Rail infrastructure: <i>Once the green rail route is operational, three trains (six movements) per day will travel along the Saxmundham to Leiston branch line and the proposed rail extension route to the new terminal within the main development site</i>	Information so far is that these movements will be over-night NOT during the day, this statement does not make that clear. It has not been evidenced that these rail paths will be available.	Clarification
21	-	Rail infrastructure: <i>SZC Co.'s preferred option for rail is to operate four trains per day, five days a week with the resilience of being able to operate on a sixth day if necessary</i>	This has not been evidenced as being deliverable. Adding a sixth day of OVERNIGHT rail movements would have a significant impact on residents from a noise perspective.	-
21	-	Walk and cycle: <i>In addition SZC Co. has been working in partnership with Leiston Town Council, Wickham Market Parish Council,</i>	There are now meetings taking place between Marlesford and Little Glemham Parish Councils also.	Further information / clarification
53	2.3.6	Lovers Lane: <i>The road is approximately 6m in width and provides access to farm land and a small number of residential properties and commercial premises.</i>	The Household Waste Recycling Centre is the only commercial premise on Lovers Lane	Clarification
56	2.3.31	B1078: <i>On approach to and throughout Coddendam, the B1078 has a speed limit of 30mph.</i>	Although not within the administrative boundary of ESC, we know that the speed limit through Coddendam is 20mph.	Clarification

59	2.3.46	A1120	The priority at the junctions in Pettaugh and Earl Soham do not follow the road numbering.	-
60	2.3.53	A12: <i>The road varies between a two and three lane grade separated dual carriageway and provides access to settlements to the south of Ipswich, including Colchester and Chelmsford</i>	It is not grade separated at all junctions.	Clarification
62	2.3.63	A12 /A214	Should read: A12/A1214	Clarification
86	2.5.31 – 2.5.33	Darsham Station to Westleton: <i>2.5.31 Cyclists approaching the area from the north, or arriving by train at Darsham, can make use of a route via Westleton in order to access Sizewell without using the B1122. 2.5.32 After travelling approximately 670m south along the A12, cyclists can head east for 4.2km onto Westleton Road (subsequently Yoxford Road) to the village of Westleton. Cyclists can then proceed along Mill Road to join the Suffolk coastal cycle route passing through Minsmere. 2.5.33 The roads are generally wide and flat, although it is noted that on the reverse journey visibility for traffic turning out of Westleton Road onto the A12 could be improved.</i>	ESC welcome promotion of this as part of a cycle and pedestrian friendly route from Darsham Station to the coast at Sizewell. ESC aspiration is for the B1122 to be downgraded from a HGV route (once the SLR is opened) to promote a cycle and pedestrian friendly route from the coast at Sizewell heading north to Darsham Station.	-
123	3.4.21	Suffolk Rail Prospectus (2015): <ul style="list-style-type: none"> ensuring that the construction of Sizewell C will not have a detrimental effect on rail capacity on the East Suffolk Line, and a potential new passenger station at Leiston. This could involve doubling all or part of the East Suffolk Line between Westerfield and Saxmundham; exploring the opportunity of achieving a passenger service and station for Leiston as a legacy benefit from the new development at Sizewell; 	ESC would welcome any opportunities for improvements such as these to the passenger rail service.	-
124	3.4.25	New Anglia Strategic Economic Plan (2014): <i>One such project is the 'A12 Suffolk Energy Gateway Scheme (SEGway)' which comprises an improvement to the 4.5-mile (7 kilometre) section between the B1078 at Wickham Market and the A1094 at Saxmundham in East Suffolk (Ref 3.15).</i>	SEGway was supposed to be the A12 from Seven Hills to Lowestoft. Phase 1 was the proposed Four Village Bypass of Marlesford, Little Glemham, Stratford St Andrew and Farnham. This definition is larger than the Four Village Bypass but smaller than the whole route.	Clarification
143	4.5.10	Green Rail Route: As there is not enough capacity on the rail network overnight to operate the fifth train, it would need to run	ESC would need to be convinced that the benefits of this fifth train outweigh our	Further information

		during normal operational hours. This may require the cancellation of a pair of passenger train services between Lowestoft and Ipswich as described in Chapter 11 of this Consolidated Transport Assessment (Doc Ref. 8.5(B))	concerns regarding cancelling an important passenger service which has been fought for over the years.	
156	5.3.5	<i>Sizewell B Relocated Facilities: A revised planning application for Sizewell B Relocated Facilities was submitted to Suffolk County Council in November 2020.</i>	The application was submitted to East Suffolk Council	Clarification / correction

6.3 Vol. 2 Ch 15 App 5I Updated Rights of Way and Access Strategy [\[REP2-035\]](#)

East Suffolk Council’s comments on the Updated Rights of Way and Access Strategy are limited as we will defer to SCC as the highway authority to provide detailed comment. However, we welcome the Applicant’s proposals to promote a Strategy and welcome discussions regarding the Rights of Way Fund to address impacts that cannot be addressed through embedded mitigation to the project.

The existing long distance walking routes that pass through the Main Development Site are important routes for local amenity, serving local communities, and tourism attractions for the district. It is therefore critical that any closures of these routes are a) kept to the minimum time possible, b) well publicised in advance, and c) provided with appropriate and well signed diversion routes.

Any opportunities to improve these routes, in particular the Coast Path, to promote access for all, would be welcomed by ESC.

ESC is keen to promote a safe pedestrian and cycle route from the coast at Sizewell to Darsham Station, proposals include re-prioritising users of the B1122 once the Sizewell Link Road is in operation. However, the last mile of the B1122 westwards to the Yoxford roundabout is too narrow to provide safer passage for pedestrians and cyclists, an alternative route is therefore sought. This could use elements of the existing public rights of way system, so we are keen to progress this idea further with the Applicant and SCC.

8.1 Main Development Site Design and Access Statement Second Addendum (June 2021) [\[REP2-040\]](#)

ESC note that the over-arching Design Principles set out at p. 65 include a new one on Sustainability and this is welcome. The new Design Principle is detailed on p.67 and includes reference to a low carbon future, adopting a circular economy model and using water wisely. These are all sound worthwhile principles to include, and ESC supports their inclusion.

There are no changes to the Detailed Design Principles, other than an additional principle for Coastal Defence (with reference to the Hard Coastal Defence Feature), p71. This element will be dealt with primarily through detailed design and requirements – see comments on the Design submission above.

Appendix A Accommodation Campus –Design Principle no. 12 on acoustic amenity has been expanded, p238. ESC supports this expansion.

8.3 Associated Design Principles – Tracked Changes Version (June 2021) [\[REP2-041\]](#)

ESC notes that document references have been updated throughout and some minor layout changes have been made.

ESC note that for the Northern Park and Ride, Southern Park and Ride and Freight Management Facility sites, all of the maximum size parameters that were previously included have now been deleted. This is a great concern, as there now appears to be no control exercised through the AD Design Principles document on the maximum width, depth and height of the buildings proposed at these sites – that is, none of these maxima will now be agreed at this stage. This change is not understood and there is no explanation or justification for it. ESC cannot support this change without having this additional explanation and / or justification. The previous building height maximum at these sites was 4 metres and, for the two park and ride sites in particular in their sensitive landscape contexts, ESC is concerned that we could see this height breached by two storey buildings or higher.

8.11 Updated Code of Construction Practice Tracked Changes Rev. 03 (June 2021) [\[REP2-057\]](#)

Contaminated land:

ESC notes that the correct standards and documents are referenced by the Applicant and that they say: “10.1.2 The mitigation measures, as set out in **Table 10.1**, are based on industry standard guidance and are appropriate to the proposed activities and potential effects / level of impact identified. These measures are considered to be established good practice on any large construction site.” ESC accepts this but find it lacking in detail. We refer back to comments made in our LIR [\[REP1-045\]](#) paras. 9.18 – 9.26.

Air Quality:

- **Table 4.1, activity: site management:** an update has been made regarding dust deposition and airborne PM10 monitoring, including the specifying of Alert Levels and Action Levels. This is welcome. We are concerned that the Action Level for PM10 is set at a 1 hour mean

of $190 \mu\text{g}/\text{m}^3$, which could be too high, given that the 24 hour mean PM_{10} standard is $50 \mu\text{g}/\text{m}^3$. ESC requests an explanation of how this level has been arrived at, and potentially specification of a lower level that ensures that the alert level is protective in relation to the 24 hour mean PM_{10} standard of $50 \mu\text{g}/\text{m}^3$.

- **Table 4.1, activity: vehicles & machinery:** an updated statement has been made on emission standards for HGVs. The CoCP now includes a commitment that the proportion of non-Euro VI HGVs will not exceed 8% annually. This is acceptable and welcome to ESC. In addition, a commitment is also made to Stage IV non-road mobile machinery (NRMM), which is also welcome. ESC will build on this to request further commitments regarding Stage V NRMM (in particular, for larger plant $>560\text{kW}$), and to request further details regarding the monitoring of HGVs and NRMM to ensure that this commitment is robust. There is a reference to monitoring of HGV emissions standards in the Construction Traffic Management Plan Table 8.1 (see below). It is expected that the Applicant will submit a more detailed plan for managing HGVs and NRMM based on information already shared with ESC by the Applicant (draft document entitled "Outline Approach to Managing SZC Engine Emissions").
- **Table 4.1, activity: vehicles & machinery:** ESC welcome confirmation of the use of electrically powered plant at the earliest possible stage to avoid the need to use diesel generators in relation to the Main Development Site. However, no similar commitment has been made in relation to Offsite Associated Developments. ESC request an explanation of the position in relation to offsite Associated Developments, and request further details of when the deployment of electrical supply will occur in the construction programme to understand potential impacts before electrical supply is provided.

Outstanding points which remain to be addressed:

- **General (CEMP):** ESC requests that the Code of Construction Practice is updated to specify that Construction Environmental Management Plans (CEMPs) will be agreed with ESC in advance of works. This will provide ESC an opportunity to ensure monitoring is undertaken in locations of concern once finalised construction details are available and will give ESC the opportunity to agree the detail of mitigation where that level of detail is not yet available.
- **General (NRMM):** ESC requests that the CoCP should be updated to specify that: (a) Deployment of NRMM close to site boundaries should be avoided where possible, and (b) Monitoring of nitrogen dioxide concentrations at key locations should be carried out.
- **Table 4.1, all activities (dust control):** The general measures described for dust control are appropriate in overall terms, but mitigation measures should reflect the scale, nature and location of the proposed construction activities. ESC has made some specific suggestions in the LIR, and will continue to discuss with the Applicant to ensure that suitable principles and measures are set out in the CoCP to guide the production of CEMPs.

- **Table 4.1, Mobile Crushing and Screening:** ESC requests that the CoCP should be updated to specify that Mobile Crushing and Screening plant will be operated in accordance with all relevant environmental permit requirements.
- **General:** ESC requests that the Code of Construction Practice is updated to specify that solid screens or barriers are erected around dusty activities or the site boundary that are at least as high as any stockpiles on site.
- **Table 4.2 Compliance:** States that baseline and activity specific dust and particulate monitoring will be carried out in line with the CEMPs. The CEMPs are to be completed by contractors and as such ESC has concerns that this is too late for baseline monitoring. If any monitoring is to be agreed in the CEMPs, ESC would once again request that the CEMPs are approved by ESC in advance of works.
- **Part C, Associated Development:** 1.1.2 Final bullet point – does not include other potential rail work e.g. Woodbridge. Clarification is sought that all construction is included within the Part B and C sections or that control of construction dust measures agreed in the CoCP and associated documents will be applicable to all construction sites associated with the SZC project.

Noise and Vibration:

Code of Construction Practice Part A – Project Wide Controls

- **Section 3. Communication, Community and Stakeholder Engagement:** ESC request clarification that they will also receive any information on construction activity circulated to the local communities, particularly in relation to any “out of the ordinary” events.
- **Sections 3.1.45 to 3.1.49. Liaising with Relevant Authorities:** ESC welcome the Applicant’s proposals on handling complaints but request clarification that logs of all complaints received by SZC Co. will be passed on to relevant regulatory authorities (e.g. ESC for matters to noise, air quality, or light pollution etc.) in a timely manner along with details any the actions arising from the complaints. ESC also request clarification that SZC will direct complaints towards the appropriate statutory authorities should they want to make a formal or anonymous complaint.

Code of Construction Practice Part B – Main Development Site

- **Section 1.3.1 Working Hours:** ESC accept that a project of this scale and complexity is likely to entail long working hours. However, the potential disturbance to residences from continuous construction activity on the site for a prolonged construction period highlights the need for appropriate control of noise and vibration from the works.
- **Section 3.1.3 Noise Monitoring and Management Plan:** ESC’s expectation is that the Noise Monitoring and Management Plan will be developed in conjunction with the detailed assessments required for the Noise Mitigation Scheme and Section 61 applications (or equivalent bespoke process) so that the data collected aligns with the areas of concern. ESC is in ongoing discussion with the Applicant on this matter.

- **Table 3.1 : Control measures to mitigate noise and vibration impacts:** Table 3.1 describes generic measures proposed to limit noise and vibration associated with construction activities in line with the guidance in BS5228 parts 1 and 2 and best practical means. This level of detail is as expected at this stage in the assessment process. ESC's understanding is that the Applicant and their appointed contractors would make specific commitments of the measures adopted to mitigate noise levels within the construction noise thresholds once the construction methodologies are suitably developed. The expectation is that these commitments will be secured via a Section 61 application, or equivalent bespoke process. ESC is in ongoing discussion with the Applicant on this matter.
- **Table 3.2 Construction noise thresholds:** The construction noise thresholds set out in Table 3.2 are those which the Applicant's contractors would be required to "use best endeavours and best practical means" to adhere to. The thresholds are more onerous than the standard BS5228 -1 ABC thresholds during the day (07.00 to 19.00), aligned with the ABC thresholds at night, but less onerous in the evening period (19.00 till 23:00). Given the nature and duration of the proposed construction works, ESC consider that the contractors should be required to target the lower construction noise thresholds set out in Annex E5 of BS5228-1 for long term construction projects involving significant earth moving activities. Use of more onerous criteria would trigger the requirement for contractors to demonstrate that best endeavours and best practical means have been adopted at a lower threshold than is currently proposed. Again, the expectation is that this process would be documented via a Section 61 application, or an equivalent bespoke process. ESC is in ongoing discussion with the Applicant on this matter.
- **Section 3.3 Additional Mitigation, Monitoring and Management:** ESC note that there is no reference to the Noise Mitigation Scheme in the main text of the document. ESC consider the protection offered by the proposed Noise Mitigation Scheme as a key aspect to the proposed noise control measures, albeit a last resort in terms of mitigation (in line with planning policy).
- **Section 3.3.1 and 3.3.2 Acoustic Screening:** ESC note that the CoCP does not contain any discussion on the balance between acoustic benefit and visual harm and how any final decisions on the locations and of screening will be made.
- **Section 3.3.20 Advance notice of works:** ESC request clarification that they will also receive any notification of any "out of the ordinary" events or similar information circulated to the community.
- **Table 7.1:** ESC note that there are no mitigation measures proposed in Table 7.1 to control construction noise to the prized amenity and recreation areas which surround the Main Development Site. This is expected but further highlights the need to control construction noise as source as is practical to minimise and mitigate against the noise related adverse impacts identifies in Chapter 14 of the ES [XXX].

Code of Construction Practice Part C – Associated Development Sites

- **1.1.6 Working hours:** ESC note that the largest predicted impacts from construction noise occur during the Saturday afternoon working periods, when lower noise assessment thresholds are applied. Given that Saturday afternoon working is generally restricted on conventional construction projects in noise sensitive areas, ESC request that the Applicant demonstrate why regular working on Saturday afternoon is considered critical to the successful delivery of the various associated development sites. Otherwise, ESC requests that working on Saturday afternoons without prior and specific approval from ESC be restricted in the same way as it is for Sunday and Bank holiday working in order to provide resident with respite from the noise from construction activity on these sites. If Saturday afternoon working is deemed essential, ESC's expectation is that the detailed assessments required for Section 61 applications (or equivalent bespoke process) will identify which of the specific construction processes associated with the works are classed as "noisy" and therefore excluded from Saturday afternoon working hours.
- **Table 3.1: Control measures to mitigate noise and vibration impacts:** Table 3.1 describes generic measures proposed to limit noise and vibration associated with construction activities in line with the guidance in BS5228 parts 1 and 2 and best practical means. This level of detail is as expected at this stage in the assessment process. However, ESC's expectation is that the Applicant and their appointed contractors would make specific commitments of the measures adopted to mitigate noise levels within the construction noise thresholds once the construction methodologies are suitably developed. The expectation is that these commitments will be secured via Section 61 applications, or an equivalent bespoke process.
- **Table 3.2 Construction noise thresholds:** These are standard criteria, and although less onerous than the recommendations for construction noise thresholds for road schemes set out in LA111 Design Manual for Roads and Bridges these criteria are widely adopted for short to medium term construction projects.
- **Section 3.3.1 and 3.3.2 Acoustic Screening:** ESC note that the CoCP does not contain any discussion on the balance between acoustic benefit and visual harm and how any final decisions on the locations and of screening will be made.

Vol 2 MDS Ch 11 Noise and Vibration App 11H Noise Mitigation Scheme (June 2021) [[REP2-034](#)]

- **General point:** ESC request confirmation that the noise mitigation scheme covers the works on the associated development sites as well as the main development site.

- **1.2.1 Process for insulating properties – Stage 7: Review of eligible properties:** ESC request confirmation that the refreshed noise assessments would reflect the construction methodologies within the agreed Construction and Environmental Management Plans for the various development sites.
- **Table 1.1 Insulation criteria – Road Noise:** These criteria are in line with the Noise Insulation Regulations for new and existing roads- including the effect of additional construction and operational traffic on existing roads which is more generous than strictly required under the Noise Insulation Regulations
- **Table 1.1 Insulation criteria – Rail Noise:** The revised lower NMS eligibility thresholds are welcomed, and this may form part of an acceptable mitigation strategy in combination with the Rail NMS, if it is demonstrated the policy aim to exhaust all other forms of mitigation before considering enhanced insulation is demonstrably met. However, if the Rail NMS is not deliverable (which remains uncertain) then ESC also considers that the NMS thresholds for might need to be reduced further to offset this.
- **Table 1.1 Insulation criteria – Construction Noise:** The eligibility criteria for construction require the relevant criteria to be exceeded for: - *“10 or more days or nights in any 15 consecutive days or nights; or*
- *a total number of days or nights exceeding 40 in any 6 consecutive months.”*
ESC has asked the Applicant to confirm how this test is intended to be applied to construction periods which do not occur every day, such as Saturdays 13:00-19:00hrs.
- **Table 1.1 Temporary rehousing criteria:** Again, ESC has asked the Applicant to confirm how this test is intended to be applied to construction periods which do not occur every day, such as Saturdays 13:00-19:00hrs.
- **Table 1.1 Temporary rehousing for construction vibration:** ESC note that the criteria for temporary rehousing due to construction vibration is aligned with the SOAEL, this is a different approach to construction noise where the temporary rehousing is set at SOAEL +10dB.
- **Table 1.1 Operational Plant:** ESC has not reviewed the thresholds for this in detail to date. The derivation is unclear so ESC will be requesting clarification of this in the next round of queries to the Applicant. ESC has some concerns regarding the suitability of the thresholds and their alignment with the eventual operational noise limits in the DCO which will be discussed with the Applicant.
- **Table 1.1 Operational activity noise:** See above comment regarding Table 1.1.
- **Table 1.2 Construction Phase thresholds:** The thresholds in the NMS for provision of insulation and for temporary rehousing are taken from Annex E4 of BS5228. While the criteria are taken from a traceable standard ESC are concerned that these thresholds could still permit noise levels which would cause significant adverse impacts to residents of the affected houses. For example, external construction noise at a level of 84 dB $L_{Aeq,t}$ in gardens would not trigger the rehousing thresholds but would be well over the SOAEL. ESC are in

discussions with the Applicant about options to adopting lower thresholds within the NMS, given the prolonged duration of the construction works.

8.12 Updated Mitigation Routemap [\[REP2-058\]](#)

ESC would just like to make a few comments in respect of Air Quality at this stage:

- **Emission standards for HGVs:** The wording has been updated within the CoCP and will need updating within the Mitigation Routemap for consistency.
- **NRMM:** Wording on NRMM has been updated within the CoCP and will need updating within the Mitigation Routemap for consistency.
- **General:** ESC requests that the Mitigation Routemap is updated to specify that Construction Environmental Management Plans (CEMPs) will be agreed with ESC in advance of works.

In relation to the Main Development Site we note reference to 'Deed of Obligation' in place of Section 106 Agreement, this remains under discussion and responses to the ExA first written questions on section 106 have been submitted at this deadline.

ESC welcomes the additional requirements proposed but is still seeking further revisions /amendments / additions in relation to coastal matters.

MDS-T1 – Pillbox Field access road. ESC's preference is for Option 1 not Option 2 in Vol.1 Ch.2 of the ES Addendum.

MDS-T12 – Transport contingency fund. ESC welcome inclusion of a transport contingency fund to be made available to the Transport Review Group.

MDS-NV7 – Noise and vibration. ESC is still discussing with the Applicant at which trigger point the Noise Mitigation Scheme will be required to implemented. This comment applies throughout this document for all references to the Noise Mitigation Scheme.

MDS-TE57 – Terrestrial Ecology Monitoring and Mitigation Plan. ESC welcomes the inclusion of this plan and the new Requirement, in particular addition of 'and Mitigation'.

MDS-GSW9 / 14 / 15 / 18 /24 / 28 / CC18, – ESC welcomes inclusion in Requirement 7 of Water Monitoring and Response Strategy.

6.3 Updated Vol. 2 Ch. 2 Appendix 2A of the ES – Outline Drainage Strategy [[REP2-033](#)]

ESC note and support the introduction of the Temporary Marine Outfall (TMO) in the Outline Drainage Strategy but the parameters will need to be clearly identified and justified with supporting evidence to prevent impacts on the nearby sensitive environment. Further detail is still awaited from the Applicant with regard to how surface water is proposed to be managed for the main development site and associated development sites. Until these details are received and discussed with SCC as Lead Local Flood Authority, it is not possible to make any further comment on the Applicant's submission.

8.4 Planning Statement Update Rev. 01 [[REP2-043](#)]

ESC note the update to the original Planning Statement that centres on policy changes and policy clarification since the original DCO submission. In particular, we note:

- Updates on policy: Energy White Paper, Ten Point Plan for a Green Industrial Revolution, National Infrastructure Strategy, Response to the National Infrastructure Assessment, Carbon Budget.

The submission reiterates need for new nuclear in light of the above developments since the initial DCO submission, it also notes the Energy White Paper 'helpfully establishes' that the current NPSs will continue to provide a proper basis on which PINS and ExA can make decisions on DCO applications. ESC does not disagree with this statement.

- Update on recent relevant decisions and judgements like the Drax case and conclusions of the ExA on Wylfa.

ESC notes the inclusion of these references.

- Section 4 covers implications for the application of NPS policy (essentially clarifying the approach set out in the planning statement [[APP-590](#)]) about whether there has been any change in circumstances since the designation of the NPS specifically in relation to need and the Strategic Siting Assessment (p19).

- P21 introduces discussion of BEIS modelling to understand extent of need for new nuclear generation and to consider what contribution Sizewell C would need to make.
- Covers new papers like BEIS - Modelling 2050 – electricity system analysis (December 2020), BEIS - Updated energy and emissions projections 2019 (October 2020).
- Appendix B covers adoption of ESC new local plan. DCO submission happened during modifications stage and relied on draft local plan which has since been modified and adopted. P35 covers Inspector’s recommendations to tweaking policy SCLP3.4 on major energy projects from the modifications stage of plan making. P37 covers the insertion of a new paragraph on SCLP10.4 on landscape character, specifically development in the Suffolk Coast and Heaths AONB.

ESC does not disagree with the document’s conclusion that the extent of amendments to these policies was relatively minor and it is considered that the Sizewell C Project continues to be consistent with relevant local planning policy, and that revised text in the new local plan enhances the consistency of the draft policies with that set out in the NPS. Therefore, the assessments made within the original planning statement continue to be appropriate and as referred to in the submitted LIR. [\[REP1-045\]](#)

8.4| Implementation Plan Update Rev. 02 [\[REP2-043\]](#)

ESC appreciate the inclusion of the Caravan Park and Rail Infrastructure in the delivery of mitigating measures.

Discussion over use of a Deed of Obligation is continuing, please see our responses to the Applicant’s responses to the ExA’s first written questions on the s106.

We note minor revisions to the indicative phasing schedule and appreciate inclusion of a new section on Main Development Site: Mitigation.

ESC note introduction of a section on pre-commencement and enabling works and welcome further discussion with the Applicant on what will be permitted during this phase and whether such works will be covered by requirements.

9.27 Second Notification of Proposed Project Changes June 2021 [\[REP2-131\]](#)

ESC note the Applicant is proposing to submit a further project change submission and that they consider the proposed changes to be not material. ESC agree that the proposed changes would not constitute a materially different project.

It is noted that there is currently a public consultation taking place on the proposed changes and will close for public comment at midday on 12 July.

It is acknowledged that the Applicant intends the changes to enhance the application.

ID	Description	Impact on Order Limits	ESC comments
Proposed Change 16: Lover’s Lane and Main Development Site Access Works			
i	<p>Public Right of Way (PRoW) change (Bridleway 19) and the relocation of Pegasus crossing A change to PRoW Bridleway 19 to propose a different alignment of the bridleway south of the new B1122/Lover’s Lane junction. In addition, the Pegasus crossing proposed on Lover’s Lane (south of the existing Recycling Centre) would be relocated approximately 10m further to the south.</p>	None	ESC defer to SCC to comment on the specifics of this proposed change.
ii	<p>The removal of trees from the tree belt adjacent to Bridleway 19 at its southern end (north of Sizewell Gap) This is to ensure the appropriate width for Bridleway 19 can be accommodated with the least environmental impact.</p>	None	ESC will examine this aspect fully if accepted as a change. Removal of trees is only acceptable where essential, our preference would be retention where possible.
iii	<p>Mammal culvert A change to reposition the proposed mammal</p>	None	Noted.

	culvert south of the Leiston Drain watercourse.		
Proposed Change 17: Two village bypass			
i	Flood relief culverts A change to reduce the length of the flood relief culverts through the eastern embankment of the River Alde overbridge, and associated changes to the adjacent accommodation track and drainage basin.	None	ESC defer to SCC as the local highway authority and lead local flood authority. ESC defer to the Environment Agency to provide flood risk expertise in this area.
ii	PRoW change (removal of bridleway upgrade) Removal of the proposed upgrade of existing footpaths E-243/003/0 and E-243/011/0 to a bridleway from the two village bypass proposals. The Order limits would be reduced as a result of this change.	Reduction	ESC defer to SCC as local highway authority for public right of way input.
iii	PRoW change (Friday Street roundabout) A change to the PRoW plans (and the Draft Development Consent Order) to show a crossing of the eastern arm of the proposed Friday Street roundabout. The crossing would connect the existing A1094 to the existing A12, both of which are proposed to be permanently converted to Non-Motorised User use.	None	ESC defer to SCC as local highway authority but support opportunities to support freedom of movement of non-motorised users.
Proposed Change 18: Sizewell link road			
i	Pretty Road bridge A change from a Non-Motorised User bridge to a vehicular bridge to avoid the closure of Pretty Road and increase connectivity across the route of the Sizewell link road. The junction	None	ESC appreciates that the previous loss of this access caused concern amongst users, we therefore welcome the Applicant's proposal for an alternative which would improve connectivity from the

	between Pretty Road and the Sizewell link road on the south west side of the route is therefore no longer to be included in the proposals.		previous iteration. SCC as local highway authority will comment on the detail.
ii	PRoW Changes to ensure that the PRoW proposals provide safe crossing points and reflect topography.	None	Noted. SCC will lead on Public rights of way.
iii	Gravity drainage solution An increase to the Order limits to allow for a gravity drainage solution to be achieved to the west of the East Suffolk line.	Increase (compulsory acquisition powers would be required)	Noted. SCC as lead local flood authority will lead on highway drainage.
iv	Highway works - B1122 near Brown's Plantation A change to the road layout where the Sizewell link road joins to the B1122 near Brown's Plantation to address a departure from the Design Manual for Roads and Bridges ('DMRB') standards.	None	Noted. SCC will lead as local highway authority.
v	Highway works - B1122/25 link A change to the road layout and carriageway level at the B1122/25 link to address a departure from DMRB standards. The proposed increase of the carriageway levels would also help to achieve a gravity drainage solution in this part of the site.	Increase (no compulsory acquisition powers would be required over this highway land)	Noted. SCC will comment on the detail as local highway authority and lead local flood authority.
vi	Highway works – Hawthorn Road An extension to the Order limits to allow tie in works to the Sizewell link road.	Increase (no compulsory acquisition	Noted. SCC will comment on the detail as local highway authority.

	It is also proposed to make minor revisions to the limits of deviation where the Sizewell link road joins Hawthorn Road to allow for improved tie ins with the existing highway.	powers would be required over this highway land)	
vii	<p>Highways works – Middleton Moor roundabout</p> <p>An extension to the Order limits to allow tie in works to the Sizewell link road.</p> <p>It is also proposed to make minor revisions to the limits of deviation at the Middleton Moor roundabout to allow for improved tie ins with the existing highway.</p>	Increase (no compulsory acquisition powers would be required over this highway land)	Noted. SCC will comment on the detail as local highway authority.
viii	<p>Minor revisions to the limits of deviation -</p> <p>to allow for an improved tie in with the existing highway are proposed at Trust Farm Link/B1122 junction, Moat Road junction and at the eastern end of the Sizewell link road where it joins the existing B1122.</p>	None	Noted. SCC will comment on the detail as local highway authority.