



**Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for  
The Sizewell C Project**

**The Examining Authority's written questions and requests for information (ExQ1)**

**PART 1 OF 6**

Chapter 2 G. 1	<a href="#">General and Cross-topic Questions</a>
Chapter 3 Ag.1	<a href="#">Agriculture and soils</a>
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ExQ1      Question to:      Question:		
Chapter 2 - G.1 General and Cross-topic Questions		
G.1.0	The Applicant	<p><b>Limits of deviation</b></p> <p>As drafted the DCO has no limitation on the depth to which works could be undertaken. Please explain how this aligns with the assessment carried out within the ES.</p> <p>In order to reflect the assessment within the ES does the DCO not require a maximum depth of excavation – with a potential for a limit of deviation? If this is not considered to be necessary, please explain how the ES has assessed the potential effects of unlimited excavation.</p>
	Response by SZC Co. at Deadline 2	<p>The depth of excavations at the main development site, where relevant, is described within the Description of Construction chapter of the <b>Environmental Statement</b> (ES) (e.g. refer to <b>Volume 3, Appendix 2.2.B</b> of the <b>ES Addendum</b>, paragraphs 3.4.30, 3.4.176, 3.4.184 [<a href="#">AS-202</a>]).</p> <p>Requirement 8 of the <b>draft Development Consent Order (DCO)</b> (Doc Ref. 3.1(C)) sets out the requirement for the construction works to be undertaken in general compliance with the Construction Method Statement (which comprises the <b>Volume 2, Chapter 3</b> (Description of Construction) of the <b>ES</b> (refer to <b>Volume 3, Appendix 2.2.B</b> of the <b>ES Addendum</b> (Doc Ref. 6.14(A) for the latest version). Any material exceedence of the depths of excavations described would therefore be a breach of Requirement 8. The DCO as drafted does therefore effectively limit the depth to which works could be undertaken.</p> <p>The ES has assessed the works as described within the Description of Construction chapter of the ES.</p>
	Response by East Suffolk Council at Deadline 2	<p>ESC shares the ExA's concerns in relation to the apparent lack of limits of deviation in the draft DCO [<a href="#">APP-059</a>]. As currently drafted, Article 4 allows for unlimited vertical limits of deviation, except for works 4C, 11 and 12 for which there are some restrictions. This is troubling as it appears to potentially allow works of any vertical limits of deviation, potentially without this having been environmentally assessed. ESC would welcome an explanation from the Applicant about how, if there are to be restrictions, these are to operate, and if there are not any restrictions, how the extent of excavations has been environmentally assessed.</p>

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2 however, for further detail, please also refer to SZC Co.'s response to <b>Question DCO.1.21</b> <a href="#">[REP2-100]</a> and the associated <b>Appendix 14I – DCO Drafting Note 9</b> <a href="#">[REP2-111]</a> , which includes reference to the limits of deviation of the Associated Development sites, submitted at Deadline 2
	Response by East Suffolk Council at Deadline 3	ESC's view is that Requirement 8 appears to relate only to Work No.1. It limits the building and use of the buildings comprised in Work No.1 to be in 'general accordance with' the Construction Method Statement and the Main Development Site Construction Parameter Plans. Firstly, ESC queries the use of the term, 'in general accordance' and considers that this is too vague for a commitment to be meaningful and would welcome the wording being amended to 'in accordance'. In addition, although ESC can see that the Main Development Site Construction Parameter Plans (as submitted for Deadline 2: <a href="https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-004671-D2%20-%20Sizewell%20C%20Project%20-%20Other-%20Updated%20Main%20Development%20Site%20Construction%20Parameter%20Plans.pdf">https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-004671-D2%20-%20Sizewell%20C%20Project%20-%20Other-%20Updated%20Main%20Development%20Site%20Construction%20Parameter%20Plans.pdf</a> ) do show some heights, these relate to 'height and working parameters required during the construction phase' and do not relate to finished building heights. The plans also identify 'general' and 'exceptional' condition heights which vary substantially and ESC has not been able to find an explanation of this within the application documents. Could the Applicant please provide a further explanation of this? ESC also considers that the Applicant has not responded to question G.1.0 in full. The question appears to require information on the depth of excavation which the Applicant's answer does not appear to cover.
	<b>Response by SZC Co. at Deadline 5</b>	<p>A definition of typical and exceptional heights during the construction phase is set out at Section 4.1 of the <b>Construction Method Statement</b> <a href="#">[REP3-105]</a>.</p> <p>A further response to limits of deviation is now also set out in SZC Co's <b>Written Summaries of Oral Submissions made at ISH1: Draft DCO and Section 106 Agreement/Deed of Obligation (6 July 2021)</b>, which has been submitted at Deadline 5 (Doc Ref. 9.41).</p>

ExQ1	Question to:	Question:
		Requirement 8 has also been updated to secure the Construction Parameter Plans with 'in accordance'. The sequence of the construction phasing set out in the Construction Method Statement is then secured by 'general accordance', which secures that the sequence of construction would be substantively consistent with the details set out.
G.1.1	The Applicant	<p><b>Plans</b></p> <p>The Planning Statement, Plate 3.2, identifies the nominated site area for Sizewell C from NPS EN-6. Please provide a set of the Figures from the original Government Appraisal of Sustainability for the site, and an overlay of the DCO Application site highlighting any additional land included or excluded from that assessed including identification of the temporary construction area.</p>
	Response by SZC Co. at Deadline 2	Please refer to <b>Figures 2.1</b> and <b>2.2</b> appended to <b>Part 1</b> . Please also refer to the response to Question G.1.10 in Part 1.
	Response by Together Against Sizewell C at Deadline 3	The Applicant states "Please refer to Figures 2.1 and 2.2 appended to Part 1. Please also refer to the response to Question G.1.10 in Part 1." But no Figures 2.1 and 2.2 are appended to Part 1 of ExQ1 and TASC have been unable to find the overlays elsewhere, so where can these be found?
	<b>Response by SZC Co. at Deadline 5</b>	<b>Figures 2.1</b> and <b>2.2</b> referenced within SZC Co. response to <b>Question G.1.1</b> are provided within <a href="#">REP2-101</a> .
G.1.2	The Applicant	<p><b>Plans</b></p> <p>On an appropriately scaled ordnance survey plan show the land within the DCO for the main development site and the lines of latitude and longitude referred to in paragraph C.8.88 of NPS-6 Vol II.</p>
	Response by SZC Co. at Deadline 2	Please refer to Figure 2.3 appended to Part 1.

ExQ1	Question to:	Question:
	Response by Together Against Sizewell C at Deadline 3	G.1.2 The response states: "Please refer to Figure 2.3 appended to Part 1" As above, there is no Figure 2.3 appended to Part 1
	<b>Response by SZC Co. at Deadline 5</b>	<b>Figure 2.3</b> referenced within SZC Co. response to <b>G.1.2</b> is provided within <a href="#">REP2-101</a> .
G.1.4	The Applicant	<p><b>Policy approach</b></p> <p>The Planning Statement, section 1.7, provides a summary of the Applicant's approach to legislation and policy. Section 3 sets out those matters in more detail. Please provide an update to and/or expansion of that approach including reference to any subsequent Government responses or publications and the changes made to the original application.</p>
	Response by SZC Co. at Deadline 2	<p>The <b>Planning Statement Update</b> (Doc Ref 8.4Ad) provides an update of the planning policy position set out in the <b>Planning Statement</b> [<a href="#">APP-590</a>]. It presents a review of relevant changes and developments in national policy and law which have arisen since the submission of the application in May 2020 and how they may affect the approach to decision making presented in the <b>Planning Statement</b>.</p> <p>This includes a review and assessment of the implications of the following:</p> <ul style="list-style-type: none"> <li>• Updated Energy and Emissions Projections 2019 (October 2020)<sup>1</sup></li> <li>• Government response to CCC progress report (October 2020)<sup>2</sup></li> <li>• The Ten Point Plan for a Green Industrial Revolution (November 2020)<sup>3</sup></li> </ul>

<sup>1</sup> DBEIS (2020) Updated Energy and Emissions Projections 2019 (October 2020) Available at: <https://www.gov.uk/government/collections/energy-and-emissions-projections>

<sup>2</sup> DBEIS (2020) Government response to CCC progress report (October 2020). Available at: <https://www.gov.uk/government/collections/government-responses-to-the-committee-on-climate-change-ccc-annual-progress-reports>

<sup>3</sup> HM Government (2020) The Ten Point Plan for a Green Industrial Revolution (November 2020). Available at: <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>National Infrastructure Strategy (November 2020)<sup>4</sup></li> <li>Response to the National Infrastructure Assessment (November 2020)<sup>5</sup></li> <li>The Sixth Carbon Budget: The UK's path to Net Zero (December 2020)<sup>6</sup></li> <li>Energy White Paper – Powering our Net Zero Future (December 2020)<sup>7</sup></li> </ul> <p>The <b>Planning Statement Update</b> also addresses the outcome of challenges in the Courts to the DCO decision on the proposals for two gas-fired generating units at the Drax Power Station, which have arisen since the preparation of the Planning Statement as well as a review of the recommendation report of the ExA on the Wylfa Newydd Power Station Project published after the withdrawal of the application.</p> <p>The <b>Planning Statement Update</b> considers the implications of the above for the application of the NPS policy to the Sizewell C Project.</p> <p>The changes made to the application do not affect the approach and interpretation of legislation or policy set out in the Planning Statement as updated by the Planning Statement Update.</p>
	Response by Together Against Sizewell C at Deadline 3	<p>The response refers to various government statements which we address in the same order, also considering the Applicant's June 2021 Document 8.4 Planning Statement Update ('8.4U') [REP2- 042].</p> <p>Refer to <a href="#">REP3-139</a> for full response.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. notes TASC's disagreement with government policy; including with the direct statement in the Energy White Paper (at page 55) that "<i>the need for the energy infrastructure set out in energy NPS remains</i>".</p>

<sup>4</sup> HM Treasury (2020) National Infrastructure Strategy (November 2020). Available at: <https://www.gov.uk/government/publications/national-infrastructure-strategy>

<sup>5</sup> HM Treasury (2020) Response to the National Infrastructure Assessment (November 2020). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/937949/Response\\_to\\_the\\_NIA\\_final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/937949/Response_to_the_NIA_final.pdf)

<sup>6</sup> CCC (2020) The Sixth Carbon Budget: The UK's path to Net Zero (December 2020) Available at: <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

<sup>7</sup> DBEIS (2020) Energy White Paper – Powering our Net Zero Future (December 2020). Available at: <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

ExQ1	Question to:	Question:
G.1.5	The Applicant	<p><b>Policy approach</b></p> <p>The Planning Statement, paragraph 3.9.11, identifies matters identified in the NPSs as not relevant for the decision-maker, principally because they have already been considered by the Government or because they are subject to control through other regimes. Please explain further why those matters should not be regarded as relevant considerations?</p>
	Response by SZC Co. at Deadline 2	<p>The individual matters identified in paragraph 3.9.11 of the <b>Planning Statement</b> [APP-590] are addressed in turn below.</p> <p><b>The need for the NSIP (NPS EN-1 paragraph 3.1.3)<sup>8</sup></b></p> <p>The national need for energy NSIPs, including new nuclear power stations, is a matter for consideration by Government through the process of National Policy Statement ("NPS") policy-making and review under the Planning Act 2008 ("PA 2008")<sup>9</sup>. The terms of the policy and its implications for the consideration of need in this case are clear. Recent decisions of the court have emphasised that it is not the role of an examination into an individual application for development consent to consider the merits of that policy or whether it is up to date.</p> <p>As the Supreme Court has explained in <i>R (Friends of the Earth Ltd.) v. Heathrow Airport Ltd.</i><sup>10</sup>, and as reflected in the Judgments of the High Court<sup>11</sup> and Court of Appeal<sup>12</sup> in <i>R (ClientEarth) v. Secretary of State for Business, Energy and Industrial Strategy</i>, the objective of the separate statutory system for decision-making on NSIPs under the PA 2008 was for policies on matters such as the need for infrastructure to be formulated and tested through the process leading up the decision to adopt a NPS, and to that extent would not be open to challenge through subsequent</p>

<sup>8</sup> Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1). (London: The Stationary Office, 2011)

<sup>9</sup> Parliament of the United Kingdom. Planning Act 2008. (London, 2008)

<sup>10</sup> [2020] EWCA Civ 214, paragraphs 20 to 28. Available at: <https://www.judiciary.uk/wp-content/uploads/2020/02/Heathrow-judgment-on-planning-issues-27-February-2020.pdf>

<sup>11</sup> [2020] EWHC 1303 (Admin), paragraphs 26 to 3. Available at: <https://www.judiciary.uk/wp-content/uploads/2020/02/Heathrow-judgment-on-planning-issues-27-February-2020.pdf>

<sup>12</sup> [2021] EWCA Civ 43, paragraph 105. Available at: <https://www.judiciary.uk/wp-content/uploads/2020/02/Heathrow-judgment-on-planning-issues-27-February-2020.pdf>

ExQ1	Question to:	Question:
		<p>consenting procedures<sup>13</sup>. As Holgate J explained, one of the underlying principles reflected in the PA 2008 was that:</p> <p><i>"New evidence, such as a change in circumstances since the policy was adopted, would be addressed by the Secretary of State making a revision to the policy, in so far as he or she judged that to be appropriate"</i> ([31]).</p> <p>Section 6 of the PA 2008 is of central importance in this respect. Holgate J summarised the implications of section 6 within the overall statutory framework as follows:</p> <p><i>"Thus the 2008 Act proceeds on the legal principle that significant changes in circumstances affecting the basis for, or content of, a policy may only be taken into account through the statutory process of review under s.6 (Spurrier at [108])."</i> ([38])</p> <p>The role of section 6 as an exclusive means of considering these matters is reflected in the restrictions to be found in sections 87(3), 94(8) and 106(1) of the PA 2008. The effect of this was summarised by Holgate J at paragraphs 106 to 108 as follows:</p> <p><i>"The merits of policy set out in a NPS are not open to challenge in the examination process or in the determination of an application for a DCO. That is the object of ss.87(3), 94(8) and 106(1).</i></p> <p><i>Furthermore, section 104(7) cannot be used to circumvent s.104(3), so, for example, where a particular NPS stated that there was a need for a particular project and ruled out alternatives, it was not permissible for that subject to be considered under s.104(7), even where a change of circumstances has occurred or material has come into existence after the designation of the NPS (see <u>Thames Blue Green Economy Limited</u> [2015] EWHC (Admin) at [8] to [9] and [37] to [43] and [2016] JPL 157 at [11] to [16]; <u>Spurrier</u> at [103] to [105] and [107]).</i></p> <p><i>This inability to use s.104(7) to challenge the merits of policy in a NPS also precludes an argument that there has been a change in circumstance since the policy was designated so that reduced, or even no, weight should be given to it. Although that is a conventional planning argument in development control</i></p>

<sup>13</sup> See also paragraph 3.2.2 of the Planning Statement and the reference to what was said about this issue in the contemporaneous Nuclear White Paper in 2008.



ExQ1	Question to:	Question:
		<p><i>under the TCPA 1990, it "relates to the merits of policy" for the purposes of the PA and therefore is to be disregarded. The appropriate procedure for dealing with a contention that a policy, or the basis for a policy, has been overtaken by events, or has become out of date, is the review mechanism in s. 6 (Spurrier at [107] to [108])."</i></p> <p>That approach was subsequently upheld by the Court of Appeal<sup>14</sup>.</p> <p>Whilst the <b>ClientEarth</b> case was concerned with an application determined under section 104, that does not affect the application of the legal principle identified by Holgate J at paragraph 38. Sections 6, 87(3), 94(8) and 106(1) apply equally to applications dealt with under section 105.</p> <p>As the <b>Planning Statement Update</b> (Doc Ref 8.4Ad) explains, in this case the issue of need has been determined in NPS EN-1, which remains extant Government policy unless and until replaced. Insofar as any issue arises as to whether the assessment of need in the NPS is up to date, that is a matter exclusively for the Government to consider through the process of NPS review pursuant to section 6 of the PA 2008. It is not a matter that can or should be determined on a case-by-case basis in response to individual applications for development consent.</p> <p>The identification of a need for a particular type of development in a NPS which remains extant does not disappear (or change in any material way) simply because an individual application is being considered pursuant to section 105 rather than section 104. The existence of the need is settled by extant Government policy, and the statutory provisions identified above makes clear that the Secretary of State may disregard representations which go to the merits of policy set out in a NPS.</p> <p><b>The availability of alternatives to the proposed development – either in terms of alternative technologies or alternative sites. In particular, the NPSs are clear that they do not create any requirement to consider alternatives; that there are no alternatives to the sites listed and that these sites are not to be regarded as alternatives to one another (NPS EN-1 paragraph 4.4.1 and EN-6 paragraphs 2.4.3 and 2.5.4).</b></p>

<sup>14</sup> See paragraphs 100, 103 and 105.

ExQ1	Question to:	Question:
		<p>Where there is a legal obligation to consider alternatives in this case, the relevant obligation has been identified in response to <b>AI.1.0</b> and an explanation provided as to how it has been complied with.</p> <p>The NPS does not contain any policy obligation to consider alternatives to the proposed development. That policy position remains unchanged whether an individual application falls to be considered pursuant to section 104 or section 105. It is a matter determined by what the policy says (the interpretation of which is a matter of law), and the meaning of policy cannot change from one application to another.</p> <p>In this case, there are three particular factors which mean that the availability of alternatives would not otherwise be "<i>important and relevant</i>" for the purposes of section 105(2)(c)<sup>15</sup> in this case.</p> <p>The first is the fact that the Government has considered the issue of alternatives (both alternatives to new nuclear generating capacity and alternative sites for new nuclear power stations) in the policy-making process (see e.g. NPS EN-1 sections 2 and 3, and EN-6 sections 2.4 and 2.5). The examination of an individual application for development consent cannot properly be used as a vehicle for questioning the merits of the policy which has emerged through that process<sup>16</sup>. The failure to appreciate the latter point, and its legal consequences, led the Examining Authority in the <b>ClientEarth</b> (Drax) case into forbidden territory and thus legal error<sup>17</sup>.</p> <p>The second and related factor is that the Government is now actively engaged in the process of considering alternatives through its review of the NPS and preparation of a new NPS for nuclear power. As a consequence, if the ExA and the Secretary of State sought to consider those matters themselves in determining an individual application for development consent, they would necessarily be trespassing on – and duplicating – that</p>

<sup>15</sup> And thus an obligatory consideration under section 105(2).

<sup>16</sup> As the Supreme Court noted in the **Heathrow** case at paragraphs 27 to 28, the PA 2008 imposed for the first time a transparent procedure for the public and other consultees to be involved in the formulation of national infrastructure policy in advance of any consideration of an application for a DCO. The draft NPS must go through an appraisal of sustainability, public consultation and publicity, Parliamentary scrutiny and Strategic Environmental Assessment before it can be designated. The rigour, transparency and democratic accountability involved in that process is an important factor in understanding why it is inappropriate and unlawful for the ExA or an individual Secretary of State to seek to use an examination into a particular proposal to bypass those statutory processes and undertake a non-statutory review the merits of such a policy.

<sup>17</sup> See per Holgate J at paragraphs 129 to 136.

ExQ1	Question to:	Question:
		<p>process<sup>18</sup>. In the meantime, the Government has provided a clear statement of its position in the Energy White Paper:</p> <p><i>"This white paper shows that the need for the energy infrastructure set out in energy NPS remains, except in the case of coal-fired generation. While the review is undertaken, the current suite of NPS remain relevant government policy and have effect for the purposes of the Planning Act 2008. They will, therefore, continue to provide a proper basis on which the Planning Inspectorate can examine, and the Secretary of State can make decisions on, applications for development consent."</i><sup>19</sup></p> <p>Not only would any duplication of the NPS review and preparation process be inappropriate as a matter of legal principle (see paragraphs 3 to 6 above) and incompatible with the clear statement made in the Energy White Paper, it would also be something for which the process for examining an individual proposal is manifestly unsuited. The ExA could not, for example, properly be asked to review all of the myriad factors involved in forecasting energy demand, balancing issues of energy-security, deliverability, comparative environmental and economic impact etc. required to determine what types of energy generation are required across the United Kingdom over future decades, and at what scale. Nor could it properly be asked to undertake its own review of the comparative merits, impacts and deliverability of the individual sites being considered by the Government in the process of formulating a new NPS for nuclear power. These obvious difficulties were intended to be – and were – overcome by the PA 2008 (see, for example, what was said by the Supreme Court in the <b>Heathrow</b> case at paragraph 21).</p> <p>The third factor is that, even if the ExA was persuaded that for some reason it was subject to a legal obligation to consider alternatives beyond those identified in response to EXAQ Al.1.0, the principles identified in paragraph 4.4.3 of EN-1 would still fall to be applied</p>

<sup>18</sup> The Government's Response to consultation on siting criteria and process for a new NPS for nuclear power (July 2018) explained at paragraph 2.10 that "Government considers that the need for nuclear remains and that the overarching process to assess the potential suitability of sites at a national strategic level prior to statutory licensing and permitting continues to be appropriate". It also explains that the new NPS will identify the sites which are potentially suitable for the deployment of a new nuclear power station between 2026-2035 (p. 10).

<sup>19</sup> P. 55

ExQ1	Question to:	Question:
		<p>having regard to the established level and urgency of the need for new nuclear generating. These principles include, amongst other things, the following:</p> <p><i>"Where, as in the case of nuclear, there is reason to suppose that the number of sites suitable for deployment on the scale and within the period of time envisaged by the relevant NPSs is constrained, the [ExA] should not reject an application for development of one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals."</i></p> <p>In the case of new nuclear the conclusion reached by Government and set out in NPS EN-6 at paragraph 2.5.4 was that it does not believe that there are any alternative sites to those listed that meet the requirements of the NPS. Subject to any contrary legal requirements, the decision-maker should judge an application on a listed site on its own merits and a comparison with any other listed site is unlikely to be important to its decision (paragraph 2.5.5).</p> <p>If the ExA wished to depart from that settled policy approach, it would first need to undertake its own assessment of how many new nuclear power stations are needed and the degree of urgency with which they are needed. It would then have to undertake its own review of the comparative merits of the potentially available sites. That is quite clearly a matter that is exclusively for the Government to consider through the section 6 policy review process, and not one that is suitable of appropriate for this examination (see above).</p> <p>The Government has made clear in the 2020 Energy White Paper that, having regard amongst other things to the associated energy security and climate change benefits, its policy is to bring at least one large scale new nuclear power station to the point of a Final Investment Decision by the end of the current Parliament<sup>20</sup>. As the Updated Planning Statement (Doc Ref 8.4Ad) explains, only Sizewell C is capable of meeting that objective. No Interested Party has identified an alternative site which is capable of doing so.</p>

ExQ1	Question to:	Question:
		<p>In the meantime, the Government has made clear that sites listed in EN-6 on which a new nuclear power station is anticipated to deploy after 2025 will continue to be considered appropriate sites and retain strong Government support during the designation of the new NPS<sup>21</sup>.</p> <p><b>The effects of any necessary Grid connection which can be promoted and assessed separately where this makes sense in terms of timescale and the delivery of the Sizewell C Project (EN-1 paragraph 4.9.2)</b></p> <p>The approach to Grid connection set out in section 4.9 of NPS EN-1 is of general application and there is no basis on which a different approach could properly be said to be warranted depending on whether a particular application for a generating station fell to be determined under section 104 or section 105. None of the considerations identified in section 4.9 would be any different in either case.</p> <p>Although the Planning Statement makes reference to the effects of any necessary Grid connection being promoted and assessed separately, that is of course subject to the acknowledged need to provide sufficient information to comply with the requirements of the EIA Directive including undertaking an assessment of the indirect, secondary and cumulative effects, which will encompass information on grid connections. Similarly, SZC Co. recognises that it must satisfy the decision-maker that there are no obvious reasons why the necessary approvals for the grid connection are likely to be refused (EN-1, paragraph 4.9.3).</p> <p>The Applicant has provided a Grid Connection Statement (Document 7.1) which addresses these matters. Further information is provided in response to Question Cu.1.20 and in the Statement of Common Ground with National Grid.</p> <p>In due course the necessary Grid connection will be subject to its own assessment in the usual way<sup>22</sup>.</p> <p><b>Matters covered by other regimes including pollution control (EN-1 paragraph 4.10.3)</b></p> <p>The approach set out in paragraph 4.10.3 of EN-1 to the relationship between the planning process and the control of processes, emissions or discharges is clear and</p>

<sup>21</sup> Government Response to Consultation on Siting Criteria and process for a new NPS for nuclear power, paragraph 3.10.

<sup>22</sup> As is reflected in the final part of paragraph 4.9.3 of EN-1.

ExQ1	Question to:	Question:
		<p>unambiguous. The approach applies equally to all energy NSIPs. It is also reflective of both the legal and policy position in the determination of applications for planning permission under the TCPA 1990, which has been held to apply to applications for development consent made pursuant to the PA 2008 (see <b><i>R (An Taisce (The National Trust for Ireland)) v. Secretary of State for Energy and Climate Change</i></b><sup>23</sup>. The reasons behind that approach are set out by the Government in paragraph 4.10.1 and 4.10.2, and the merits of the Government's policy position are not for debate in this examination (see above).</p> <p>The focus of attention in examining an application for development consent is on whether the development itself is an acceptable use of land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The ExA should, therefore, work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. It should act to complement but not seek to duplicate these parallel consenting regimes.</p> <p>The same approach is reflected in paragraph 183 of the NPPF, and the essential principle was summarised by Lindblom LJ in <b><i>Gladman Developments Ltd. v. SSCLG</i></b><sup>24</sup> as being that '<i>the planning system should not duplicate those other regulatory controls, but should generally assume they will operate effectively</i>'. He went on to explain that the policy in the NPPF to that effect '<i>was directed to situations where some proposed process or operation ... is subject to control under another regulatory regime ... its purpose was to avoid needless duplication between the two systems of statutory control</i>'<sup>25</sup>.</p> <p>The legal principle does not depend on whether the application is being determined pursuant to section 104 or section 105. It is a matter of general approach, applicable in all cases.</p> <p>Paragraph 4.10.7 of NPS EN-1 provides that the decision-maker should be satisfied that development consent can be granted taking full account of environmental impacts. The impacts on air quality, water quality, land quality etc. are fully assessed in the <b>ES</b> and <b>ES</b></p>

<sup>23</sup> [2013] EWHC 4161 at paragraphs 177 to 193

<sup>24</sup> [2020] Env. L.R. 15 at paragraph 43

<sup>25</sup> Paragraph 45

ExQ1	Question to:	Question:
		<p><b>Addendum</b>, and taken into account in the planning assessment contained in the <b>Planning Statement</b>. Paragraph 4.10.7 also identifies the limited extent to which it is appropriate for the decision-maker to consider matters regulated by the relevant pollution control network, and how it should approach this task in close co-operation with the relevant bodies.</p> <p>Paragraph 4.10.8 of the NPS provides that consent should not be refused on the basis of pollution impacts unless the decision-maker has good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. There are no good reasons to reach such a conclusion in this case.</p> <p><b>Safety matters which are subject to other regimes (EN-1 paragraph 4.11.3)</b></p> <p>Paragraph 4.11.3 provides that the same principles apply here as for those set out in section 4.10 on pollution control and other environmental permitting regimes. The same explanation therefore applies here but is not repeated.</p> <p><b>Health issues, in respect of which NPS EN-1 advises: "Generally those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refuse consents or require specific mitigation under the Planning Act 2008. However the IPC will want to take account of health concerns when setting requirements relating to a range of impacts such as noise" (EN-1 paragraph 4.13.5)</b></p> <p>Again, the same essential principle is engaged. To the extent that health issues are not subject to separate regulation, these are fully assessed in the <b>ES</b> and <b>ES Addendum</b><sup>26</sup>, taken into account in the planning assessment contained in the <b>Planning Statement</b>, and reflected in the suite of controls and mitigation that the Applicant has proposed.</p> <p><b>The question of whether effective arrangements exist to manage and dispose of nuclear waste, because this has been addressed by the Government and the Secretary of State should not consider it further (EN-6, paragraph 2.11.4).</b></p>

<sup>26</sup> See in particular ES Vol. 2, Chapter 28

ExQ1	Question to:	Question:
		<p>Annex B of NPS EN-6 sets out how the Government has satisfied itself that effective arrangements will exist for the management and disposal of the wastes produced by new nuclear power stations. The reasoning is summarised in section 2.11 of the NPS, leading to the conclusion in paragraph 2.11.4 that the decision-maker should not consider this matter further.</p> <p>The merits of that decision are not for consideration in this examination (see above).</p> <p>Furthermore, whether the Government is or is not satisfied that effective arrangements will exist is a matter of fact. The Government made its position on this point clear in the July 2018 Response to consultation on siting criteria and process for a new NPS for nuclear power:</p> <p><i>"Government policy is that before development consents for new nuclear power stations are granted, the Government will need to be satisfied that effective arrangements exist or will exist to manage and dispose of the waste they will produce. In 2011, the Government set out in the national Policy Statement for Nuclear Power Generation why it was satisfied that such arrangements will exist. The Government considered these conclusions in the production of the 2014 Implementing Geological Disposal White Paper and the draft National Policy Statement for Geological Disposal Infrastructure and continues to be satisfied that they apply."</i><sup>27</sup></p> <p><b>Security – where the Centre for the Protection of National Infrastructure, the Office for Civil Nuclear Security (now the Office for Nuclear Regulation) or the Department for Energy and Climate Change (now the Department for Business, Energy &amp; Industrial Strategy) are satisfied that security issues have been adequately addressed in the Sizewell C Project when the application is submitted to the Secretary of State and have confirmed this to the Secretary of State (EN-1 paragraph 4.15.3).</b></p> <p>Paragraph 4.15.3 of NPS EN-1 both explains and justifies the approach to be taken to security considerations when examining applications for development consent for new energy NSIPs. The merits of that approach are not for consideration through this examination (see above).</p>

<sup>27</sup> Paragraph 3.27



ExQ1	Question to:	Question:
		<p>The application is subject to the requirements of the Nuclear Industries Security Regulations (2003) Ionising Radiation Regulations and Security Assessment Principles (SyAPS), 2017 and will be assessed by the Office for Nuclear Regulation Civil Nuclear Security and Safeguards. SZC will need to satisfy the requirements of the SyAPS to allow construction, operation and decommissioning.</p> <p>In accordance with paragraph 4.15.3, the ExA should not need to give any further consideration to the details of the security measures in its examination.</p> <p><b>Emergency Planning (EN-6, paragraph 3.5.3)</b></p> <p>Paragraph 3.5.3 contains a list of 'Flags for Local Consideration' for the Office for Nuclear Regulation ("ONR"), and paragraph 3.5.4 makes clear that because these are for the ONR rather than the ExA to consider, they are not covered by detailed policy in the NPS. The list includes emergency planning, in respect of which the ONR will work together with the local authority or other Emergency Planning Authority.</p> <p>This should be considered together with section 2.7 of the NPS which explains the relationship between the regulatory framework for nuclear power stations and the planning regime. Paragraph 2.7.3 explains that when considering an application for development the ExA should act on the basis that the relevant licensing and permitting regimes will be properly applied and enforced, that it should not duplicate the consideration of matters that are within the remit of the nuclear regulators, and that it should not delay a decision as to whether to grant consent until completion of the licensing or permitting process. The Nuclear Regulators are responsible for, amongst other things, those matters listed in paragraph 3.5.3 (see paragraph 2.7.4).</p>
	Response by Together Against Sizewell C at Deadline 3	<p>G.1.5, G.1.6 and G.1.7 The Applicant's lengthy and detailed response to these questions and their repetitive detailed submissions to justify the need for new nuclear in their DCO application, seems to be at odds with the simple message the Applicant appears to be making that it is no business of PINS to consider the policy requirements for the need for Sizewell C. The Applicant does however give weight to the support of the existing set of National Policy Statements (NPSs) even though EN6 and EN1 are clearly out of date, as evidenced by the government's decision to review them. The Applicant also applies a very narrow definition of 'changes in relevant circumstances' when considering the Written Ministerial Statement referred to in the Rule 6 letter, certainly not one that TASC recognises when considering the changed circumstances since the NPSs were first introduced. To understand TASC's view of these matters, we</p>

ExQ1	Question to:	Question:
		refer PINS to our Policy and Need WR [REP2-481b], in particular pages 2-7 and TASC's review of EN6 Volumes I and II in appendices B and C. In order to clarify these issues, TASC request Policy and Need be the subject of an issue specific hearing.
	<b>Response by SZC Co. at Deadline 5</b>	No further response is proposed.
G.1.10	The Applicant	<p><b>Policy approach</b></p> <p>The Planning Statement, section 3.8, considers whether there has been a change in circumstances since the EN-6 site specific assessment. Please identify and list all changes to the site area/circumstances for the Sizewell C Project application compared to what was considered by EN-6.</p>
	Response by SZC Co. at Deadline 2	<p>This response is concerned directly with the matters covered by Section 3.8 of the <b>Planning Statement</b> [APP-590] (i.e. matters related to the site boundary). Plate 3.2 of the <b>Planning Statement</b> identifies the boundary of the site that was nominated into the SSA process by EDF Energy in March 2009 and contained within NPS EN-6 Volume II (at page 261).</p> <p><b>Figure 2.1</b> shows the comparative extent of the nominated site area and the application site boundary for the main development site. This shows that the main development site application boundary extends beyond the nomination site boundary to accommodate the whole of the temporary construction area (although this is in part within the nomination boundary), the Land east of Eastlands Industrial Estate, the Offshore Works Area and the Sizewell B Relocated Facilities and National Grid land (although again this is in part included within the nomination site boundary).</p> <p><b>Figure 2.2</b> overlays the extent of the Permanent Development Site Boundary (as shown on the Main Development Site Main Platform Proposed General Arrangement (Operations) drawing [APP-017]). This shows that the main platform is almost entirely contained within the original nomination site boundary - including the Nuclear Island, Conventional Island, Ancillary buildings, Cooling water pumphouses and associated infrastructure.</p>

ExQ1	Question to:	Question:
		<p>The only exceptions are minor differences where the main platform extends beyond the nomination boundary:</p> <ol style="list-style-type: none"> <li>1. to the south of the main platform where its boundary marginally extends beyond the nomination site boundary; and</li> <li>2. to the south west of the main platform. The nomination boundary was drawn to follow the line of the eastern bank of the Sizewell Drain which would be realigned. The application boundary, therefore, follows the straight western boundary of the platform.</li> </ol> <p>The majority of the other permanent development within the main development site is also contained within the extent of the nomination site boundary, including:</p> <ol style="list-style-type: none"> <li>1. Power Infrastructure (including Sizewell C pylons, Sizewell C monopoles, National Grid gantries and the National Grid substation)</li> <li>2. the Operational and ancillary car parks (and Off-site delivery checkpoint).</li> <li>3. Some of the Sizewell B relocated facilities (namely the Sizewell B outage car park at Pillbox Field)</li> </ol> <p>The exceptions to this are the marine works, the remainder of the Sizewell B relocated facilities and peripheral buildings (the Emergency equipment store, Back-up generator and Ancillary substation).</p> <p>The majority of land within the application site boundary for the main development site, but outside the nomination site boundary, is required for construction. The description of construction activities is provided within <b>Volume 3, Appendix 2.2.B</b> of the <b>ES Addendum</b> (Doc Ref. 6.14(A)) which at <b>Figure 2.2.33</b> <a href="#">[AS-191]</a> provides an illustrative construction masterplan. This shows the locations of the Site Entrance Hub, the Accommodation Campus, borrow pits, stockpile areas, contractor compounds, water management areas etc.</p> <p>The boundary of the nominated site in 2009 included (as described in EDF Energy's nomination report):</p> <p><i>"land in the Goose and Kenton Hills to provide for an access road and other facilities which may be located outside the nuclear power station boundary" as well as "a secondary area to the south of Sizewell A and B power stations, between Sizewell Wents and the hamlet of Sizewell. This area has been identified because it may be needed to accommodate ancillary facilities to meet operational requirements".</i> The</p>

ExQ1	Question to:	Question:
		<p>nomination also noted that other operational infrastructure would be required outside the boundary but could not yet be defined, stating <i>"It will be necessary to construct cooling water intake and outfall structures and possibly also coastal defences and marine off-loading facilities beyond this boundary. It is not possible to define these features in any detail at this time and their requirement, siting and design would be subject to detailed investigations at the local level. The appropriate measures to mitigate potential adverse environmental effects associated with these facilities would be considered during these detailed investigations"</i>.</p> <p><b>Figure 2.1</b> shows that some of the land identified in the nominated site boundary is not included within the application site boundary. This includes land at Kenton Hills which reflected the potential alignment of a site access road. The exclusion of this land from the application site boundary reflects the relocation of the access road north of Kenton Hills (to avoid increased land take within the SSSI) and relocation of the junction to a more favourable location. This change was reflected in EDF Energy's response to the nomination process in November 2018 which included a revised nomination site area (for a new nuclear NPS). This also identified other amendments since the 2009 nomination as a result of operational requirements including the increase in size of the foreshore area to tie into Sizewell B sea defence. The amended boundary also addressed the minor discrepancies between the extent of the main platform and the original 2009 nomination boundary to the south and south west (as noted above). Neither the nomination site submitted in 2009, nor the revised boundary in 2018 identify the full extent of the land required for construction activities.</p> <p>NPS EN-6 is clear that differences between the nomination site and the application site boundary are likely. Paragraph 2.3.3 advises:</p> <p><i>"The boundary of the nominated area may...vary from the site boundary that is proposed for development consent. It was not considered reasonable to expect nominators to have established, at the time of requesting nominations, detailed lay-outs for the whole of their proposed developments, including for example any additional land needed for construction or decommissioning."</i> Paragraph 2.3.4 goes on to state that: <i>"The SSA has therefore been carried out on the basis that applications for development consent may also include land additional to the boundary of the listed site for other elements of the power station, such as car parks, access roads or marine</i></p>

ExQ1	Question to:	Question:
		<p><i>landing facilities, or for the construction and/or decommissioning of the nuclear power station”.</i></p> <p>Paragraph C.8.117 then states, specifically in relation to Sizewell, that <i>‘the SSA has not assessed in detail proposals for associated works such as access roads. Such details could change without affecting the overall strategic suitability of the site. The Government believes that this type of proposal is more appropriately considered by the IPC’.</i></p> <p>In summary, in considering and comparing the nomination site boundary with the application site boundary for the main development site, it is important to note that:</p> <ul style="list-style-type: none"> <li>• The nomination site boundary was indicative at the time of that nomination.</li> <li>• The extent of the main platform as proposed is entirely within the nomination site boundary (with the exception of some minor boundary alignment).</li> <li>• Most other permanent development as proposed in the application is also within the nomination site boundary.</li> <li>• The NPS recognises that the application boundary may include additional land for other elements of the power station including for construction activities.</li> <li>• The majority of additional land within the main development site boundary is to accommodate construction activities.</li> <li>• The NPS confirms that details relating to construction were not assessed through the SSA process and such details could change without affecting the overall suitability of the site.</li> </ul> <p>The response to Question <b>AI.1.5</b> addresses the relationship of the nomination site boundary and the application site boundary further.</p>
	Response by Mr Ian Galloway at Deadline 3	<p>In answering G.1.10 the Applicant makes a number of statements that seem to question whether they have fully addressed the requirement on them to demonstrate they can accommodate the proposed development within the nomination site boundary. For example;</p> <ul style="list-style-type: none"> <li>a) “...the main platform is almost entirely contained within the original nomination site boundary...”</li> <li>b) “to the south of the main platform where its boundary marginally extends beyond the nomination site boundary;”</li> </ul>

ExQ1	Question to:	Question:
		<p>c) "The majority of the other permanent development within the main development site is also contained within the extent of the nomination site boundary..."</p> <p>d) "The majority of land within the application site boundary for the main development site, but outside the nomination site boundary, is required for construction."</p> <p>It seems to me that the proposed SZC does not sit within the nomination site boundary....period! Or am I missing something?</p> <p>In a similar connection, is it reasonable for the products of mitigating actions required as part of the permission process for Sizewell B, to be removed by SZC in order to obtain sufficient space for the current proposed development?</p> <p>If it is indeed reasonable (and permissible), what value do mitigations really carry for a project with an operational lifetime in excess of 60 years?</p>
	Response by Together Against Sizewell C at Deadline 3	<p>As stated in reference to G.1.1, Figures 2.1 and 2.2 could not be located, so TASC have been unable to comment on those figures and statements.</p> <p>However, as set out in TASC's Critical Review of EN6 Volumes I and II, appendices B and C to TASC's Policy and Need WR [REP2-481b], TASC are of the opinion that the size of the site and scale of the development in Suffolk Coast and Heaths AONB are materially different from that nominated by the applicant in EN6. Examples of our comments in TASC's review of EN6 Vol II, appendix C, relate to paragraphs C.8.80-.82: "According to the HRA Site Report for Sizewell para 2.7, the nominated site for the SZC development amounted to 117 hectares but the DCO application (8.4 Planning Statement para 2.2.1) states the main development site will be 371.7 hectares i.e. 317% the size of that nominated. Virtually all of this is included within the AONB and its hinterlands.</p> <p>The estimated period for construction has risen from 5-7 years in the AoS and HRA to 10-12 years (actually 12-14 years including the SZB facilities relocation works) in the DCO application, although the experiences at Olkiluoto, Flamanville and Hinkley Point C suggest the SZC timelines are likely to be extended, especially given the rural infrastructure that will be used to get materials to the site and the potential cumulative impact of other infrastructure projects.</p> <p>The AoS did not consider impacts on the AONB and its hinterlands that reflect the scale of development now proposed. Examples of significant changes include: the height,</p>

ExQ1	Question to:	Question:
		<p>scale and location of the hard and soft coastal defences; the size of the site; the height of the main platform; the height of the causeway across the SSSI; additional beach landing facility; size of car park on Goose Hill, in Dunwich Forest; additional pylons", and,</p> <p>Paragraph C.8.36: "TASC highlight that the AoS took place 13-16 years ago which points to the appraisal being out of date, e.g. Table 1.2 of the Site Report published in October 2010 refers to a construction period of 5-6 years (now 12-14 years including the relocation of SZB facilities) and a maximum workforce of 4,000 (now 8,500). There are now also 2 Beach Landing Facilities (BLFs) and a hard sea defence up to 16 metres AOD and an SSSI crossing of 7.3/10.4 metres AOD to consider. In addition, climate change predictions have changed significantly since 2008."</p> <p>TASC draw PINS attention to the additional fact that the original nomination did not anticipate the destruction of Coronation Wood. Describing 10-12 years of construction in an Area of Outstanding Natural Beauty as 'temporary', demonstrates that the Applicant has total disregard for the special qualities and environmental sensitivities of the landscape the proposed development will affect.</p> <p>TASC conclude that Applicant is incorrect in asserting that the SZC project now proposed is not materially different from that nominated in EN6.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. does not wish to add to the detail of its response at Deadline 2 but does draw the Examining Authority's attention to paragraphs 2.3.3 and 2.3.4 of NPS EN-6 in relation to the status of nominated site boundaries.</p>
G.1.20	The Applicant	<p><b>Need</b></p> <p>The Planning Statement, section 3.7, considers the EN-1, EN-6 site specific assessment and amongst other things, asserts that, in principle, Sizewell C is identified as a site suitable for the development of a new nuclear power station. The relevant representation of Walberswick Parish Council [RR-1257] submits that this potential suitability is no longer valid since it was based on an ability to use a sea-based transport strategy. Please provide a specific response to that matter in the light of the changes to the original application.</p>

ExQ1	Question to:	Question:
	Response by SZC Co. at Deadline 2	<p>The Parish Council's Relevant Representation [<a href="#">RR-1257</a>] is concerned that:</p> <p><i>"The Government's National Policy Statement for Nuclear Power Generation concluded that Sizewell is a potentially suitable site for new nuclear power stations before 2025. This potential suitability is no longer valid because of the following: o It was based on an ability to use a sea-based transport strategy. Once that was deemed unviable by EDF, the project should have been declared unsuitable because land based transport cannot be properly mitigated."</i></p> <p>NPS EN-6 explains in sections 2.3 and 2.4 how potentially suitable sites for new nuclear power stations were identified for the purposes of the NPS. The process involved a Strategic Siting Assessment, an Alternative Sites Study and an Appraisal of Sustainability for the NPS policy itself and for individual sites.</p> <p>Transport issues were considered under the heading of <i>Communities: Supporting Infrastructure</i>. The <i>Appraisal of Sustainability: Site Report for Sizewell (October 2020)</i> recognised that the construction of Sizewell C could generate effects on the road network but reported:</p> <p><i>"5.32... However, these issues are primarily localised and can likely be mitigated, provided the design includes transport management plans, green travel plans and consideration of alternatives to road for the transport of large loads (for example, transport by sea). Nevertheless, further studies should be undertaken by the developer. There is a strategic intent to improve capacity on the East Suffolk Rail Line in order to improve links between Ipswich and Lowestoft. East Suffolk Rail Line improvements would be of strategic importance in developing increased nuclear capacity. A primary access to rail and sea transport routes is the local road and rail infrastructure."</i></p> <p>Access by sea, therefore, was not a pre-condition of the identification of Sizewell C. Similarly, Annex C of NPS EN-6 sets out <i>'why the sites have been found to be potentially suitable'</i> (paragraph C.1.1). In relation to Sizewell, the Annex confirms (at paragraph C.8.123) that the Appraisal of Sustainability assessed there to be potential for some adverse impacts locally from additional traffic during construction and wider negative effects on regional transport infrastructure but does not state that it set out any requirement or conclusion that the transport solution must be sea-based. Instead, the Annex refers to the general policies on transport in NPS EN-1.</p>



ExQ1	Question to:	Question:
		Those policies are set out in NPS EN-1 at section 5.13. They apply to all of the potentially suitable sites and contain no pre-condition for sea-based transport at Sizewell. Paragraph 5.13.10 expresses a preference for rail or water-borne transport over road transport where cost-effective, but no specific requirement for either.
	Response by Stop Sizewell C at Deadline 3	G.1.20, G.1.21 & G.1.22 Whilst the per kWh emissions of nuclear and renewable generators may be at a similar scale to that of some renewable generators, the point should be made that onshore/offshore wind have a distinct advantage in terms of payback time, so EDF's response here misses the point. Whilst Sizewell C will take around a decade (or more) to build, and will then have to operate for a few years before the carbon emissions investment is repaid, a wind farm can be built in a much shorter period of time, and the emissions investment repaid typically within a year of connection.
	Response by Together Against Sizewell C at Deadline 3	TASC note that the Applicant refers to the AoS October 2020 to substantiate their response. TASC assume the Applicant is referring to the AoS undertaken in October 2010 as TASC have been unable to locate an AoS dated October 2020. The October 2010 AoS states, at 1.1, "This report considers the nominated site at Sizewell in Suffolk as a possible [emphasis added] location for new nuclear power station(s)." The Applicant refers to the AoS's mention of potential adverse impacts in the report, as some sort of licence that allows the Applicant to inflict unrestricted damage on the community and environment. In doing so, the Applicant is not acknowledging that the scale of the development proposed in their DCO application bears little resemblance to the one originally envisaged in EN6. The AoS in Table 1.2 on pages 12/13 refers to a construction timescale of 5-6 years and construction workforce of approximately 4,000. The new project anticipates a maximum workforce of 8,500 during construction and a construction timeline of 10-12 years (plus 2 more years with the relocation of the Sizewell B facilities). So, if the workforce is more than doubled and the timeline is more than doubled, there is in effect a minimum fourfold adverse impact in relation to some issues e.g. contactor journeys and a between double and fourfold increase in other impacts eg HGV journeys/delivery of materials to the site.  Walberswick Parish Council made the point that it was not possible to satisfactorily mitigate the adverse impact from the road traffic that will arise from the proposed development, and TASC fully support that statement.

ExQ1	Question to:	Question:
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. does not wish to add to its response to the question posed by the Examining Authority. On the additional comments made by TASC, however, SZC Co. notes that the Government has reconfirmed that the NPS remain a proper basis for the examination of applications for energy NSIPs in full knowledge of their characteristics.
G.1.21	The Applicant	<p><b>Need</b></p> <p>The Planning Statement, paragraph 7.2.11, states that based on current grid intensity the operation of Sizewell C would displace the equivalent of its construction emissions within the first 6 years of operation. The representation of Ian Marshall [RR-0490], states that <i>"the carbon footprint of Sizewell C's construction will have an adverse impact on carbon targets; it cannot positively contribute to UK's carbon neutral timetable until 2040 at the earliest"</i>. Please comment on that assertion and set out the anticipated timetable for the displacement of construction emissions and the achievement of a positive contribution to the UK carbon neutral timetable.</p>
	Response by SZC Co. at Deadline 2	<p><b>Volume 2, Chapter 26</b> of the <b>ES</b> [<a href="#">APP-342</a>] stated that the Sizewell C Project would take 6 years to offset its construction emissions. This estimate was based on a comparison of Sizewell C output with long-term forecasts for the grid average carbon emissions (the grid average comparison approach). The approach used in the ES is consistent with the approach taken in a number of other Environmental Statements for nationally significant infrastructure projects (NSIPs) to contextualise potential offsets. Following the receipt of comments on the assessment, SZC Co. has considered the issue further and concluded that within the context of Sizewell C - and any other new low carbon generation project - the grid average comparison approach used in the ES is overly conservative and has significant limitations as a means of assessing the carbon savings that new low carbon generators can provide. Some of the issues that give rise to this conclusion are explained further below.</p> <p>In summary, the grid average comparison approach involves comparing a new project (such as Sizewell C) with the carbon intensity of a hypothetical future electricity mix (in the years to 2050). It is assumed that any hypothetical future electricity mix will be delivered even without the new project under consideration. The hypothetical electricity mix is based on an assumption that large amounts of new low carbon generation electricity capacity throughout the period will have been delivered (up to a fourfold increase in low carbon electricity between today and 2050). This is because of the large</p>

ExQ1	Question to:	Question:
		<p>amount of new low carbon electricity is needed in order to a) decarbonise the electricity grid and b) meet rising demand for electricity caused by electrification of other parts of the economy (e.g. heating and transport). However, most of the new low carbon generation electricity capacity which is assumed in the hypothetical energy mix is also hypothetical (i.e. is not represented by a project under construction). Therefore, a more appropriate comparison of Sizewell C (or any other new low carbon project) would be to evaluate the new project in the context of the currently unmet need for new low-carbon generation capacity.</p> <p>This does not affect the overall conclusion of the assessment presented within <b>Volume 2, Chapter 26</b> of the ES [<a href="#">APP-342</a>] namely that the Sizewell C Project will provide a significant contribution to reducing the greenhouse gas (GHG) emissions in the long term. In the short-term the GHG emissions associated with the construction of Sizewell C will not affect the ability of the Government to meet its relevant carbon budgets. These conclusions remain robust.</p> <p><b><i>The grid average comparison approach</i></b></p> <p>Under the grid average comparison approach, new generation projects are compared with a future projection for the electricity grid. The new project is assumed to displace carbon to an amount equal to the carbon intensity of the forecast grid. In turn, the projected grid intensity would be derived from a long-term forecast for the electricity sector (which would incorporate assumptions about changes in demand and rates of new build technologies and other key variables).</p> <p>To illustrate the grid average comparison approach: If the future grid was assumed to be 20% fossil fuelled, then 20% of the additional output from a new low carbon generator would be assumed to displace fossil fuels. A consequence of this approach is that the lower the carbon intensity of the hypothetical future grid, the lower the carbon saving that any new low carbon project is forecast to have. For example, if the future grid was assumed to be only 10% fossil fuelled (rather than 20% as above), then only 10% of the additional output from a new low carbon generator would be assumed to displace fossil fuels.</p> <p>The grid average comparison approach implicitly assumes that the forecast grid carbon intensity would be achieved without the specific project in question. For example, if Sizewell C was being compared to a grid that was forecast to have decarbonised to a point where only 10% of the power was from fossil fuelled sources (for reference, the</p>

ExQ1	Question to:	Question:
		<p>UK grid is currently around 40-50% fossil fuelled), then it is assumed that this level of decarbonisation would happen without Sizewell C. I.e. Sizewell C would not help the grid reach the level of decarbonisation where only 10% of the grid is fossil fuelled.</p> <p>It is important to note that this is not a Sizewell C (or new nuclear) specific issue. Any new low carbon generation project which was compared to a future grid projection would also be assumed to not be contributing to the level of decarbonisation achieved in the projection.</p> <p><b><i>UK power market forecasts are for a low carbon system. Under the grid average approach, this results in low implied carbon savings from new projects.</i></b></p> <p>Forecasts for the future UK grid are typically developed through a modelling exercise during which the party undertaking the modelling will set out assumptions and constraints on key parameters which influence the modelling outputs (outputs include generation technology capacities, power demand and the average carbon intensity of the electricity grid). These modelling exercises typically reflect the UK's decarbonisation requirements and objectives (including carbon budgets which require falling levels of UK carbon emissions and the 2050 net zero obligation). For example, the model will be set up so that the output is consistent with net zero in 2050 (in the most recent BEIS Energy and Emissions Projections there are two illustrative scenarios which specifically achieve net zero<sup>28</sup>). More generally, as the modelling exercises that provide forecasts for the future electricity grid tend to take account of the UK's decarbonisation objectives, it follows that as a result, prevailing electricity forecasts show very low levels of future carbon intensity.</p> <p>Consequently, the grid average comparison, when applied with prevailing forecasts for an electricity system which is mostly decarbonised, implies that any (and all) new low carbon generation projects (nuclear, wind, solar etc) would provide minimal carbon emissions savings. On this basis, new projects appear to take a long time to displace their construction emissions. This can be seen in the Sizewell C calculation in <b>Volume 2, Chapter 26</b> of the <b>ES</b> [APP-342] and has been highlighted in the relevant</p>

<sup>28</sup> DBEIS (2020) Updated Energy and Emissions Projections 2019 (October 2020) Available at: <https://www.gov.uk/government/collections/energy-and-emissions-projections>

ExQ1	Question to:	Question:
		<p>representations, but a similar effect would apply if the new project in question was for any other low carbon technology.</p> <p><b>Power sector forecasts show a large amount of new build low carbon capacity</b></p> <p>In order to achieve the low grid average carbon intensities which are implied in the electricity sector forecasts used in the ES calculation (and other forecasts for the UK electricity sector), large increases in low carbon generation output will be required relative to today's levels:</p> <ul style="list-style-type: none"> <li>• Low carbon generation output would need to roughly double between today and the early 2030s; and</li> <li>• increase 3-4 times compared to today's outputs by 2050 depending on which forecast is considered.</li> </ul> <p>In other words, achieving the low future levels of grid carbon intensity assumed in forecasts for the electricity grid would require a significant build of new low carbon projects from today and continuing through to 2050.</p> <p>Importantly, this means continuing to build a large number of low carbon projects after the electricity grid has reached a very low (or even zero) carbon intensity in order to meet the continually increasing demand for low carbon electricity. This increasing demand for low carbon electricity occurs because other sectors within the economy (for example transport, heating, and industry) are anticipated to achieve decarbonisation by electrification (i.e. the energy sources of these sectors will switch from hydrocarbons to low carbon electricity). This is considered extensively in the CCC net zero report and technical appendices and can be seen in the BEIS Energy and Emissions Projections<sup>29</sup>.</p> <p><b>Carbon savings calculated using the grid average comparison approach in the context of the forecasts described above</b></p> <p>If enough low carbon generation is built to achieve the level of carbon intensity assumed in the Government's forecasts, then the new capacity would serve to avoid carbon emissions by:</p>

<sup>29</sup> DBEIS (2020) Updated Energy and Emissions Projections 2019 (October 2020) Available at: <https://www.gov.uk/government/collections/energy-and-emissions-projections>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• reducing the amount of fossil fuelled generation required in the electricity sector to the extent reflected in the model, in effect, this is displacing carbon emissions in electricity production. Within the model, new low carbon generation will be mostly or entirely displacing fossil fuelled power generation; and</li> <li>• meeting increasing demand for low carbon electricity from e.g. heating, transport and industry, in effect new low carbon generation is displacing carbon emissions from other sectors.</li> </ul> <p>In other words, the projected new capacity in power market models are effectively modelled to achieve carbon '<i>savings</i>' via either (or both) effects (a) and (b) above. As the grid average comparison assumes that the projected future mix would occur without Sizewell C (or any other new low carbon project) being constructed and becoming operational, the consequence is that an appropriate proportion of the benefits of (a) or (b) is not ascribed to the new project being assessed. Instead, the only benefit implied by the grid average calculation is to remove a proportion of the residual grid emissions in the modelled outcome.</p> <p>This approach does not reflect the following important factors:</p> <ul style="list-style-type: none"> <li>• the large amount of new build capacity that is required to achieve the future forecast (many times the output that Sizewell C would generate);</li> <li>• the fact that most of this forecast capacity is hypothetical (i.e. not yet operating or committed to be built); and</li> <li>• the fact that a large amount of new build will be required to come online throughout the period to 2050 (including after Sizewell C comes online) for the future forecast to be achieved.</li> </ul> <p>Sizewell C and other new build low carbon projects will contribute to achieving the large amount of low carbon generation required to decarbonise the electricity grid and other sectors embedded in power sector forecasts. Having regard to the factors listed above, decarbonisation of the grid (and the resultant carbon savings) can only occur if significant numbers of new low carbon generating stations are authorised and constructed. Therefore, the actual carbon savings delivered from the new low carbon projects are much greater than would be implied through comparison against grid average, as the electricity generated would be consumed instead of fossil fuelled power generation (for example a gas plant) and/ or provide low carbon electricity to replace</p>

ExQ1	Question to:	Question:
		<p>fossil fuels in other sectors (e.g. through the electrification of motor vehicles). Government policy to achieve net zero requires the decarbonisation of these other sectors and cannot be achieved without projects like Sizewell C.</p> <p>To provide some context of how much need there is for new low carbon generation and how much Sizewell C will contribute to meeting that need, using the BEIS UEP net zero 'low demand' scenario, Sizewell C will provide 7% of the total projected 2035 low carbon power and 4% of the total 2050 total; while in the 'high demand' scenario the equivalent numbers are 6% (in 2035) and 4% (in 2050).</p> <p><b><i>Illustration of the potential carbon savings provided by Sizewell C's generation and the implied length of time to offset carbon emissions</i></b></p> <p>As described above, one of the benefits of new low carbon power generation is that it is expected to replace fossil fuelled power generation that would otherwise be operating. In the UK the fossil fuelled generator would likely be a combined cycle gas turbine (CCGT). If the full output from Sizewell C replaced a CCGT, the carbon emissions saved would be enough to offset the Sizewell C construction emissions in 4 to 5 months. As described above, low carbon power will also help reduce emissions in other sectors such as transport and heating. If the low carbon power were compared to the emissions from a petrol vehicle or gas boiler the carbon savings would be expected to be even greater than the CCGT comparison provided above.</p>
	Response by Stop Sizewell C at Deadline 3	<p>We note EDF's attempt to reframe the question, but in doing so, they have not rebutted the point that the carbon emissions invested in the project will not be recouped (in reduced operating emissions) until 2040 at the earliest. Even if the average grid emission factor expected immediately before Sizewell C connects is used for the calculation (41gCO<sub>2</sub>e/kWh), with no further decrease, then the construction emissions debt would still take until around 2040 to be paid off.</p> <p>In their answer, EDF states that "In the short-term the GHG emissions associated with the construction of Sizewell C will not affect the ability of the Government to meet its relevant carbon budgets". This is highly debatable. Whilst the millions of tonnes of emissions invested are modest relative to the Government's budgets, it is clearly the case that if the budgets are eventually exceeded, then the emissions associated with the construction of Sizewell C will have been a contributory factor. As such, those emissions must not be dismissed.</p>

ExQ1	Question to:	Question:
		<p>The point that Sizewell C is likely to displace (unabated) fossil fuel facilities such as CCGT from the grid is contentious. It is likely that insofar as fossil fuel or nuclear generators are needed on the grid, fossil fuel stations will be investing significantly in carbon capture and storage (CCS) by the mid-2030s, and so it is likely that Sizewell C will be an alternative to CCS investments and/or more renewables projects and/or interconnectors, with energy storage.</p> <p>Comments specifically on the LCA (referred to in G.1.21 and .22) are shown below. Carbon focused Life Cycle Assessment of the proposed Sizewell C nuclear power plant development (May 2021) contained within the document 9.11 Responses to the ExA's First Written Questions (ExQ1) – Volume 3 Appendices Part 3).</p> <p>a. Optimism Bias</p> <p>The figure used in the LCA for gross generation over 60 years (approximately 1.694 x 10<sup>12</sup> kWh, or 1,694,000 GWh) is 92% of the maximum possible output from a plant rated at 3.5 GWe, implying a very high level of availability and very little downtime. The net figure is 85%. [Note, also, that the figure for gross generation is greater than 100% of the maximum possible if the plant capacity is taken as 3.2 GWe, as EDF has stated elsewhere rather than the 3.5 GWe stated in the LCA]."</p> <p>Given experience of nuclear energy in the UK to date, these figures appear highly optimistic. Figures from the BEIS Digest of UK Energy Statistics show that the net load factor of the UK nuclear fleet in the five years to 2019 averaged 74%, rather than the 85% implied for Sizewell C. Furthermore, the proposed lifetime of 60 years also appears optimistic given that no nuclear generating facility has survived this long to date. In other words, the LCA has presented a case based on the best possible scenario, with negligible margin for error over a period of 60 years.</p> <p>Alongside this scenario, EDF should present a realistic case, in which the facility operates at a lower net load factor for less than 60 years, and adjust the GWP results per life cycle stage in table 12 accordingly (core operation, core infrastructure - construction, core infrastructure - decommissioning).</p> <p>b. Construction Emissions Inconsistencies</p> <p>Emissions of CO<sub>2</sub>e associated with construction have previously been stated as follows:</p>



ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• 5,738,084 tCO<sub>2</sub>e , then recalculated as 6,237,269 tCO<sub>2</sub>e in the Environmental Statement Addendum (The Sizewell C Project – 6.14, Volume 1, Chapter 2, January 2021. Table 2.66) as more specific site information became available.</li> </ul> <p>No such figure is presented in the more recent LCA, but the following information is provided which enables a calculation to be made.</p> <ul style="list-style-type: none"> <li>• Construction of core infrastructure: 2.44 gCO<sub>2</sub>e/kWh</li> <li>• Total net generation: 1,569,718,000,000 kWh Multiplying the two implies that the total construction emissions (core infrastructure) are 3,830,112 tCO<sub>2</sub>e. It is unclear why these emissions, having been revised upwards from ~5.7 to 6.2 MtCO<sub>2</sub>e in January 2021 are now assumed to be only ~3.8MtCO<sub>2</sub>e. If the old figures were 'wrong', what was the underlying cause, and what evidence is there that the new figure is less wrong?</li> </ul> <p>c. Fuel Cycle – Upstream emissions</p> <p>The upstream emissions (associated with the extraction and preparation of uranium) reported in table 12 of the LCA are given as 2.75 gCO<sub>2</sub>e/kWh. Researchers 2 have previously shown how the carbon cost of uranium extraction and preparation may rise in the future under a scenario in which global nuclear generating capacity increases. This is because the industry must move on to ores containing uranium in ever-lower concentrations as the better deposits are used up, as there is now relatively little discovery of previously unknown uranium deposits. EDF should share its analysis of how the supply chain for fuel, and the associated embedded carbon, is likely to develop in response to this challenge.</p>
	Response by Together Against Sizewell C at Deadline 3	<p>The Applicant's answer to this question refers to 'significant limitations' of the 'grid average comparison' as a means of assessing the carbon benefits of a major project, even though this method has been used by many other projects. TASC believe the 'significant limitations' are due to it providing the wrong result for the Applicant. The Applicant prefers to use an unprovable and probably over-optimistic assumption that SZC can operate at a high load factor throughout its planned 60 year operational life, despite there being no evidence that the EPR technology can meet these claims.</p> <p>The Applicant criticises the use of a 'hypothetical future electricity mix' but expects us to accept the alleged benefits of a hypothetical Sizewell C- after all, there are no operational EPR reactors built to European Regulatory requirements and the only operational EPRs built by the Chinese appear to be experiencing a problem regarding</p>

ExQ1	Question to:	Question:
		<p>the build-up of excess noble gases, as reported by various organisations earlier in June 2021 (see comment re question G.1.4). In TASC's opinion, the 60 year planned operational period could be considered hypothetical as TASC are unaware that any nuclear power plants have continued generating electricity for this length of time. A future electricity mix will have to be low/zero carbon by 2050 due to legal requirements and is slated to be much lower carbon intensity by 2035, as it is seen as one of the easier areas to decarbonise. Indeed, the grid has substantially decarbonised without any contribution from new nuclear and this decarbonisation has happened while nuclear energy's share of electricity production has reduced, due to extended outages for maintenance and closure of older plants.</p> <p>TASC also draw to PINS attention, that the 10-12 years it will take before SZC becomes operational, will mean that low carbon alternatives such as offshore/onshore wind, which can be deployed far quicker, will likely be held back due to investment being diverted to the SZC project, leading to higher use of existing gas plants and therefore a higher carbon debt than necessary.</p> <p>TASC also draw to PINS attention, the answer provided to this question does not address the question raised. Presumably, this is because the Applicant cannot counter their own statement that the 6.3 million tonne carbon debt will take at least 6 years to 'pay back'. Due to the expected mix of electricity generation by the time SZC becomes operational, the carbon debt will likely take much longer, if ever, to be repaid. In TASC's opinion, SZC will not help the UK meet its carbon reduction targets and needs to be compared to the much quicker to deploy wind turbines which repay their carbon debt within a year or two.</p>
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co.'s response provided at Deadline 2 remains valid.
G.1.24	The Applicant, Relevant local planning authorities	<p><b>Benefits - Economic</b></p> <p>The Planning Statement, paragraph 7.2.18, states that home-based jobs generated by the project would equate to around 1% of all employment in Suffolk. This is regarded by the Applicant as a significant increase in employment and a major beneficial change to employment in the area:</p>

ExQ1	Question to:	Question:
		<p>(i) What reliance can be placed upon the estimate that around 2,000 home based workers would be employed on the main development site at peak?</p> <p>(ii) What weight can be placed upon such relatively temporary employment benefits in the overall balancing exercise?</p>
	Response by SZC Co. at Deadline 2	<p>i) Evidence of strong home-based (HB) recruitment at Hinkley Point C means that the Sizewell C Project is confident of the reliability of its peak recruitment estimates. The assessment of local and regional socio-economic effects for the Sizewell C Project including assumptions on the number of home-based workers at peak and throughout the construction phase – set out and evidenced within <b>Volume 2, Appendix 9A</b> (Technical Note 1 – Workforce Profile) of the <b>ES</b> [APP-196] - draws on evidence from Hinkley Point C.</p> <p>As reported to the Socio-economic Advisory Group for the Project<sup>30</sup>, this shows there are currently (as at January 2021) 1,717 home-based (HB) workers out of a total workforce of 4,769. Many of these HB workers are in roles that will be available to local residents at Sizewell C, and which are not attractive to non-home-based (NHB) workers, because they do not have a subsistence allowance to support working away from home. Evidence from Hinkley Point C also suggests that higher skilled MEH roles are likely to be filled by local residents, supported by changes in work packages and local training to increase the HB number at peak.</p> <p>For clarity, the 2,000 workers referred to in the question does not include staff operating the Associated Development sites as these are outside of the Main Development Site security gate, or remote, and does not include pre-operational and commissioning staff who have the potential to be home-based.</p> <p>As also set out in response to Question <b>SE.1.33</b>, estimates of the total, HB and NHB employment for each year of construction, by phase/work package are set out in <b>Table 1.9 of Volume 2, Appendix 9A</b> (Technical Note 1 – Workforce Profile) of the <b>ES</b> [APP-196] with supporting text to evidence the assumptions.</p> <p><b>Volume 2, Chapter 9</b> (Socio-economics) of the <b>ES</b> [APP-195] uses a conservative assessment case for assumptions about HB and NHB workers - this is to ensure</p>

<sup>30</sup> HPC Socio-economic Advisory Board (2021) Available at: [https://www.sedgemoor.gov.uk/media/9721/SEAG-Dashboard-Accommodation/pdf/SEAG\\_Dashboard\\_-\\_Accommodation.pdf?m=637511338094670000](https://www.sedgemoor.gov.uk/media/9721/SEAG-Dashboard-Accommodation/pdf/SEAG_Dashboard_-_Accommodation.pdf?m=637511338094670000)

ExQ1	Question to:	Question:
		<p>mitigation for the NHB component is sufficiently robust. Some of the additional workforce (resulting from changing assumptions about the scale of workforce required as presented through Stage 2 and Stage 3 Consultation) may be home-based, but the ES has taken a 'worst case' position with regards to knock-on effects on socio-economic factors.</p> <p>The scale of HB workforce was based on assumptions by broad contract package – though it may represent an underestimate given advances in higher-skilled operative recruitment for MEH roles. At Hinkley Point C, the proportion of HB workers is currently 36%, and has been above 50% in early years.</p> <p>SZC Co, ESC and SCC are working to develop iterative and responsive governance for the implementation of employment, skills and training interventions (set out in Schedule 7 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C))) that take into account real data from contractors for each Workforce Delivery Strategy at each phase of the Project, and review data to understand the effectiveness of such interventions, in order to maximise local labour market benefits and local recruitment. This is likely to be even more effective than similar measures applied at Hinkley Point C, having had the benefit of lessons learnt about the targeting of investment from Hinkley Point C.</p> <p>ii) Despite being temporary, the construction phase will:</p> <ul style="list-style-type: none"> <li>• Represents over 42,000 years of construction employment output, much of which is supported by the long-term gain in skills for individuals that will develop their sustainable careers in the industry well beyond the construction phase of this project;</li> <li>• Is equivalent to twice the median job tenure in the UK and far longer than the average job tenure on a construction site – as set out from paragraph 3.3.9 to 3.3.11 of the <b>Economic Statement</b> [<a href="#">APP-610</a>].</li> </ul> <p>Whilst construction employment is often short-term and peripatetic, the length of this particular construction project provides valuable opportunities for people to cycle through different roles on the Project (using the SZC Jobs Service), gain long-term skills and develop genuine long-term sustainable careers.</p> <p>SZC Co. has worked with SCC, ESC, the New Anglia Local Enterprise Partnership (NALEP) and local skills and training providers to generate a suite of measures for the labour market and supply chain to not just deliver the workforce for the Project, but maximise the local opportunities for sustainable careers, transferrable skills, and particularly</p>

ExQ1	Question to:	Question:
		<p>supporting breaking down barriers to employment and raising aspiration via an Outreach Fund, Sizewell C Bursary and Young Sizewell C. Other elements include long-term investment in revenue for the existing capital projects in the region, with the aim of supporting the legacy benefits for the region. Further detail is set out in response to question <b>SE.1.17</b> and within Schedule 7 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)).</p> <p>The construction employment benefits are only one part of the benefits, with significant permanent benefits in the operational phase as well which represents a permanent uplift in employment, skills and supply chain benefits. Although they are temporary, they are relatively long-term, especially in the context of the typical duration of a construction job (typically only between 13% and 23% expect to be working on the same site for more than a year, and up to half less than six months) and in the economy more generally, where the median job tenure is 5.6 years.</p> <p>There are also important qualitative elements in providing a pipeline into the industry, including the HPC-SZC skills conveyor, leaving behind a more skilled and productive workforce.</p> <p>Further information on the scale of the benefits generated by the Project is outlined in the <b>Economic Statement</b> [<a href="#">APP-610</a>] and summarised in an appendix to this response (<b>Appendix 2A</b>), which also sets out how the Project will secure interventions and funding for regional skills infrastructure, and support the region to focus on long-term, legacy skill-sets to the benefit of sustainable economic growth forecast to be demanded by both the region and the Project.</p> <p>Substantial weight should be placed on the long-term, substantial economic benefits that this Project will bring to the region. Its scale – and the ways in which its benefits will be retained and enhanced – draw on the same successful measures for business and skills/employment as at Hinkley Point C, where to-date:</p> <ul style="list-style-type: none"> <li>• £2.7bn has been spent on local businesses who have been supported into the project’s supply chain through engagement activities;</li> <li>• Currently 36% of the workforce is from within the 90-minute area, and for much of the construction period so far this has been higher, up to around 50%;</li> <li>• 9,494 people have registered for the Jobs Service, and 1,240 of them have been placed into work on the HPC Project;</li> </ul>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• 1,500 young people have benefitted from the Young HPC Programme; and</li> <li>• 734 apprentices have been employed on the Project.</li> </ul> <p>Hinkley Point C is yet to reach its peak of construction activity, but the Project has already substantially outperformed its aspirations for local (economic) benefits, which the Secretary of State considered '<i>significantly outweighed</i>' residual adverse impacts of the HPC Project (SoS HPC Decision Letter, Section 6.6).</p> <p>The Ten Point Plan for a Green Industrial Revolution identifies the importance of the benefits of construction employment associated with new nuclear projects, using Hinkley Point C (HPC) as its case study. Furthermore, regional supply chain benefits are also supported by the Energy White Paper (page 56), which sets out that 'Developing the domestic supply chain for the sector has the potential to transform the prosperity of these regions. It provides high-value and skilled employment opportunities, unlocking investment to support infrastructure projects and growing manufacturing and industrial capability'</p>
	Response by East Suffolk Council at Deadline 2	<p>i) In seeking to understand the home based workforce and the figures that have been presented by the Applicant, we have considered the experience from the build of Sizewell B, as considered in the longitudinal research study led by John Glasson of Oxford Brookes University (summarised in an article in "Impact Assessment and Project Appraisal", vol 23, September 2005, pages 215–226 [See SCC Appendix to SE.1.5]). This study identified a 'substantial boost to local employment especially in the civil engineering phase of construction'. We can also look to Hinkley Point C and the Oxford Brookes Study commissioned by the New Nuclear Local Authorities Group (para 3.2.3) which independently confirms that local employment percentages are above those predicted for the first years of construction (LIR Appendix 2:1 [<a href="#">REP1-045</a>]). Both of these studies confirm that this level of home-based recruitment can be reached. However, both studies confirm that these levels of home-based recruitment were underpinned by effective employment and training measures.</p> <p>Therefore, we are confident that with a robust and sufficiently funded employment, skills and education strategy the conservative estimate of 2,000 home based workers will be met and further home-based employment maximised. This strategy will need to be deployed in advance of commencement of construction. However, in the context of Sizewell B approximately 60% of local recruitment was into semi-skilled/unskilled and clerical jobs. The employment, skills and education strategy for this project needs to</p>

ExQ1	Question to:	Question:
		<p>ensure there are a range of measures to increase local employment levels in higher skilled roles, identified as legacy roles, in the region and therefore valuable in the long term. ii) As set out in para 25.1 – 25.12 LIR <a href="#">[REP1-045]</a> and in answers to SE1.28, SE1.29 and SE1.31 ESC's approach to the employment opportunities is to view the opportunities as a catalyst for long term employment in roles that have an increasing and enduring demand in the region as identified in the report "Technical Skills Legacy for Norfolk &amp; Suffolk" by Pye Tait Consulting (see Appendix submitted by SCC) ESC expects the Applicant to proactively support this ambition through the Employment, Skills and Education Strategy and through an agreed Governance structure. ESC will work with the Applicant to deliver a Workforce Delivery Strategy (WDS) and Annual Workforce Delivery Implementation Plans (AIP), which would secure a flexible, dynamic process enabling reaction to any impacts picked up through monitoring, such as workforce churn, and take account of the changing skills and employment landscape, legacy opportunities and the economic cycle we are in.</p>
	<p>Response by Suffolk County Council at Deadline 2</p>	<p>i) SCC considers that any estimate like this has to be treated with a degree of caution, and should be considered as an indication rather than a worst or best case scenario. When looking to understand the home-based workforce and the figures that have been presented it is worth to review experience from the build of Sizewell B, as considered in the longitudinal research study led by John Glasson of Oxford Brookes University (summarised in an article in "Impact Assessment and Project Appraisal", vol 23, September 2005, pages 215–226 [submitted by SCC as ExQ SE.1.5 SCC Appendix]). This study identified a 'substantial boost to local employment especially in the civil engineering phase of construction'.</p> <p>Looking at Hinkley Point C, the Oxford Brookes Study commissioned by the New Nuclear Authorities Group ([REP1-089] para 3.2.3) independently confirms that local employment percentages are above those predicted for the first years of construction. Both of these studies indicate that the level of home-based recruitment estimated by the Applicant can be reached. However, both studies confirm that these levels of home-based recruitment were underpinned by effective employment and training measures. Therefore, SCC considers that, subject to a robust and sufficiently funded employment, skills and education strategy, the estimate of 2,000 home-based workers is a conservative one that can be met, and then encourages home-based employment to be maximised beyond this estimate.</p>

ExQ1	Question to:	Question:
		<p>It is important for the ExA to note that, in the context of Sizewell B, approximately 60% of local recruitment was into semi-skilled/unskilled and clerical jobs. This has limited the legacy benefits for the local community. Therefore, SCC considers that the Sizewell C employment, skills and education strategy as set out by the Applicant needs to ensure there are a range of measures to increase local employment levels in higher skilled roles, identified as legacy roles, which would be valuable for the region in the long term.</p> <p>ii) As set out in para 25.1 – 25.12 LIR and in answers to SE1.28, SE1.29 &amp; SE1.31 SCC's approach to the employment opportunities is to view the opportunities as a catalyst for long term employment, especially for those furthest from the labour market, in roles that have an increasing and enduring demand in the region as identified in the report "Technical Skills Legacy for Norfolk &amp; Suffolk" by Pye Tait Consulting [submitted by SCC as ExQ SE.1.39 Appendix 2]. The higher number of individuals and the further they have been supported to progress (i.e. from unemployed to work or from within work to better work) the greater the value of the home-based worker opportunities to the region. We expect the Applicant to proactively support this ambition through the Employment, Skills and Education Strategy. Through an agreed Governance structure we will work with the Applicant to deliver a Workforce Delivery Strategy (WDS) and Annual Workforce Delivery Implementation Plans (AIP), which would secure a flexible, dynamic process enabling reaction to any impacts picked up through monitoring, such as workforce churn, and take account of the changing skills and employment landscape, legacy opportunities and the economic cycle we are in</p>
	Response by SZC Co. at Deadline 3	<p>As set out in SZC Co's response to this question at Deadline 2, SZC Co is content that the estimate of HB workforce is conservative, allowing for the 'reasonable worst case' to be assessed, and sufficient mitigation (for a 5,884 peak NHB workforce) to be established.</p> <p>That does not preclude the HB recruitment level exceeding the estimated peak – it is in the interest of the Project to maximise local recruitment, and this is why an extensive range of measures has been set out in terms of employment, skills, education and supply chain at Schedule 7 of the <b>Draft Deed of Obligation</b>, an updated version of which is submitted at Deadline 3 (Doc Ref. 8.17(D)).</p> <p>These measures are supported by specific Workforce Delivery Strategies for each phase of the Project, which focus directly on employment in civils and MEH construction,</p>



ExQ1	Question to:	Question:
		<p>directing funding and measures towards local recruitment in these areas which are often higher skilled roles, identified as legacy roles, which would be valuable for the region in the long term.</p> <p>See also SZC Co's response to the <b>Councils' Local Impact Report</b> (Chapter 25) (Doc Ref. 9.29).</p>
	Response by Ian Galloway at Deadline 3	<p>Does 'Home Based' in this context imply 'Suffolk resident' or resident in the area identified in the gravity model? If the latter, benefit may not be contributing to the implied 1% of all employment in Suffolk, let alone the immediate area.</p> <p>The Applicant identifies "Evidence of strong home-based (HB) recruitment at Hinkley Point C" and extrapolates that this enables the SZC Project to be confident of the reliability of its peak estimates.</p> <p>The Applicant seemingly overlooks the vital role of the M5 in providing fast access to the HPC site by workers from distant conurbations.</p> <p>The A12, A14 and lesser roads hardly provide the same capability.</p> <p>The Applicant in making their response identifies that "Whilst construction employment is often short-term and peripatetic, the length of this particular construction project provides valuable opportunities for people to cycle through different roles on the Project (using the SZC Jobs Service), gain long-term skills and develop genuine long-term sustainable careers".</p> <p>However, so far as I can establish there is no evidence provided to support this assertion, despite their HPC experience. Why not?</p>
	Response by Stop Sizewell C at Deadline 3	<p><b>Temporary Construction Phase Employment Effects</b></p> <p>The Applicant has responded to queries regarding the scale of temporary construction phase employment effects, specifically concerning the estimate that around 2,000 home-based workers (HB) would be employed on the main development site at peak.</p> <p>It should be noted that the Applicant's estimates of HB workers is based on a 90-minute drivetime area, which extends beyond the boundaries of Suffolk into adjacent areas of Cambridgeshire, Norfolk, and Essex. Therefore, any suggestion that 'around 2,000 home-based workers would be employed on the main site at peak' is synonymous with around 2,000 Suffolk residents benefiting from this employment opportunity simply</p>

ExQ1	Question to:	Question:
		<p>cannot be proven, as the applicant's analysis is focused on a wider spatial area of which Suffolk is only part.</p> <p>Furthermore, it is also apparent from the Applicant's evidence that the majority of roles that the applicant expects to be available to HB workers are in low-skilled or semi-skilled occupational roles, such as in catering, cleaning, security, admin support, etc. However, setting all these points to one side for a moment, it is fundamentally still the case that none of the applicant's evidence concerning quantification of local employment opportunities can be regarded as soundly based, for the simple reason that their analysis excludes any proper assessment of local displacement effects during the construction phase.</p> <p>In short, the concern remains that a substantial proportion of jobs filled by local HB workers during construction would be offset by a reduction in business activity and employment in other local businesses during this phase of the proposed project.</p> <p>Further specific details of the concerns held by Stop Sizewell C regarding the approach taken by the applicant to factoring in displacement effects on other local businesses is set out below, especially in the responses to matters SE.1.3 and SE.1.37.</p>
	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p><b>Defining Home-based Workers</b></p> <p>Home-based (HB) workers are defined by the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(E)).</p> <p>These workers will not all be Suffolk residents. However, estimates provided by the Gravity Model suggest that about 60% of HB recruits are anticipated to be Suffolk residents at peak – this is set out in <b>Volume 2, Chapter 9, Appendix 9C</b> [<a href="#">APP-196</a>] of the Environmental Statement.</p> <p><b>Supply Chain 'Displacement'</b></p> <p>The HM Treasury definition of displacement is clear – it is the loss of economic output elsewhere as a result of the project. It has been suggested that some local firms might prefer to supply the Project rather than other customers. There is no evidence to suggest that this would happen but even if it did, those other customers' needs would not go away, i.e. there would be no reduction in economic activity, it would still be there, just fulfilled by another business. The reality is that most businesses will seek to expand to meet new orders rather than switch from one customer to another.</p>

ExQ1	Question to:	Question:
		<p>The main effect of Sizewell C would be to increase the size of the market and offer a substantial opportunity for local and regional firms to provide goods and services to the Project, becoming part of the supply chain as contractors. In most cases, those businesses would expand to deliver on existing contracts as well as supply chain opportunities within the Sizewell C Project.</p> <p>This is the normal function of an economy.</p> <p>Businesses can make these choices themselves, they do not need the Applicant or the local authorities, or the planning system to be involved, other than making the opportunity available. SZC Co. will help them understand how to become part of the Sizewell C Project supply chain, via the Sizewell C Supply Chain Team at the Chamber of Commerce.</p> <p><b>Labour Market 'Displacement'</b></p> <p>SZC Co's responses to Stop Sizewell's concerns about displacement have been set out in response to <b>Questions SE.13</b> and <b>SE.1.37</b> (response by SZC Co. at Deadline 5) in Part 6 of this submission.</p>
G.1.25	The Applicant	<p><b>Benefits - Economic</b></p> <p>The Planning Statement, paragraph 7.2.20, states that the project would also create extensive supply chain opportunities:</p> <p>(i) What reliance can be placed upon the experience of development at Hinkley Point C by way of a comparator for such opportunities given the different location and circumstances of the Sizewell site?</p> <p>(ii) What is the likelihood of a similar level of spending on the regional supply chain at Sizewell C taking place and how would that be secured?</p>
	Response by SZC Co. at Deadline 2	<p>(i) The <b>Economic Statement</b> [<a href="#">APP-610</a>] sets out the Applicant's assumptions regarding the scale of local and regional supply chain benefit at Section 3.4. This includes several assumptions about replication of the regional supply chain procurement experienced at Hinkley Point C to-date to estimate a proportion of the overall Sizewell C Project Value that would be retained in businesses in the region. Overall, reliance can be placed on upon the experience of development at Hinkley Point C by way of a comparator for such opportunities for the following reasons:</p>

ExQ1	Question to:	Question:
		<p>a) Sizewell C is essentially a replication of Hinkley Point C (with the exception of some differences in ground conditions and site preparation) and as such will have the same spending profile on supply chain as Hinkley Point C, which has (so far) spent £2.7bn on goods and services procured from local and regional suppliers;</p> <p>b) Sizewell C will apply broadly the same measures as are in place for Hinkley Point C to engage, support local and regional firms to win work on the Project (and in fact has the benefit of lessons learned for effectiveness from Hinkley Point C, as well as a running start with a willing and informed Sizewell C Consortium already geared up for the Project and a Supply Chain Portal already in place);</p> <p>c) The fact that interventions to be secured by the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)) are focused on local and regional firms, and support is being provided to local/regionally-focused bodies such as the Councils, NA LEP, and Suffolk Chamber of Commerce; and</p> <p>d) The regional economy in the East of England is not substantially different to the South West in terms of the relative scale of business, employment, output and sectoral representation. Tier 1 contractors will not have the resource capacity to deliver all of the work packages directly – they will need to draw on local firms at Tier 2 and Tier 3 in the supply chain across a range of construction and non-construction contracts. Local and regional firms have a competitive advantage in winning work (even without the proposed measures in the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)) – they have shorter travel times, smaller carbon footprints, and logistical benefits that translate into economic advantages.</p> <p>To expand on (b) – in terms of measures already underway:</p> <ul style="list-style-type: none"> <li>• In developing the approach to delivery of supply chain benefits, SZC Co. has provided resourcing to the Suffolk Chamber of Commerce for several years, and currently supports a team of seven people who undertake supply chain engagement activities with local businesses. This activity includes the investigation of developing local consortia (similar to successful consortia at Hinkley Point C), and the running of 'meet the buyer' events (next event planned for July 2021). The activity has also included the development and maintenance</li> </ul>

ExQ1	Question to:	Question:
		<p>of a Sizewell C Supply Chain Portal, which currently has 1,385 registered businesses, of which 747 are in Suffolk and 575 are outside of Suffolk, but within the region. The companies registered cross-cut a range of sectors relevant to the work packages that the Project will need – including 177 Suffolk-based professional/technical services companies, 89 transport/logistics companies, and 47 civil construction (on-site) firms.</p> <ul style="list-style-type: none"> <li>• Registration does not guarantee that a company will work at Sizewell C, but allows the Chamber of Commerce to ‘Supplier Match’ local and regional companies to specific work packages that will be necessary to deliver the Project. As such, local and regional companies are potentially in a stronger position to win work than they might ordinarily be.</li> <li>• To further improve the potential opportunities for local and regional companies to win work at Sizewell C, the Chamber of Commerce actively engages with those local and regional companies to support their business development and accreditation alignment in accordance with the requirements of the Project.</li> <li>• Suffolk Chamber of Commerce notes that statistical evidence from portal registrations suggest that the Local and Regional content pledged in the DCO can be delivered. There are a significant number of local and regional companies already registered and it is predicted, with reasonable certainty, that this will continue to grow. Further, there is a breadth of local and regional capability that would be able to deliver against a range of work packages necessary during the Sizewell C Project.</li> </ul> <p>By undertaking similar interventions to those at Hinkley Point C, to be secured by the <b>Draft Deed of Obligation</b> (currently in draft at Doc Ref 8.17(C)), focused on local and regional firms, the approach to Sizewell C essentially replicates the successful approach to supply chain engagement currently being enacted for Hinkley Point C in the South West, which has:</p> <ul style="list-style-type: none"> <li>• Resulted in £2.7bn being spent with regional businesses on goods and services – exceeding the anticipated level for the whole project (£1.5bn) in just the first 5 years<sup>31</sup>;</li> </ul>

<sup>31</sup> HPC Socio-economic Advisory Group. Available at: <https://www.sedgemoor.gov.uk/SEAG>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>• Delivered innovative consortia from local firms such as the Somerset Larder;</li> <li>• Enabled brokerage between Tier 1-2 contractors and local firms – in 2019 alone 1,657 South West companies were recommended for a total of 141 work packages<sup>32</sup>.</li> </ul> <p>The market is confident that this level of retention of spending in local and regional supply chains is realistic (and in fact represents a conservative estimate). This is demonstrated by an independent assessment of the potential local and regional supply chain benefits has been undertaken by the Sizewell C Consortium, a collection of more than 200 leading companies and organisations from across the country, leading to a Memorandum of Understanding (MoU) being signed between the group, MPs and regional stakeholders. The group estimates that the Sizewell C Project may exceed estimates for local/regional supply chain benefit estimated by the Applicant (estimated at c. £1.5bn within the <b>Economic Statement</b> [APP-610] at paragraph 3.4.13), estimating that £4.4bn may be retained in the East of England. This demonstrates market confidence in the supply chain capacity available, and the fact that potential contractors are willing to sign up to the MoU proves that they are willing to make a commitment to local and regional investment.</p> <p>(ii) As set out in Part (i), there are several factors that result in confidence that a similar level of spending on the local and regional supply chain at Sizewell C as at Hinkley Point C is realistic.</p> <p>Specific levels of spending cannot of course be secured through the DCO - that depends on local businesses wanting and being able to take advantage of the opportunity. SZC Co.'s commitments to support the process, however, can and will be secured through the Deed of Obligation which (as set out at Schedule 7, Paragraph 3 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C))) requires the Applicant to implement or procure measures described in the <b>Supply Chain Strategy</b> [APP-611].</p> <p>Further information regarding the detail, delivery and securing mechanism, governance and monitoring for supply chain activities is set out in response to question <b>SE.1.27</b></p>

<sup>32</sup> EDF Energy (2020) HPC Socio-economic Brochure [https://www.edfenergy.com/sites/default/files/hpc\\_socio-economics\\_brochure\\_2020.pdf](https://www.edfenergy.com/sites/default/files/hpc_socio-economics_brochure_2020.pdf)

ExQ1	Question to:	Question:
	Response by Ian Galloway at Deadline 3	<p>In their response the Applicant states "Overall, reliance can be placed on upon the experience of development at Hinkley Point C by way of a comparator for such opportunities for the following reasons:</p> <p>a) Sizewell C is essentially a replication of Hinkley Point C (with the exception of some differences in ground conditions and site preparation) and as such will have the same spending profile on supply chain as Hinkley Point C, which has (so far) spent £2.7bn on goods and services procured from local and regional suppliers;</p> <p>Is the Applicant expecting the significant and obvious differences of the HPC site and the potential SZC site to be dismissed with the ill-considered comment that "...with the exception of some differences in ground conditions and site preparation...Sizewell C is essentially a replication of Hinkley Point C". It beggars belief that the Applicant can so crudely dismiss the huge differences between; the sites, the requirements for safeguarding the sites themselves, the surrounding coastlines, the landscape settings, the pre-existing infrastructure, ease of accessibility and egress, materials requirements, etc.</p> <p>This perfunctory response lays bare the contempt the Applicant has for the; Planning Inspectorate, DCO process, people of Coastal Suffolk, the coastline, landscape, wildlife and exposes once again the lack of understanding they have of the immediate area and the region in which the site sits.</p> <p>Moreover, the Applicant continues at point d) that, "Local and regional firms have a competitive advantage in winning work (even without the proposed measures in the Draft Deed of Obligation (Doc Ref. 8.17(C)) – they have shorter travel times, smaller carbon footprints, and logistical benefits that translate into economic advantages.</p> <p>Again, the Applicant makes a very simplistic assertion, provides no evidence and in some industry sectors confounds logic applicable to some of the most easterly and rural points of England (i.e. accessibility to raw material/components, lead times, inbound transport costs, etc.).</p> <p>Finally, in expanding further the Applicant engages in a facile 'numbers game' quoting the Sizewell C Supply Chain Portal as having 1,385 businesses registered, of which 747 (54%) are in Suffolk, with another 575 (41%) outside Suffolk but within the 'Region'. Presumably the remaining 63 (5%) are based elsewhere (UK or otherwise).</p>

ExQ1	Question to:	Question:
		<p>What is not provided is; any quantification of the relative weighting (in either potential contract values or additional employment opportunities) of the commercial opportunity these entities might be able to compete for.</p> <p>Consequently, there is little hard evidence, even at this early stage as to what on the surface appear healthy numbers might mean in terms of local businesses and over what timescale.</p> <p>For example, if the 63 have 80% of the potential contract value opportunity across the piece, the most the Regional businesses might be able to compete for in contract value might only be 20%!</p>
	Response by Stop Sizewell C at Deadline 3	<p>Supply chain opportunities</p> <p>The Applicant has been asked about the scale of opportunities that might be available for local companies to provide services to SZC. In response, the applicant places considerable stress on the experience and successes that 'local and regional' companies have had in supplying services to the Hinkley Point C (HPC) project that is currently underway.</p> <p>The Applicant would like local audiences to believe that the experience with HPC is a good guide to what could be achieved with a supply chain in the Suffolk/Norfolk area. However, for reasons that we set out in our previous submission to the Inquiry at Deadline 2 (REP2-449I), the quantified estimates of supply chain stimulus for HPC is an entirely inappropriate benchmark for what would be likely to occur if the Sizewell C project is permitted and built as intended by the applicant. This is for two principal reasons:</p> <ul style="list-style-type: none"> <li>• First, the spatial impact area that is used by the applicant to assess the supply chain impacts of the HPC project is a much larger area than the area of Suffolk and Norfolk combined. Indeed, the spatial impact area used for the analysis of the HPC supply chain covers all of South West England (i.e. Wiltshire to Cornwall) and also all of South Wales, from Monmouthshire to Pembrokeshire. In short, the working age population and the number of businesses in the combined South West and South Wales area is around 5 times larger than the equivalent working age and business populations of Suffolk and Norfolk together.</li> <li>• The other key point is that having invested in developing a local and regional supply chain for HPC, the companies in that supply chain (including those in South West</li> </ul>



ExQ1	Question to:	Question:
		<p>England and Wales, but also other parts of the UK) now have a considerable advantage when it comes to compete for contracts to supply services to any new nuclear projects that might be permitted, including Sizewell C.</p> <p>In other words, having developed expertise and experience of working on the first new nuclear project in nearly three decades, the companies that are currently participating in the HPC supply chain would have a substantial competitive advantage when it comes to bidding for contracts to supply similar types of services to a Sizewell C project, were it to be permitted.</p> <p>For both of these reasons, the emphasis that the applicant is placing on the current experience of the HPC supply chain across the South West England and South Wales regions cannot be regarded as a sound basis for the assessment of the size and pattern of any potential supply chain impact associated with the proposed SZC project on the economy of Suffolk and Norfolk.</p>
	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p><b>Comparison between Hinkley Point C and Sizewell C 'impact areas'</b></p> <p>For clarity, Sizewell C's regional supply chain retention estimate (£1.5bn) is based on an early estimate of regional retention at Hinkley Point C - the comparative regional areas are broadly similar in population, jobs and GDP:</p> <ul style="list-style-type: none"> <li>a) Jobs (BRES, 2019): East of England = 2.785m; HPC Region (South West England and part of South Wales) = 2.783m</li> <li>b) GDP (ONS, 2019): East of England = £191bn; HPC Region (South West England and part of South Wales) = £224bn</li> </ul> <p><b>Perceived competitive advantage for South-West based companies</b></p> <p>The Sizewell C Project is learning from Hinkley Point C and the expertise built up there but that does not mean that every opportunity will go to a company or a worker that has previously worked on Hinkley Point C. As set out in the <b>Economic Statement</b> [<a href="#">APP-610</a>], paragraph 7.3.3 ".... SZC Co. will support 'intelligent replication' – using the as-built design of Hinkley Point C, while taking into account local conditions in order to develop and implement Sizewell C. Replication does not mean that the entire Hinkley Point C supply chain and workforce will be transferred to Sizewell C, rather than key contracts that are critical to replication of the power station are transferred."</p> <p>There are various aspects of the Sizewell C Project which are inherently local and will be undertaken by local firms and local people, and SZC Co. is encouraging as much local</p>

ExQ1	Question to:	Question:
		<p>involvement as possible through the Sizewell C Supply Chain portal (businesses do not have to be a member of the Suffolk Chamber of Commerce to register) and the early launch of the Sizewell C Jobs Service:</p> <p><a href="#">Sign up to Sizewell C Supply Chain - Sizewell C Supply Chain Jobs and training   Sizewell C   EDF (edfenergy.com)</a></p> <p>SZC Co. is in broad agreement on this with the Councils and has committed to a programme of activity to ensure that local businesses are aware of the opportunities available and are able to access support to ensure that they are prepared, and that they understand what the requirements are of the Sizewell C Project supply chain. Most recently, almost 100 companies attended the July 21 "<a href="#">meet the buyer</a>" webinar event, with more to follow in the Autumn. A substantial amount of work has happened in this regard already and future work will be secured through the <b>Deed of Obligation</b> (Schedule 7) (Doc Ref. 8.17(E)).</p> <p>Some contracts will be won, and workforce will be used, from Hinkley Point C where expertise and project knowledge has been developed – but this does not affect the proportion of home-based labour and supply chain benefits estimated (they are effectively accounted for by the NHB workforce and non-regionally-retained element of the supply chain spend).</p> <p>Local and regional firms have a competitive advantage in winning work – they have shorter travel times, smaller carbon footprints, and logistical benefits that translate into economic advantages.</p> <p>Interventions to be secured by the Draft Deed of Obligation are focused on local and regional firms, and support is being provided to local / regionally focused bodies such as the Councils, NALEP and Suffolk Chamber of Commerce to facilitate this.</p> <p>SZC Co. has engaged the Suffolk Chamber of Commerce to actively promote opportunities for the provision of goods and services by local consortia as these will provide stability within the supply chain, help reduce carbon footprint, and provide a legacy of business development in the region.</p> <p>Initial work is underway between SZC Co., the Suffolk Chamber of Commerce, and the Sizewell C Civil Works Alliance to identify which work packages will go to competitive tender in order for SZC Co. and Suffolk Chamber of Commerce to work together to look</p>

ExQ1	Question to:	Question:
		<p>at regional capacity and to encourage companies to sign up to the Sizewell C Supply Chain Portal</p> <p>SZC Co has identified an initial list of work packages available in the first 12 months of the construction phase. It is estimated that these contracts in total could be in excess of £500m.</p>
G.1.32	The Applicant	<p><b>Permanent SSSI Crossing</b></p> <p>In paragraphs 2.2.135 and 2.2.136 of [AS-181] the crossing bridge is said to be 30m long and 45m wide, in paragraphs 2.7.7 and 2.7.9 of [AS-202] the crossing bridge is said to be approximately 40m long and 40m wide and in paragraph 3.2.3 of the FRA Addendum [AS-157] the bridge is said to be 30m wide. In the plan SZC-SZ0100-XX-000-DRW-100205 [PDA-005] it is 40m long and 30m wide. Confirm the following:</p> <p>(i) The length of the proposed bridge (north /south); and</p> <p>(ii) The width of the proposed bridge at soffit level (east/west).</p> <p>Please update the plans to record the conclusion.</p>
	Response by SZC Co. at Deadline 2	<p>(i) The distance between the bank seats located at either end of the bridge would be approximately 30m. Please refer to <b>Section A-A of Drawing SZC-SZ0100-XX-000-DWG-100205</b> [PDA-005]. This is considered to be consistent with paragraph 2.2.135 of [AS-181]. This is replicated at Paragraph 3.4.35 of [AS-202].</p> <p>(ii) The width of the proposed bridge (east/west) at crest level would be 40m during the construction phase. Please refer to Section B-B of Drawing SZC-SZ0100-XX-000-DWG-100207 [PDA-005].</p> <p>In response to ecological concerns raised by stakeholders, SZC Co. has further optimised the design and proposes to reduce the width of the bridge to approximately 15m once the power station has been built. This would be achieved by removing part of the bridge deck. It is also proposed to raise the soffit level of the bridge in response to stakeholder feedback. Updated indicative plans and further details will be submitted at Deadline 4. Requirement 12C of the <b>draft DCO</b> (Doc Ref. 3.1(C)) will be updated at the same time to secure primary mitigation.</p>

ExQ1	Question to:	Question:
	Response by RSPB at Deadline 3	<p>We welcome the proposal to reduce the width of the bridge to approximately 15m once the power station has been built. However, we note that the Applicant proposes to submit updated indicative plans and further details at Deadline 4. We are concerned that only indicative plans will be submitted at Deadline 5 and without full details potential impacts cannot be adequately considered and assessed.</p> <p>We also highlight that Deadline 5 is after the biodiversity ISHs on 15 and 16 July where this issue may arise. We therefore request detailed plans are submitted to the Examination at the earliest opportunity and if possible before the ISH, with adequate time for parties to consider.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>Updated plans for the SSSI crossing design have been shared informally with relevant stakeholders, including the RSPB and Suffolk Wildlife Trust, in advance of the ISH on 15<sup>th</sup> July. These plans are also submitted at Deadline 5 (Doc Ref. 2.5(A)).</p> <p>Requirement 12C of the draft Development Consent Order is also updated at Deadline 5 to ensure that details of the layout, scale and external appearance of the permanent SSSI Crossing comprises a bridge:</p> <ul style="list-style-type: none"> <li>- span no wider than 15m.</li> <li>- soffit no lower than 6.8mAOD at its intersection with Leiston Drain.</li> <li>- crest height no lower than 8.6mAOD.</li> </ul> <p>The construction and permanent stages of the SSSI Crossing must also be built in general accordance with the updated plans submitted at Deadline 5 (Doc Ref. 2.5(A)).</p> <p>The design update falls within the Rochdale envelope assessed for the purposes of environmental assessment and the above serves only to further constrain the parameters in response to stakeholder feedback.</p> <p>Requirment 12C also now requires details of working methods within the SSSI and a timetable for the return of temporary SSSI land be submitted to East Suffolk Council, following consultation with the Environment Agency and Natural England.</p>

ExQ1	Question to:	Question:
		The update also brings the benefit of not needing to adapt the SSSI Crossing during the operational period of the power station, which would have required parts of the crossing to have been re-landscaped to accommodate the increased height. Further details on why this is not necessary are provided in <b>SZC's Comments on Responses from Earlier Deadlines - SSSI Crossing Future Adaptation Review</b> provided at Deadline 5 (Doc Ref. 9.54).
G.1.33	The Applicant	<b>Permanent SSSI Crossing</b> Explain in detail why the width of the crossing needs to be around 40m at crest level given only the permanent access road will remain at operation.
	Response by SZC Co. at Deadline 2	SZC Co. has further examined whether the crossing needs to retain a width of 40m in its permanent operation. As stated in response to Question <b>G.1.32</b> , in response to feedback from stakeholders following the January 2021 change application, SZC Co. commissioned a design review to determine if the structure could be optimised to further reduce impacts on Sizewell Marshes SSSI. This included consideration of the adaptive design. SZC Co. now proposes to reduce the width of the bridge to approximately 15m once the power station has been built. This would be achieved by removing part of the bridge deck. Updated indicative plans and further details will be submitted at Deadline 4. Requirement 12C of the <b>draft DCO</b> (Doc Ref. 3.1(C)) will be updated at the same time to secure primary mitigation
	Response by RSPB at Deadline 3	We welcome the proposal to reduce the width of the bridge to approximately 15m once the power station has been built. However, we note that the Applicant proposes to submit updated indicative plans and further details at Deadline 4. We are concerned that only indicative plans will be submitted at Deadline 5 and without full details potential impacts cannot be adequately considered and assessed.  We also highlight that Deadline 5 is after the biodiversity ISHs on 15 and 16 July where this issue may arise. We therefore request detailed plans are submitted to the Examination at the earliest opportunity and if possible before the ISH, with adequate time for parties to consider.

ExQ1	Question to:	Question:
	<b>Response by SZC Co. at Deadline 5</b>	Please see Deadline 5 response to <b>Question G.1.32</b> above.
G.1.34	The Applicant	<p><b>Permanent SSSI Crossing</b></p> <p>A number of IP's have referred to a crossing option of a three span bridge, that was considered at Stage 2 consultation. This is outlined in Appendix D7 [APP-072]. In Table 7.2 of that document it sets out the relative merits of a number of options including a three span bridge. This three span bridge option is stated to have the least land take from the SSSI and also has the least width of 35.5m, which includes the temporary bridge that would be ultimately removed. The current proposal has a final footprint width of 70m. This width is greater than any option in that previous consultation and presumably has a higher land take from the SSSI especially as there would be no removal of temporary incursion into the SSSI. Provide:</p> <p>(i) Explanation in detail why the three span bridge approach in the Stage 2 consultation is no longer being proposed, given the implications for the SSSI set out in Table 7.2 and Table 7.3; and</p> <p>(ii) The estimated land take of the current single span bridge proposal.</p>
	Response by SZC Co. at Deadline 2	<p>(i) The triple-span bridge is not proposed because of its substantial effect on the construction programme. This is because it would delay the movement of bulk earthworks from the deep excavation to the Temporary Construction Area. The 6-12 month programme saving benefits of the proposed SSSI Crossing are considered to outweigh the impact caused by the permanent loss of a small additional area of the Sizewell Marshes SSSI.</p> <p>The triple span bridge is estimated to take 35 weeks to provide its first crossing (a short-term modular bridge), compared with 17 weeks for the proposed solution. During the 18-week delay associated with the triple span bridge, no bulk earthworks at all can be transported to the Temporary Construction Area.</p> <p>The second milestone under the triple-span bridge option would be when the temporary triple-span bridge is complete next to the modular bridge. This is when full-size haul vehicles can use the SSSI Crossing. It would take approximately 30 weeks longer in total to reach the point where full-size haul vehicles, which have a much greater</p>

ExQ1	Question to:	Question:
		<p>carrying capacity, can use the triple span bridge compared with the proposed solution. The final milestone is when the SSSI Crossing is complete. The proposed solution can be constructed in a total of approximately 55 weeks, whereas the triple-span bridge option would take more than twice as long (approximately 108 weeks in total). Whilst full-size vehicles can use the crossing from the second milestone, the capacity for bulk earthworks movements is substantially constrained because the temporary triple-span bridge would need to be shared with other construction-related vehicles whilst the permanent triple-span bridge is under construction.</p> <p>Overall, the effect of constraints to bulk earthworks movements that would be caused by implementing the triple span bridge option is a 6-12 month delay to the overall construction programme of SZC.</p> <p>(ii) The permanent SSSI land-take for the proposed SSSI Crossing, as defined by the footprint of the embankments located at either end, is approximately 0.21ha.</p> <p>The permanent SSSI land-take for the triple span bridge option, as defined by the footprint of its (smaller) embankments and areas of permanent ground improvement required for the temporary bridge, is approximately 0.19ha. This area of ground improvement is included in the permanent land take even though the temporary bridge would be removed, because the works would have been so extensive that the land could never have feasibly become SSSI status again. Works would have included substantive piling, overlaid with a reinforced granular stone load transfer platform. The platform would have needed to extend up to the central span to create a working area for construction activity.</p> <p>Further to the above, SZC Co's response to question <b>G.1.32</b> states that in response to ecological concerns raised by stakeholders, SZC Co. now propose to constrain the width of the bridge to approximately 15m once the power station has been built. This is narrower than the width of the triple span bridge, which would have been approximately 18.5m. Narrowing the proposed bridge post-construction substantially reduces long-term ecological impacts on the SSSI, which are mainly associated with shading.</p>
	Response by RSPB at Deadline 3	As detailed in our Written Representations submitted at Deadline 23 we are still unconvinced about the Applicant's justification for the choice of the SSSI crossing option rather than a triple span bridge to cross Sizewell Marshes SSSI, despite the higher land take from the SSSI. In addition we are concerned that this larger loss of the

ExQ1	Question to:	Question:
		<p>SSSI (even with the reduced width in operation as currently proposed) compared to the triple span bridge option has not been adequately considered nor that the Applicant has minimised all possible impacts to the SSSI and its features.</p> <p>Whilst the land take might be only 0.02ha more (approximately 10% more) with the proposed design re-adjustment, the shading effect due to the intricacy of the design differences may lead to significantly more fragmentation. It is welcomed that the proposal for operational width is reduced to 15 metres and we note that one of the other options - the triple-span bridge is 18.5 metres, we query whether the 18.5 metres allow more light than the 15 metres? The differences might be important in terms of what vegetation colonises. Crucially what is needed are detailed designs and impact assessments.</p> <p>The Applicant has stated</p> <p><i>This area of ground improvement [that would be required for the temporary bridge for the three span bridge option] is included in the permanent land take even though the temporary bridge would be removed, because the works would have been so extensive that the land could never have feasibly become SSSI status again.</i></p> <p>This suggests the area of land required for the two "Bailey" style temporary crossings for the proposed SSSI crossing option and any land now proposed to be released when the crossing width is reduced from 40m to 15m post construction will also never feasibly become SSSI status again. We request the Applicant assesses the impacts of the proposed crossing option on these areas of land and submits the assessment to the Examination at the earliest opportunity.</p>
	Response by Suffolk County Council at Deadline 3	<p>The difference in time for delivery of the two approaches should be tested more thoroughly if this is to be seen as the major driver for the use of a scheme which SCC and other parties see as more damaging environmentally.</p> <p>The Applicant suggests in their answer that the difference between the SSSI land take by a bridge (0.19ha) and the causeway (0.21ha) is only 0.02ha greater. This appears counter-intuitive, given the much wider splay that the embankments of a causeway would have than a bridge. Further evidence on this would be appropriate.</p> <p>There is a proposal to reduce the causeway bridge width in operational phase. The Applicant should confirm how it can be assured that will be achieved.</p>



ExQ1	Question to:	Question:
	Response by Together Against Sizewell C at Deadline 3	<p>TASC are appalled by the Applicant's statement that they are not prepared to mitigate the adverse impact of the SSSI crossing purely for commercial reasons. In TASC's opinion, no damage to the SSSI is acceptable to deliver this project. The Applicant's answer that they are not willing to lessen the impact on the natural environment stating it will cause a 6 to 12 month delay to the project exposes their lack of respect for the environment in which they operate. In TASC's opinion the Applicant has delayed the whole process by: 10 years of poor consultations dismissing valid local knowledge and opinions, leading to the Applicant presenting to the ExA a DCO with misleading plans, insufficient detail and missing information (a situation that has continued throughout the DCO process, as evidenced by the lack of progress with rail transport, the lack of details of sea defences, lack of definitive supply of mains water, lack of finance to complete the project etc etc); submitting material changes just weeks after the acceptance of the DCO leading to further delay as these needed to be consulted on. The Applicant's shortcomings and lack of impetus to further their SZC project has resulted in SZC, despite being nominated by the Applicant in 2009 if approved, unlikely to be deployed by 2035, so TASC find it galling that the Applicant's preference is to increase environmental damage to the Sizewell Marshes SSSI rather than accept a short delay to a project that the Applicant has dithered and delayed on for years.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>In response to RSPB's comments, the following SSSI land within the footprint of the SSSI Crossing is considered to be incapable of returning to SSSI status: land located within the perimeter sheet pile walls and associated areas of ground improvement; and, land underneath the permanent 15m wide bridge span.</p> <p>The area of land between the two sheet piles (where the Leiston Drain is located) has no ground improvement works. The portion of that land that is not then underneath the permanent bridge is considered capable of re-establishing primarily wet woodland vegetation, which is the habitat currently located there. The approach is the same for the SSSI Crossing and the discounted triple-span bridge option.</p> <p>It is not considered that an 18.5m span bridge could lead to less overshadowing than a 15m wide bridge – particularly given they would have the same soffit height and both would be of solid construction.</p>

ExQ1	Question to:	Question:
		In response to SCC comments, please see the <b>Written Summary of Oral Submissions for Issue Specific Hearing 7: Biodiversity and Ecology</b> (15 July 2021) for further details (Doc Ref. 9.47).
G.1.37	The Applicant	<p><b>Permanent SSSI Crossing – Adaptive Sea Defence</b></p> <p>Paragraph 2.2.134 of [AS-181] states that by 2090 the maximum crest height of the SSSI crossing is likely to need to be increased to 10.5m AOD. Provide:</p> <ul style="list-style-type: none"> <li>(i) A section similar to the adaptive design shown in Figure 2.2.25 in [AS-190] showing how the adaptive design may be constructed on the SSSI crossing;</li> <li>(ii) An explanation of the monitoring process to ensure the adaptive defence is delivered when required and how this process is secured within the DCO;</li> <li>(ii) A description of how the works required to deliver the adaptive defences are secured within the DCO; and</li> <li>(iv) An explanation as to whether consideration has been given to construct the SSSI crossing at the 10.5m AOD height at the start of the project.</li> </ul>
	Response by SZC Co. at Deadline 2	<ul style="list-style-type: none"> <li>(i) In addition to the reduced width set out in response to question <b>G.1.33</b>, SZC Co. propose to reduce the height of the adaptive design to below the 10.5m maximum height parameter. Further details will be provided at Deadline 4. It is proposed that a section is provided at that deadline, rather than providing a section of the current illustrative design at Deadline 2, which is about to change.</li> <li>(ii) The <b>Coastal Processes Monitoring and Mitigation Plan (Volume 3, Appendix 2.15.A</b> of the <b>ES Addendum</b> [AS-237]) states that Sizewell Marine Technical Forum (MTF) has been established 'to facilitate open and transparent dialogue between SZC Co. and the statutory environmental bodies (and their advisors) relating to marine monitoring of the SZC Project'. Paragraph 7.1.37 in the <b>Main Development Site Flood Risk Assessment</b> [AS-018] confirms that the impacts of climate change on sea level rise would be monitored and assessed at set intervals (e.g. 10 years) to determine the trajectory of the projections (e.g. in terms of sea level rise or increased storminess) and consider whether there is any change from either the currently considered projections or the climate change guidance as applied within the Application. The Applicant notes that the</li> </ul>

ExQ1	Question to:	Question:
		<p>periodic safety review would aid in the decision-making process regarding whether and when there is a need to raise the sea defences. An explanation of how this is secured is set out below.</p> <p>(iii) It is proposed that a new requirement is included in the <b>Draft DCO</b> (Doc Ref. 3.1(C)), Requirement 12C, to secure the details of the layout, scale and external appearance of the SSSI Crossing, along with the monitoring arrangements, including water levels and the trigger points when the adaptive design may need to be implemented.</p> <p>In the light of evolving design, further details will be provided at a future deadline, as set out above.</p> <p>(iv) SZC Co. does not consider it would be justified to construct the SSSI Crossing at the taller height from the outset given it is not predicted to be required until at least 2090.</p>
	Response by RSPB at Deadline 3	<p>We note that Schedule 11 of the Draft Deed of Obligation explains in item 10. MARINE TECHNICAL FORUM 10.1 The Marine Technical Forum shall operate in accordance with the Marine Technical Forum Terms of Reference unless otherwise agreed by the members of the Marine Technical Forum.</p> <p>We question whether the governance and operating procedures of the Marine Technical Forum are clearly understood at this stage and whether it is sufficient, as questioned by the ExA to not at least have details of how the adaptive defence is to be delivered, within the DCO. We would also question whether it is adequate to leave so much to be determined at a later stage. For confidence to be placed on the DCO processes and measures, more detail should be required now for review and so the ExA can receive comments from the interested parties.</p>

	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p>SZC Co. confirms that the height of the optimised SSSI crossing has been raised to provide a road level above +8.6mOD that designs-in adequate resilience such that there is no reasonably foreseeable need to adapt the bridge due to climate change in the future. Refer to SZC Co's Deadline 5 response to <b>Question G.1.32</b> and the <b>SZC's Comments on Responses from Earlier Deadlines - SSSI Crossing Future Adaptation Review paper</b> (Doc Ref. 9.54) (submitted at Deadline 5) for further details.</p> <p>Periodic monitoring of sea-levels and other climate change parameters will be periodically reviewed as part of the Nuclear Site Licence in respect of external hazards. The details are yet to be confirmed, but Section 2(iii) of Requirement 12B of the <b>draft DCO</b> (Doc Ref. 3.1(D)) states that SZC Co must provide:</p> <p>iii) <i>[include] a monitoring and adaptive sea defence plan that sets out the periodic monitoring proposals for the sea defence features and the trigger point for when the crest height of the sea defence would need to be increased to 16.9m (AOD).</i></p> <p>SZC Co is still in discussions with ESC in relation to the wording of Requirements but the necessary monitoring arrangements will be secured.</p> <p>Section 1 and Section 2(i) and 2(ii) of Requirement 12B secure the design details of the HCDF and, by extension, the adaptive HCDF when those works trigger the necessary modification:</p> <p><i>Construction of Work No. 1A(m) (permanent beach landing facility), Work No. 1A(n) (soft coastal defence feature), Work No. 1A(o) (hard coastal defence feature), Work No. 1A and Work No. 1A(bb) (temporary beach landing facility) must not commence until :</i></p> <p><i>(a) details of the layout, scale and external appearance of that work in respect of land landward of the mean high water springs have been submitted to and approved by East Suffolk Council, in consultation with the Marine Management Organisation. ; and (b) details of the layout, scale and external appearance of that work in respect of land seaward of the mean high water springs have been submitted to and approved by the Marine Management Organisation, in consultation with East Suffolk Council.</i></p> <p><i>(2) The details referred to in paragraph (1) must:</i></p> <p><i>i) be in general accordance with the design principles set out in Chapter 5 of the Main Development Site Design and Access Statement and ;</i></p>
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		<p><i>ii) be in accordance with the Main Development Site Operational Parameter Plan – Operational Platform (SZC-SZC100-XX-100-DRW-100043).</i></p> <p>Similarly the works must be in agreement with the <b>Code of Construction Practice (CoCP)</b> (Doc Ref. 8.11(C)) which is secured by Requirement 2 of the <b>draft DCO</b> (Doc Ref. 3.1(D)).</p>
G.1.42	The Applicant	<p><b>Draft DCO</b></p> <p>In [AS-148] Table 2 refers to how Article 3 and 4(1)(a) set vertical limits to control the parameters of development.</p> <p>(i) Please explain how this would be achieved for each of the associated development sites where there are no parameters plans and are not specifically covered by these articles except for Work No. 4C, Work No. 11 and Work No. 12.</p> <p>(ii) Is it not fairer to say that there are no vertical limits of deviation in these locations as parameter plans have not been provided and as the DCO is currently drafted?</p> <p>As this document is intended to be a signposting document to aid the public’s understanding of the DCO, is this a fair representation to them?</p>
	Response by SZC Co. at Deadline 2	The ExA is referred to <b>Appendix 14I – DCO Drafting Note 9</b> of the written responses.
	Response by East Suffolk Council at Deadline 2	ESC shares the ExA’s concerns in relation to the absence of limits of deviation and refers the ExA to its response to question G.1.0.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by East Suffolk Council at Deadline 3	ESC maintains its previous position. Despite the Applicant’s Drafting Note 9 submitted for Deadline 2 which seeks to explain the Applicant’s approach to limits of deviation, ESC considers that the approach to any committed limits of deviation remains unclear. ESC would like to see Article 4 drafted so that it directly ties the limits of deviation to a distinct set of plans where these limits, both horizontal and vertical, are shown.

	<b>Response by SZC Co. at Deadline 5</b>	<p>This issue was addressed at Issue Specific Hearing 1. The Applicant refers ESC to <b>Written Summary of Oral Submissions at Issue Specific Hearings 1: Draft DCO and Section 106 Agreement/Deed of Obligation</b> (Doc Ref. 9.41) and the <b>Written Submissions Responding to Actions Arising from ISH1: Draft DCO and Section 106 Agreement/Deed of Obligation</b> (Doc Ref. 9.48).</p> <p>In summary, Article 4 is subject to the limits set out within the requirements. The park and ride sites and the freight management facility (Work No.s 9, 10 and 13) include drawings submitted for approval (Schedule 7) [APP-034, APP-036 and APP-053], which define the proposed finished levels, building heights are then defined in the <b>Associated Development Design Principles</b> [REP3-023], which are then secured by requirement 20. These drawings and the parameters provided within the Associated Development Design Principles provide clearly defined parameters. The Statement of Compliance that would be submitted and approved by ESC to discharge Requirement 20 would then confirm that the final designs are within these defined limits. It is unclear what further controls ESC would seek to impose on the scheme than those already secured by Article 4 and Requirement 20.</p>
G.1.45	The Applicant, All relevant local authorities, EA	<p><b>Code of Construction Practice</b></p> <p>The CoCP [AS-273] sub heading m) indicates SZC Co. would hope to lead on complaints.</p> <p>Please explain how this would be undertaken to respect privacy and comply with the GDPR as well as enforcing authorities' responsibilities to investigate complaints.</p>
	Response by SZC Co. at Deadline 2	<p>All complaints are and will continue to be recorded and monitored through the 'Tractivity' database used by SZC Co. and personal data will be processed in accordance with SZC Co.'s privacy policy, which ensures compliance with the GDPR. The privacy policy is available here: <a href="https://sizewellcdco.co.uk/privacy-notice-and-policy/">https://sizewellcdco.co.uk/privacy-notice-and-policy/</a> . It is, and will continue to be reviewed regularly and updated as necessary.</p> <p>SZC Co. will monitor, record and provide information on complaints monthly to relevant authorities via the communications teams. This would not disclose any personal data that could breach the GDPR.</p>
	Response by East Suffolk Council at Deadline 2	<p>Paragraph 3.1.45 – 3.1.49 of the CoCP [<a href="#">AS-273</a>] does reference SZC Co. as taking responsibility for all enquiries and complaints.</p>

		<p>However, ESC, as a statutory investigating authority for planning and noise complaints is not able to hand this responsibility to the Applicant. Statutory complaints will therefore continue to be investigated by ESC in consultation with the Applicant where appropriate.</p> <p>Minor complaints or queries that are considered by ESC to be better dealt with by the Applicant, will be referred to the Applicant following a process to be agreed. At 3.1.47 [<a href="#">AS-273</a>] the Applicant acknowledges that ESC may also respond where it has overall responsibility.</p> <p>ESC, upon taking a call that is considered better dealt with by the Applicant would re-direct the caller to the Applicant thus avoiding any compromise of our own published privacy and GPDR requirements. If a caller is making a complaint that ESC has a duty to investigate under our statutory responsibilities, then we will do so in accordance with our existing privacy and GPDR requirements.</p> <p>Although article 10 of the draft DCO proposes some limitations on the scope of statutory nuisance proceedings (see also the response to DCO.1.28 below) the duty remains placed upon ESC under S.79 of the Environmental Protection Act 1990 to investigate complaints of statutory nuisance received. ESC will still be responsible for enforcing the DCO and associated documents to ensure that agreed criteria are being complied with and this will rely partially on involvement in the complaints process. It is likely that we would require notification of complaints and regular updates on investigation and actions taken on complaints received directly by Sizewell C, we would also liaise with Sizewell C about complaints received directly by us in our role as the regulatory authority in respect of the DCO and relevant legislation. ESC would disagree that SZC Co would "lead" on complaints although their role in investigating and resolving them is critical. On a project of this scale and scope we would envisage that there would be a collaborative approach in dealing with complaints to efficiently resolve matters arising but ultimately, we are the regulating authority for many matters including the DCO itself. In terms of reconciling any information sharing with Sizewell C this would have to be compliant with the GDPR and would not occur if it were otherwise.</p>
	Response by Suffolk County Council at Deadline 2	We defer to ESC's response to this question.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.

	Response by Ian Galloway at Deadline 3	<p>There being a significant issue of Public Interest in respect to the behaviour of the Applicant, their agents and suppliers in respect to; the proposed programme of construction, operation and subsequent decommissioning of a power station, the question has to be asked as to whether Public Safeguards and interests are best served by the Applicant taking the lead on complaints.</p> <p>It is suggested that at the very least; an independent audit of complaints made in respect of the Applicant, their agents, suppliers and contractors is conducted on a continuous basis and that the Applicants Complaints Handling Capabilities, Processes, Procedures and Reporting are similarly open to audit from time to time.</p> <p>Alternatively, a totally discrete complaints management environment would be preferable providing total transparency and independence from the day to day influence of the Applicant, its management and their operational priorities which may not always align with public interests.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>It should be noted that East Suffolk Council would be the body responsible for enforcement of potential breaches of controls set out in the DCO, or within the Deed of Obligation. The reference to the complaints handling procedures in the <b>CoCP</b> Part A (Doc Ref. 8.11 (C)) is part of SZC Co.'s commitment to ongoing community engagement which ensures that there is a clear process for issues of concern to local residents and stakeholders to be raised directly to the SZC Co. project team, with a view to resolving issues where possible. This process would not seek to replace any enforcement process that would be available to East Suffolk Council.</p>
G.1.46	The Applicant, Network Rail	<p><b>Green Rail Route and Land East of Eastlands Industrial Estate (LEEIE)</b></p> <p>(i) In the event the Saxmundham to Leiston branch line is modified as proposed and both the LEEIE and Green Rail Route are established could they both be operational at the same time?</p> <p>(ii) Please explain whether this is possible and if not what would be in place to prevent it?</p> <p>(iii) Has the ES assessed the possibility of both operating together?</p>
	Response by SZC Co. at Deadline 2	<p>i) Based on the proposed designs, it would be technically possible to operate both the Green Rail Route and the LEEIE at the same time, although simultaneous operation is not intended.</p>



	<p>ii) The design is being optimised for sequential operation of the LEEIE, and then the Green Rail Route. For example, the signalling design is being developed to enable access to the LEEIE, and then the Green Rail Route. While both pieces of infrastructure could theoretically be operated simultaneously, this would require a specifically agreed operational process. Any simultaneous use of the infrastructure in the course of normal operation has not been identified as a design requirement and would only be likely during a short changeover period.</p> <p>iii) Please see the response to question <b>TT.1.90.</b></p>
Response by Network Rail at Deadline 2	<p>The applicant has entered into a BAPA arrangement with Network Rail. As part of this undertaking a full review of designs and interoperability will be undertaken. At this stage we are unable to provide comments on the designs proposed.</p> <p>N.B Green Rail Route and Land East of Eastlands Industrial Estate (LEEIE) is being developed by EDF.</p>
Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
Response by Ian Galloway at Deadline 3	<p>It is noted the Applicant does not totally discount both being operational simultaneously. An unequivocal answer is sought, whether yes (i.e. during a short changeover period.) or no, simultaneous use will not occur.</p> <p>If the former rather than the latter, it is suggested that an estimate of; occurrences, duration and time of day, etc. be sought from the Applicant</p>
Response by Suffolk County Council at Deadline 3	There is concern that the work being undertaken by the Applicant could result in the project delivery being fragmented. SCC needs to see a full programme of work on both the East Suffolk Line and Leiston Branch Line with information on how both pieces of work will be aligned and delivered in a way that is not disruptive to passenger rail and rail freight services.
<b>Response by SZC Co. at Deadline 5</b>	SZC Co. expect only a short transition in the transfer of rail operations from LEEIE to the temporary construction area (TCA) via the Green Rail Route. No additional environmental effects are likely during the transition. The work in completing the Green Rail Route would have no impact on passenger services and it is not understood why SCC needs to see a full programme of work for a transition which impacts only on SZC trains and which SZC Co will manage in order to meet its own requirements.

G.1.47	The Applicant	<p><b>Main Development Site</b></p> <p>Please will the Applicant confirm that the Main Development Site as defined in the ES glossary [APP-005] is exactly the same as the Main Development Site as defined in the dDCO (both the original [APP-059] and the current version). The wording is different. If there are differences, please supply plans setting them out and an explanation.</p>
	Response by SZC Co. at Deadline 2	<p>In the context of the ES, the 'main development site' comprises five main components:</p> <ul style="list-style-type: none"> <li>(1) the main platform;</li> <li>(2) the Sizewell B relocated facilities and National Grid works;</li> <li>(3) the offshore works area;</li> <li>(4) the Temporary Construction Area (TCA); and</li> <li>(5) the Land East of Eastlands Industrial Estate (LEEIE).</li> </ul> <p>In addition certain additional sites fall within the same area assessed, which are:</p> <ul style="list-style-type: none"> <li>(6) the permanent off-site sports facilities at Leiston;</li> <li>(7) fen meadow compensation sites at Benhall, Halesworth and Pakenham; and</li> <li>(8) marsh harrier improvement area.</li> </ul> <p>In the context of the <b>Draft DCO</b> (Doc Ref. 3.1(C)), the 'main development site' is limited to Work Nos. 1A-1E, which comprises the five main components except for the offshore works area, which for the reasons given in the Applicant's response to question <b>DCO.1.20</b> is treated separately. The off-site elements of the main development site have their own separate Work Nos in the dDCO, which are: Work No 5 (sports facilities) ((6) above); Work Nos 6, 7 and 8 (fen meadow sites) ((7) above); and Work No 8 (marsh harrier site) ((8) above).</p> <p>The subdivision of the main development site in the DCO into different Work Nos is necessary because the same Requirements do not apply to all parts of the main development site as defined in the ES. The Applicant's response to question <b>DCO.1.20</b> sets out further explanation as to why the main development site is defined as it is in the DCO.</p> <p>The extent of the main development site as defined in the ES can be found in <b>Volume 2, Chapter 1, Figures 1.1 - 1.12</b> [APP-179], with the Pakenham site shown in <b>Figure 2.2.26</b> of the <b>ES Addendum</b> [AS-190].</p>

		The main development site as defined in the <b>dDCO</b> is shown on Works Plans on sheet nos. 1-5 and 7-8 (Doc Ref. 2.3(C)).
	Response by Ian Galloway at Deadline 3	<p>It remains unclear what the Applicant is saying insofar as "In the context of the ES, the 'main development site' comprises five main components.." (listed as items 1-5), yet "In the context of the Draft DCO(Doc Ref. 3.1(C)), the 'main development site' in limited to Work Nos. 1A-1E, which comprises the five main components except for the offshore works area..."</p> <p>It seems to the casual observer that an unequivocal answer was sought (whether yes or no, with a suitable and unambiguous explanation), but the Applicant is unable (or unwilling) to provide one.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>It is accepted that the definitions of the main development site set out in the <b>ES</b> and the DCO are different. The differences between the two are necessary as the DCO needs to differentiate the works in order to allow the associate mitigation to be effectively secured by the DCO requirements, Deemed Marine Licence Conditions and commitments made within the Deed of Obligation.</p> <p>For the avoidance of doubt, the <b>draft DCO</b> (Doc Ref. 3.1(D)) defines the main development site as Work No. 1, whereas the ES definition of the main development site would comprise Work Nos. 1, 2, 3 and 4 insofar as located within the temporary construction area. The main development site considered within the ES is illustrated within <b>Volume 2, Figure 1.2</b> of the <b>ES</b> [APP-179]. In addition, Work No.s 5 to 8, the Sports Facilities and offsite ecological mitigation sites have been considered within <b>Volume 2</b> (Main Development Site) of the <b>ES</b>, albeit they do not form part of the main development site definition within the <b>ES</b>.</p>
G.1.51	The Applicant, Network Rail	<p><b>Freight Trains</b></p> <p>(i) Please advise of the stages to go through to confirm that freight trains could begin to deliver materials to both Land East of the Eastlands Industrial Estate (LEEIE) and the Main Development Site (MDS) using the Green Rail Route.</p> <p>(ii) Please set out what you consider to be a realistic time frame for the delivery and facilitation of both options in the event the DCO were to be granted.</p>
	Response by SZC Co. at Deadline 2	<p>(i) Project Stages (common to all railway projects):</p> <p>In addition to approvals necessary through the DCO process, the Sizewell C rail projects are being developed and delivered in line with Network Rail (NWR) standards</p>

		<p>NR/L1/INI/PM/GRIP/100 (Governance for Railway Investment Projects) and NR/L2/INI/02009 (Engineering Management for Projects). This includes the Green Rail Route and LEEIE sections which, as temporary sections of track, will remain the responsibility of SZC Co. throughout the period of their operational use. As such there is no obligation on SZC Co. to comply with NWR standards; however, compliance with these standards demonstrates the "best practice" approach being adopted by SZC Co. In summary, the steps are:</p> <ul style="list-style-type: none"> <li>• GRIP 3 – Single Option Selection</li> <li>• GRIP 4 – Single Option Development to achieve Approval in Principle (AiP) by NWR of the design. This confirms compliance with the appropriate technical standards.</li> <li>• GRIP 5 – Detailed Design, based on AiP design, with inter-disciplinary check and reviews and independent design checks carried out. Acceptance of the detailed design by suitably qualified and experienced NWR and SZC engineers. Designs progressed to "Approved for Construction" status.</li> <li>• GRIP 6 – Construction of the new and upgrade infrastructure works associated with the project, in line with the accepted design and specification for the work. Testing &amp; Commissioning activities to confirm operation to the operator and maintainer prior to bringing into use.</li> <li>• GRIP 7 – Handover, transferring responsibility for the new and upgraded assets to the operator and maintainer, likely to be NWR for the existing branch line; and the appointed Freight Operating Company (FOC) for the Green Rail Route and LEEIE.</li> </ul> <p>Compliance with the NWR GRIP and Engineering Management standards will ensure that, once commissioned, the new and upgraded rail infrastructure will be capable of operating the rail services required for construction of SZC. There are, however, additional elements which need to be in place prior to the commencement of these services. These include the following:</p> <ul style="list-style-type: none"> <li>• Freight Customer Track Access Contract, between NWR and SZC Co. This sets out the terms on which SZC Co. is entitled to operate services. Where SZC Co. requires services to be operated, it issues a "drawdown notice" to NWR and the FOC. NWR and the FOC then enter into an access contract as below. This contract requires the approval of the Office of Road and Rail (ORR).</li> </ul>
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		<ul style="list-style-type: none"> <li>• Freight Track Access contract, between NWR and the FOC. This is required to secure the train paths to allow the proposed SZC freight trains to operate on the national railway network. This contract requires ORR approval.</li> <li>• Connection Agreement, between NWR and SZC Co. to secure approval to make the proposed temporary rail connections between the Saxmundham to Leiston branch line and the development site. This agreement requires ORR approval.</li> <li>• Asset Protection legal agreements or implementation agreements, between NWR and SZC Co., under which SZC Co. secure the services of NWR to support the development and / or delivery of the necessary infrastructure changes. A schedule of these agreements is set out in the NWR / SZC Co. Statement of Common Ground.</li> <li>• Framework Agreement / Protective Provisions between NWR and SZC Co, the purpose of which is to regulate aspects of the relationship between NWR and SZC Co. to ensure that NWR's interests are properly protected in relation to the implementation of the Works.</li> <li>• Land Access licences or agreements between NWR and SZC Co., to secure the necessary access to NWR property to enable the infrastructure work to be carried out.</li> <li>• Network Change. A formal process, led by NWR, under which all users of the railway infrastructure are consulted on the proposed changes, leading to ORR approval.</li> <li>• Level Crossing Order. A formal process, led by the crossing operator, generally NWR, to secure approval to changes to the layout or operation of level crossings, leading to ORR approval.</li> </ul> <p>(ii) Realistic timeframe for these activities: The summary timeframe for the proposed rail works is as shown below. This timeframe includes a suitable allowance for putting in place the necessary agreements as listed above.</p>
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		cannot conclude from this that the Applicant is going to be able to achieve its capacity aspirations for rail freight.
	Response by Together Against Sizewell C at Deadline 3	The summary timeframe shown on page 66, shows that GRIP stage 3 will not be completed until end of July this year. GRIP stage 3 leads to the selection of a single option. As this process started back last September are you now in a position to say what this single option will be and whether you are in a position to issue a draft version of signalling scheme plans showing the works associated with the Saxmundham Junction upgrade, Branchline Upgrade and the Green Rail Route? The Branchline Upgrade work is shown to be completed at the end of January 2024. Please confirm that this includes the commissioning of the eight level crossing upgrades on the route. The applicant's previous submission of November/December 2020 referred to a two train service per night to LEEIE in 2023. Can the applicant clarify whether it is their intention to run these services before the safety upgrades to the crossings are completed? It would greatly assist the examination of the rail freight proposals if there were a common standard for timescales. The bar chart on page 66 refers to actual month/years whilst the information on rail tonnage refers to "year1, year 2" etc.
	Response by Suffolk County Council at Deadline 3	<p>The indicative timeframe provided by the Applicant does not include timescales for legal agreements. SCC understand that the East Suffolk Line infrastructure improvement proposals are currently at GRIP 2 stage. The Applicant / Network Rail have not progressed infrastructure requirements to GRIP 3 stage. SCC notes that Network Rail has recently adopted a new internal delivery process called PACE (Projects Accelerated in a Controlled Environment) and that this affords greater flexibility in the project development process and encourages faster decision-making in line with the Government's Project SPEED principles (Swift, Pragmatic and Efficient Enhancement Delivery).</p> <p>Similarly, Network Rail has recently introduced a new level crossing risk assessment process that is anticipated to streamline assessments.</p> <p>Recognising that third parties are not bound by GRIP or PACE but are nevertheless heavily influenced by Network Rail's processes, what is the anticipated improvement in programme as a result of the introduction of PACE and the new level crossing risk assessment process?</p>
	<b>Response by SZC Co. at Deadline 5</b>	The Initial Statement of Common Ground with Network Rail [ <a href="#">REP2-074</a> ] and Network Rail's Written Representations [ <a href="#">REP2-155</a> ] explain the confidence they have that the

		necessary train services can be enabled and operated within the timescale required, taking account of all necessary legal and other steps. The GRIP process is designed to protect against the sort of issues raised by TASC. An updated, agreed programme will be provided with the next version of the Statement of Common Ground (Doc Ref. 9.10.10(A)).
G.1.53	ESC, SCC, EA, Natural England	<p><b>Code of Construction Practice (CoCP)</b></p> <p>The CoCP [AS-273] would be an important part of the mitigation strategy for dealing with and controlling potentially adverse effects from the various construction activities. Do you consider that as drafted it is sufficiently robust and precise and consequently enforceable?</p>
	Response by SZC Co. at Deadline 2	<p>The <b>CoCP</b> [AS-273] (Doc Ref. 8.11(B)) includes precise controls that provide clarity on the measure, scope and timing for each commitment relied on by the ES. Given the scale and complexity of the construction process there may be instances where minor derogations are needed, or where more than one set of controls apply to a specific set of works and there may be ambiguity over which control takes precedence where a conflict may exist. These limited instances mean that a degree of flexibility is therefore both necessary and appropriate.</p> <p>The proposed governance and monitoring arrangements secured will then ensure that ESC, SCC, the EA and NE will have sufficient oversight of the Project to ensure that relevant measures and commitments can be monitored and enforced.</p>
	Response by East Suffolk Council at Deadline 2	<p><b>Noise and Vibration:</b> In terms of noise and vibration we do not currently consider the draft CoCP to be sufficiently robust and precise and consequently enforceable. We are however in continuing discussion with the Applicant in respect of matters of concern.</p> <p><b>Ecology:</b> As drafted the CoCP does not currently capture all of the appropriate ecological mitigation measures, for example relating to the most recently submitted mitigation strategies for bats and otters. Please see the LIR [<a href="#">REP1-045</a>] for more detailed comments on this. The current draft CoCP does not fully capture the ecological mitigation strategies necessary for some of the Associated Developments, including the Two Village Bypass, please see our LIR for comments in relation to this. Given the importance of the CoCP as the mechanism for securing delivery of many of the necessary construction ecological mitigation measures, it is essential that they are correctly captured within the document.</p>



		<p><b>Air Quality:</b> There are matters within the CoCP that are still under discussion and as such the document is still evolving and further discussion will be required around mitigation measures. In terms of air quality, we do not currently consider the CoCP to be sufficiently robust, precise and consequently enforceable. We are however in continuing discussion with the Applicant in respect of matters of concern.</p>
	Response by Suffolk County Council at Deadline 2	<p>SCC considers that the wording of the CoCP should be less ambiguous and more precise (noting that PINS guidance "Drafting Development Consent Orders" (July 2018, section 3) requests that ambiguous wording should be avoided), but we defer to ESC to comment further on enforceability.</p> <p>See also AQ.1.72 and AQ.1.78.</p>
	Response by Natural England at Deadline 2	<p>Currently we consider that some of the potential adverse effects to the natural environment relevant to our remit can be adequately mitigated through the provisions within the CoCP where we consider what is proposed to be sufficiently robust and precise (i.e. issues 1, 2, 4, 6, 12, 14 and 16 which are marked 'green' in column G of the Statement of Common Ground (SoCG) between EDF Energy and Natural England for the reasons set out in columns D and E). In these instances, there is clearly a dependency that the respective mitigation as set out in the CoCP will be rigorously implemented and maintained. With regards the other potential adverse effects to the natural environment relevant to our remit (i.e. those marked as 'amber' or 'red' within column G of the SoCG), we do not consider that the Applicant has yet provided sufficiently robust and precise mitigation/compensation, either through the provisions within the CoCP or elsewhere; the reasons for this are outlined further in the SoCG (column D), our Relevant Representations (our ref: 306236, dated 30th September 2020) and our Written Representations (our ref: 350822, dated 2nd June 2021). In regard to enforcement we defer to the competent authorities who would be responsible for securing, monitoring and enforcing the measures outlined in the CoCP.</p>
	Response by SZC Co. at Deadline 3	<p>SZC Co. is continuing to agree measures to be included within the <b>CoCP</b> [<a href="#">REP2-056</a>] through the development of the Statement of Common Ground with ESC and engagement with other environmental stakeholders. An updated version of the <b>CoCP</b> [<a href="#">REP2-056</a>] was also submitted at Deadline 2.</p> <p><b>Noise and vibration:</b> Further detail on the processes to monitor and control noise and vibration will be set out in the 'Noise Monitoring and Management Plans', which are</p>

		<p>currently being developed for discussion with the local planning authorities. The 'Noise Monitoring and Management Plans' form part of the <b>CoCP</b> [<a href="#">REP2-056</a>].</p> <p><b>Ecology:</b> The <b>CoCP</b> [<a href="#">REP2-056</a>] is one of the documents which includes ecological mitigation measures but as ESC identifies, does not include all the measures. The <b>TEMP</b> [<a href="#">REP1-016</a>] is a key document securing the ecological mitigation measures and other ecological mitigation is secured through separate consents and licences, the Deed of Obligation and the DCO. SZC Co. has provided a detailed response to the points raised by ESC within <b>Bio.1.17</b> and <b>Appendix 7C</b> submitted as part of the SZC Co.'s <b>Responses to ExQ1s</b> at Deadline 2.</p> <p><b>Air Quality:</b> Air quality control and mitigation measures have been agreed between SZC Co. and the Councils through discussions, as documented in the draft Statement of Common Ground [<a href="#">REP2-076</a>]. Further detail on the dust monitoring approach and locations will be set out in the 'Dust Management Plan', which will be developed in consultation with the Councils. The 'Dust Management Plan' forms part of the <b>CoCP</b> [<a href="#">REP2-056</a>].</p> <p>SZC Co. has provided a response to the Natural England Written Representation in Chapter 11 of <b>Comments on Written Representations</b> (Doc Ref. 9.28) and will continue to work with Natural England to agree common ground on the outstanding issues in amber and red within the response.</p>
	Response by East Suffolk Council at Deadline 3	No further comments.
	Response by Ian Galloway at Deadline 3	<p>It is noted that despite "...The CoCP (Doc Ref. 8.11(B)) includes precise controls that provide clarity on the measure, scope and timing for each commitment relied on by the ES." even at this early stage, the Applicant is reversing out of total commitment to the authority of the CoCP, citing "...scale and complexity..." as legitimate justification for needing "minor derogations" and the requirement for "...a degree of flexibility is therefore both necessary and appropriate."</p> <p>Frankly, this continual blurring of the edges and the writing in of 'exceptions' does little credit to the Applicant and further erodes any trust Coastal Suffolk residents have in any provision or undertaking the Applicant makes.</p>

	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. has committed to implement the CoCP in a way that ensures that the environmental outcomes are not worse than those set out in the Environmental Statement. For the avoidance of doubt, the derogations referred to would only relate to those issues that would not lead to a greater impact than those identified. SZC Co. has prepared a note on this issue in response to questions raised during Issue Specific Hearing 1 (DCO, Requirements and the Deed of Obligation). This is provided within <b>Written Submissions Responding to Actions Arising from ISH1: Draft DCO and Section 106 Agreement/Deed of Obligation (6 July 2021)</b> (Doc Ref. 9.48).														
G.1.55	The Applicant	<p><b>Construction Shift Patterns</b></p> <p>(i) Please provide a breakdown of the numbers of staff anticipated to be arriving and leaving the site during each of the construction phases of the project. Linking this information to the indicative working patterns identified in Table 3.1[APP-184] would assist in the understanding of movements on and off the site.</p> <p>(ii) Please include the mode of travel you have assumed for them to arrive and leave by with assumed numbers by each mode.</p> <p>(iii) How does the DCO secure the shift pattern assumed?</p>														
	Response by SZC Co. at Deadline 2	<p>(i) and (ii): In the <b>early years of construction</b>, the shift patterns at the main development site are assumed to be as follows:</p> <table><tr><th>SHIFT</th><th>WORKERS</th><th>%</th><th>SHIFT START</th><th>SHIFT END</th></tr><tr><td>Single Shift</td><td>1,100</td><td><b>72.7%</b></td><td>07.00-08.30</td><td>16.30-18.30</td></tr><tr><td>Night Shift</td><td>400</td><td><b>27.3%</b></td><td>20.30-22.00</td><td>06.00-08.00</td></tr></table> <p>The total construction workers and vehicles using each mode (excluding 600 in caravans on LEEIE, who would catch a shuttle bus to site) at the main development site in early years, are assumed to be as follows:</p>	SHIFT	WORKERS	%	SHIFT START	SHIFT END	Single Shift	1,100	<b>72.7%</b>	07.00-08.30	16.30-18.30	Night Shift	400	<b>27.3%</b>	20.30-22.00
SHIFT	WORKERS	%	SHIFT START	SHIFT END												
Single Shift	1,100	<b>72.7%</b>	07.00-08.30	16.30-18.30												
Night Shift	400	<b>27.3%</b>	20.30-22.00	06.00-08.00												

WORKERS OR VEHICLES	TOTAL	TRAVEL MODE		
		MAIN SITE CAR PARK	LEEIE PARK AND RIDE	WALK/ CYCLE
<b>Workers</b>	<b>900</b>	<b>300</b>	<b>535</b>	<b>65</b>
<b>Vehicles</b>	<b>677</b>	<b>242</b>	<b>435</b>	<b>-</b>

At **peak construction**, the shift patterns at the main development site are assumed to be as follows:

SHIFT	WORKERS	%	SHIFT START	SHIFT END
Early Shift	4,148	<b>52.5%</b>	06:00- 08:30	14:00- 18:30
Late Shift	2,031	<b>25.7%</b>	13:30- 15:00	22 00- 00:00
Office Shift	1,185	<b>15.0%</b>	07:30- 09:00	17:30- 19:00
Night Shift	536	<b>6.8%</b>	20:30- 22:00	06:00- 08:00
<b>Total</b>	<b>7,900</b>	<b>100%</b>		

The total construction workers and vehicles using each mode (excluding 2,400 on campus and 600 in caravans on LEEIE, who would catch a shuttle bus to site), at the main development site at peak construction, are assumed to be as follows:

		WORKERS OR VEHICLES	TOTAL	TRAVEL MODE				BUS	RAIL
				MAIN SITE CAR PARK	PARK AND RIDE				
					TOTAL PARK AND RIDE	SOUTH ERN	NORTH ERN		
		Construction workers	<b>4,900</b>	1,361	2,356	1,086	1,270	1,183	0
		Vehicles	<b>2,852</b>	935	1,917	907	1,010	-	-
		<p>More information on the Sizewell traffic calculations in provided in <b>Chapter 7</b> of the <b>Consolidated Transport Assessment (TA)</b> (Doc Ref. 8.5(B)).</p> <p>iii) Working hours for the main development site and associated development sites are included in the <b>CoCP</b> (Doc Ref. 8.11(B)) as follows:</p> <ul style="list-style-type: none"><li>• Main development site: <b>Part B</b> of the <b>CoCP, Section 1.3</b> sets out that the working hours on the main development site, which allow for 24 hour working seven days per week. <b>Table 1.1</b> sets out the expected shift patterns, with the type of activities undertaken in each shift set out in Section 1.3. These working patterns reflect the assumptions and mitigation measures set out within the ES; and</li><li>• Associated development sites: <b>Part C</b> of the <b>CoCP, section 1.1 c)</b> sets out that the working hours on off-site associated developments are from Monday to Saturday and between the hours of 07:00 to 19:00 hours. Some activities may require 24 hour working and where this is the case, ESC will be notified in advance, including details of any noise control measures that may be necessary.</li></ul> <p>The <b>CoCP</b> must be complied with and is capable of being enforced by the local planning authority through Requirement 2 of the <b>draft DCO</b> (Doc Ref. 3.1(C)).</p>							
	Response by Ian Galloway at Deadline 3	The ExA are asked to use all endeavours to ensure commitments made by the Applicant are clear, unambiguous and fully enforceable throughout; the construction, operation, and decommissioning phases of the SZC Project, should it obtain consent.							

		<p>The unremitting use of ineffective tables and inadequate data has continued throughout Pre-Application Consultation and is now evidenced in the Examination Phase.</p> <p>In my view, the answer(?) provided by the Applicant in response to the relatively simple questions asked a G.1.55 is ambiguous, overcomplicated and open to misinterpretation. My understanding is the answer(?) is more easily understood as:</p> <p><b>Early Years Only Shift Pattern</b></p> <p>1 x day shift of 1,100 workers (07:00 - 08:30 start) (16:30 - 18:30 finish)</p> <p>1 x night shift of 400 workers (20:30 - 22:00 start) (06:00 - 08:00 finish)</p> <p>of which:</p> <p>600 workers will use shuttle buses from the campsite (LEEIE) [attributable shuttlebus movements unquantified]</p> <p>300 workers will drive (or car-share) to Main Site in 242 vehicles [484 car movements at 1.2 persons per vehicle]</p> <p>65 workers will cycle or walk [Zero vehicle movements]</p> <p>535 workers will drive to LEEIE Park and Ride in 435 vehicles for shuttle buses to Main Site [870 car movements at 1.2 persons per vehicle] plus [attributable shuttlebus movements unquantified]</p> <p><b>Peak Construction Only Shift Pattern</b></p> <p>1 x early shift of 4,148 workers (06:00 - 08:30 start) (14:00 - 18:30 finish)</p> <p>1 x late shift of 2,031 workers (13:30 - 15:00 start) (22:00 - 00:00 finish)</p> <p>1 x Office shift of 1,185 workers (07:30 - 09:00 start) (17:30 - 19:00 finish)</p> <p>1 x night shift of 536 workers (20:30 - 22:00 start) (06:00 - 08:00 finish)</p> <p>of which:</p> <p>1,361 workers will drive (or car-share) to Main Site in 935 vehicles [1,870 car movements at 1.45 persons per vehicle]</p> <p>Zero workers will cycle or walk [Zero vehicle movements]</p> <p>1,086 workers will drive to Southern Park and Ride in 907 vehicles for shuttle buses to Main Site [2,172 car movements at 1.2 persons per vehicle] plus [attributable shuttlebus movements unquantified]</p>
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		<p>1,270 workers will drive to Northern Park and Ride in 1,010 vehicles f.or shuttle buses to Main Site [2,540 car movements at 1.26 persons per vehicle] plus [attributable shuttlebus movements unquantified]</p> <p>1,183 workers will catch SZC buses to Main Site [attributable bus routes and movements unquantified]</p> <p>It is my contention that, shown this way the data is 'linked' as requested, describes the impact on local infrastructure more clearly and also demonstrates the gaps in the data presented (i.e. no one walks or cycles at 'Peak'(?), Bus movement volumes aren't presented, etc.)</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co.'s response at Deadline 2 remains valid.</p> <p>In response to the two specific points:</p> <ul style="list-style-type: none"> <li>- <b>Table 3.1</b> of the updated <b>Construction Worker Travel Plan</b> submitted at Deadline 2 [<a href="#">REP2-055</a>] sets out the mode share commitments which include a 28% walk/cycle mode share during peak construction, and a total of 83% in peak construction of workers travelling to site using sustainable modes including direct and park and ride buses.</li> <li>- The assessed frequency of bus services during peak construction is shown in <b>Table 26</b> of <b>Appendix 7B</b> of the <b>Consolidated Transport Assessment</b> [<a href="#">REP2-045</a>]. <b>Table 43</b> of the same appendix shows the assessed bus services during early years.</li> </ul>
<b>Chapter 3 - Ag.1 Agriculture and Soils</b>		
Ag.1.2	The Applicant	<p><b>Impact Assessment</b></p> <p>The following areas have not been surveyed due to lack of access:</p> <ul style="list-style-type: none"> <li>(i) 14.5ha of the SLR</li> <li>(ii) 3.15ha of the TVB</li> <li>(iii) 14.4ha of the MDS</li> </ul> <p>Please explain why access was not possible.</p>
	Response by SZC Co. at Deadline 2	<p>Whilst it has been noted that it has not been possible to survey all the land, the actual proportions of land un-surveyed are relatively low (for example the un-surveyed land comprises just 3.87% of the Main Development Site area). For un-surveyed land expert</p>

		<p>knowledge has been used to predict the likely grade, based on available soil mapping, topography, flood risk and the soil characteristics from the closest surveyed points. The assessment clearly states whether, based on this information, it is considered that BMV land could be present in these un-surveyed areas. For the main development site it is considered that BMV land would not occur in the un-surveyed area due to flood risk and the closest survey points being Grade 3b or 4. For the road schemes it has been assessed that there is the potential for BMV land to occur in the un-surveyed areas and so this has been built into the assessment outcome, stating a potentially worst case scenario where all the un-surveyed land is BMV.</p> <p>These surveys will be carried out in due course to validate the assessment. However, as a worst-case assessment has been undertaken, SZC Co. consider the assessment to be robust.</p> <p>(i) 14.5ha of the Sizewell link road - access was not possible due to the Applicant being unable to reach agreement with the landowner at the time of surveys. Access agreements have now been reached. These surveys will be carried out in due course to validate the assessment. However, as a worst case assessment has been undertaken, SZC Co. considers the assessment to be robust.</p> <p>(ii) 3.15ha of the two village bypass - This area of land had not been surveyed due to changes to the red line boundary between Stage 3 and Stage 4 consultation. At the time of survey, access to the land could not be agreed between the landowner and the Applicant at the time the surveys were undertaken. These surveys will be carried out in due course to validate the assessment. However, as a worst case assessment has been undertaken, SZC Co consider the assessment to be robust.</p> <p>(iii) 14.4ha of the main development site - despite attempts to do so, access to the land could not be agreed with the landowner and the Applicant at the time the surveys were undertaken. These surveys will be carried out in due course to validate the assessment. However, as a worst case assessment has been undertaken, SZC Co. consider the assessment to be robust.</p> <p>For the reasons stated above these surveys have not been carried out.</p>
	Response by FERN at Deadline 3	<p>I regret to say that we find it hard to believe this denial of access since, we have seen this excuse used by EDF when they clearly didn't fancy doing something, as for the Farnham Hall Estate habitats and ponds!</p>



	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. response at Deadline 2 remains valid.
Ag.1.6	Mollett's Partnership [RR-0812] Finn Dowley [RR-0382] LJ and EJ Dowley Farming Partnership [RR-0697] Justin Dowley [RR-0638] Myles Dowley [RR-0866] Miss Frances Paul on behalf of Mrs J F Flick [RR-0806] NJ Bacon Farms [RR-0867] Ward Farming Business [RR-1259]	<b>Effect on Business Operations</b> Please provide more detail in respect of your concern on the impact that the Proposed Development may have on your business.
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by Mollett's Farm at Deadline 2	Full details are provided in our Written Response to Deadline 2 [Mollett's Farm - ExA Deadline 2 Representation (2021-06-02).pdf] [ <a href="#">REP2-380</a> ].
	Response by SZC Co. at Deadline 3	There is no land required from Molletts Farm and as such there is no direct impact on the agricultural land. SZC Co. has met with the owners of Molletts Farm to understand concerns, and to provide detail of experiences of Hinkley Point C and outline details of statutory compensation. A further meeting has been diarised for late June 2021 to discuss their concerns further, and confirm the opportunities available to business as a result of the Project.

	<p>Response by Ward Farming Ltd, N J Bacon Farms and A W Bacon Will Trust at Deadline 2</p>	<p>The development will affect our business in the following ways:</p> <ul style="list-style-type: none"> <li>• Land Take</li> </ul> <p>The impacts of land take, severance and lost rented land will mean that we have around 67 acres less land available for the production of cereal and vegetable crops including onions, potatoes and peas. This will affect our profitability considerably because the land taken is some of our most productive land and is also within 1 mile of our main operating centre at Theberton. It will not be possible for us to reduce our overhead and as such the lost net margins of this area of cropping will cause our profitability to be reduced accordingly.</p> <ul style="list-style-type: none"> <li>• Logistics</li> </ul> <p>Difficulties with logistics arising from increased levels of traffic in the area, in particular on the B1125 which we use to access land to the north and east of Westleton are likely to increase operating times for works involving access to land in these areas.</p> <ul style="list-style-type: none"> <li>• Cost of Accommodation</li> </ul> <p>It is anticipated that rental values and potentially capital values for properties in the area are likely to increase as a result of demand arising from the need for housing for workers employed as part of the Sizewell C development. This is likely to increase the cost of employment to local business who are either renting properties for employees or paying employees who are themselves renting properties.</p> <ul style="list-style-type: none"> <li>• Impact on shooting</li> </ul> <p>The farm business includes a small shooting enterprise which sells sporting days annually. The land take resulting from the SLR development around Theberton will reduce the land available for shooting by around 25%. It cannot be said for certain what impact this will have on the shoot, but it may be that it is no longer a viable enterprise.</p> <ul style="list-style-type: none"> <li>• Impact on cost of local trades</li> </ul> <p>We are concerned that the ability for SZC Ltd to pay higher rates for local trades, albeit in the medium term, will adversely affect other local businesses (and households) who are forced to pay more for trades such as plumbers and electricians. The impact of this should not be underestimated.</p> <ul style="list-style-type: none"> <li>• Impact on drainage of inland water</li> </ul> <p>The Minsmere New Cut carries water from as far inland as Sibton and Peasenhall. It is fed by a network of ditches, drainage channels and small rivers, including the Minsmere</p>
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		<p>River. It takes this water out to sea at the Minsemere Sluice to the east of Eastbridge. The New Cut passes through the Minsmere Levels and, as the main channel, its level will impact on water levels on the marshes and surrounding areas. The increased impermeable areas resulting from the construction of roads, compounds, car parks, and the main facility at Sizewell will all potentially result in water levels in the New Cut and Minsmere Levels drainage system increasing more rapidly following periods of rainfall. The Minsmere Levels drainage system is finely balanced and relies on a sluice which lets water through the sea wall during low tide, to release inland water into the sea. Increased pressure on this sluice could increase water levels on the marshes. This could affect our ability to manage the habitat in line with Natural England prescriptions for the area, much of which is designated as a Site of Special Scientific Interest (SSSI), please see maps showing the extents of the SSSI area on the Minsmere Levels as well as SSSI areas on our farm at Theberton in appendix 1 [Please refer to <a href="#">[REP2-382]</a> for further detail].</p> <p>Arable areas also rely on this drainage system to take water away and increased pressure on these systems and increased water levels would impact on their effectiveness in doing so. There are a number of low-lying houses in Eastbridge, Theberton and Middleton, the residents of which would also be concerned with negative impacts on this drainage system.</p> <ul style="list-style-type: none"> <li>• Saltwater Intrusion and Irrigation</li> </ul> <p>We have major concerns over the potential impacts of the project on coastal erosion and the ensuing impacts of saltwater intrusion onto the Minsmere Levels. If this system was to fail, SSSI marshes, providing rare habitat and used for grazing livestock, which are not only part of our farming enterprise, but also essential to the ongoing management of this habitat, would be lost. The New Cut, which is a large drainage channel, is also an essential source of water used for irrigation. In line with Environment Agency guidance, we have built winter storage facilities to harvest peak flows of winter water which flow through the Minsmere Levels. It is absolutely essential to the ongoing viability of our farming business that we are able to abstract fresh water from the Minsmere New Cut.</p> <p>It is also possible that salt intrusion into the marshes would impact on ground water also used for irrigation and again, essential to the business.</p>
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	Response by SZC Co. at Deadline 3	SZC Co. has responded to these issues as raised in the <b>Interested Party's Written Representation</b> [ <a href="#">REP2-384</a> ] the <b>Comments on Written Representations</b> (Chapter 20) (Doc Ref. 9.28) included in this Deadline 3 submission.
	Response by Justin and Emma Dowley at Deadline 2	<p>Our family has run a farming business at Eastbridge since the 1960s. It has a number of areas of operation and all will be affected in one way or another by the Proposed Development at Sizewell.</p> <p>We run an integrated farm involving a mix of arable and beef cattle with shooting, and disruption to any one area will have a knock-on effect on the others. We have not received any assessment from EDF of how our particular holding might be affected. There has also been no mention of any mitigation measures which might be put in place to offset adverse effects (individual or cumulative, direct or indirect) during either the construction period or the post-construction phase.</p> <p>1. Arable farming:</p> <p>The land EDF would like to acquire from us for the Proposed Development for the site Entrance Roundabout at the junction of the Eastbridge Road with the B1122 and for Borrow Pits along the Eastbridge Road, comes to some 24 acres (as notified on 4th May 2021, but EDF changes proposed land take regularly without explanation). This is 12% of our total arable acreage and would have a major adverse effect on the viability of our business. Shrinking the area of irrigable land is also a particular problem because of the consequent necessity of spreading the fixed costs of irrigation over a smaller area.</p> <p>Successful cultivation of crops is dependent on being able to irrigate our 200 acres of arable land because it consists of very light sandy soil. To do this we take water from a bore hole located on the edge of the marshes at Eastbridge – please see map. Our irrigation system is at risk if the Project causes coastal erosion to the extent that salt water either comes in over the Eastbridge marshes or through the sluice gates in the New Cut and contaminates our water source. EDF state that they have taken all possible precautions to prevent this, but there is no guarantee that these measures will not fail at some point. Being unable to irrigate our land would severely impact our ability to grow arable crops.</p> <p>We ask the Inspectors to note what happened at Aldeburgh Golf Club at the time of the tidal surge in December 2013. A note in this connection from the Secretary of Aldeburgh Golf Club is attached (Attachment 1) [Please refer to <a href="#">REP2-342</a>] for further</p>

		<p>information] which details the damage from saline incursion suffered by the course, trees and other flora and the fact that the water rose to a level 2.5 metres above ordnance datum. A startling photograph is also attached. The Inspectors may also note that this incursion took place approximately 7 miles up the river from the mouth at Shingle Street, whilst our marshes are close to, and those of the RSPB adjoin, the sea. The village of Eastbridge is only approximately one mile up the New Cut from the sluice. EDF have not attempted to tell us what they would do to correct this situation if it arises or provided any guarantee of water supply. This is understandable because there is nothing that they could do. A saline incursion is irreversible and as noted above would be fatal to our business. When we raised this with EDF's agents at the meeting on 30th April 2021 all they could say was that any undertaking or agreement by EDF would not survive the 6 year limit imposed by the Statute of Limitations. Tidal surges or floods do not necessarily occur on a 6 year cycle.</p> <p>The Borrow Pits on the Eastbridge Road are likely to involve considerable amounts of dust, noise and light pollution for our land surrounding them. No details, however, have been provided about the types of works that will be conducted there during the construction of SZC. Post construction, the Borrow Pits also hold a potential future danger since we have not been told what materials will be left behind in them, whether or not there will be any risk of contamination leaching out into our adjacent arable land and marshes nearby at some future point or whether the land would be in a fit state to be farmed afterwards.</p> <p>2. Cattle</p> <p>We have a prizewinning herd of c.220 pedigree Simmental cattle and feed them on barley, maize and fodder beet grown by us, as well as grass silage and hay taken from our grassland and marshes. Additionally we use the straw from our barley crop for bedding in barns and use the muck generated by the cattle to fertilize our arable acreage in an environmentally friendly way. The cattle are usually turned out onto the marshes from the end of May until October each year. The marshes are at risk from two main threats. First, SZC have stated that fresh water levels may rise on the marshes at Eastbridge and any rise in water levels would inevitably reduce the grazing available for cattle in the summer, which cannot readily be replaced. Second, coastal erosion resulting from the SZC project or any failure of the sluice gates in the New Cut could result in sea water contaminating the Eastbridge marshes and render them useless for grazing purposes.</p>
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		<p>We would have to sell our herd and make our herdsman of 21 years, as well as a part-time man who does weekend relief work, redundant if the Proposed Development goes ahead.</p> <p>3. Shoot</p> <p>We run a small commercial shoot, which dovetails with the farming operations as it runs over our woodland and set-aside land. We would have to shut the shoot down if the Proposed Development goes ahead. The woodland taken for the SLR, the land taken for the roundabout at the junction of the Eastbridge Road and the B1122, and the land taken for the Borrow Pits is such that 5 of our 7 drives would be taken out, whether through total loss of habitat or proximity to construction works and traffic. We would have to make our full-time game keeper of 34 years redundant and the casual employment of c.20 beaters and other helpers would cease.</p> <p>4. Camp site at Eastbridge Farm</p> <p>Besides the farming operation, we run a small no-frills camp site at Eastbridge Farm. Most visitors come for an inexpensive break in the peace and quiet of the local rural surroundings (many have been coming for years). Our customers include bird watchers visiting the RSPB Minsmere sanctuary adjacent to our land and groups of students doing Duke of Edinburgh awards. It is difficult to see how visitors would not be put off by the noise of large vehicles manoeuvring in the Borrow Pits (EDF states they will be 30m high as 'promised' at Hinkley Point, which is bad enough, but evidence from Hinkley suggests they may be as high as 45m), and the light and dust pollution arising from them, situated as they are along the Eastbridge Road within 250 metres of the camp site and easily visible from it. This is to say nothing of the nuisance value and security risk of having 2,500 SZC workers living nearby next to the Borrow Pits.</p> <p>5. Other</p> <p>We employ a gardener at our house, but he also helps out on the farm business on a regular basis when needed. He has been with us for some 35 years. It would be impossible to justify continuing his full-time employment if the SZC project goes ahead.</p> <p>6. Employment overall</p> <p>We employ 3 people full-time and 4 more on a part-time basis as well as casual labour for the shoot – most sadly for us, all would most likely have to go.</p>
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	Response by SZC Co. at Deadline 3	SZC Co. has responded to these issues as raised in the <b>Interested Party's Written Representation</b> [REP2-343] the <b>Comments on Written Representations</b> (Chapter 20) (Doc Ref. 9.28) included in this Deadline 3 submission.
	Response by FERN at Deadline 3	The Ayres will submit a separate representation that FERN are in full support of; they have had to battle repeatedly to be acknowledged as a tourism business despite the very close proximity to the Applicants site boundary, hopefully this is now rectified as it was clearly highlighted on the ASV walk.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. responses provided at Deadline 3 remain valid.
Ag.1.13	The Applicant	<b>Soil Management</b> ESC note that dust nuisance is likely to be minimal with the proposed mitigation in place [RR-0304]. ESC has however requested that stockpiles and earth bunds are turfed and fenced/screened in locations which are within 350m of sensitive human health and ecological receptors to minimise wind whipping of loose bund or stockpile material. Please provide a response to this request including confirmation of how any such commitments would be secured.
	Response by SZC Co at Deadline 2	As outlined in IAQM guidance <sup>33</sup> , the seeding of stockpiles and earth bunds, or other measures to reduce dust and run-off, are appropriate where stockpiles or bunds are to be left in situ for extended periods or where they are located close to site boundaries or sensitive receptors. As outlined in the dust management plan within the <b>CoCP</b> (Doc Ref. 8.11(B)), seeding of stockpiles or earth bunds, or other appropriate measures such as fencing or screening will be undertaken at sensitive site boundaries with early planting used where possible. This will be secured through the detailed Dust Management Plan to be prepared under the <b>CoCP</b> (Doc Ref. 8.11(B)) and discharged by requirement. Turfing of stockpiles or bunds is not proposed.
	Response by East Suffolk Council at Deadline 3	ESC has requested screening/fencing of stockpiles. The CoCP does not go far enough in this regard. This matter is under discussion between ESC and the Applicant.

<sup>33</sup> Institute of Air Quality Management (IAQM). Guidance on the Assessment of Dust from Demolition and Construction. 2014. (Online). Available from: <http://iaqm.co.uk/text/guidance/construction-dust-2014.pdf>

	<b>Response by SZC Co. at Deadline 5</b>	The CoCP (Doc Ref. 8.11(C)) confirms that stockpiled materials with potential to produce dust will be reused as soon as possible, or covered, seeded or fenced to prevent wind whipping. Updated IAQM guidance no longer specifies a distance of 350m from sensitive receptors being used as a threshold within which additional controls may be required; a risk based approach will be used to determine the measures required based on stockpile locations, sizing and the nature of materials stored.
Ag.1.15	The Applicant	<b>Dust Management</b> Please provide a response to the issues raised regarding dust management for spoil heaps and stockpiles [RR-0960, RR-0181, RR-1230, RR-0636, RR-577, RR-1162, RR-319].
	Response by SZC Co. at Deadline 2	The dust management plan, including proposals for monitoring and mitigation based on best practice measures, has been informed by the risks identified through the dust impact assessment. The dust impact assessment includes consideration of the materials to be stockpiled, and the heights and orientation of the stockpiles. The best practice mitigation measures outlined in the IAQM guidance <sup>34</sup> have a long history of successful implementation in the the UK. Dust monitoring measures will be specified within the Dust Management Plan and monitoring results reported monthly to the Suffolk County and East Suffolk Council.
	Response by East Suffolk Council at Deadline 3	ESC requests acknowledgment of the scale, nature and location of dust-generating activities in the specification of dust mitigation measures. The CoCP does not go far enough in this regard. This matter is under discussion between ESC and the Applicant.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. response at Deadline 2 remains valid.
Ag.1.22	The Applicant	<b>Code of Construction Practice</b> In [RR-0304] ESC requested that the CoCP should specify that dust deposition monitoring is required when soil stripping is undertaken within proximity of sensitive receptors. Please provide a response.

<sup>34</sup> Institute of Air Quality Management (IAQM). Guidance on the Assessment of Dust from Demolition and Construction. 2014. (Online). Available from: <http://iaqm.co.uk/text/guidance/construction-dust-2014.pdf>



	Response by SZC Co. at Deadline 2	As described in <b>Table 12.17</b> of <b>Volume 2, Chapter 12</b> (Air Quality) of the <b>ES</b> [ <a href="#">APP-212</a> ], the surface stripping associated with earthworks in Zone A is identified to require activity-specific mitigation. Monitoring would be undertaken such that applied mitigation is proportionate and effective. Based on the potential risk associated with this activity therefore, dust monitoring will be undertaken before and during this activity. Monitoring results will be reported monthly to the Suffolk County and East Suffolk Council as per the <b>CoCP</b> (Doc Ref. 8.11(B)).
	Response by East Suffolk Council at Deadline 3	ESC welcomes this confirmation and requests that it be added to the CoCP.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. response at Deadline 2 remains valid.
Ag.1.25	<p>Catherine Bacon [RR-0184] NJ Bacon Farms [RR-0867] NFU [RR-0885]</p> <p>Clarke &amp; Simpson on behalf of Family Mellen [RR-0241] Ward Farming Ltd [RR-1259]</p> <p>Mollett's Partnership [RR-0812]</p> <p>Savills (UK) Ltd on behalf of David and Belinda Grant [RR-1098]</p> <p>Savills UK (Ltd) on behalf of Nat &amp; India Bacon [RR-1100]</p> <p>Savills UK (Ltd) on behalf of Trustees of AW Bacon Will Trust</p> <p>Myles Dowley [RR-0866] Justin Dowley [RR-0638] Emma Dowley [RR-0367] Finn Dowley [RR-0382]</p>	<p><b>Water Supply</b></p> <p>Please provide information, including annotated maps, confirming whether your agricultural business(es) rely on private boreholes for water supply. Please also indicate whether you rely partly or solely on such supplies.</p>

	<p>LJ &amp; EJ Dowley Farming Partnership [RR-0697] Dowley Family Business [RR-0319]</p> <p>Savills UK (Ltd) on behalf of Justin &amp; Emma Dowley [RR-1099]</p>	
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by Mollett's Farm at Deadline 2	Full details are provided in our Written Response to Deadline 2 [Mollett's Farm - ExA Deadline 2 Representation (2021-06-02).pdf]
	Response by SZC Co. at Deadline 3	SZC Co. is aware that land at Molletts Farm relies on a water supply from the neighbouring land-holding (Friday Street Farm) for irrigation. SZC Co. has requested details of the existing water supply and has instructed an irrigation and drainage specialist to engage with landowners and identify and agree irrigation and drainage solutions.
	Response by Ward Farming Ltd, N J Bacon Farms and A W Bacon Will Trust at Deadline 2	<p>We rely on well points for the irrigation of land for the growing of 600 acres of cereals and vegetable crops at Theberton Hall Farm. These well points are shown on Map showing abstractions points at Theberton Hall Farm included in appendix 2 of this document [note figRefer to <a href="#">[REP2-382]</a> for further information]. If this were to be affected by saline intrusion the viability of the farming business would be affected catastrophically as this is our sole source of water.</p> <p>It is essential that management of coastal defences are carried out such that salt water is not allowed to enter the irrigation abstraction points within the Minsmere Levels. This irrigation water is essential to the production of cereals and vegetables on a further 650 acres around Westleton. The location of the New Cut abstraction point is shown on the map New Cut Abstraction Point included in appendix 3 of this document [Refer to <a href="#">[REP2-382]</a> for further information].</p>

	Response by SZC Co. at Deadline 3	SZC Co. has responded to this issue in <b>Comments on Written Representations</b> (Chapter 20) (Doc Ref. 9.28) included in this Deadline 3 submission.
	Response by Justin and Emma Dowley at Deadline 2	Our agricultural business relies on a private bore hole for water supply to our irrigation system. Virtually all our arable land is irrigated due to the fact that it consists of very light sandy soil. Successful cultivation of crops is dependent on being able to irrigate them. The bore hole is located on the edge of the marshes at Eastbridge – please see map. [Please refer to <a href="#">[REP2-342]</a> for further information]
	Response by David and Belinda Grant at Deadline 2	We have no private boreholes.
	Response by SZC Co. at Deadline 3	No response from SZC Co. required.
	Response by Simon Mellen at Deadline 2 (late submission)	I can confirm we do have a private well which has a depth of 15.8m. Water is pumped via an electric pump and used for agricultural purposes at present. We have a mains supply connected which we use for domestic purposes. The well is accessed via a manhole cover situated behind our house to the left of the back door.
	<b>Response by SZC Co. at Deadline 5</b>	No response from SZC Co. is required.
<b>Chapter 4 - AQ.1 Air Quality</b>		
AQ.1.3	ESC	<b>Dust emissions</b> Do you agree with the findings of the ES that the only potential source of significant air pollution would arise from construction dust?
	Response by SZC Co. at Deadline 2	The assessment has considered air quality effects from various emission sources including construction dust, construction traffic, NRMM, and operational emissions.
	Response by East Suffolk Council at Deadline 2	This is not agreed. <b>Construction phase</b> ESC agrees that potentially significant sources of air pollution will occur during the construction phase, but it has not yet been demonstrated that construction dust is the only potentially significant source of air pollution.

		<p>ESC considers that it will be possible to limit the impacts of construction dust through mitigation so that they are insignificant. This was identified by the Applicant within Volume 2, Chapter 12, Table 12.21 [APP-212], where residual risk after mitigation is low to negligible. The proposed mitigation is appropriate but may not be sufficient to achieve a negligible impact. Discussions between ESC and the Applicant are ongoing to finalise construction dust mitigation to ensure impacts are negligible (see Paragraphs 19.25 to 19.29 in the LIR [REP1-045]).</p> <p>ESC is in discussion with the Applicant regarding the minimisation and management of emissions from NRMM during construction. To minimise the impacts of NRMM, a request for the highest available emission standard and a cap on more polluting plant has been made within paragraph 19.3 of the LIR.</p> <p>ESC considers that there is a risk of potentially significant impacts on air quality within the Stratford St Andrew Air Quality Management Area (AQMA). ESC and the Applicant have held constructive discussions on this matter, and it is likely that this issue will be resolved following further discussion with the Applicant (see LIR [REP1-045] Section 19.30).</p> <p><b>Operational phase</b></p> <p>The proposed development will require the use of emergency diesel generators (EDGs). It is expected that EDGs will be addressed appropriately through the environmental permitting regime. In the event that this does not occur, ESC may seek further controls on EDGs through the DCO process (LIR [REP1-045] Table 19).</p>
	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 [<a href="#">REP2-076</a>]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed mitigation and control measures for construction dust, NRMM and construction traffic have been agreed. An updated Statement of Common Ground is anticipated to be submitted at Deadline 5.</p>
	Response by East Suffolk Council at Deadline 3	ESC stand by our original response.
	<b>Response by SZC Co. at Deadline 5</b>	No further response required, except the updated draft Statement of Common Ground is now anticipated to be submitted at Deadline 7.
AQ.1.7	ESC	<b>Dust emissions</b>

		Are you confident the baseline monitoring locations chosen for assessing the significance of dust emissions arising from the main development site would satisfactorily provide sufficient information such that appropriate standards can be monitored managed and mitigated to safeguard health and amenity for local receptors?
	Response by SZC Co. at Deadline 2	See the Applicant's response to question <b>AQ.1.6</b> .
	Response by East Suffolk Council at Deadline 2	<p>No, baseline dust monitoring locations presented within Appendix 12E, Plate 1.2 [APP-214] do not necessarily represent worst-case receptor locations. Construction dust assessment figures in Appendix 12A, figures 12A.1, 12A.4 and 12A.5 [APP-213] do not show dust deposition monitoring representative of Minsmere SPA/SAC, Sizewell Marshes SSSI, or human health receptors such as LE47 for main development site activities and trackout. In figure 12A.2, which is representative of activities associated with the main crag stockpile, site 5 is representative of worst-case ecological receptors. However, LE25 which is the worst-case human health receptor does not have a dust deposition monitoring location. For figure 12A.3, which represents lime spreading, worst-case monitoring has not been captured at human health receptor LE25, whereas the closest ecological site Minsmere is well represented with site 7. Please note that for matters relating to Statutory designated nature conservation sites we defer to Natural England for more detailed advice.</p> <p>At this stage, it may not be possible to be prescriptive about the specific locations where baseline and construction phase monitoring should be carried out. This is because exact construction details may not be known e.g., confirmation of which haul routes will be hardsurfaced. ESC recommends that a requirement for a minimum number of monitoring locations, and a minimum time period for monitoring during construction activities should be specified, to be agreed at the CoCP/Dust Management Plan/CEMP stage. This should include a requirement for the Applicant and contractors to propose and agree specific locations with ESC as part of the CoCP/Dust Management Plan/CEMP.</p> <p>The Applicant has made a commitment to monitor and take corrective actions during construction works (Table 1.1 of Appendix 12A) [APP-213]. As such the Applicant's current baseline dust monitoring is not critical for control of dust impacts. It is expected that dust deposition and particulate monitoring locations will be agreed at the CEMP stage.</p>

		<p>There are not considered to be satisfactory mechanisms within the CoCP to ensure that corrective actions will be taken if dust deposition and particulate concentrations thresholds are exceeded. ESC requests that this be included within the CoCP. Further to this, paragraph 2.3.8 of the CoCP only requires the Applicant to approve contractors' construction environmental management plans (CEMP). This should be amended to also require approval by ESC.</p> <p>ESC has made other requests in paragraphs 19.25 through to 19.29 of the LIR [REP1-045] to strengthen mitigation requirements.</p>
	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 [<a href="#">REP2-076</a>]. Further constructive dialogue has been held between SZC Co. and East Suffolk Council in developing the next version of the <b>Statement of Common Ground (SoCG)</b> between the parties, and an updated Statement of Common Ground is anticipated to be submitted at Deadline 5. This has addressed the points raised by ESC at Deadline 2 and the proposed construction dust monitoring measures have been agreed. SZC Co. will share relevant dust and air quality monitoring data with the local authorities on a frequency to be agreed.</p> <p>The <b>Construction Environmental Management Plans</b> are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> [<a href="#">REP2-056</a>]), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>
	Response by East Suffolk Council at Deadline 3	ESC stand by our original comment.

	<b>Response by SZC Co. at Deadline 5</b>	As noted in G.1.54, the air quality control and mitigation measures have been agreed between SZC Co. and the Councils through discussions, which will be documented in the updated draft Statement of Common Ground due to be submitted at Deadline 7. Further detail on the dust monitoring approach and locations will be set out in the 'Dust Monitoring and Management Plan', which will be developed in consultation with the Councils. The 'Dust Management Plan' would be submitted by SZC Co. to ESC for approval in order to comply with the commitment set out in the <b>CoCP</b> (Doc Ref. 8.11(C)).
AQ.1.19	ESC	<b>Approach</b> (i) Is the Council satisfied with the overall approach of the Applicant to dealing with Air Quality? (ii) Do the Council have any specific criticisms it would like to make?
	Response by SZC Co. at Deadline 2	The Applicant and ESC have maintained regular dialogue regarding air quality assessment, predicted effects and proposed mitigation measures. These measures are being agreed through an air quality mitigation plan as detailed in the draft <b>Statement of Common Ground</b> between the Applicant and ESC (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	(i) ESC is satisfied with the overall approach. The Applicant has been in regular contact with ESC in pre-application and since submission. Many of ESC's concerns with regard to potential air quality impacts and how they should be assessed have been addressed. ESC and the Applicant have discussed and recorded approximately 86 separate comments after reviewing the air quality environmental statement, the majority of which have been addressed. (ii) ESC has a relatively small number of outstanding criticisms. The outstanding points are presented within the LIR Section 19 [REP1-045]
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	The Applicant was referring to the Mitigation and Monitoring Plan, as referenced in the SoCG. In addition, updates have been made to the <b>CoCP</b> (Doc Ref. 8.11(C)) to reflect

		the agreed mitigation measures proposed. An updated draft Statement of Common Ground is now anticipated to be submitted at Deadline 7.
AQ.1.34	ESC, SCC, PHE, EA	<p><b>Dust Soiling</b></p> <p>(i) Are you satisfied with the suggested mitigation to control the levels of dust arising from the development?</p> <p>(ii) If not what additional mitigation would you wish to see supplementing the Dust Management Plan, Outline Dust Management Plan or Code of Construction Practice?</p>
	Response by SZC Co. at Deadline 2	The Applicant notes that the approach to dust mitigation has been discussed and is being agreed with the Councils through the air quality mitigation plan, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	<p>(i) ESC is broadly in agreement with the approach to mitigation proposed by the Applicant but has made some further requests for controls in relation to dust mitigation.</p> <p>(ii) Additional controls requested by ESC are set out in paragraphs 19.25 to 19.29 of the LIR [REP1-045].</p>
	Response by Environment Agency at Deadline 2	(i) The mitigation suggested is as expected and would normally be sufficient. However, as the proposed designs develop then more detail on the mitigation measures will be expected. Given the scale and opportunities available to the project the overarching Code of Construction Practice should provide more detail for Air Quality matters
	Response by Public Health England for Deadline 2	PHE have not identified any concerns with the proposed mitigation measures which appear in line with relevant guidance; however, note that a dust management plan is to be prepared. As the local authority regulators, PHE note that ESC and SCC would be best placed to provide a detailed assessment and response to this question.
	Response by Suffolk County Council at Deadline 2	<p>(i) SCC is broadly in agreement with the approach to mitigation proposed by the Applicant but has made some further requests for controls in relation to dust mitigation.</p> <p>(ii) Additional controls requested by the Councils are set out in paragraphs 19.25 to 19.29 of the LIR [REP1-045].</p>
	Response by SZC Co. at Deadline 3	An initial Statement of Common Ground was submitted at Deadline 2 [ <a href="#">REP2-076</a> ]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and



		control measures have been agreed. An updated Statement of Common Ground is anticipated to be submitted at Deadline 5.
	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19.
AQ.1.35	ESC, SCC, PHE, EA, Natural England	<p><b>Dust Soiling</b></p> <p>(i) Are you satisfied with the suggested monitoring of dust emissions from the development?</p> <p>(ii) If not what additional mitigation would you wish to see and how do you consider this should be secured?</p>
	Response by SZC Co. at Deadline 2	The Applicant notes that the approach to dust monitoring has been discussed and is being agreed with the Councils through the air quality mitigation plan, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	<p>ESC interprets this comment as referring to <u>monitoring</u>, rather than <u>mitigation</u> of dust. Dust mitigation is addressed in AQ.1.34.</p> <p>(i) ESC is generally satisfied with the dust deposition monitoring proposed within the CoCP. A flexible approach will be needed as the construction programme develops.</p> <p>(ii) Changes to CoCP wording are recommended as per AQ.1.11 [AS-273]. This should strengthen mechanisms for corrective actions following monitored exceedances and approval of CEMPs by ESC.</p>
	Response by Environment Agency at Deadline 2	<p>(i) There are improvements that could be made to the suggested monitoring of dust emissions.</p> <p>(ii) Inspection of dust emissions would benefit from</p> <ul style="list-style-type: none"> <li>• a regular timetable to allow reasonable comparison of data to ensure a consistent approach</li> <li>• expansion on the increased frequency of inspections during poor weather conditions should be provided.</li> </ul>
	Response by Public Health England at Deadline 2	PHE note that the applicant has reported in their Outline Dust Management Plan, that a Dust Management Plan will be prepared and include details of the monitoring. Whilst

		PHE have not had sight of the latter document, it is noted in the former reports that particulate monitoring will be undertaken. PHE recommend that any monitoring strategy should include sources of dust emissions; the location of sensitive health receptors; monitoring standards and guidelines; and a reporting schedule which allows for timely intervention if elevated concentrations are recorded.
	Response by Suffolk County Council at Deadline 2	<p>SCC interprets this comment as referring to monitoring, rather than mitigation of dust. Dust mitigation is addressed in AQ.1.34.</p> <p>(i) SCC is generally satisfied that dust deposition monitoring has been recommended within the enforceable CoCP. A flexible approach will be needed as the construction programme develops.</p> <p>(ii) Changes to CoCP. wording are recommended by ESC in their response to AQ.1.11. This should strengthen mechanisms for corrective actions following monitored exceedances and agreement of CEMPs.</p>
	Response by Natural England for Deadline 2	In the context of our remit, Natural England is satisfied that impacts from dust on internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites) and nationally designated sites (Sites of Special Scientific Interest (SSSIs) can be adequately mitigated through the provisions of the Outline Dust Management Plan and Code of Construction Practice provided these are rigorously implemented, maintained and monitored as outlined.
	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 [<a href="#">REP2-076</a>]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed.</p> <p>The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> [<a href="#">REP2-056</a>]), and related permits, consents and licences.</p>

		Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.
	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19.
AQ.1.36	The Applicant	<p><b>Dust Soiling</b></p> <p>In light of the comments from ESC in [RR-0342] can you confirm that the CoCP will address the need for dust monitoring during soil stripping to protect sensitive receptors?</p> <p>If you don't agree with this approach, please explain why.</p>
	Response by SZC Co. at Deadline 2	As described in <b>Table 12.17</b> of <b>Volume 2, Chapter 12</b> (Air Quality) of the <b>ES</b> [ <a href="#">APP-212</a> ], the surface stripping associated with earthworks in Zone A is identified to require activity-specific mitigation. Monitoring would be undertaken such that applied mitigation is proportionate and effective. Based on the potential risk associated with this activity, dust monitoring will be undertaken before and during this activity. The monitoring requirement would be secured through compliance with the <b>CoCP</b> (Doc Ref. 8.11(B)) under Requirement 2 of the <b>draft DCO</b> (Doc Ref. 3.1(C)).
	Response by East Suffolk Council at Deadline 3	As with AG.1.22, ESC welcomes this confirmation and requests that it be added to the CoCP.
	<b>Response by SZC Co. at Deadline 5</b>	The <b>CoCP</b> (Doc Ref. 8.11(C)) has been updated for Deadline 5.
AQ.1.40	The Applicant, ESC, SCC	<b>Mitigation</b>

		<p>(i) The Applicant suggests in paragraph 14.7.79 [APP-224] that if exceeded of dust levels occurs additional mitigation would be adopted – please explain what this might entail – particularly in light of the commitment within the CoCP to best practice?</p> <p>(ii) How would this additional mitigation be secured?</p> <p>(iii) In the event the threshold of 0.5g/m<sup>2</sup>/day had been exceeded – what would the consequence be? E.g. would work need to cease until the threshold level had fallen below the agreed level? Please explain the practicalities of what would occur on the ground and how this would be monitored, and the agreed level reached.</p>
	Response by SZC Co. at Deadline 2	<p>(i) The level of mitigation deployed for particular activities and locations has been based on a risk assessment of potential effects. The system is by its nature proactive in identifying the need to apply more mitigation to works tasks with greater potential to generate dust emissions, and reactive in immediately responding to, visual appraisal of dust generation risks and meteorological conditions. In line with best practice, the dust deposition rate monitoring generates data that initially confirms that management measures are as effective as is expected (i.e. rates below 0.5g/m<sup>2</sup>/day) and then provides a point of reference to check for any erosion in the margin of ongoing delivery of the same high level of protection. The approach is intended to deliver effective ongoing protection to sensitive receptors, rather than being a short term alert system.</p> <p>(ii) See response to question AQ.1.10, the additional mitigation is secured through compliance with the measures set out within the CoCP (Doc Ref. 8.11(B)). In addition, the mitigation measures will be documented in the Dust Management Plan which will include additional control measures to be employed in the event of for example unfavourable weather conditions.</p> <p>(iii) The dust monitoring results will be collated weekly so works will not immediately link to dust monitoring results. However, the contractor will use visual appraisal of dust levels during works and will increase control measures or mitigation, if required based on the conditions at the time of works. If monitoring results indicate exceedance of the threshold then additional controls will be proposed to and agreed with the Environment Review Group.</p>
	Response by East Suffolk Council at Deadline 2	<p>ESC considers that this is principally a comment for consideration by the Applicant. It is envisaged by ESC that any additional mitigation will be secured through the CoCP and be implemented into each contractor's CEMP. As per AQ.1.11, the CoCP does not currently have satisfactory wording regarding this matter for corrective actions such as</p>

		<p>mitigation to be included within a contractor's CEMP [AS-273]. As such ESC recommends that the CoCP is updated to explicitly state the monitoring exceedance thresholds and that corrective actions should be taken to ensure impacts are brought well below exceedance thresholds.</p> <p>ESC expects the details of corrective actions to be defined by the contractors in the CEMP, once construction details are better understood. As such, ESC requests that CEMPs are agreed with the Council in advance of construction works commencing to ensure that corrective actions are satisfactory.</p> <p>ESC anticipates that mitigation measures may include measures such as temporarily halting of dust-generating activities during periods of adverse meteorological conditions, increasing the intensity of interventions such as water spraying, or extending the zones within which specific measures such as road surfacing are implemented. Any such measures would generally be proposed by the Applicant or its agents for consideration and agreement by ESC.</p>
	Response by Suffolk County Council at Deadline 2	<p>SCC considers that this is principally a comment for consideration by the Applicant. It is envisaged that any additional mitigation will be secured through the CoCP and be implemented into each contractor's CEMP. The CoCP does not currently have satisfactory wording regarding this matter for corrective actions such as mitigation to be included within a contractor's CEMP. As such, SCC recommends that the CoCP is updated to explicitly state the monitoring exceedance thresholds and that corrective actions should be taken to ensure impacts are brought well below exceedance thresholds.</p> <p>SCC expects the details of corrective actions to be defined by the contractors in the CEMP, once construction details are better understood. As such, SCC requests that CEMPs are agreed with the Councils in advance of construction works commencing to ensure that corrective actions are satisfactory.</p> <p>SCC anticipates that mitigation measures may include measures such as temporarily halting dust-generating activities during periods of adverse meteorological conditions, increasing the intensity of interventions such as water spraying, or extending the zones within which specific measures such as road surfacing are implemented. Any such measures would generally be proposed by the Applicant or its agents for consideration and agreement by the Councils.</p>

	Response by SZC Co. at Deadline 3	<p>Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed.</p> <p>As noted, in our response to <b>AQ.1.10</b>, SZC Co. will share relevant dust and air quality monitoring data with the local authorities on a frequency to be agreed.</p> <p>The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> [<a href="#">REP2-056</a>]), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>
	Response by East Suffolk Council at Deadline 3	ESC anticipated that the Applicant would provide an explanation of specific further mitigation measures that would be applied in response to question (i). No such explanation was provided by the Applicant. ESC would expect further discussion to agree monitoring and reporting frequencies and processes.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.7.
AQ.1.41	The Applicant, ESC	<p><b>Dust Emissions (Rail)</b></p> <p>(i) ESC in the [RR-0342] at paragraph 2.207 – please clarify if you are seeking screens/fences in relation to general earthworks across the main development site and associated development sites.</p>

		(ii) Have further discussions progressed identifying the areas of concern? Please advise the ExA where these are and whether an agreed approach to protecting these receptors has now been reached?
	Response by SZC Co. at Deadline 2	The Applicant notes that the approach to dust monitoring has been discussed and is being agreed with the Councils through the air quality mitigation plan, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	<p>i) The request for screens/fences identified in paragraph 2.207 is targeted to the green rail route [RR-0342]. A similar request was also made for the northern park and ride (RR paragraph 2.168). This may still be pertinent when it comes to development of the CEMP. (ii) During a meeting with the Applicant, it was clarified that there are insufficient receptors for this to be a high-risk location. No further information is sought by ESC in relation to this point.</p> <p>As mentioned previously, a request for the CEMPs to be approved by the Council is proposed by ESC. This will enable the need for screens and fences in this location to be reviewed and agreed once construction details are finalised.</p>
	Response by SZC Co. at Deadline 3	<p>No further comments to add to SZC Co. response for Deadline 2.</p> <p>The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> [<a href="#">REP2-056</a>]), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>

	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19.
AQ.1.42	The Applicant, ESC, PHE	<b>Human Health (particulate matter)</b> Paragraph 12.6.11 of [APP-212] suggests that there could be a risk to human health if long term dust generating activities increase the baseline level within a receptor area. Do you consider the mitigation identified would be sufficient to avoid adverse effects to human health?
	Response by SZC Co. at Deadline 2	The mitigation identified is considered to be sufficient to avoid adverse impacts to human health, because the level of mitigation has been defined by the need to mitigate the higher risk of dust soiling impacts at receptors, rather than the lower risk of PM <sub>10</sub> impact; and such mitigation would also lessen the risk of potential PM <sub>10</sub> impact, as described at paragraph 12.6.12, and Table 12.16, <b>Volume 2, Chapter 12</b> (Air Quality) of the <b>ES</b> [APP-212]. As detailed in <b>Volume 2, Chapter 12</b> of the <b>ES</b> (for main development site) [APP-212]; <b>Chapter 5</b> of <b>Volumes 3-9</b> of the <b>ES</b> (for associated developments) [APP-357, APP-387, APP-418, APP-454, APP-487, APP-517 and APP-548] and the <b>CoCP</b> (Doc Ref. 8.11(B)), localised changes in air quality during construction, are temporary; associated with specific activities; and not of a concentration or exposure sufficient to quantify any measurable adverse health outcome at any receptor.
	Response by East Suffolk Council at Deadline 2	Construction mitigation is considered satisfactory to mitigate human health impacts associated with construction dust activities. However, as per paragraphs 19.25 through to 19.29 of the LIR [REP1-045] some recommendations have been made to strengthen mitigation. As mentioned within ESC's response to AQ.1.40, wording alterations to CoCP dust monitoring and agreement of CEMP with ESC should be included. Any increase in exposure to PM <sub>2.5</sub> would have an additional effect on human health, as there is no threshold for these effects. However, smaller increments in PM <sub>2.5</sub> have progressively smaller effects on health. Provided the controls on dust requested in the LIR are implemented, ESC considers that the controls on particulate matter due to dust



		generating activities would be sufficient to avoid significant adverse effects on human health.
	Response by Public Health England at Deadline 2	<p>PHE's position is that pollutants, particularly particulate matter are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.</p> <p>PHE note that the applicant has reported in their Outline Dust Management Plan, that a Dust Management Plan will be prepared and include details of the monitoring. Whilst PHE have not had sight of the latter document, PHE consider that providing suitable particulate monitoring is in place at sensitive receptors and suitable mitigation measures are implemented based on review of monitoring data, then adverse effects would not be expected.</p>
	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 <a href="#">[REP2-076]</a>. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed. SZC Co. will share relevant dust and air quality monitoring data with the local authorities on a frequency to be agreed. An updated Statement of Common Ground is anticipated to be submitted at Deadline 5.</p> <p>The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> <a href="#">[REP2-056]</a>), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to</p>

		ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.
	Response by East Suffolk Council at Deadline 3	CoCP to be updated in accordance with our original answer.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.7.
AQ.1.45	The Applicant, ESC	<b>Stratford St Andrew AQMA</b> Please advise on the latest position in respect of the assessment of air quality in the Stratford St Andrew AQMA and whether the assessment is now considered robust indicating whether there remain concerns on the assessment undertaken or whether the additional sensitivity testing has now resolved any concerns in this area.
	Response by SZC Co. at Deadline 2	The Applicant notes that the robustness of the assessment in the Stratford St Andrew AQMA has been discussed and is being agreed with the Councils through the air quality mitigation plan, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	Mitigation proposed by the Applicant sufficiently minimises the likelihood of significant impacts. Provided this is satisfactorily secured in the CoCP or other documents, this is considered robust and ESC would not have further concerns regarding this issue. Refer to paragraph 19.1 of the LIR [REP1-045] for further details.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19
AQ.1.47	The Applicant, ESC	<b>Stratford St Andrew and Woodbridge AQMA</b>

	<p>(i) In light of the proposed development do you agree that both AQMAs would remain within legal limits assuming the worst-case scenarios for traffic movements?</p> <p>(ii) Is there an agreed management and monitoring approach through the lifetime of the project?</p> <p>(iii) How will traffic from other projects be taken into account to ensure that air quality standards will be maintained?</p> <p>(iv) In the event there is congestion on the A12 what would be in place to monitor this, and ensure air quality remained within acceptable levels within Woodbridge and Stratford St Andrew AQMAs but also would not adversely affect other areas?</p> <p>(iv) What would be in place to secure appropriate mitigation?</p>
Response by SZC Co. at Deadline 2	<p>i) Sensitivity testing has been undertaken to support the assumptions of the transport emissions assessment. No exceedances of air quality standards are predicted in the AQMAs as a result of the development, as reported in the <b>Volume 3, Appendix 2.7.C</b> (Transport Emissions Assessment) of the <b>ES Addendum</b> [<a href="#">AS-127</a>].</p> <p>ii, iv) Ongoing discussions are being held with ESC regarding an agreed management and monitoring approach. It is agreed between the Applicant and ESC that NO<sub>2</sub> monitoring undertaken by the Council will continue to be supported financially by SZC Co.</p> <p>iii) A detailed assessment of the cumulative effects of transport emissions in combination with other schemes (including SPR EA1N and EA2) has been undertaken, the results of which are presented in <b>Volume 1, Chapter 10</b> (Project-wide, Cumulative and Transboundary Effects) of the <b>ES Addendum</b> [<a href="#">AS-189</a>]. No significant effects or exceedances of air quality standards are predicted. Once SZC is constructed and operational, it will become part of the baseline to be considered by future projects thereafter. Similarly, projects coming forward now should take into account the predicted effects of SZC traffic through use of a modified baseline and consideration of cumulative effects.</p> <p>iv) In response to the Relevant Representations and the engagement, SZC Co. has committed to construction HGV vehicles meeting Euro VI emissions performance standards, as confirmed in the <b>CoCP</b> (Doc Ref. 8.11(B)). SZC Co. has shared an Air Quality Mitigation Plan with the Councils which sets out how the improved commitments could be implemented, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).</p>

	Response by East Suffolk Council at Deadline 2	<p>(i) The management and mitigation of HGVs and associated emissions to air is still under discussion between ESC and the Applicant. It is difficult to accurately forecast air quality trends within the AQMAs in the light of wider issues such as the effect of Covid-19 epidemic and lockdowns on traffic movements and vehicle fleets. However, it seems likely on balance that both AQMAs will remain within legal limits, particularly with the Applicant's commitment to Euro VI targets. Provided appropriate mitigation of HGV emissions is satisfactorily secured in the CoCP or other documents, ESC considers that the impacts of the proposed development within both AQMAs would remain acceptable. The worst case has been assumed to be the early years traffic scenario before the Two Village bypass is completed. However, as a precautionary measure the number of HGVs passing through the AQMA should be capped until such time as the Two Village bypass is open for use.</p> <p>(ii) The pre-submission details shared by the Applicant with ESC suggest an acceptable mitigation strategy.</p> <p>(iii) ESC has taken into account the potential for in-combination impacts with other projects, specifically the East Anglia One North and East Anglia Two windfarm developments and secured similar mitigation of HGV emissions from this development.</p> <p>(iv) The relevant air quality standard is for annual mean concentrations, and short-term impacts such as congestion would not be expected to significantly affect this conclusion. In the longer term, ESC understands that the proposed development is not forecast to result in a significant increase in congestion on the A12 that could affect the AQMAs. Air quality monitoring in the AQMAs will continue and can be used to trigger the need for additional mitigation to be agreed with the Applicant, if this is required.</p> <p>(v) Mitigation will be secured through an appropriate management plan, under development between the Applicant and ESC.</p>
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by East Suffolk Council at Deadline 3	<p>The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.</p> <p>The Applicant notes that "It is agreed between the Applicant and ESC that NO2 monitoring undertaken by the Council will continue to be supported financially by SZC</p>

		Co.” ESC will discuss further with the Applicant to confirm the level of support envisaged.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19.
AQ.1.48	The Applicant	<b>Air Quality Monitoring</b> (i) Please confirm the commitment to undertake air quality monitoring and the timing of when this would commence for the main development site and all the associated development sites both prior to, and during construction and subsequent operation. (ii) In light of the concerns raised by ESC over NO <sub>2</sub> levels in Stratford St Andrew AQMA, please advise how you would propose to monitor the air quality levels in this area and elsewhere to ensure standards were maintained and no breaches of standards occurred.
	Response by SZC Co. at Deadline 2	(iii) Ongoing discussions are being held with ESC regarding an agreed management and monitoring approach. It is agreed between the Applicant and ESC that NO <sub>2</sub> monitoring undertaken by the Council will continue to be supported financially by SZC Co., including the monitoring of compliance within the Stratford St Andrew AQMA but also at other locations. (iv) See above.
	Response by East Suffolk Council at Deadline 3	ESC Consider the Applicant’s response is generally reasonable. The Applicant notes that “It is agreed between the Applicant and ESC that NO <sub>2</sub> monitoring undertaken by the Council will continue to be supported financially by SZC Co.” ESC may wish to discuss further with the Applicant to confirm the level of support envisaged.
	<b>Response by SZC Co. at Deadline 5</b>	No additional comments.
AQ.1.49	The Applicant	<b>Non Road Mobile Machinery (NRMM)</b>

		<p>ESC have requested the adoption of low emitting plant and an assessment both alone and in combination of impacts on both human health and ecology from NRMM and other sources.</p> <p>(i) Please advise whether there is a commitment to low emitting plant and if so how this would be delivered.</p> <p>(ii) Has an assessment now been undertaken of the potential effects of NRMM and other sources as requested by the Council?</p>
	Response by SZC Co. at Deadline 2	<p>(i) In response to the Relevant Representations and the engagement, SZC Co. has committed to construction plant meeting Stage IV emissions performance standards. SZC Co. has shared an Air Quality Mitigation Plan with the Councils which sets out how the improved commitments could be implemented, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).</p> <p>(ii) Further discussions have been held with the Councils to agree the assessment conclusions and mitigation measures to be required for NRMM, as set out in the Air Quality Mitigation Plan within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).</p>
	Response by East Suffolk Council at Deadline 3	<p>ESC consider the Applicant's response is generally reasonable, and discussions are ongoing.</p> <p>The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – applicant should clarify what is meant here.</p>
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19
AQ.1.51	ESC, EA, Natural England	<p><b>Haul Routes</b></p> <p>(i) The applicant has indicated that haul routes would be hard surfaced 'where practicable' – do you consider this approach to be adequate to safeguard sensitive receptors?</p> <p>(ii) Are there specific locations you consider that a more robust approach should be required, or should a more robust approach be provided across the main development site and associated development sites?</p>

	Response by SZC Co. at Deadline 2	The wording relating to surfacing of haul routes has been discussed between the Applicant and the Councils and proposed wording is included in the Air Quality Mitigation Plan, as recorded within the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12).
	Response by East Suffolk Council at Deadline 2	i) Hard surfacing "where practicable" is not considered to be fully satisfactory. ESC considers that the approach should be to provide hard surfacing where appropriate, in consultation with ESC if necessary within the CoCP (LIR 19.26 [REP1-0045]). ii) In other locations, alternative forms of mitigation (e.g. limit on vehicle speeds) would be sufficient. Rather than identifying specific locations ESC has suggested a methodology for hard surfacing site selection (paragraph 19.26 of the LIR [REP1-045]).
	Response by Environment Agency at Deadline 2	This approach would be appropriate and allows for improvements to be made where required.
	Response by Natural England at Deadline 2	We are currently satisfied with the locations of haul routes in respect to sensitive receptors and consider the mitigation proposed in the CoCP and Outline Dust Management plan sufficiently robust.
	Response by SZC Co. at Deadline 3	An initial Statement of Common Ground was submitted at Deadline 2 [ <a href="#">REP2-076</a> ]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed. An updated Statement of Common Ground is anticipated to be submitted at Deadline 5.
	Response by East Suffolk Council at Deadline 3	The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19.
AQ.1.54	The Applicant	<b>Mitigation</b> Please explain how the various elements of mitigation relate to each other, and how they are secured by the dDCO.

		<p>In particular how the Outline Dust Management Plan (oDMP), Dust Management Plan (DMP) relates to the Construction Environmental Management Plans (CEMP) and the Code of Construction Practice (CoCP).</p> <p>Please also set out which document would have precedence in the event of a conflict.</p>
	Response by SZC Co. at Deadline 2	<p>The Dust Management Plan (DMP) is required to be submitted to the Applicant as part of the details submitted for the Code of Construction Practice. The DMP must be in accordance with the principles of the Outline DMP as amended by the agreed mitigation measures in the Air Quality Mitigation Plan being agreed between SZC Co. and the Councils.</p> <p>There should be no conflict between the various documents but for the avoidance of doubt the <b>Outline DMP</b> will take precedence on the dust control measures to be adopted.</p>
	Response by East Suffolk Council at Deadline 3	<p>The Applicant's response is incomplete and does not reflect ESC's understanding.</p> <ul style="list-style-type: none"> <li>• Applicant's response does not mention CEMPs.</li> <li>• Applicant's response does not explain relationship between DMP, Outline DMP and CoCP.</li> <li>• Applicant's response does not refer to the structure of dust control plans.</li> </ul> <p>ESC's understanding is that the CoCP sets the framework and principles for dust control, mitigation and assessment. The DMP provides specific guidance and details on dust control, mitigation and monitoring. Contractors develop their own CEMPs which must be in accordance with the CoCP and DMP. Accordingly, it would be logical for the CoCP and then the DMP to take precedence.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>As noted in AQ.1.7, The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO, such as the CoCP and the Dust Management Plan.</p> <p>As set out in G.1.54, air quality control and mitigation measures have been agreed between SZC Co. and the Councils through discussions, as documented in the draft Statement of Common Ground (Doc Ref. 9.10.12(A)). This means that the structure of dust controls would be as follows:</p> <ul style="list-style-type: none"> <li>• The CoCP sets out the dust control measures set out in the Outline Dust Management Plan;</li> </ul>



		<ul style="list-style-type: none"> <li>• A Dust Monitoring and Management Plan will be developed and agreed with the ESC;</li> <li>• Dust monitoring will be undertaken pursuant to the details set out in the DMP and reported to ESC through the Environment Review Group.</li> </ul> <p>ESC are correct to say that the CoCP and the Dust Management Plan would provide the control measures that would take precedence.</p>
AQ.1.56	The Applicant	<p><b>Early Years</b></p> <p>B1122 Action Group [RR-0124] express concern that the level of traffic generated during the early years creates an unreasonable burden on the local community in terms of traffic, noise and air quality. Please address this particular concern and explain how the effects during early years could be considered reasonable in light of the recognised need to mitigate for similar levels of traffic later.</p>
	Response by SZC Co. at Deadline 2	<p>The effects of air quality at sensitive receptors on the B1122 during the early years construction scenario are presented in <b>Table 2</b> to <b>Table 4</b> of <b>Annex 2.7.C.1</b> in <b>Volume 3, Appendix 2.7.C</b> (Transport Emissions Assessment) of the <b>ES Addendum</b> [<a href="#">AS-127</a>]. Refer specifically to receptors YX6, YX19, YX7, LE5, LE6 which represent receptors adjacent to the B1122. The effects at these receptors are predicted to be negligible for all receptors, therefore the effects at these receptors are not significant during early years. In addition, air quality would remain well below the air quality standards.</p> <p>As set out within <b>Volume 3, Appendix 2.6.B</b> of the <b>ES Addendum</b> [<a href="#">AS-204</a>], noise effects at sensitive receptors on B1122 are assessed to be moderate adverse (<b>significant</b>) between the A12, Yoxford Junction (site access), Middleton Moor, Mill Street and B1125. Where affected properties meet the qualifying criteria, the provisions of the <b>Noise Mitigation Scheme</b> (the original version of which was contained in <b>Volume 2, Appendix 11H</b> of the <b>ES</b> [<a href="#">APP-210</a>] with a revised version appended to the draft <b>Statement of Common Ground</b> with ESC (Doc Ref. 9.10.12)) will apply to avoid significant adverse effects on health and quality of life.</p> <p>Furthermore, as identified within <b>Volume 1, Chapter 2</b> of the <b>ES Addendum</b> [<a href="#">AS-181</a>], the users of B1122 would experience moderate to major adverse (<b>significant</b>) effects due to a reduction in amenity. Highway condition survey of B1122 prior to commencement of construction and a maintenance fund for the B1122 are proposed to mitigate the effects.</p>

		<p>The peak year construction scenario is anticipated to have more traffic travelling to the main development site which, without the mitigation of the Sizewell link road, has the potential to have worse air quality, noise and traffic effects at receptors near the B1122 than those assessed for the traffic volume expected in the early years. The Sizewell link road will provide effective mitigation against such effects.</p>
	<p>Response by Charles Macdowell, B1122 Action Group at Deadline 3</p>	<p>The applicant's air quality data shows that the A12 through Yoxford is already on the limits of acceptable particulate levels, with annual concentrations of 15.5 and 10.6 µg/m<sup>3</sup> of PM<sub>10</sub> and PM<sub>2.5</sub> respectively [location YX3, 2018 baseline - 6.8 Volume 7 Chapter 5, Table 5.10]. Yoxfords Primary School is only 200 metres away. The World Health Organisation's Air Quality Guidelines are 20 and 10 µg/m<sup>3</sup> of PM<sub>10</sub> and PM<sub>2.5</sub>, respectively. [<a href="http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/">http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/</a>].</p> <p>The applicant states in Tables 5.11 and 5.12 that particulate levels will fall during the Early Years, and further still once the Link Road is open. We find that inconceivable, given the substantial increase in vehicles of all kinds, including the near doubling of HGV numbers.</p> <p>We recommend that the traffic and pollution modelling and the assumptions behind it are reexamined thoroughly by an independent authority.</p>
	<p>Response by Stop Sizewell C at Deadline 3</p>	<p>Noise effects are considered to be moderate adverse (significant) between the A12 Yoxford Junction, at Middleton Moor, Mill Street and B1125. Quality of journeys on the B1122 is expected to be major adverse (significant).</p> <p>We remain concerned about the impacts on pedestrians (including those with mobility difficulties), cyclists and equestrians or people wishing to travel on local journeys – to school, shops, doctor, etc.. The applicant is aware that the use of the B1122 for the first 3 years or so of the development, combined with the movements and disturbance caused by SLR construction traffic will be enormous and will be particularly harmful to communities. There should be safety changes implemented prior to the early years' construction, including improved visibility at Mill Street, and safe crossings and footways in Theberton as shown in ES vol 6 ch 3 (DCO doc 6.7)</p> <p>The applicant's Noise Mitigation Scheme should be extended to cover all the B1122 in the Early Years phase, and homes between the Middleton Moor Spur and the Yoxford Roundabout at all stages,</p> <p>The applicant's air quality data shows that the A12 through Yoxford is already on the limits of acceptable particulate levels, with annual concentrations of 15.5 and 10.6</p>

		<p>µg/m<sup>3</sup> of PM<sub>10</sub> and PM<sub>2.5</sub> respectively [location YX3, 2018 baseline - 6.8 Volume 7 Chapter 5, Table 5.10]. Yoxford Primary School is only 200 metres away. The World Health Organisation's Air Quality Guidelines are 20 and 10 µg/m<sup>3</sup> of PM<sub>10</sub> and PM<sub>2.5</sub>, respectively <a href="http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/">http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/</a> The applicant states in Tables 5.11 and 5.12 that particulate levels will fall during the Early Years, and further still once the Link Road is open. We find that inconceivable, given the substantial increase in vehicles of all kinds, including the near doubling of HGV numbers. We recommend that the traffic and pollution modelling and the assumptions behind it are re-examined thoroughly by an independent authority.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>Acceptable levels of particulate matter are defined in England by the national air quality objective values<sup>35</sup>. The objective value for PM<sub>10</sub> is an annual mean concentration of 40 µg/m<sup>3</sup> and for PM<sub>2.5</sub> is an annual mean concentration of 25 µg/m<sup>3</sup>. The current and predicted future concentrations of both PM<sub>10</sub> and PM<sub>2.5</sub> are well below the air quality objective values. The pollution modelling has been examined by SCC, ESC and their independent consultant.</p>
AQ.1.57	The Applicant	<p><b>Southern Park and Ride</b></p> <p>Campsea Ashe Parish Council [RR-0170] express concern that the assessment of effects from the Southern Park and Ride have not been adequately addressed. Please respond to these specific concerns</p>
	Response by SZC Co. at Deadline 2	<p>A detailed assessment of transport emission (presented in <b>Volume 3, Appendix 2.7.C</b> (Transport Emissions Assessment) of the <b>ES Addendum</b> [AS-127]) and construction dust (<b>Volume 4, Appendix 5A</b> of the <b>ES</b> [APP-388]) has been carried out for the southern park and ride. The dust assessment follows the guidance and methods set out in IAQM Guidance on the Assessment of Dust from Demolition and Construction<sup>36</sup>. The assessment considers the risk of dust generating activity during construction of the southern park and ride, the sensitivity of the area to dust soiling and human health effects (ecological effects were screening out due to no sensitive sites within the construction dust study area), and concluded that no significant effects are anticipated during construction of the site, with the implementation of mitigation measures set out</p>

<sup>35</sup> Defra Air Quality Objectives Update. [https://uk-air.defra.gov.uk/assets/documents/Air\\_Quality\\_Objectives\\_Update.pdf](https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update.pdf)

<sup>36</sup> Institute of Air Quality Management (IAQM). Guidance on the Assessment of Dust from Demolition and Construction. 2014. (Online). Available from: <http://iaqm.co.uk/text/guidance/construction-dust-2014.pdf>.

		in the <b>CoCP</b> (Doc Ref. 8.11(B)). In addition, a detailed assessment of the effects from transport emissions at receptors near the southern park and ride (including receptors on the B1116, B1078 and Station Road) has concluded that no significant effects are expected during the construction and operation of the park and ride.
	Response by Marlesford Parish Council at Deadline 3	The Applicant responds to the specific concerns of Campsea Ashe, but MPC questions whether the assessment effects for dust and emissions have been adequately assessed for receptors in Marlesford. This is a particular concern as the prevailing winds are in a generally west or southwest direction and will carry dust and emissions towards Marlesford if appropriate mitigation is not incorporated into the construction, operation and decommissioning plans. A contribution towards such mitigation would be the use of electric buses for the whole Park and Ride fleet.
	<b>Response by SZC Co. at Deadline 5</b>	The assessment considers dust effects based on distances from the works and the proposed mitigation remains applicable and appropriate for Marlesford. Traffic emissions have been assessed using representative meteorological data and the modelled effects are negligible. No significant effects are predicted despite the use of conservative assumptions.
AQ.1.66	The Applicant, ONR, Environment Agency, Natural England, PHE	<b>Tritium Gas</b> Please comment on the concerns raised in [RR-785] in respect of the potential release of tritium gas and any controls that would be in place to safeguard human health and ecology.
	Response by SZC Co. at Deadline 2	In England and Wales, radioactive discharges are regulated under the Environmental Permitting Regulations 2016 (EPR16) to ensure that the radiological impact to members of the public and the environment remain well below internationally agreed limits and to protect both human health and the environment.  In May 2020, Sizewell C applied for a 'Radioactive Substances Activity' Environmental Permit under EPR16. This proposed a set of limits for all routine discharges of radioactivity from the future Sizewell C power station that will not be exceeded under routine operations, along with an assessment of the impacts to Human Health and the Environment from these discharges (which is also included within <b>Volume 2, Appendix 25B</b> of the <b>ES</b> [ <a href="#">APP-341</a> ]). This includes the release of gaseous tritium to the atmosphere.  The assessment showed that the radiation exposure associated with the routine discharges at these limits are well below all dose constraints and legal limits and 200

		<p>times lower than the average radiation exposure a member of the UK public receives from natural sources of radioactivity such as the food we eat, the water we drink, and the air we breathe.</p> <p>In addition annual monitoring of radioactivity in the Sizewell area is undertaken by the UK Environment Agencies and Food Standard Agencies as part of the 'Radioactivity in Food and Environment' Programme. This has been undertaken for over 25 years and includes monitoring of Tritium. The most recent publication, RIFE-25 (2019)<sup>37</sup> has shown that there are no detectable levels of Tritium in the Sizewell area, as a result of the operation of Sizewell A or B, and the addition of Sizewell C is not expected to alter this position.</p>
	Response by ONR at Deadline 2	<p>Approximately 95% of tritium discharges are in liquid form, not gaseous, with systems included within the EPR design to preferentially partition tritium in aqueous waste. The principle of minimisation at source is applied for tritium in the EPR reactor design. Aqueous form is considered preferable as discharges to the marine environment have a lower dose per unit discharged than that of gaseous releases to atmosphere.</p> <p>Discharges of tritium form part of the requirements for the environmental permit issued by the Environment Agency (EA) and therefore questions on safeguards to human health and the ecology as a result of the discharges would be best answered by the EA</p>
	Response by Environment Agency at Deadline 2	<p>Any discharges of tritium from the proposed nuclear power station will be subject to limits and conditions placed via a Radioactive Substances Activity permit under EPR 16. The applicant has applied for a Radioactive Substances Activity permit and we are in the process of determining that application. The applicant has provided a prospective radiological impact assessment which covers the impact of proposed tritium discharges in the environment. As part of our permit determination process we will verify the Applicant's radiological impact assessment as well as undertaking our own independent assessment of radiological impact. We also monitor levels of tritium in the environment as part of our ongoing monitoring of radioactivity in the environment and we undertake regional monitoring of tritium in drinking water sources to meet the UK's obligations under the Euratom treaty. The results of our monitoring are provided in our Radioactivity in Food and the Environment report</p>

<sup>37</sup> East Suffolk Council (ESC) (2020). Local Plan <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

		<p>(<a href="https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports">https://www.gov.uk/government/publications/radioactivity-in-food-and-the-environment-rife-reports</a>). We have reviewed the results of our tritium monitoring in natural water sources in the Sizewell area (1998-2019) and the majority of results show levels of tritium at or below the limit of detection (&lt;4 Bq/l) and all results are well below the investigation level for drinking water of 100 Bq/l set in European Directive 2013/51. Our 2019 monitoring of drinking water sources in England and Wales showed levels of tritium at or below the limit of detection at all locations. Local water supply companies also perform monitoring of their drinking water sources to demonstrate compliance with water quality requirements, however we do not have access to that data</p>
	Response by Public Health England at Deadline 2	<p>Discharges of radioactivity from nuclear power plants during normal operations in England and Wales are regulated by the Environment Agency according to the principles of optimisation and use of Best Available Techniques. There is substantial scientific evidence which suggests that the controlled and regulated release of low level radioactivity from nuclear power plants does not cause serious illnesses and presents a very low health risk to people residing in the vicinity. Annex A of the 2012 Report of the UN Scientific Committee on the Effects of Atomic Radiation, entitled 'Attributing health effects to ionizing radiation exposure and inferring risks', provides a detailed review of the risks associated with ionising radiation at all levels and in particular at the level associated with controlled and regulated release of low level radioactivity from nuclear power plants.</p> <p>It should be noted that detection of tritium in drinking water is not an indication per se that there is a risk associated with this radionuclide; tritium has a low radiotoxicity and monitoring systems used to measure radioactivity in the environment are able to detect very low levels. Regular monitoring of radioactivity carried out around nuclear power plants as well as models used to predict the dispersion of radionuclides in the environment have not shown that tritium in drinking water (or any other environmental material) due to discharges from nuclear facilities poses a radiological risk to the UK population. The Radioactivity in Food and the Environment (RIFE) report series available on the gov.uk website (<a href="https://www.gov.uk/government/publications/radioactivity-in-foodand-the-environment-rife-reports">https://www.gov.uk/government/publications/radioactivity-in-foodand-the-environment-rife-reports</a>), include detailed information on the regular monitoring of radioactivity performed around nuclear facilities in the UK.</p> <p>Our assessment of potential additional numbers of cancer fatalities or possible increase in cancer incidence rates associated with discharges from new nuclear power plants</p>

		built in the UK, shows that the collective dose associated with releases from all possible facilities planned to be built will be very low (0.6 personSv to the UK population and 90 personSv to the world population) indicating that the expected increase in cancer incidence rates and fatalities will be negligible compared to the natural cancer incidence rate and number of fatalities. Our assessment is described in the paper Jones, A. L., et al. (2013). Assessing the possible radiological impact of routine radiological discharges from proposed nuclear power stations in England and Wales. Journal of Radiological Protection 33: 163-174.
	Response by Natural England at Deadline 2	On this issue we defer to Environment Agency who have Habitats Regulations Assessment (HRA) guidance for radioactive substances. Tritium gas is readily absorbed by the body and distributed so could be of concern for wildlife at the least.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Together Against Sizewell C at Deadline 3	The EPR at Flamanville, often referred to as the 'pilot plant', is still not operating, being way behind schedule and wildly over budget. The lack of data usually generated to establish operating norms have therefore been unavailable. Tritium gas emissions, in particular, have always been controversial in respect of their health impact. They generally occur as a spike in routine emissions during normal operating periods or during outages and manifest as 'steam venting'. Sizewell B has occasionally exceeded quarterly notification limits, but not the annual limit. The tritium gas discharge limit for the Sizewell B in its early days of commissioning was underestimated and the limit had to be raised. This was permitted following expert advice taken at a Suffolk Coastal District Council meeting around 1995. (SCDC meeting historic minutes archive appears to have been removed). Tritium binds to water, replacing the hydrogen atoms to form tritiated water. As a beta emitter, tritium is potentially harmful to humans, particularly in ingested. Health/mortality records of people most exposed at Sizewell B and A could still be a cause for concern and may need investigation.
	<b>Response by SZC Co. at Deadline 5</b>	No further comments to add to SZC Co.'s response for Deadline 2.
AQ.1.67	The Applicant, SCC	<b>Mitigation</b> In the Air Quality Chapter [APP-212] you refer to primary mitigation as 'minimising' freight movements on roads in light of the other delivery methods envisaged via rail and sea.

		(i) Is it really fair to say these movements would be minimised when to date neither the rail nor sea alternatives are confirmed, or to what degree they could operate?
	Response by SZC Co. at Deadline 2	<p>The work undertaken by the Applicant ensures that freight movements by road would be minimised.</p> <p>The Applicant's responses to questions <b>TT.1.1</b> and <b>TT.1.12</b> explain why approximately 40% of construction materials require HGV transport (see also paragraphs 2.1.12-13 of the <b>Freight Management Strategy</b> [AS-280]). The remaining circa 60% of imported material would be transported by rail or sea.</p> <p>The 40% road modal transport allows reduction from the original 325 daily typical HGV deliveries (in the original <b>Transport Assessment</b> [AS-017]) to 250 HGV deliveries. Control will be provided by maximum daily limits on HGV movements in the <b>Construction Traffic Management Plan</b> (Doc Ref. 8.7(A)). Accordingly, it is correct to say that freight movements on roads would be minimised.</p> <p>The Applicant has designed, applied for and is committed to providing the additional capacity by rail and sea which will be necessary to enable HGV movements to be reduced to their minimum mode share.</p> <p>If it transpires that the additional rail or marine capacity is not acceptable (to the Examining Authority and the Secretary of State), the application will have tested and determined the full capacity of non-HGV capacity. By definition, in those circumstances, the HGV mode share will have been minimised. It will be apparent that there are no feasible ways of reducing HGV movements.</p> <p>The statement is fair, and the application will conform with the requirement in NPS EN-1 at paragraph 5.13.10 to prefer water-borne or rail transport where cost-effective.</p>
	Response by East Suffolk Council at Deadline 2	ESC considers that the ExA is referring to the 3rd bullet point of 12.5.3 [APP-212] (i). If this is the text referenced, then ESC agrees with the ExA's comments. Freight movements could be reduced, if not minimised, by committing to the January 2021 freight management strategy, which envisages greater transportation of material by sea and rail.
	Response by Suffolk County Council at Deadline 2	<p>(iv) SCC agrees that this is a valid question. SCC has raised concerns, both at numerous (v) occasions with the Applicant, and in the Local Impact Report (e.g. para 15.4 [REP1-045]),</p> <p>(vi) that we had yet to see the evidence that the measures to achieve an increased proportion</p>



		<p>(vii) of rail transport and sea borne transport are deliverable at the time required by the</p> <p>(viii) project to mitigate its impact on the road transport network.</p> <p>(ix) In addition, SCC has not seen evidence that, if the proposed increases in rail and sea</p> <p>(x) deliveries are achievable and if they may have spare capacity, that they 'minimise' freight</p> <p>(xi) movements by road as much as reasonably possible, i.e. that the proportion of materials</p> <p>(xii) being brought to site using rail and sea-borne transport modes cannot be increased</p> <p>(xiii) further beyond the 60% proposed by the Applicant.</p> <p><b>See answer to Question AL.1.10 for further detail.</b></p>
	Response by SZC Co. at Deadline 3	SZC Co. has responded to the issues raised by SCC in its Response to Written Representations (Doc Ref. 9.28). SZC Co. has confidence in the proposed Freight Management Strategy and has committed to limits on HGV movements as a result, which protect against the concerns expressed.
	Response by Mr Ian Galloway at Deadline 3	<p>In response the Applicant makes the case that they have demonstrated "...why approximately 40% of construction materials require HGV transport." rather than addressing the singular issue of 'are the movements minimised'.</p> <p>At Para 2.1.12 [AS-280] the Applicant infers part of the lower limit being at 40% is because "SZC Co. has been working with the Suffolk Chamber of Commerce to develop the local supply chain. Where materials can be sourced locally, it is unlikely that it would be economic to use rail or marine transport."</p> <p>I am of course supportive of the use of the local supply chain and would suggest that a challenge for both the Applicant, the Local Supply Chain and Suffolk CoC (working collaboratively) is to improve the sustainability and attractiveness of 'local' by formulating a 'load aggregation arrangement', thereby reducing vehicle movements (and potentially supplier costs) across a broad range of non-bulk supplies.</p> <p>Moreover, as the Applicant contends 40% of materials being transported by HGV constitutes minimisation, it is perhaps appropriate to remember 'minimised' is broadly accepted as meaning "reduced (something, especially something undesirable) to the smallest possible amount or degree."</p>

		<p>At Para 2.1.13 [AS-280] the Applicant implies the impact of a larger number of 3.5 to 7.5 tonne vehicles is desirable, as opposed to a single larger HGV. It is my contention that this is not always the case and would look to the Applicant to provide persuasive evidence that it is so.</p> <p>At Para 2.1.14 the Applicant argues that continuous concrete production cannot be sustained at peak without the additional capacity provided by the temporary BLF or increased HGV movements.</p> <p>This precarious arrangement for materials critical to the safety of a power station seems untenable. Consequently, it is my contention that without confirmed arrangements for the optimal rail solution, the reality must be that the Applicant only has recourse to HGV, as the combined vagaries of the sea and weather could not necessarily be relied upon to 'deliver the goods'!</p>
	Response by Marlesford Parish Council at Deadline 3	<p>The Applicant, in its response states that "The work undertaken by the Applicant ensures that freight movements by road would be minimised." MPC contends that this statement can only be true if other modes of freight movement (road and sea) have been maximised. Suffolk County Council (SCC) make clear in their response to this question [REP2-192], that they have "not seen evidence that, if the proposed increases in rail and sea deliveries are achievable and if they may have spare capacity, that they 'minimise' freight movements by road as much as reasonably possible, i.e. that the proportion of materials being brought to site using rail and sea-borne transport modes cannot be increased further beyond the 60% proposed by the Applicant." This echoes MPC's concerns expressed in para 11 of its Written Representation [Rep2-365]. And until such time as we know what the full details of the Applicant's freight strategy are, we do not believe that it is possible at this stage for them to claim that they have minimised freight movements by road.</p>
	Response by Woodbridge Town Council at Deadline 3	WTC concurs with SCC's response at Deadline 2.
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. is conscious that these matters were raised by the Examining Authority at ISH2 and SZC Co. is providing further information at Deadline 5 (See <b>Written Submissions Arising from Issue Specific Hearing 2: Traffic and Transport Part 1</b> Doc Ref. 9.49). In principle, however, by committing to both marine and rail infrastructure and adopting HGV limits which can only be achieved through their use, SZC Co. is taking all</p>

		practical steps possible to optimise the use of sustainable modes. No party has identified how greater capacity can be achieved by sea or rail.
AQ.1.69	ESC, SCC	<p><b>Mitigation</b></p> <p>The Outline Dust Management Plan [APP-213] would be an essential part of the mitigation required to control construction activities on site.</p> <p>Do you consider it sufficiently precise that it would be enforceable?</p>
	Response by SZC Co. at Deadline 2	<p>The Applicant notes that further discussions have been held with the Councils to agree the mitigation measures to be required, as set out in the Air Quality Mitigation Plan (refer to the <b>Statement of Common Ground</b> (Doc Ref. 9.10.12)).</p> <p>The measures set out in <b>Table 4.1</b> of the <b>CoCP Part B</b> (Doc Ref. 8.11(B)) have been informed by a dust risk assessment and development of an <b>Outline Dust Management Plan</b> provided in <b>Appendix 12A</b> of <b>Volume 2</b> of the <b>ES</b> [APP-213]. The measures secured by <b>Table 4.1</b> of the <b>CoCP Part B</b> (Doc Ref. 8.11(B)) will be implemented by the contractors and the relevant measures set out in detail within the Construction Environmental Management Plan prepared by the contractor for the relevant stage of works. These measures are then secured by Requirement 2 of the <b>Draft DCO</b> (Doc Ref. 3.1(C)). Together these controls are considered to set out precise and enforceable mitigation measures.</p>
	Response by East Suffolk Council at Deadline 2	<p>The Outline Dust Management Plan is in the ES Annex 12A.1 [APP213]. ESC expects that as an outline plan, further details would be provided as the construction programme is developed and refined, and contractors are appointed.</p> <p>The Outline DMP refers to actions being taken “where possible” or “where practicable.” ESC expects that such comments should always be interpreted in the light of the relevant dust management guidance produced by the Institute for Air Quality Management, with a presumption that the measures identified from this guidance should always be adopted and, where appropriate, enhanced in the light of the specific features of this proposed development (e.g. scale and coastal setting of construction activities; see response to AQ.1.12).</p> <p>ESC considers that the Outline DMP is not fully enforceable at present, as would be expected at this stage. ESC will continue to discuss the Outline DMP with the Applicant and will seek to obtain firmer commitments to certain measures to render them fully</p>

		<p>enforceable. It is expected that with a requirement for the CEMP to be approved by ESC, the necessary specifics for enforceability can be introduced at this stage. Examples of DMP items for further clarification are provided below:</p> <ul style="list-style-type: none"> <li>• G1.4, seeking confirmation of which activities would be halted during adverse weather conditions</li> <li>• G2.2, two construction activities are listed as "significant dust generating activities." Confirmation is sought regarding the significance status for all construction activities.</li> <li>• G2.4, seeking confirmation of which plant is considered to have "significant dust raising potential"</li> <li>• G4.1, seeking further details of how surface stripping would be managed in the light of likely variations in wind direction</li> <li>• G5.2, seeking confirmation of when scabbling would be required, the extent of this activity, and any further controls to be applied</li> <li>• G7.1, to update in the light of more recent commitments made in relation to HGVs conforming to Euro VI emission standard</li> <li>• G7.4, seeking clarification of when vehicle idling could be considered necessary and unnecessary</li> <li>• G7.5, seeking confirmation of the permitting status of stationary generators, and the arrangements that would apply if the stationary generators were not found to require a permit</li> <li>• M5.3, seeking clarification of how operations would be managed in the light of daily weather conditions. Would this be based on measured or forecast conditions, and what steps would be taken if adverse conditions were identified?</li> <li>• M5.4, seeking clarification of how the results of monitoring would be used to inform dust controls. What action would be taken in the event of an exceedance of a threshold, and what ongoing monitoring would be carried out to confirm that the problem had been addressed? Would site activities be halted pending agreement of steps to be taken? How would the appropriate authorities be involved in the process?</li> </ul>
	Response by Suffolk County Council at Deadline 2	<p>SCC defers to ESC, which will be responsible for enforcement of this measure, on technical matters related to enforceability.</p>

	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 <a href="#">[REP2-076]</a>. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed. SZC Co. will share relevant dust and air quality monitoring data with the local authorities on a frequency to be agreed.</p> <p>An updated Statement of Common Ground is anticipated to be submitted at Deadline 5. The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this CoCP), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>
	Response by East Suffolk Council at Deadline 3	<p>The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.</p> <p>The Applicant suggests that the proposed dust controls in the DMP are "precise and enforceable". ESC does not agree, and is seeking further amendments to ensure that appropriate controls are available.</p>
	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19. In addition, the <b>CoCP</b> (Doc Ref. 8.11(C)) has been updated for submission at Deadline 5
AQ.1.72	The Applicant, ESC, SCC	<b>Code of Construction Practice</b>

		The CoCP contains general phrases such as 'where possible' and 'will seek to ensure'. In such circumstances how would the local authorities be able to enforce compliance?
	Response by SZC Co. at Deadline 2	<p>The <b>CoCP</b> (Doc Ref. 8.11(B)) includes a range of targets and measures that would be defined and measured by contractors during the course of construction works. Detailed construction methodologies will be set out within the Construction and Environmental Management Plans that each contractor would prepare for a relevant stage of the construction stage. These would be reviewed and agreed with SZC Co.</p> <p>The absolute dust emission rate for any given task can not be known with complete certainty prior to the task starting and this is why best practice is based on a risk based approach that is able to respond to changing conditions, to maintain control of emissions of dust on each task and across the site as a whole. Monitoring and reporting measures will be used to demonstrate that contractors applying measures '<i>where possible</i>' and '<i>seeking to ensure</i>' they control emissions as required, are effective in doing so.</p> <p>Monitoring and enforcement from East Suffolk Council would be secured through the monitoring and reporting measures agreed in the <b>CoCP</b> (Doc Ref. 8.11(B)) and through the Environment Review Group secured by the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)). This approach represents best practice in securing the type of measures set out within the CoCP.</p>
	Response by East Suffolk Council at Deadline 2	<p>ESC considers it acceptable to have some conditional wording for controls on construction operations at this point, in view of uncertainties in the construction programme – these should become more developed as the Implementation Plan evolves. ESC considers that it is most important to establish principles for dust control at this stage, with the details to be completed in the light of these principles. ESC will continue to work with the Applicant to refine and improve the CoCP and associated documents.</p> <p>For some key sources of pollution such as HGV traffic, ESC is in discussion with the Applicant to eliminate caveats such as "where possible." The use of ambiguous phrasing is not helpful and can lead to problems with enforceability.</p>
	Response by Suffolk County Council at Deadline 2	SCC would prefer that ambiguous phrases like this are replaced (noting that PINs guidance "Drafting Development Consent Orders" (July 2018, section 3) requests that ambiguous wording should be avoided), but we defer to East Suffolk Council to comment

		further on enforceability.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by East Suffolk Council at Deadline 3	The Applicant suggests that the proposed dust controls in the DMP are "precise and enforceable". ESC does not agree, and is seeking further amendments to ensure that appropriate controls are available.
	Response by Ian Galloway at Deadline 3	In their response the Applicant emphasises the role of contractors (i.e. "...a range of targets and measures that would be defined and measured by contractors...", "...Environmental Management Plans that each contractor would prepare for a relevant stage of the construction..." etc.).  For the sake of clarity can the Applicant confirm that irrespective of the phrasing and terminology (above) they, (the Applicant), remain responsible and accountable for all actions, inactions and acts of omission by contracted parties?  If this is not the case, can the Applicant describe and document all the responsible and accountable parties enjoined in the design, execution, performance and conduct of the proposed powerstation construction project and associated works.
	<b>Response by SZC Co. at Deadline 5</b>	The <b>CoCP</b> (Doc Ref. 8.11(C)) has been updated for submission at Deadline 5 to clarify proposed dust monitoring measures.
AQ.1.74	The Applicant	<b>Bus Fleet</b> (i) Is the bus fleet proposed to operate to and from the main development site and associated sites intended to be electric, zero emission or ultra low emission? (ii) Please advise on the types of bus to be employed and the effect on emissions/air quality. (iii) How might any commitment to electric, zero emission or ultra low emission be secured?
	Response by SZC Co. at Deadline 2	(i) Use of a low emissions fleet is being considered by SZC Co. However, conservatively the impact of bus emissions on air quality has been included in the assessment of HGVs within the transport emissions assessment based on the assumption that they are not low emission vehicles. No significant air quality effects were predicted on this basis.  (ii) See (i) above

		(iii) The discussions with potential bus operators are ongoing and there is a drive to commit to a green bus fleet. SZC Co. is not yet in a position to set out the details of the commitment but will be able to do so over the course of the examination.
	Response by Ian Galloway at Deadline 3	<p>i) It is highly regrettable that the Applicant's direct association with a company espousing their virtue as a 'low carbon' energy provider cannot commit to any more than "Use of a low emissions fleet is being considered by SZC Co." and then continuing "However, conservatively the impact of bus emissions on air quality has been included in the assessment of HGVs within the transport emissions assessment based on the assumption that they are not low emission vehicles. No significant air quality effects were predicted on this basis."</p> <p>This response is depressingly familiar of large multinational companies who impose themselves on communities who are active in trying to take individual actions that will improve the lot for many.</p> <p>Rather than considering issues of "No significant air quality effects...", it would be refreshing for the Applicant to regard any detrimental impacts arising from their Project as one that would not have occurred were they not there, and take all necessary steps to neutralise them.</p> <p>Such initiatives might see parking at the Main Site, Campus, etc. only available to "electric, zero emission or ultra low emission" vehicles", promoting their use by the workforce with high density 'free to use' charging facilities at all sites.</p> <p>ii) It is noted at [AS-202] para 3.5.16 et seq. that the estimated time for works necessary to bring a mains electricity supply to the Main Development Site (and for the provision of power to the conveyor system on the BLF) is nine months.</p> <p>It is currently unclear where this places an effective BLF and associated conveyor within the overall construction programme. Could the Applicant</p>



		provide reference (or details) for the description of this element in the context of all the concomitant dependencies and inter-dependencies of the Project?
	<b>Response by SZC Co. at Deadline 5</b>	(i) SZC Co.'s response at Deadline 2 remains valid. (ii) Construction timescales, including the delivery of BLFs, is illustrated on the <b>Implementation Plan</b> [ <a href="#">REP2-044</a> ].
AQ.1.76	The Applicant, ESC (part ii), SCC (part ii)	<p><b>Mitigation</b></p> <p>The revised Mitigation Route Map [AS 276] has added for the Main Development Site</p> <p><i>" Use of contractor vehicles as far as practicable that meet the Euro VI emissions standards and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority.</i></p> <ul style="list-style-type: none"> <li><i>• Use of non-road mobile machines as far as practicable and available that meet the Stage IV engine standards of the NRMM Emission Standards Directive to minimise NOx and particulate emissions on site."</i></li> </ul> <p>(i) This wording is not consistent across the main development site and other associated sites – is there a reason for this?</p> <p>(ii) Do the Councils consider that as reworded this is sufficiently robust?</p>
	Response by SZC Co. at Deadline 2	<p>The intent is the same for the Main Development Site and Associated Developments. The <b>Mitigation Route Map</b> (Doc Ref. 8.12(B)) submitted for Deadline 2 has been updated accordingly.</p> <p>A draft air quality mitigation plan is currently under discussion with the Councils. The draft mitigation plan has been updated in response to comments received from the Councils and to specify the commitments made to the use of Euro VI and Stage IV emissions performance, with only a percentage of vehicles/ plant to be exempt from meeting those standards (refer to <b>Statement of Common Ground</b> (Doc Ref. 9.10.12)).</p>
	Response by East Suffolk Council at Deadline 2	(ii) No, ESC do not consider this to be robust and have suggested amendments to the wording of HGV and NRMM engine standards within paragraphs 19.30 and 19.31 of the LIR [REP1-045], respectively.

Response by Suffolk County Council at Deadline 2	<p>SCC does not consider the rewording is sufficient. We would like to refer the ExA to the requirements proposed for East Anglia One North and East Anglia Two: Recognising the risk to the Stratford St Andrew AQMA, the SPR Outline Construction Traffic Management Plan (Rev 5) section 5.1.5 (see <a href="https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010078/EN010078-004789-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan%20(Track%20ed).pdf">https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010078/EN010078-004789-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan%20(Track%20ed).pdf</a>) sets out the requirements and controls agreed with the Councils for that project. This includes a requirement that if either SPR project overlaps with SZC there would be a requirement that ensures 70% of SPR's HGVs are of a Euro VI standard. SCC would expect similar proposals and monitoring for Sizewell C. This is also set out in our LIR (particularly para 19.30 [REP1-049]).</p>
Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 [<a href="#">REP2-076</a>]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed. An updated Statement of Common Ground is anticipated to be submitted at Deadline 5. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>
Response by East Suffolk Council at Deadline 3	<p>The Applicant's responses refer to an Air Quality Mitigation Plan detailed in the draft Statement of Common Ground. No such plan is mentioned in the SoCG – the Applicant is asked to clarify what is meant here.</p>
Response by Marlesford Parish Council at Deadline 3	<p>Neither SCC nor East Suffolk Council (ESC) [REP2-176] regard the wording as being sufficiently robust. MPC agrees with this position and again asks that all HGVs delivering to the main construction site should be Euro V1 compliant (not just a proportion as SCC seems to accept) and all park and ride buses should be electric. Our view is that in the period between now and when construction starts, the Applicant has enough time to ensure that all its contractors comply with these requirements.</p>

	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.19. The proposed Euro VI compliance approach and use of exemptions has been agreed with ESC to allow local contractors to also support the construction project.
AQ.1.77	The Applicant	<p><b>CoCP</b></p> <p>Table 4.1 [AS 273] requires an adequate water supply to be made available to suppress dust/particulate matter.</p> <p>The latest information provided with the ES Addendum appears to prefer the provision of a water supply which does not form part of the dDCO.</p> <p>Please explain the rationale for this approach and how the ExA can be assured adequate water supplies would be available in a timely manner to ensure dust and particulate matter is limited to agreed levels.</p>
	Response by SZC Co. at Deadline 2	<p>Since submission of the change application for the DCO in January 2021, the water supply strategy for the project has been further developed. It is confirmed that non-potable sources of water would be used wherever practicable to supply those construction activities that do not require potable water, such as dust suppression and wheel washing. A non-potable water demand profile has been developed for the main development site for the construction phase. The peak demand is estimated to be approximately 570m<sup>3</sup>/day. This non-potable demand would be met using treated domestic (foul) effluent from Sizewell B power station and the Sizewell C construction site, combined with winter storage of treated effluent within the proposed 16,000m<sup>3</sup> non potable and temporary Water Resource Storage Area (WRSa). The WRSa would be located close to the borrow pits, main stockpile area and haul roads for operational efficiency. See <b>Volume 3, Appendix 2.2.B</b> of the <b>ES Addendum</b> (Doc Ref. 6.14 (A)) for further details.</p> <p>SZC Co intends to submit a 'Water Supply Strategy' at Deadline 4.</p>
	Response by Ian Galloway at Deadline 3	<p>Apart from the obvious risks of reliance on a water strategy that lays entirely outside of the DCO (as identified by the ExA) it is noted the Applicant intends to source "non-potable demand ...met using treated domestic (foul) effluent from Sizewell B power station and the Sizewell C construction site, combined with winter storage of treated effluent within the proposed 16,000m<sup>3</sup> non potable and temporary Water Resource Storage Area (WRSa).</p>

		<p>It is presumed that there has been a rigorous risk analysis undertaken regarding the sourcing, securing and storing of this effluent cocktail? Assuming that it has all the measures to safeguard adjacent land, nearby residents, livestock and the environment at large; should seepage or significant loss(es) occur, what remediation provisions are being made for emergencies?</p> <p>The Applicant states "winter storage" in their reply, is this term rigorous enough? Moreover, should a holding remain at the time "winter storage" expires, what proposals does the Applicant have for dealing with it.</p>
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. confirms that the proposal is to reduce reliance on mains (potable) water as far possible by maximising recycling and use of non-potable sources, including treated foul sewage. Sewage would be treated to an appropriate standard commensurate with its use. The need for winter storage only applies to the first three summers of construction when the demand for non-potable water, for example in dust suppression, would exceed direct supply. It is therefore proposed to store treated effluent during the winter when the demand for non potable water is lower, in order to supplement supply in the summer.
AQ.1.78	The Applicant, ESC, SCC	<p><b>CoCP</b></p> <p>Table 4.2 refers to regular inspection and monitoring and this terminology is used in several places. Regular could ostensibly be once a year, While, it is assumed this is not the intention is there a more precise term that could be used to ensure maintenance and monitoring is undertaken expeditiously?</p>
	Response by SZC Co. at Deadline 2	<p>The approach to inspection monitoring will be secured through compliance with the <b>CoCP</b> (Doc Ref. 8.11(B)), as required by Requirement 2 of the <b>draft DCO</b> (Doc Ref. 3.1(C)).</p> <p>The detailed Dust Management Plan will specify the frequency of inspections – for some parameters this may be daily when works are being undertaken. Monitoring during construction will also be included in the Dust Management Plan. Dust monitoring results will be reported to the Councils monthly throughout the monitoring period and reviewed through the Environment Review Group (ERG), to which the Councils will be a participant.</p>
	Response by East Suffolk Council at Deadline 2	ESC understands that Table 4.2 acts as a framework for contractors to base their CEMPs upon [AS-273]. It will be the CEMPs that should contain more detail on the monitoring frequency. Currently there is no commitment within the CoCP for CEMPs to

		be approved by the local authority. As per previous responses such as AQ.1.40, CoCP wording should be amended to require approval of the CEMP by ESC. This will provide a check on more detailed dust monitoring plans in the CEMP. ESC note the ExA's concerns and will work with the Applicant to develop an improved level of detail within the CoCP, DMP and CEMPs. For example, see response to AQ.1.72.
	Response by Suffolk County Council at Deadline 2	SCC would prefer that ambiguous phrases like this are replaced (noting that PINS guidance "Drafting Development Consent Orders" (July 2018, section 3) requests that ambiguous wording should be avoided), but we defer to East Suffolk Council to comment further.
	Response by SZC Co. at Deadline 3	<p>An initial Statement of Common Ground was submitted at Deadline 2 [<a href="#">REP2-076</a>]. Further constructive dialogue has been held between SZC Co. and ESC as part of the drafting of the Statement of Common Ground between the parties. This has addressed the points raised by ESC at Deadline 2 and proposed construction dust monitoring and control measures have been agreed. SZC Co. will share relevant dust and air quality monitoring data with the local authorities on a frequency to be agreed.</p> <p>The Construction Environmental Management Plans are SZC Co.'s tool in ensuring that the work undertaken by contractors is in accordance with the controls set out by the DCO. Contractors will use the SSMP's and other project requirements provided to them to produce their CEMP. The CEMP will contain a description of their work activities and the appropriate risk assessment and mitigation associated with the activities. The CEMP will show how the contractor intends to implement the associated environmental management measures therefore demonstrating compliance with the requirements of the DCO (including this <b>CoCP</b> [<a href="#">REP2-056</a>]), and related permits, consents and licences.</p> <p>Due to the scale and complexity of construction works it would not be appropriate for each CEMP to be submitted to and approved by ESC. SZC Co. would however provide regular monitoring reports and information to ESC via the Environment Review Group to ensure that they have appropriate oversight of the project throughout the construction stage. SZC Co. will include additional details in the CoCP as part of Deadline 5 setting out the way in which monitoring would be agreed with the Local Authorities, including monitoring locations.</p>
	Response by East Suffolk Council at Deadline 3	The Applicant suggests that the proposed dust controls in the DMP are "precise and enforceable". ESC does not agree, and is seeking further amendments to ensure that appropriate controls are available.

	<b>Response by SZC Co. at Deadline 5</b>	See response to AQ.1.69.
<b>Chapter 5 - AI.1 Alternatives</b>		
AI.1.1	The Applicant	<p><b>General assessment principles</b></p> <p>The Planning Statement, paragraph 7.3.35, explains that SZC Co. has not considered any alternatives for elements of the Sizewell C Project which have been determined through other processes, policies or legislation, including the proposed siting of Sizewell C. Please identify all elements including any associated development for which alternatives have not been considered, providing reasons for each element in that category.</p>
	Response by SZC Co. at Deadline 2	<p>Apart from the selection of the location of the main site platform and decisions relating to the reactor design, the Applicant is not aware of any elements of the proposals which have not been selected without the consideration of alternatives by SZC Co. The Applicant's position in this respect is set out in the <b>Planning Statement, Appendix 8.4A Site Selection Report</b> [<a href="#">APP-591</a>] and in <b>Volume 1, Chapter 4</b> [<a href="#">APP-175</a>], <b>Volume 2, Chapter 6</b> [<a href="#">APP-190</a>] and <b>Volumes 3-9, Chapter 3</b> of the <b>ES</b> [<a href="#">APP-353</a>, <a href="#">APP-383</a>, <a href="#">APP-414</a>, <a href="#">APP-450</a>, <a href="#">APP-483</a>, <a href="#">APP-514</a>, <a href="#">APP-544</a>].</p> <p>Those documents explain for the associated development sites how the need for those sites was first identified, informed by strategies for accommodation, construction workforce and freight transport. The development of each of those strategies included consideration and consultation on potential alternatives. Sites selected to fulfill those strategies were themselves selected through a process which involved the consideration of alternatives in each case, and were the subject of consultation.</p> <p>For the main development site, the same documents chart the evolution of the application proposals through the consideration of alternatives – for example, in relation to the SSSI crossing, the relocated Sizewell B facilities, the temporary construction area, the accommodation campus, offshore works etc. <b>The Sizewell C Main Development Site Design and Access Statement</b> [APP-585 to APP-587] also reports on the testing and evolution of the proposals through an iterative design process.</p> <p>Alternatives that informed the changes proposed to the application in January 2021 were not reported in the same way, although each was considered as an alternative to the originally submitted proposals. For a number of the changes, additional alternatives</p>

		were consulted on and the outcome was reported in the <b>Consultation Report Addendum</b> [ <a href="#">AS-153</a> ] and in <b>Part 1 of the Proposed Changes to the Application</b> [ <a href="#">AS-281</a> ].
	Response by Ian Galloway at Deadline 3	<p>Whilst it is true that the Applicant bought forward other seemingly random options for the proposed SLR; it is my contention that their starting point for the whole SLR was predicated on the basis that irrespective of traffic origin the only route on which it would arrive would be the B1122 (i.e. the experience gained at Sizewell B construction where significant quantities of materials were largely landed via the sea for a considerably smaller and less complex Power Station.</p> <p>This contrasts sharply with an approach that should have recognised (including earlier experience from their SZB and HPC construction) that; in the absence of existing motorways, trunk roads, other significant 'A Roads' or a viable lesser road network, it was fundamental to the projects success that they would need at least one direct route to site avoiding the A12 as much as possible, and that consideration of a second route might be sensibly considered for resilience should rail and sea options be confirmed as impracticable.</p> <p>Irrespective of this, despite strong local concern about taking the bulk of the proposed road traffic north of Saxmundham, EDF via a somewhat arcane process; elected to back the most northerly route that they had allegedly examined thoroughly.</p> <p>To compound this wanton ignoring of local opinions, the Applicant then, after significant delay, provided (to a limited audience) what many regard as a hastily; conceived, commissioned and executed lightweight Peer Review of their processes and route selection work. It is noted for seemingly being conducted by; a significant supplier to them, largely desk based and referencing much of the historic work undertaken in the 1980's. It is however noted that a 'drive by' locality inspection was also undertaken by the author.</p>
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co.'s response to the question posed at Deadline 2 remains valid. SZC Co's commitment to sustainable transport modes has been explained elsewhere (for instance in the <b>Freight Management Strategy</b> [ <a href="#">AS-280</a> ]).
Al.1.5	The Applicant	<p><b>Site specific assessment – change in circumstances</b></p> <p>The Planning Statement, paragraph 3.8.9, indicates that further details of the evolution of the main development site boundary and the alternatives considered by SCZ Co. are provided at Volume 2, Chapter 6 of the ES:</p>

		<p>(i) Please provide a separate summary of those changes and the justification for them.</p> <p>(ii) Explain further why the changes to the nominated site area and the siting of the temporary construction area in close proximity to the main construction area do not represent a change in circumstances?</p>
	Response by SZC Co. at Deadline 2	<p>(i) The response to <b>Question G.1.10</b> in <b>Chapter 2 (Part 1)</b> sets out a summary of and justification for the differences between the proposed order limits for the main development site and the originally nominated site boundary with reference to overlay plans <b>Figures 2.1</b> and <b>2.2</b>, provided in <b>Chapter 2</b> of this report.</p> <p>(ii) The evolution of the site boundary shows changes from the nominated boundary but it is more appropriate to consider these as differences rather than '<i>changes in circumstances</i>' (if changes in circumstances are meant to encompass the types of matters referred to in the ministerial Statement or in section 6 of the Planning Act).</p> <p>The <b>Planning Statement Update</b> (Doc Ref 8.4Ad) considers what is meant by a '<i>change of circumstance</i>' in relation to decision making and the effect of NPS policy having regard to the 2017 Ministerial Statement<sup>38</sup> - which stated:</p> <p><i>"...in deciding whether or not to grant development consent to such a project, the Secretary of State would be required, under section 105(2)(c) of the Act, to have regard to the content of EN-1 and EN-6, unless they have been suspended or revoked. In respect of matters where there is no relevant <u>change of circumstances</u> it is likely that significant weight would be given to the policy in EN-1 and EN-6"</i></p> <p>As set out in greater detail in the <b>Planning Statement Update</b> (Doc Ref 8.4Ad), the recent judgements in relation to the Drax decision (and the publication of the Wylfa Newydd ExA recommendation report) have helpfully clarified that changes in circumstance relating to whether the NPS is up to date, its merits, the weight to be attached to it, or the policy position on need which it sets out, are matters not for this examination but for a review of the NPS pursuant to section 6 of the 2008 Act.</p> <p>The nomination site boundary was submitted in 2009 in order for the AoS and SSA process to be carried out. This nominated site boundary was one of a number of assumptions adopted for the purposes of concluding at a strategic level whether the</p>

<sup>38</sup> UK Parliament (2017) Written Ministerial Statement on Energy Infrastructure. Available at: <https://questions-statements.parliament.uk/written-statements/detail/2017-12-07/HLWS316>



		<p>nominated sites were potentially suitable for the development of a new nuclear power station.</p> <p>The assessment boundaries were only ever indicative for these purposes and NPS EN-6 specifically recognises that applications for development consent may also include land additional to the boundary of the listed site. There is no suggestion that this legitimate process of site design development would invalidate the strategic suitability of the site. The AoS and SSA established the principle of the location, based on the assessment of a 'base-case' to provide a standardised approach to the appraisal of the nominated sites.</p> <p>The AoS was undertaken at a strategic level to consider the effects of the proposed policy at a national level and the in-principle suitability of sites for the deployment of new nuclear power stations. It was recognised that the AoS would be followed by project level assessments through applications for development consent. It was, therefore, anticipated at the time of undertaking the AoS and SSA that the nominated boundaries would not be definitive. This is evident from paragraphs 2.3.3 and 2.3.4 of EN-6 and C.8.117 (specifically in relation to Sizewell).</p> <p>The difference between the nomination site boundary and the application site boundary does not change the conclusions or validity of the SSA process – as the inclusion of additional land for activities including construction was anticipated at the SSA stage. As set out in the response to <b>Question G.1.1 in Chapter 2 (Part 1)</b> of this report, the main platform (other than some minor boundary changes) and the majority of permanent development as proposed are contained within the nomination boundary. It is primarily construction activities (including the accommodation campus for example) that are located within the wider application site boundary.</p> <p>The difference between the two boundaries does not represent a change of circumstances since the SSA process. The suitability in planning terms of the additional land outside the nomination site boundary will appropriately be considered through the application process.</p> <p>As noted in the response to <b>Question G.1.10 in Chapter 2 (Part 1)</b> of this report, the nomination boundary and the application boundary were derived at different points in time and for different purposes - the former in order to undertake a strategic assessment of the potential suitability of the site for a new nuclear power station and the latter to define the full extent of the site boundary required to deliver the Project. This includes all land required to facilitate the construction of the power station.</p>
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		<p>The responses to <b>Questions G.1.1</b> and <b>G.1.10</b> in <b>Chapter 2 (Part 1)</b> (and the accompanying figures) identify the relationship between the two boundaries and establish that the land within the nomination site accommodates the majority of the permanent development and the land outside primarily accommodates temporary construction activities (see that response for further detail).</p>
	Response by Ian Galloway at Deadline 3	<p>In their response the Applicant helpfully advises that "The AoS and SSA established the principle of the location, based on the assessment of a 'base-case' to provide a standardised approach to the appraisal of the nominated sites."</p> <p>It is noted that the Applicant (or their forerunner nominator) actively sought to make a change to the 'standardised approach' of the 'Base Case'; effectively seeking a change that was only applicable to the Sizewell Site.</p> <p>Consequently, a change was made (at the insistence of the Sizewell Site nominator) so that unlike all other sites, Sizewell was assessed on the basis of "At Least 1 Reactor", contrasting with the 'Base Case' standard "1 Nuclear Reactor".</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co agrees with Mr Galloway that the Appraisal of Sustainability for Sizewell was based on "at least one reactor" being brought forward at Sizewell. The Government identified Sizewell as potentially suitable for one or more reactors and satisfied itself of the site's potential. NPS EN-6 (at paragraph 3.3.1) confirms that Sizewell was in fact assessed for its suitability for twin reactors. Further detail on this topic can be found in SZC Co's <b>Written Summary of Oral Submissions for Issue Specific Hearing 5</b> submitted at Deadline 5 (Doc Ref. 9.45).</p> <p>It is not correct that Sizewell was the only nominated site to include a variation to its base case for multiple reactors. It was also included for Hinkley Point, Hartlepool and Sellafield.</p>
AI.1.7	ONR	<p><b>Reactor design</b></p> <p>The Office for Nuclear Regulation (ONR) [RR-0911] explains that in June 2020, NNB Generation Company (SZC) Ltd applied for a nuclear site licence to allow it to install and operate two EPR™ reactors at the Sizewell C site. The design of the proposed twin reactor development at Sizewell C is closely based on that for the power station that is currently under construction at Hinkley Point C. ONR carried out an assessment of the generic EPR design in 2012 and concluded that it could be safely constructed and operated in the United Kingdom. Whilst the ExA appreciates that the ONR is currently</p>

		assessing the nuclear site licence application, does it have any concerns at this stage in the light of experience and development of the EPR reactor since 2012 at Hinkley Point C?
	Response by SZC Co. at Deadline 2	No further response from SZC Co. is required.
	Response by ONR at Deadline 2	ONR has been regulating the activities of NNB GenCo (HPC) Ltd in relation to the construction of Hinkley Point C since we granted the company a nuclear site licence in December 2012. We are drawing on that experience to ensure that our approach to the licensing and subsequent regulation of Sizewell C construction is as efficient and effective as possible. Although this experience has provided ONR with useful learning, no matters of concern have arisen in our dealings with Hinkley Point C that undermine our view that we should be able to grant a licence for Sizewell C by mid-2022, provided NNB GenCo (SZC) Ltd can provide the necessary reassurances in relation to its corporate competences and the acceptability of the SZC site.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Together Against Sizewell C at Deadline 3	<p>The series 1 EPR reactor has been through a Generic Design Assessment (GDA) procedure but many assessment findings remain unresolved. French Nuclear regulator ASN has a catalogue of issues to do with faults on the EPR including the reactor pressure vessel cap and weld faults. <a href="http://www.french-nuclear-safety.fr/Inspections/Supervision-of-the-EPR-reactor">http://www.french-nuclear-safety.fr/Inspections/Supervision-of-the-EPR-reactor</a></p> <p>Many comments have been made about the reactor design. The French Authorities have commissioned a further Series 2 version of the EPR, currently being assessed by their regulators and it is understood they will not build more reactors of the series 1 type.</p> <p>Taishan 1, in China, has recently experienced excessive emissions linked to fuel pin issues warranting the manufacturer, Framatome, to call for help from the US government. A full report on the cause has not been received to date. This reactor is the only operational EPR using French components.</p> <p>TASC does not have any confidence in the EPR.</p>

	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. refers the Examining Authority to the response provided by ONR at Deadline 2.
Al.1.10	The Applicant, SCC	<p><b>Strategic alternatives for the movement of freight</b></p> <p>The Suffolk County Council [RR-1174] states that the Council does not support the Applicant's proposed freight transport strategy as it stands, and considers that it is still reasonably achievable to increase the proportion of rail and potentially sea-borne deliveries. In the light of the Applicant's strategic assessment of alternatives, and the Applicant's subsequent Changes to the original application, please indicate:</p> <p>(i) Why it is considered that an increased proportion of rail transport and sea-borne transport can be achieved without causing undue delay to the construction programme?</p> <p>(ii) Whether the changes to the application have overcome the SCCs concerns in this respect?</p>
	Response by SZC Co. at Deadline 2	<p>There are potentially two parts to the question: why an increased proportion of rail and sea borne transport can be achieved and why that is possible without impacting adversely on the construction programme.</p> <p>The Applicant's position in relation to the potential for increased rail and sea-borne capacity is set out in <b>Part 1 of the Proposed Changes to the Application</b> [<a href="#">AS-281</a>], particularly from paragraphs 2.2.1 – 2.2.65. In addition, the Applicant's responses to <b>Questions Al.1.11-13</b> of this chapter explain why a temporary Beach Landing Facility is considered appropriate where an earlier proposal for a jetty was not.</p> <p>The Applicant's responses to <b>Questions TT.1.3</b> and <b>TT.1.5</b> in <b>Chapter 24 (Part 6)</b> of this report explain the deliverability of the rail capacity proposals.</p> <p>Close scrutiny of the potential for both marine and rail capacity took place in response to engagement with stakeholders and continuing design development. As a result, the freight management option which involves the use of 4 trains per day for up to 6 days per week, in combination with a second, temporary BLF for bulk materials assumed to be operating at 70% of its campaign capacity and with HGV traffic taking c.40% of materials volume is SZC Co.'s preferred freight management option (see the <b>Freight Management Strategy</b> [<a href="#">AS-280</a>], section 4).</p> <p>The revisions to the freight management strategy (through the enhancement of rail and marine capacity) do not adversely affect the construction timetable. The</p>

		<p><b>Implementation Plan</b> is unaffected in principle and the Applicant's response to <b>Question AI.1.4</b> of this chapter explains the credibility of deployment by 2035.</p> <p>In this context, it may be helpful to briefly explain that:</p> <ul style="list-style-type: none"> <li>• the proposed construction sequence involves an 'early years' stage which does not defer the project in advance of the completion of transport or accommodation related associated development; in view of the urgency of the project;</li> <li>• the increase in train capacity (from 3 trains per day to 4) does not require any different or additional infrastructure;</li> <li>• the sequence of train capacity is unaltered – with the branch line works first opening up the capacity for 2 trains per day to Land East of Eastlands Industrial Estate;</li> <li>• the step up from 2 to 4 trains per day on the opening of the green rail route is unaffected in terms of timing compared with the original 3 trains per day assumption but would allow greater capacity (than a step up to 3 trains per day) and greater resilience in the overall programme;</li> <li>• the temporary BLF will be constructed whilst the early works stage is being undertaken; it does not affect that stage;</li> <li>• again, the commissioning of the temporary BLF will support rather than slow the programme.</li> </ul>
	Response by Suffolk County Council at Deadline 2	<p>(i) It is not clear to us whether the question refers to (a) an increased proportion of rail and sea-borne transport in relation to the proportion (around 40%) set in the original DCO submission; or (b) an increase beyond the proportion (60%) set in the DCO change application. Our response deals with each of these aspects separately:</p> <p>(a) With its change application, the Applicant has conceded that in its view, an increased proportion of rail and sea-borne, from 40% in the original submission to 60% in the change application can be achieved. The Applicant states that this can be achieved as required for the construction programme timetable, although SCC has raised concerns about needing to evidence the deliverability.</p> <p>These concerns, that we had yet to see the evidence that these are deliverable at the time required by the project to mitigate its impact on the road transport network, were raised at numerous occasions with the Applicant, and in the Local Impact Report (e.g. para 15.4 [REP1-045])). Some of the outstanding issues to deliver the proposed rail</p>

	<p>strategy are summarised in the LIR Para 15.39 onwards. We have also not seen clear evidence that HGVs can be reduced to the levels indicated in the change documents. The Implementation Plan [APP-599] shows that delivery of the rail and marine infrastructure is at a similar stage in the programme to the highway mitigation, at the end of the Early Years Scenario. This implies no greater delays are forecast for the delivery of rail and marine transport than for road. SCC is not party to the detailed programming of the construction phase nor the associated risks so does not feel informed to comment in more detail.</p> <p>(b) SCC is not satisfied at the moment that the increased proportion set in the change application (60% by rail and sea) is the upper limit that can be achieved. We think a higher proportion can be achieved if the capacity of rail and marine modes allows for this, and we do not see why this should delay the programme.</p> <p>Both the marine and rail options have been shown by the Applicant to in theory deliver significant tonnages of materials, likely to be above the 60%, and the Applicant has not evidenced why 40% of materials have to be transport by HGV and thus the proportion of materials being brought to site using rail and sea-borne transport modes cannot be increased further beyond 60%. The Applicant states, but has not evidenced, that some specialist materials such as concrete powders have to be delivered by road. SCC considers that the Applicant has not fully explored the maximisation of delivery of materials by modes other than road and is not matching the aspirations of recently examined projects such as Wylfa New Nuclear Plant (while the Transport Assessment there was based on a minimum 60% of materials being delivered by sea, Wylfa's target was 80% - see ExA's recommendation report EN010007-003948-Recommendation Report - English.pdf (planninginspectorate.gov.uk) paragraphs 17.4.1 and 17.4.5) nor evidencing that it is matching the aspiration of the NPS. (see LIR [REP1-045] para 15.50)</p> <p>(ii) The changes to the freight management strategy, aiming to increase rail and seaborne transport, are broadly welcome by SCC; however, at this point, the changes in the application have not yet overcome SCC's concerns, due to unknowns and outstanding matters in terms of:</p> <p>a) Uncertainty in the deliverability and timing of additional train movements, and lack of clarity in the timing of the construction of a second beach landing facility (as set out under (1) and in the LIR para 15.35)</p>
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		<p>b) SCC is not satisfied at the moment that the increased proportion of deliveries by rail and sea set in the change application (60% by rail and sea) is the upper limit that can be achieved. Unless it is clearly evidenced why the proportion of materials being brought to site using rail and sea-borne transport modes cannot be increased further beyond 60%, a higher target should be set if the capacity of rail and marine modes allows for this (see part (1) (b) of the answer above).</p> <p>c) Concerns that adverse impacts of the transport strategy have not sufficiently been minimised and mitigated. This includes impacts from the additional night-time train movements as well as from road traffic. It should be noted that even when marine and rail deliveries are maximised, a substantial amount of additional traffic will be created as a result of the construction activity. The LIR sets out (in para 15.91 onwards) the negative impact on the highway network and (in Table 14-17) highway related mitigation that will, or may be, required, with a number of locations not being agreed by the Applicant.</p> <p>d) The residual carbon footprints, as even if sustainable transport modes of rail and sea are maximised, the carbon footprint of the construction traffic will be substantial. As set out in the LIR (para 21.3), SCC encourages the Applicant to consider ways to off-set the carbon footprint of the development.</p> <p>In summary, SCC considers the proposed changes in the freight management strategy, to increase rail and sea-borne transport modes, as important. If deliverable, and secured by suitable requirements and/or obligations, combined with a comprehensive mitigation package, the changes would make the application more acceptable to SCC. However, as set out in the LIR, many of the issues highlighted above remain unresolved and “work in progress”</p> <p>Due to the uncertainties around the deliverability, if the project is consented it is SCC’s strong stated position that the DCO must include suitable controls and monitoring secured by requirements to ensure that mitigation is delivered in a timely manner and impacts on communities do not exceed those assessed in the ES and Transport Assessment, as set out in the LIR.</p>
	Response by SZC Co. at Deadline 3	<p>SZC Co. and Horizon at Wylfa offered the same commitment for the movement of construction materials, i.e. 40% maximum by HGV. The Wylfa application gave no commitment to reduce HGV movements below that level. It is relevant, however, that the application at Wylfa involved a Material Off-loading facility (MOLF) of considerably greater potential and capacity than can be achieved at Sizewell. In particular, the MOLF</p>

	<p>would provide two purpose-built quays: a bulk quay (with two berths); and a Ro-Ro quay. The facility was described in the Wylfa application as follows:</p> <p><i>"The bulk quay would extend between the eastern breakwater and the Ro-Ro quay and comprise two berthing platforms, each with four mooring dolphins (i.e. eight on total). It would provide berthing facilities for bulk vessels and unloading facilities for bulk materials. The two berthing platforms would have approximate surface area dimensions of 65 m by 30 m. The area behind the platforms and dolphins would be filled to a platform level of between +5 m AOD or +6 m AOD, and would be protected by a rock armour revetment.</i></p> <p><i>The Ro-Ro quay would extend eastwards from the southern end of the bulk quay (i.e. towards the shoreline) and comprise a quayside used primarily for Ro-Ro vessels and Lift-on Lift-off (Lo-Lo) vessels, incorporating a ramp for ship to shore transfer of AILs, and Lo-Lo of equipment and materials by cranes. Its quay wall would be approximately 100 m in length and its quay surface would be set at a platform level of between +5 m AOD or +6 m AOD. The quay wall for the Ro-Ro ramp would be set at the same level as the bulk berth quay surface level with the toe of the sloping ramp used to receive AILs being at approximately +3.5 m AOD, thereby providing a shallow gradient up to the general quay level. The quay wall would continue towards the Cooling Water System intake and the base of the wall would match the level required for the Cooling Water System intake.</i></p> <p><i>In addition to the bulk and Ro-Ro quays, the MOLF would include a temporary layby berth that vessels could be moored against for short-term waiting until the destination bulk or Ro-Ro berth is available. The berth would be located at the southern end of the western breakwater and consist of a series of berthing and mooring dolphin structures. The berth is remote from the land and would be accessed by small boats."</i></p> <p>The scale of the structure, the number of berths (3) and a significantly greater depth of water would allow access by a greater range, type, size and frequency of vessels. A MOLF has vehicular access allowing it to handle containerised and other goods of a type that cannot be brought via a BLF (or MBIF) which only supports a conveyor for bulk</p>
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		<p>materials. The constraints at Sizewell do not make this scale of marine intervention practical.</p> <p>Please also see SZC Co.'s response to Chapter 15 of the <b>Comments on Councils' Local Impact Report</b> (Doc Ref. 9.29), where SZC Co. discusses maximising delivery of materials by rail and marine in further detail in response to matters raised by SCC.</p>
	Response by Marlesford Parish Council at Deadline 3	<p>The Applicant appears confident that its plans for delivering 60% of materials by sea and rail (leaving circa 40% to be moved by road) can be achieved without compromising the project timetable. But uncertainties still exist, and MPC shares SCC's concerns, expressed in its answer to this question, that the Applicant has yet to demonstrate conclusively that its plans can be achieved. And there is also a question of whether, if additional capacity above 60% were achievable by rail and sea, the Applicant would commit to using that capacity as a means of reducing the road borne freight percentage below 40%.</p>
	Response by Woodbridge Town Council at Deadline 3	<p>WTC welcomes SCC's response.</p> <ul style="list-style-type: none"> <li>• We feel that the Applicant is trying to say whatever is necessary to get a positive decision on the DCO - in the expectation that once that stage has been passed and the build started, they will be allowed to use whatever means are expedient to finish. This is of grave concern to WTC; we are very worried that our townspeople's health and wellbeing will be given scant regard once the build has started.</li> <li>• We contend that throughout its FMS, the Applicant is under-playing the adverse impact of night-time train noise on the health and well-being of people living near the track. The noise will be enough to disturb sleep much further from the track than a few metres.</li> <li>• While it's welcome that HGV movements are supposed to stop during the night (between 23.00 and 07.00), it's only sharing the misery, rather than giving any relief, to start delivering freight by rail through the night between these same times. Woodbridge is situated between the A12 and East Suffolk Line transport arteries.</li> </ul>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. has responded to the matters raised by SCC in its <b>Comments on Written Representations</b> <a href="#">[REP3-042]</a> submitted at Deadline 3. It is not the case that SZC Co. is less than fully committed to its <b>Freight Management Strategy</b> <a href="#">[AS-280]</a> and it proposes a DCO consent and legal agreement with binding limits based on that Strategy. Extensive measures are proposed to limit and mitigate noise from night time</p>

		trains on the East Suffolk main line and the Saxmundham to Leiston branch line to acceptable levels and these are being closely reviewed with specialist advisers to ESC and SCC.
Al.1.16	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The Planning Statement, Appendix A - Site Selection Report, section 6, sets out the site selection process for the Two Village Bypass. This is also noted in the Site Selection Report, paragraph 6.4.70, and the reasons for rejection of that proposal are set out in subsequent paragraphs. The representation of Farnham with Stratford St Andrew Parish Council [RR-0379] expresses concern as regards the route alignment for the bypass of Farnham and Stratford St Andrew villages. There are also objections from a number of local residents including Ashtons Legal on behalf of Farnham Environment Residents &amp; Neighbours (FERN) and others [RR-0108 to RR-0117]:</p> <p>(i) Please respond in detail to the criticism made by the Parish Council and other IPs to the proposed alignment of the new road including any change to the Ancient Woodland designation, the impact upon the properties at Farnham Hall and the benefit of facilitating a future four village bypass.</p> <p>(ii) Please provide a larger scale plan of Plate 6.1: A12 Four village route options with the proposed Two Village Bypass route overlaid to aid comparison of those schemes.</p>
	Response by SZC Co. at Deadline 2	<p>SZC Co. has prepared a summary document which brings together a number of issues relating to the history of and selection of the two village bypass in order to assist the ExA: Two Village Bypass Summary Paper (refer to <b>Appendix 5C</b> of this chapter).</p> <p>(i) <b>Criticism</b> - that further consideration should be given to marine and railway led provision</p> <p><b>Applicant response</b> - Please see the SZC Co. response to <b>Question TT.1.22</b> in <b>Chapter 24 (Part 6)</b> on this matter.</p> <p><b>Criticism</b> - the pursuit of a bypass route to the west of Foxburrow Wood, to the exclusion of a more easterly alignment</p> <p><b>Applicant response</b> - The proposed two village bypass alignment has been selected to minimise its impact on residential properties and sensitive receptors, whilst providing an effective bypass of Farnham and Stratford St. Andrew.</p>

		<p>The route selected was assessed to have the least environmental effects. For instance, an alternative alignment further from Farnham and Stratford St Andrew would inevitably extend further into countryside and impact on woodland at Palant's Grove, whilst increasing journey times and reducing or negating the effectiveness of the road as a bypass.</p> <p>SZC Co.'s proposals for the bypass to run to the north of Foxburrow Wood obviate that impact. In doing so the proposals also involve a smaller land take than the Parish Council's suggestion and provide an effective bypass which offers a clear benefit to traffic compared with remaining on the existing A12.</p> <p>In this respect, the DCO alignment accords with the lessons learned from previous bypass proposals. The history of bypass proposals, and how the DCO proposal has evolved from these historic proposals, is explained at <b>Section 2.2</b> and <b>Chapter 3</b> of the <b>Two Village Bypass Summary Paper (Appendix 5C)</b>. The route selected by SZC Co. is comparable with the preferred route options historically promoted by the Highways Agency, preferred by an independent public inquiry and, more recently, preferred in studies undertaken on behalf of the County Council. This is set out in more detail in the Summary Paper.</p> <p>A consequence of the route is its relative proximity to properties at Farnham Hall. In this respect, SZC Co. has taken care in developing the route to respect the amenity of those properties. Where the proposed alignment passes to the east of the Farnham Hall properties, the route would be in cutting approximately 4.5m deep to reduce the environmental impacts on residents.</p> <p>Noise impacts at Farnham Hall have been carefully considered. NPS EN-1 requires the avoidance of significant adverse effects on health and quality of life from noise. Paragraphs 4.6.32 and 4.6.33, and <b>Table 4.24</b> of <b>Volume 5 Chapter 4</b> of the <b>ES</b> [APP-415] confirm that during 2028 Peak Construction, 2028 Typical Day and 2034 Operation, the SOAEL is only exceeded at Pond Barn Cottages (and mitigation made available). The bypass of course brings lasting noise and other benefits to Farnham and Stratford St Andrew.</p> <p><b>Criticism - Palant's Grove has been de-classified as Ancient Woodland</b></p> <p><b>Applicant response</b> - Please see the SZC Co. response to <b>Question AI.1.22</b> of this chapter.</p> <p><b>Criticism</b> - that Farnham Hall is ten separate properties rather than one such that around twenty properties and not eleven will be affected</p>
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	<p><b>Applicant response</b> - Please see the SZC Co. response to <b>Question NV.1.42</b> in <b>Chapter 21 (Part 5)</b> of this report.</p> <p><b>Criticism</b> - An easterly alignment would enable the linking up of a future four village bypass.</p> <p><b>Applicant response</b> – The proposed alignment of the two village bypass in the DCO application would not prejudice the delivery of a longer, four village bypass in the future, but, based on the conclusions of previous studies (as discussed below), a more preferable solution may be for a separate bypass of Little Glemham and Marlesford to be brought forward in the future by Suffolk County Council (SCC) if deemed appropriate.</p> <p>The proposed two village bypass route has evolved as the detail has been developed but it is fundamentally the same route as the preferred route in SCC’s 2014 A12 Four Villages Study. This route (known as SB5), which bypassed the two villages of Farnham and Stratford At Andrew is shown at Plate 2.2 of the <b>Two Village Bypass Summary Paper (Appendix 5C)</b> of this chapter.</p> <p>In the 2014 Study, SCC concluded that:</p> <p><i>"a staged approach for the implementation of an improvement scheme for the length of A12 between Wickham Market bypass and the junction with A1094 Friday Street – termination point for this study – would be the most suitable solution. Currently the section of A12 between Marlesford and Little Glemham has a layout with comparatively acceptable road widths and geometry. The most difficult section with the worst geometric layout is that between Stratford St Andrew and a point north of Farnham."</i></p> <p>Similarly, the two village bypass Summary Paper explains that DfT’s decision (December 2019) to reject the bid for Suffolk’s Energy Gateway (SEGWay, 2017) scheme stated that alternative options ‘<i>such as a smaller two village bypass</i>’ should be considered. Equally, SCC’s 2006 study, as explained in the Summary Paper, also concluded that shorter interventions are preferable.</p> <p>The DCO proposal for a two village bypass would contribute significantly to the long term local objective for a four village bypass. Should a four village bypass be pursued in the future, a spur could be created coming off the two village bypass to the south which would continue to bypass Little Glemham and Marlesford. This would require changes to the two village bypass to tie the two together but it could be achieved if a four-village bypass was still sought in the future. <b>Figure 5.1</b> in this chapter provides an indicative sketch of how a potential link could be provided to link the two village bypass to a future</p>
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		<p>four-village bypass. Alternatively, separate bypasses for Little Glemham and Marlesford could be developed in the future.</p> <p><b>Criticism</b> – a speed limit of 60mph rather than 50mph which will cause more noise and pollution</p> <p><b>Applicant response</b> – A speed limit of 50mph rather than 60mph would reduce noise levels by approximately 1dB, however, this noise reduction is unlikely to be reflected at every noise receptor as noise from other roads would mask this marginal reduction.</p> <p>(ii) A larger scale plan of Plate 6.1: A12 Four village route options (2006) with the proposed two village bypass route overlaid is provided at <b>Figure 5.2</b> in this chapter. In addition, figures have been prepared to show the proposed two village bypass overlaid onto the A12 Four Villages route options from the A12 Four Villages Study 2014 (<b>Figure 5.3</b> in this chapter), and the proposed two village bypass route overlaid onto the A12 SEGWay Strategic Case 2017 route options (<b>Figure 5.4</b> in this chapter). This helps to show the proposed two village bypass in the context of the various route options for an A12 bypass, which evolved through SCC's studies between 2006 and 2017. The proposed two village bypass is shown in green on each of these figures.</p>
	Response by Marlesford Parish Council at Deadline 3	<p>In its response, the Applicant claims that an alternative route for the Two Village Bypass further to the east of Farnham (supported by Farnham and Stratford Parish Council and Farnham Environment Residents and Neighbours (FERN)) would increase journey times and reduce or negate the effectiveness of the road as a bypass. MPC contends that this is not a credible position – the additional distance involved could not be claimed to negate the bypass's effectiveness. The Applicant goes on to say in relation to a more easterly alignment better facilitating a Four Village Bypass "The proposed alignment of the two village bypass in the DCO application would not prejudice the delivery of a longer, four village bypass in the future, but, based on the conclusions of previous studies (as discussed below), a more preferable solution may be for a separate bypass of Little Glemham and Marlesford to be brought forward in the future by Suffolk County Council (SCC) if deemed appropriate." MPC disputes the fact that the proposed Two Village Bypass alignment would still allow the connection to a Four Village Bypass at a later stage and this view is supported at para 2.24 in SCC's Deadline 2 Written Representation [Rep2-189] where SCC states "The Two Village Bypass will in effect preclude the building of the SEGWay four village bypass proposals on the desired alignment as set out in the SEGWay business case, and it does not deliver the full improvements required to address future congestion on the A12 to</p>

		<p>support the Lowestoft and east Suffolk economy, support the housing development in the Suffolk Coastal Local Plan and the other energy NSIP developments in the area.” MPC’s position remains as stated in para 7 of our Deadline 2 submission [Rep2-365], namely that the Applicant should be required to provide a Two Village Bypass alignment that is capable of joining to a bypass of Marlesford and Little Glemham, preferably as part of the Applicant’s works or at a later stage.</p>
	<p>Response by FERN at Deadline 3</p>	<p>[A summary of the response is provided below – refer to <a href="#">REP3-102</a> for full response.]</p> <p>Table 1 below shows out of the 26 houses affected by the Applicant’s route the majority are worse off. We fail to understand how this 'alignment has been selected to minimise its impact on residential properties'. Table 2 shows the Farnham &amp; Stratford St Andrews Parish Council’s detailed analysis of both the Applicant’s Route and the Parish Council’s route with exact measurements, this was submitted regularly in the Consultation period and thereafter by the Parish Council (<a href="http://farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnham-withStratford-PC-Stage-3-Consultation-Response-FINAL3.pdf">http://farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnham-withStratford-PC-Stage-3-Consultation-Response-FINAL3.pdf</a>). EDF can hardly claim to be unaware of it.</p> <p>[Refer to <a href="#">REP3-102</a> for Tables 1 and 2.]</p> <p>THE ALTERNATIVE - to the East of Foxburrow Wood</p> <p>The bypass that does the least harm is the one put forward in detail in 2016 by Stratford St. Andrew &amp; Farnham Parish Council to EDF’s Consultation 2. Details of this and a route map can be found at: <a href="http://farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnhamwith-Stratford-PC-Stage-3-Consultation-Response-FINAL3.pdf">farnhamwithstratfordstandrew.onesuffolk.net/assets/Uploads/Farnhamwith-Stratford-PC-Stage-3-Consultation-Response-FINAL3.pdf</a>.) [Refer to <a href="#">REP3-102</a> for benefits of this route listed by FERN.]</p> <p>AGAINST</p> <p>i) A loss of a thin strip of land between Foxburrow Wood and Palant’s Grove – whatever designation EDF give to that strip of land, its value is low compared to the damage EDF’s route would do and it is incomprehensible that this strip is used as justification for a route that is so blatantly wrong.</p>

		<p>EDF's DCO route is 2.4km and the Parish Council's more easterly route is 2.9km this calculates at adding around 24 seconds to the journey time, which was confirmed by ESC/SCC in their joint response at Consultation 4 as making little difference to road users.</p> <p><i>[With reference to the following statement in SZC Co response: 'In this respect, the DCO alignment accords with the lessons learned from previous bypass proposals.']</i></p> <p>Where is the evidence for this last assertion? Do people opt to travel through Ipswich rather than use the western, southern or eastern bypasses? Likewise for the A12 Martlesham, Woodbridge, Wickham Market, Saxmundham or Kessingland bypasses? Suffolk County Council can no doubt say whether its schemes in Lowestoft (the eastern relief road, the northern spine road and the southern relief road) have failed in the objective of relief of traffic, and providing better routes.</p> <p>Likewise for the Bury St Edmunds eastern relief road and the Beccles southern relief road, EDF are not adducing any evidence to show that a more easterly route will not deliver exactly the same benefits (save a marginal increase in travel time) but without causing anywhere near as much harm to the built and natural environment.</p> <p><i>[with reference to the proximity of two-village bypass route to properties]</i> Not just Farnham Hall estate but also other properties as shown in Tables 1 and Table 2. EDF has obviously not looked closely enough at the Inspector's report on the Highways Agency's scheme, which makes it clear that the decision was marginal, and it is evident also that the impact on Heritage was not sufficiently taken into account, as it should be now.</p> <p>Although a cutting is imperative for some properties, the road would still be very present in places as it is only in part in a deep cutting. A further worry is that in the Applicant's addendum it says it could be subject to plus/minus 1m changes vertically. The route goes very close to Pond Barn Cottages, Pond Wood, the gardens and walled garden at Farnham Manor, Farmham Hall Farmhouse, Stockhouse Cottages, Old Police House and Mollett's Farm. Traffic will be visible from upper windows in 2/3/4/5 Farnham Hall. Boothby's Barn and The Cartshed gardens and houses in Farnham Barn would directly face the DCO route and see it and hear it. The noise would severely affect these properties and their outside amenities will no longer be the tranquil places they</p>
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		<p>currently are. The large overbridge and ramps will be an intrusion into the landscape, and people walking up and down the western ramp and over the bridge will have direct views into some of the homes and gardens.</p> <p>There is no doubt there will be a significant impact from noise and pollution to this rural landscape (and of major detriment); the area is currently one of bird noise and fresh air. People spend a lot of time outside in their gardens and villagers walk up and through here to enjoy the countryside, which will be blighted by EDF's route. The Applicant's table of requirements for the bypass is an earth shattering list including 360 wheeled tracked excavators, 180 loaders, articulated haulers/dump trucks, vibratory tamping rollers, road tipper wagons, compressors and pneumatic tools, motor graders dozers, asphalt pavers (and tipper lorries), crane. These will be working in close proximity to tourism businesses, homes and gardens for extended hours and over months. Compare this to the 3 diggers that were building a reservoir about 500m from a centre point at Farnham Hall Estate that caused local upset, with constant digger beeping on reversing and diggers engine revving whilst they continually went back and forth. The Applicant's bypass comes unnecessarily close to the majority of homes and this will make their environment particularly unbearable during construction. Also, as the main construction site is right by Mollett's Farm there will be continual movement of road building apparatus up by their holiday tourism business and continually going past Farnham Hall Estate/Farnham Hall Farmhouse/Pond Wood/Pond Barn etc. Why has the Applicant chosen the most insensitive route that causes maximum blight to villagers who live in the S.E part of Farnham?</p> <p><i>[with reference to the de-classification of Palant's Grove as Ancient Woodland]</i> Yes, the corridor between Foxburrow Wood and Palant's Grove has been declassified as AW. It has been accepted by Natural England that it was NOT ancient woodland and should not have been classified as such.</p> <p><i>[with reference to the number of properties at Farnham Hall]</i> The Farnham Hall Estate has Farnham Manor, 2 Farnham Hall, 3 Farnham Hall, 4 Farnham Hall, 5 Farnham Hall, Boothby's Barn, The Cartshed (2a Farnham Barn), 2 Farnham Barn, Farnham Barn, 1 Hall Cottage, 2 Hall Cottage plus The Old Vicarage.</p>
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		<p><i>[with reference the proposed alignment not pre-judging a four-village bypass in the future]</i> ESC/SCC have said because of the severe loop it would be impossible to link into. The EDF alignment severely prejudices the potential for any future relief of Marlesford and Little Glemham; the more easterly Parish Council route does not do so.</p> <p><i>[with reference to a solution for a separate bypass of Little Glemham and Marlesford]</i> This would entail 4 roundabouts in a short distance, slowing traffic and causing tailbacks.</p> <p><i>[with reference to the two village bypass route being fundamentally the same route as the preferred route in SCC's 2014 A12 Four Villages Study]</i> This mis-characterises the 2103 A12 Four Villages study for SCC; it was not conclusive about any route and summarised that all the options needed 'cost/benefit ration analysis, alongside design refinement including mitigation measures, accurate costing analysis and traffic forecast and a detailed environmental assessment' before a preferred route was decided on." It did confirm that the route known as SB5 was the 'least favourable' option for biodiversity. (<a href="https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Executive-Summary-A12-Four-VillagesStudy-02062014-REV-2.8.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Executive-Summary-A12-Four-VillagesStudy-02062014-REV-2.8.pdf</a>) Below are the details of the Applicants' consultations that showed that, after Consultation 2, no further discussions were undertaken with either the Parish Council or local people about the exact details of the DCO route. The plans presented in Consultation 2 comprised a rather vague line on a map making it possible to see any route detail. We can only wonder why EDF were not pressed to make greater efforts to investigate the Parish Council's more easterly route and with the same diligence that EDF put into investigating its preferred route west of Foxburrow Wood. This made something of a mockery of the consultation process and EDF is engaging in increasingly desperate arguments to attempt to justify what is simply the wrong route alignment.</p> <p><i>[Refer to <a href="#">REP3-102</a> for details of the consultation provided by FERN.]</i></p> <p><i>[References to FERN not being able to find Appendix 5C Two Village Bypass Study and Figure 5.1 in the Examination Library].</i></p>
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		<p><i>[with reference to the 60mph speed limit]</i> There is a 6m hill to climb and a roundabout at either end of the bypass so a 60mph speed limit seems excessive and unnecessary. Noise effects to properties have been underestimated in the DCO.</p>
	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p><b>Response relating to the four village bypass</b></p> <p>SZC Co. notes the business case for a four village bypass was rejected by Government in 2019, with a recommendation that a smaller scheme should be pursued with a financial contribution from EDF and industry stakeholders (refer to <b>Two Village Bypass Summary Paper</b>, paragraph 2.2.38, <a href="#">[REP2-108]</a>). In fact, the two village bypass would be fully funded by SZC Co. with no call on the County Council or government, whilst additional mitigation of existing and incremental effects is proposed in Marlesford and Little Glemham. The two village bypass would also make a substantial start to any future four village bypass and provide the majority of the most significant benefits.</p> <p><b>Response to FERN</b></p> <p><i>The DCO alignment accords with the lessons learnt from previous bypass proposals:</i></p> <p>SZC Co. made this statement in explaining that the route selected by SZC Co. is comparable with the preferred route options historically promoted by the Highways Agency, preferred by an independent public inquiry and, more recently, preferred in studies undertaken on behalf of the County Council. This is set out in more detail in the <u>Two Village Bypass Summary Paper</u> <a href="#">[REP2-108]</a>. SZC Co.'s response to ExQ1 Al.1.16 at Deadline 2 remains valid.</p> <p><u><i>Proximity to properties along the Two village bypass:</i></u></p> <p>As requested by the Examining Authority, SZC Co. submitted further information at Deadline 4. <b>Appendix A</b> <a href="#">[REP4-006]</a> comprises a table with distances of the Two village bypass to properties. The relationship with affected properties is acceptable in planning terms. The alignment of the road has been optimised to protect the amenity of properties whilst providing a buffer to Foxborrow Wood.</p> <p><u><i>Heritage and noise impacts:</i></u></p>

	<p>SZC Co.'s Response to SZC Co.'s Comments on Written Representations [<a href="#">REP3-042</a>] (page 70, 71 and 76-78) remains valid.</p> <p>SZC Co. does not accept the statement that the noise effects to properties have been underestimated. The assessment utilises the appropriate calculation method, as set out in the Calculation of Road Traffic Noise (CRTN)<sup>39</sup>, which takes account of all relevant factors, including traffic flow volume and composition, speed, gradient, road surfaces, and intervening obstructions where present.</p> <p>tThe noise impacts were determined at the worst-affected locations. The effect at that location was deemed to occur at other nearby receptors, even though the effects are likely to be less at these other receptors, because, as an example, they may be more screened from traffic noise by intervening buildings.</p> <p><i>Route selection and Appendix 5C and Figure 5.1:</i></p> <p>SZC Co.'s site selection process, and the reasons for selecting the proposed route of the Two village bypass have already been set out in the <b>Two Village Bypass Summary Paper</b>, which can be found at [<a href="#">REP2-108</a>] from electronic page 145. Figure 5.1 can be found at [<a href="#">REP2-101</a>] on electronic page 17.</p> <p><i>Four Village Bypass:</i></p> <p>SZC Co.'s has responded to this in SZC Co.'s Comments on Written Representations [<a href="#">REP3-042</a>] (page 71).</p> <p><i>Woodland between Foxburrow Wood and Palant's Grove:</i></p> <p>SZC Co.'s response to ExQ1 Al.1.22 [<a href="#">REP2-100</a>] remains valid. The woodland between Foxburrow Wood and Palant's Grove is not Ancient Woodland, but is designated as Foxburrow Wood County Wildlife Site (CWS). This is not a designation "given by EDF". The County Council's Deadline 3 'Response to Request from ExA for more information (ASI, 10<sup>th</sup> June)' [<a href="#">REP3-081</a>] confirms the status of the affected woodland as part of a</p>
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<sup>39</sup> Calculation of Road Traffic Noise (CRTN), Department of Transport, Welsh Office (1988)

		<p>County Wildlife Site and advises that <i>"the non-Ancient Woodland part of the CWS joins the two larger parts of the woodland and remains important for its ecological functioning."</i></p> <p>East Suffolk Council's Response to Examining Authority's First Round of Written Questions BIO.1.134 [REP2-176] has confirmed the designation of this woodland. ESC stated on page 59 that <i>"as a CWS we considered it to be of 'County' level importance for the purposes of EIA"</i>.</p> <p><i>SCC's 2014 A12 Four Villages Study</i></p> <p>As set out in paragraph 2.2.27 of the <b>Two village bypass Summary Paper</b> [<a href="#">REP2-108</a>], Route SB5 was a preliminary preferred route in SCC's 2014 A12 Four Villages Study (the other preliminary preferred route being SB1). Please see the Sumamry Paper for further information on SB1.</p> <p>Table 7 of the SCC 2014 A12 Four Village Study sets out the potential impacts of Route SB5 on biodiversity, and states that there is "possible direct loss of Ancient Woodland". As set out at paragraph 3.1.2 of the Summary Paper, whilst the Two village bypass alignment is largely similar to Route SB5, SZC Co. adjusted the alignment of the bypass slightly further south between stage 2 and stage 3 to reduce impacts on Nuttery Belt and remove any impact on Pond Wood. An overlay of the Two village bypass route and Route SB5 and Route SB1 is shown on Figure 5.3 [<a href="#">REP2-101</a>] (electronic page 19) of SZC Co.'s Response to ExQ1 A1.1.16.</p> <p><i>Consultations</i></p> <p>SZC Co.'s response in Section 2.3 of the Two village bypass Summary Paper remains valid [<a href="#">REP2-108</a>]. Section 2.3 summarises SZC Co.'s consultation on mitigation options for Farnham across all the consultation stages, and summarises how SZC Co. has had regard to the consultation feedback.</p>
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Al.1.17	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.2.25, refers to analysis which suggested that congestion was only likely within Farnham due to the narrowing of the road at the Farnham bend. At Stage 2 of the consultation Stratford St Andrew was also added to the bypass options so as to remove Sizewell C traffic congestion from both villages. The Appraisal of Sustainability (AoS) for the Sizewell Site (DECC, 2010) noted the Four Village Bypass as one of the key transport interactions for the proposed Sizewell C development. Please explain in detail the reasons for concluding that congestion was only likely to occur at the bend and that the impact of Sizewell C traffic would not be sufficient to justify a bypass of all four villages.</p>
	Response by SZC Co. at Deadline 2	<p>The Appraisal of Sustainability (AoS) for the Sizewell Site<sup>40</sup>, states that '<i>Strategic development plans are in place for a scheme to provide a new route for the A12, bypassing the four villages of Farnham, Stratford, Glenham and Marlesford</i>'.</p> <p>Since the publication of the above report in 2010, further work has been carried out by both SCC and SZC Co. on the A12 near these four villages. This additional work is set out in detail within the <b>Two Village Bypass Summary Paper (Appendix 5C)</b> of this chapter). In particular, and as explained in the Summary Paper (<b>Appendix 5C</b>), the 2014 study published by SCC recognises that the issue relates to Stratford St Andrew and Farnham, it states:</p> <p><i>"Currently the section of A12 between Marlesford and Little Glemham has a layout with comparatively acceptable road widths and geometry. The most difficult section with the worst geometric layout is that between Stratford St Andrew and a point north of Farnham."</i></p> <p>Paragraph 2.3.50 of the <b>Transport Assessment</b> [APP-602] states that the Farnham Bend between Stratford St. Andrew and a point north of Farnham is a pinch point along the A12. The Farnham bend is an existing known constraint to abnormal indivisible load (AIL) movements on the A12 due to narrowing of the A12 and tight configuration of the bend (see <b>Chapter 2.2</b> of the <b>Two Village Bypass Summary Paper</b> at <b>Appendix 5C</b> to this chapter for further information).</p>

<sup>40</sup> DECC (2010) Appraisal of Sustainability: Site Report for Sizewell. Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47800/1983-aos-site-report-sizewell-en6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47800/1983-aos-site-report-sizewell-en6.pdf)

		<p>At the Farnham bend, the A12 bends sharply and larger vehicles such as HGVs must slow to pass each other when coming from opposite directions. <b>Table 8.4</b> and <b>Table 8.5</b> of the <b>Transport Assessment Addendum</b> [<a href="#">AS-266</a>] set out the flows in the Early Years, before the two village bypass would be in operation. A detailed breakdown of flows by vehicular type for Peak Construction without the bypass is contained at <b>Chapter 2</b> of the <b>Two Village Bypass Summary Paper</b>. The modelling demonstrates a significant increase in HGV flows. During the network peak hours of 08:00-09:00 and 17:00-18:00, there would be a 76% and 143% increase in HGVs respectively through Farnham during Peak Construction (typical day) as a result of Sizewell C construction traffic. This significant increase in the number of HGV movements negotiating the narrow bend would reduce average speeds and increase the likelihood of congestion and journey unreliability.</p> <p>Suffolk Police has highlighted a clear risk of collision at the Farnham Bend. The safety concerns are set out at <b>Chapter 2</b> and <b>Chapter 3</b> of the <b>Two Village Bypass Summary Paper</b> (<b>Appendix 5C</b> of this chapter).</p> <p><b>Table 8.7</b> of the <b>Transport Assessment Addendum</b> [<a href="#">AS-266</a>] shows that the introduction of a bypass of the two villages would reduce traffic flows by approximately 99% during Peak Construction during the evening peak hour (17:00-18:00) through Stratford St Andrew and Farnham. The bypass would be highly effective in its principal purpose.</p> <p>In comparison, and as noted above in the 2014 study published by SCC, the A12 between Marlesford and Little Glemham has a layout with comparatively acceptable road widths and geometry, unlike at the Farnham Bend.</p> <p>A bypass of all four villages would be of a significant scale and this scale would have significant environmental impacts, as noted in the 2006 Four Villages Study undertaken for SCC. A four village bypass would be a disproportionate intervention to mitigate the effects of Sizewell C traffic during the construction phase, and therefore it was not included within the application for development consent for the Sizewell C Project. However, is necessary to give detailed consideration to more local issues and, particularly, issues arising from the bend in Farnham.</p>
	Response by Marlesford Parish Council at Deadline 3	<p>The Applicant justifies its position on a SCC report which states that "The most difficult section with the worst geometric layout is that between Stratford St Andrew and a point north of Farnham". Whilst MPC recognises this as a fact, it should not be used to ignore the current difficulties faced by Marlesford and Little Glemham and whilst SCC states</p>

		that there are “comparatively acceptable road widths and geometry” on the Marlesford and Little Glemham stretches of the A12, this does not automatically mean that the A12 through these two villages is acceptable for the volume of traffic proposed by the Applicant. We refer the ExA to comments made by Inspector Guy Rigby in the EA1-N and EA2 Issue Specific Hearing 13 (Traffic and Transport), when he recognised that Marlesford is “the first unimproved section of the A12 after the dual carriageway section [north of Wickham Market]”. MPC maintains its position that the only feasible, economic and sustainable solution is a bypass of all four villages. After all, Marlesford and Little Glemham will experience the same volumes of traffic that would have gone through Stratford St Andrew and Farnham.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co.’s response at Deadline 2 remains valid. SZC Co. is nevertheless in discussion with Marlesford Parish Council in terms of mitigation and enhancement measures.
Al.1.18	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.3.25, indicates that the alternative alignment put forward by the Parish Council was reviewed at the Stage 4 consultation stage, taking into account the impacts on woodland, environment and nearby receptors as well as operational matters, but it was not considered to be a better solution. Please explain:</p> <p>(i) The operational matters that weighed upon that decision.</p> <p>(ii) The additional average journey time that users of the alternative alignment would be likely to take compared to the proposed route and the existing routes.</p> <p>(iii) Justification for the conclusion that the proposed route would be likely to encourage road users to bypass the current A12 route through Stratford St. Andrew and Farnham compared to the alternative route.</p>
	Response by SZC Co. at Deadline 2	<p>(i) In relation to operational matters, the Parish Council’s alternative alignment would be considerably longer, diverting traffic well into the countryside, rather than providing a realistic bypass of the villages. The Parish Council’s alternative alignment would be 2,860m in length compared to 2,380m for the DCO proposals, almost half a kilometre longer.</p> <p>The Parish Council’s alternative alignment has not been designed in detail and, for instance, is not compliant with geometric standards. To address this at a high level SZC Co. has prepared a geometric standards compliant schematic alignment version of</p>

		<p>the Parish Council's alternative to help understand the potential impact more closely (referred to as the revised alternative Parish Council alignment). A comparison of the Parish Council's alternative alignment, and the revised alternative Parish Council alignment are provided at <b>Appendix A</b> and <b>Appendix B</b> of the <b>Two Village Bypass Summary Paper (Appendix 5C)</b>.</p> <p>The revised alternative Parish Council alignment would have significant effects on Friday Street Farm, as the alignment would sever more of the 'pick-your-own' fields from the Farm Shop and Café compared to the proposed alignment in the DCO submission. The <b>Two Village Bypass Summary Paper</b> at <b>Appendix 5C</b> explains in more detail the reasons why the Parish Council alignment is not considered to be a better solution.</p> <p>(ii) SZC Co. has used a strategic model to calculate the journey time on the existing A12 at Peak Construction (2028) through Farnham and Stratford St Andrew without the bypass. The journey time is estimated at 1 minute 50 seconds, but this estimate does not take into account potential delays at Farnham Bend, and therefore the journey time is likely to be greater. This journey time has been measured from the same points on the A12 as where the proposed bypasses (both the two village bypass and the Parish Council alignment) would leave and re-join the A12. The journey times for the DCO proposed bypass is estimated at 1 minute 48 seconds; whilst the journey time for the revised alternative Parish Council alignment is estimated at 2 minutes 8 seconds.</p> <p>(iii) The two village bypass journey time is marginally faster than staying on the A12 through Farnham and Stratford St Andrew, assuming that there is no congestion at Farnham Bend. However, the bypass is clearly needed due to the safety and potential congestion concerns at Farnham Bend, as explained in response to <b>Question Al.1.17</b> of this Chapter. The Parish Council alignment journey time is longer and could not be expected to be attractive to the majority of drivers.</p> <p>Whilst Sizewell C construction traffic would be instructed to use the bypass and avoid the two villages, Sizewell C traffic represents only approximately 7% of A12 traffic (based on Location AB – Marlesford, which is just to the south of Farnham – <b>Table 8.6</b> of the <b>Transport Assessment Addendum [AS-266]</b>) and the majority of other vehicles using the A12 would be less likely to divert onto a bypass which offers no significant benefit in journey time or distance.</p> <p>As a result of its greater length the revised alternative Parish Council alignment would be significantly less successful in its primary purpose – to bypass the two villages. The revised alternative Parish Council alignment would be unlikely to provide the significant</p>
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		reduction in traffic flows that would come as a legacy benefit for these local communities with the DCO proposals.
	Response by FERN at Deadline 3	<p>[A summary of the response is provided below – refer to <a href="#">REP3-102</a> for full response.]</p> <p>No meetings or discussion was undertaken with the Parish Council about their proposed route and things were obviously taken as settled at Consultation 3, which makes a mockery of the supposed process of consultation.</p> <p><i>[with reference to the following statement in SZC Co response: 'The two village bypass journey time is marginally faster than staying on the A12 through Farnham and Stratford St Andrew, assuming that there is no congestion at Farnham Bend.']</i></p> <p>It is ridiculous to use the word "marginally". A simple drive through the villages at 30 mph will, shown this as significantly longer in time than the more easterly route.</p> <p><i>[Statements of disagreement with SZC Co's arguments on the benefits of the proposed two-village bypass alignment over the Parish Council's alternative]</i></p>
	<b>Response by SZC Co. at Deadline 5</b>	<p><u>Consultations</u></p> <p>SZC Co.'s response in Section 2.3 of the Two village bypass Summary Paper remains valid [<a href="#">REP2-108</a>]. Section 2.3 summarises SZC Co.'s consultation on mitigation options for Farnham across all the consultation stages, and summarises how SZC Co. has had regard to the consultation feedback.</p> <p><i>Two village bypass journey times and Statements of disagreement with SZC Co's arguments</i></p> <p>SZC Co.'s response at Deadline 2 remains valid.</p> <p>SZC Co. has worked closely with the local stakeholders as part of the evolution of the design and preferred alignment of the two village bypass. Chapter 16 of the Local Impact Report (LIR) [<a href="#">REP1-045</a>] sets out Suffolk County Council and East Suffolk</p>

		<p>Council's position on the two village bypass. At paragraph 16.54 of the LIR [<a href="#">REP1-045</a>] it states that <i>"the Councils consider that the route proposed by the Applicant is the least worst option when considering impacts on Foxborrow Wood and its position is subject to satisfactory detailed design of the bypass."</i></p> <p>It goes on to state at paragraph 16.55 of the LIR [<a href="#">REP1-045</a>] that <i>"the new route will remove traffic from an existing constrained section on the A12 known as Farnham Bends, which will improve road network resilience and reliability. The bypass will remove through traffic from the communities of Farnham and Stratford St Andrew and improve network resilience by providing an alternative route to traffic during incidents. Although longer, being a higher speed road of modern design it will somewhat improve journey times and thus help to support the Suffolk economy."</i></p> <p>The greater length of the Parish Council's suggested route was judged to make it operationally less effective when the same alignment was considered by the Inspector who conducted the 1995 inquiry into the Highway Agency's proposals (see reference to alternative 14 at paragraph 3.1.7 of the Two village bypass Summary Paper [<a href="#">REP2-108</a>]). .</p>
Al.1.19	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.3.27 states that the alternative alignment would be closer to Walk Barn Farm than the SZC Co. proposal is to any neighbouring property. Nonetheless the proposed route would pass close to the Farnham Hall complex. Please provide in summary a comparison of the distance of the two routes from residential properties in the vicinity; the numbers of residences in the various locations; the anticipated noise impact upon those residents and any impact upon heritage assets.</p>
	Response by SZC Co. at Deadline 2	<p>The proposed two village bypass has been routed as far away from residential properties as practical, whilst providing an effective bypass and avoiding environmentally important woodland and gardens.</p> <p><b>Comparison of distance and number of properties within 250m of the routes: Chapter 3 of the Two Village Bypass Summary Paper, and Appendices C and D of the Summary Paper</b> (found at <b>Appendix 5C</b> to this chapter), include plans showing</p>

	<p>the proximity of the geometric standards compliant Parish Council alignment to properties along the whole route (including 2 properties at Walk Barn Farm), and plans showing the proximity of the two village bypass alignment (as proposed in the DCO) to properties along the whole route (including the properties at Farnham Hall).</p> <p>The plans show that there are 48 properties within 250m of the proposed bypass in the DCO alignment and that there are 32 properties within 250m of the geometric standards compliant Parish Council alignment.</p> <p>The plans show that the two village bypass alignment (as proposed in the DCO) is approximately 83 metres from Farnham Hall Farm House (to the east of the bypass) and 135 metres from the nearest property at Farnham Hall (to the west of the bypass). The geometric standards compliant Parish Council alignment is 21.6 metres from Walk Barn Farm.</p> <p><b>Potential noise impacts:</b></p> <p>The assessment of potential noise impacts from the two village bypass are set out in <b>Volume 5, Chapter 4</b> of the <b>ES</b> [APP-415] and updated in <b>Volume 1, Chapter 5</b> of the <b>ES Addendum</b> [AS-184]. There is no equivalent assessment for an alternative alignment.</p> <p><b>Table 4.21</b> in <b>Volume 5, Chapter 4</b> of the <b>ES</b> [APP-415] shows that there will be no significant adverse effects from the construction of the two village bypass, once mitigation is taken into account.</p> <p><b>Table 4.23</b> in <b>Volume 5, Chapter 4</b> of the <b>ES</b> [APP-415] shows that significant adverse effects from the use of the two village bypass are possible at 11 receptors or receptor groups.</p> <p>A significant adverse effect, in an EIA context, which is what is identified in <b>Table 4.23</b>, is not the same as a significant adverse impact on health and quality of life, as described in the Noise Policy Statement for England or NPS-EN1. They are separate concepts. It does not follow from the existence of a significant adverse effect in EIA terms that there will be a significant adverse impact on health and quality of life (i.e. an exceedance of the 'SOAEL') in terms of the NPSE or NPS EN-1. Please refer to the answer to <b>Question NV.1.75(i)</b> in <b>Chapter 21 (Part 5)</b> for a full explanation of why this is the case.</p>
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	<p>Overall, the noise effects of the two village bypass accord with NPS EN-1 paragraph 5.11.9 because noise effects have been minimised by design, whilst significant adverse effects on health and quality of life are avoided, as SOAEL will not be exceeded.</p> <p><b>Potential heritage impacts:</b></p> <p>The impact on heritage assets on the DCO alignment of the two village bypass alignment is summarised in <b>Table 9.5</b> of <b>Volume 5, Chapter 9</b> of the <b>ES</b> (Terrestrial Historic Environment) [APP-432]. The table shows that no significant adverse effects are anticipated for any heritage assets during the construction phase and during the operational phase.</p> <p>The Parish Council alignment would pass close to the Grade II listed Hill Farmhouse (1278707) and Pond Barn, which is a non-designated heritage asset considered in the ES, on a raised embankment, and would be likely to give rise to significant adverse effects through change to setting to these heritage assets. Other effects arising through change to setting would be of a limited magnitude broadly comparable to those set out in the submitted ES.</p> <p>The Parish Council alignment is similar to that investigated in the early 1990s for a proposed bypass, and there are a number of areas where artefactual material and archaeological features have been identified, including cropmarks east of Glemham Hall (SSA13), a scatter of medieval artefacts near Whin Covert (FNM 006) and Pond Barn (FNM 004), a scatter of burnt and worked flints near Nuttery Belt (FNM007), Prehistoric and medieval field systems at Pond Barn (FNM 021) and cropmarks of an undated field system (FNM 013). Effects on these features are considered likely to give rise to disturbance of archaeological remains which would be broadly comparable to that arising from the DCO alignment set out in the submitted ES.</p>
Response by FERN at Deadline 3	<p>[A summary of the response is provided below – refer to <a href="#">REP3-102</a> for full response.]</p> <p>See Table 1 and Table 2 in <a href="#">[REP3-102]</a> which show correct distances [to properties].</p> <p>There is ONE residential property at Walk Barn Farm, it is a small farm bungalow of low architectural merit that is usually unoccupied but occasionally so for holiday lets or a very occasional visit by the owners, we understand. The alternative route would be behind this bungalow, behind a thick line of trees/hedge, the way the house orientates and the height of land levels mean it would have a lower adverse effect to the property</p>

		<p>than the current route does to many other properties. We also question the 20m proximity that the Applicants claim the Eastern route would put on Walk Barn Farm. We have detailed plans of Option 14 that went East of Foxburrow Wood drawn up by the Highways Agency in a 1990 consultation (A1 plans which we could provide). This was for a proposed dual carriageway that went east of Foxburrow Wood. It was positioned about 90m from Walk Barn Farm, it did clip Foxburrow Wood by 10m, but was a dual as opposed to a single carriageway. We are not road builders but this 20m measurement appears mistaken.</p> <p><i>[Pictures of Walk Barn Farm, Mollett's Farm, the Old Vicarage, Farnham Manor, Farnham Hall, Boothby's Barn, 2 Farnham Barn &amp; Farnham Barn, 1 &amp; 2 Hall Cottages, and The Cartshed provided within <a href="#">[REP3-102]</a>].</i></p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>As requested by the Examining Authority, SZC Co. submitted further information at Deadline 4. <b>Appendix A</b> <a href="#">[REP4-006]</a> comprises a table with distances between properties to the DCO boundary, the permanent boundary and to the two village bypass alignment (edge of carriageway).</p> <p>In this context the Parish Council's 'alternative' is not an alternative for the purposes of comparative assessment. It has not been designed to a standard that enables its effects to be robustly assessed. Paragraph 4.4.3 of NPS EN-6 is clear that the onus is not on the Applicant to design alternatives suggested by others. What is apparent on any basis, however, is that any alternative to the east of Foxborrow Wood would run very close to Walk Barn Farm.</p>
Al.1.20	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The Consultation Report Appendix G records concern that the two village bypass would damage Grade II listed buildings and other heritage assets in the area. The response indicates that potential loss of heritage significance through change to setting would be addressed through mitigation measures including standard CoCP measures to minimise noise and air quality effects (construction phase).</p> <p>(i) Please explain in detail why such measures are not proposed for the operational phase and identify the mitigation that is proposed for that phase?</p> <p>(ii) Specifically in relation to ES Vol 5 Chapter 4 Noise and Vibration para 4.7.12, how would further consideration of measures that could be implemented to further reduce</p>

		traffic noise at detailed design stage be secured, and what type of measures are anticipated?
	Response by SZC Co. at Deadline 2	<p>(i) <b>Figure 9.1 of Volume 5, Chapter 9</b> of the <b>ES</b> (Terrestrial Historic Environment) [<a href="#">APP-434</a>], shows that the majority of heritage assets are located adjacent to the A12 within the villages of Stratford St Andrew and Farnham.</p> <p>The introduction of a bypass of the two villages would reduce traffic flows by approximately 99% during Peak Construction through Stratford St Andrew and Farnham. The existing carriageway would remain open for local traffic but signposting and the timesaving advantages of the bypass would take all but very local traffic out of the villages.</p> <p>As summarised in <b>Table 9.6 of Volume 5, Chapter 9</b> of the <b>ES</b> (Terrestrial Historic Environment) [<a href="#">APP-432</a>], and between paragraphs 9.6.64 and 9.6.108, the removal of traffic from the two villages during the operational phase will result in a positive effect for the majority of the heritage assets. In many cases, the reduction in traffic noise as result of diverted traffic would help restore the setting of the assets, therefore contributing to their historic interest.</p> <p>Out of the 16 designated heritage assets in the 'data search study area' (defined at paragraph 9.3.10 of [<a href="#">APP-432</a>]), only one designated heritage asset (Farnham Manor Grade II) is assessed to experience minor adverse effects which are not significant during the operational phase. In terms of mitigation, as the new road passes near Farnham Manor the road is proposed to be in cutting, approximately 4.5m deep, as shown in Dwg no. SZC-SZ0204-XX-000-DRW-100522 [<a href="#">APP-038</a>]. Woodland planting is also proposed along the western side of the cutting.</p> <p>As shown in <b>Table 9.6 of Volume 5, Chapter 9</b> of the <b>ES</b> (Terrestrial Historic Environment) [<a href="#">APP-432</a>], only one other heritage asset is assessed to have minor adverse effects which are not significant during the operational phase, and this is reported on the 'Historic Landscape Character' (HLC). In terms of mitigation, existing vegetation has been retained where possible, and additional hedgerow planning is proposed along the route of the road.</p> <p>During the operational phase there are no significant adverse effects anticipated for any heritage asset.</p>

		(ii) Further steps may be taken to mitigate and minimise adverse noise effects as part of the detailed design of the road, which may include the use of a quiet road surface. This was not originally proposed as this road surface is more expensive to maintain. However, this will be discussed with Suffolk County Council (SCC) and East Suffolk Council (ESC) and an update will be provided within the SoCG (Ref. 9.10.12) at Deadline 4.
	Response by FERN at Deadline 3	<p><i>A summary of the response is provided below – refer to <a href="#">REP3-102</a> for full response.]</i></p> <p>Please see FERN Heritage report from Brighter Planning Consultancy submitted at WR Deadline 2. This concludes that EDF's assessments and proposals fail to comply with statutory tests (S66(1) Listed Buildings and Conservation Areas Act 1990 and the guidance of the NPPF).</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p><u>Heritage</u></p> <p>The concerns raised in the FERN Heritage Impact Assessment are similar to matters raised in the Suffolk County Council and East Suffolk Council Joint Local Impact Report [<a href="#">REP1-045</a>], to which a response has been prepared, providing greater detail and explanation of how the assessment presented in <b>Volume 5, Chapter 9</b> of the ES [<a href="#">APP-432</a>] was carried out. Reference should be made to <b>Chapter 12</b> of SZC Co.'s response to the Joint Local Impact Report [<a href="#">REP3-044</a>].</p> <p>The impact on heritage assets on the proposed alignment of the two village bypass is summarised in <b>Table 9.5</b> of <b>Volume 5, Chapter 9</b> of the ES (Terrestrial Historic Environment) [<a href="#">APP-432</a>]. The table shows that no significant residual adverse effects are anticipated for any heritage assets during the construction phase and during the operational phase.</p> <p><u>Locating Appendix 5C</u></p> <p>SZC Co.'s site selection process, and the reasons for selecting the proposed route of the Two village bypass has already been set out in the <b>Two Village Bypass Summary Paper</b>, which can be found at [<a href="#">REP2-108</a>] from electronic page 145.</p>

		<p><u>Woodland between Foxburrow Wood and Palant's Grove</u></p> <p>SZC Co. has responded to this in its <b>Comments on Written Representations</b> [<a href="#">REP3-042</a>] (page 74) submitted at Deadline 3. Please also see above in response to Al.1.16.</p> <p><i>Route selection</i></p> <p>SZC Co. has worked closely with the local stakeholders as part of the evolution of the design and preferred alignment of the two village bypass. Chapter 16 of the Local Impact Report (LIR) [<a href="#">REP1-045</a>] sets out Suffolk County Council and East Suffolk Council's position on the two village bypass. At paragraph 16.54 of the LIR [<a href="#">REP1-045</a>] it states that "<i>the Councils consider that the route proposed by the Applicant is the least worst option when considering impacts on Foxburrow Wood and its position is subject to satisfactory detailed design of the bypass.</i>"</p>
Al.1.22	The Applicant	<p><b>Site selection for the Two Village Bypass</b></p> <p>The ES 6.6, Volume 5 Two Village Bypass, Chapter 3 Alternatives and Design Evolution, paragraph 3.3.29, refers to the potential impact of the alternative alignment upon Foxburrow Wood ancient woodland and Palants Grove:</p> <p>(i) Please explain in detail the perceived difficulties in maintaining a 15m buffer to Foxburrow Wood and why this could not be overcome?</p> <p>(ii) Provide an update as to the status of Foxburrow Wood and Palant's Grove as ancient woodland.</p> <p>(iii) The extent of the County Wildlife Site that would be lost as a result of the alternative alignment.</p>
	Response by SZC Co. at Deadline 2	<p>The alternative alignment proposed by the Parish Council is not compliant with geometric standards. However, SZC Co. has prepared a revised alternative, comparable to the Parish Council's alignment, so that it is compliant with geometric standards (referred to as the revised alternative Parish Council alignment). The Parish Council alignment, and the revised alternative Parish Council alignment can be found at <b>Appendix A</b> and <b>B</b> of the <b>Two Village Bypass Summary Paper (Appendix 5C</b> of this chapter). This revised alternative Parish Council alignment has been prepared at a high-level to help understand the potential impacts of an alignment to the east of</p>



		<p>Foxburrow Wood, however it has not been designed in detail, for example the likely extent of earthworks required. The level of detail shown in <b>Appendix B</b> of the <b>Two Village Bypass Summary Paper (Appendix 5C</b> of this chapter) is considered sufficient to inform this response.</p> <p>(i) The revised alternative Parish Council alignment would pass between the two ancient woodlands of Foxburrow Wood and Palant's Grove, bisecting the woodland between them (which forms part of the Foxburrow Wood County Wildlife Site (CWS)).</p> <p>As with the DCO alignment for the two village bypass, in addition to the requirement of land for the road itself, the revised alternative Parish Council's alignment would also require additional land for any necessary earthworks, drainage, diversions of PRow, fencing and planting, as well as land to facilitate construction for example haul routes. At this time, as detailed design has not been undertaken, it has been assumed that the Parish Council alignment would require approximately a 14m to 20m corridor on both sides of the road alignment (assuming no earthworks are required) where it passes between the two ancient woodlands to facilitate construction and operation of the road, including the accommodation of haul routes, drainage, PRow changes (specifically E-243/006/0) and a fence. This corridor would be wider if earthworks are required.</p> <p>At its closest point, the road in the revised alternative Parish Council alignment would be approximately 23m from ancient woodland on the eastern side and 30m on the western side. With a 14m to 20m corridor either side of the road, it would be possible to avoid land take directly from the ancient woodland (assuming no earthworks would be required), but the alignment, due to the corridor, would impinge upon a 15m buffer to Foxborrow Wood and Palant's Grove ancient woodland.</p> <p>In addition, as described above, the revised alternative Parish Council alignment would result in a new road fragmenting Foxburrow Wood CWS. The alignment would separate the two ancient woodlands (Foxborrow Wood and Palant's Grove Ancient Woodland), which are currently functionally linked by the central wooded section of Palant's Grove. Bisecting Palant's Grove would fragment the CWS and sever the ecological connectivity of between the two retained ancient woodlands and prevent movement of wildlife through the existing corridor which connects them. No tree surveys of the section of woodland that would be impacted have been undertaken and therefore the potential for bat roosts is not known, however, historical records and bat transect surveys undertaken in May and July 2019 recorded evidence of bat activity (Common pipistrelle</p>
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		<p><i>Pipistrellus pipistrellus</i>) and the revised alternative alignment would result in loss of woodland that is likely to provide suitable foraging, commuting and roosting habitat. In comparison, the route proposed by SZC Co. would avoid both of these Ancient Woodlands in their entirety, and not result in their separation. The proposed route by SZC Co. would also provide a 15m buffer to Foxborrow Wood and would not result in the loss of any CWS.</p> <p>(ii) The central section of Palant's Grove woodland, was previously classified as ancient woodland but was de-classified by Natural England after the submission of the DCO application. However, both Foxburrow Wood and the eastern section of Palant's Grove remain designated Ancient Woodland. In addition, all of the woodland is a non-statutory designated County Wildlife Site (Foxburrow Wood CWS).</p> <p>(iii) The revised alternative Parish Council alignment would pass between Foxburrow Wood ancient woodland and Palant's Grove ancient woodland, requiring the removal of the central section of Palant's Grove. The road itself, and the corridors either side of the road required to facilitate construction and operation of the road (as explained in part (i) of this response), would result in a permanent loss of approximately 1,834sqm of Foxburrow Wood CWS (assuming no earthworks would be required in the revised alternative Parish Council alignment).</p> <p>The County Wildlife Site (CWS) designation is recognition of a site's high wildlife value within the County context and is typically made by the local planning authorities. Site selection criteria vary but in general, these sites support important or threatened species and habitats that are local and national priorities for conservation including the habitat types listed on Section 41 of the NERC Act. Further information on CWS designations is set out in response to <b>question Bio.1.20</b> in <b>Chapter 7 (Part 2)</b> of this report.</p> <p>CWSs are not protected by legislation, but their importance is recognised by local authorities when considering any relevant planning applications and there is a presumption against granting permission for development that would have an adverse impact on a site<sup>41</sup>.</p>
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<sup>41</sup> East Suffolk Council (ESC) (2020). Local Plan <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

		<p>The removal of this central neck of Foxburrow Wood CWS would fragment the CWS and sever the ecological connectivity of the ancient woodlands on either side, resulting in avoidable harm to the biodiversity of the CWS.</p>
	<p>Response by FERN at Deadline 3</p>	<p><i>A summary of the response is provided below – refer to <a href="#">REP3-102</a> for full response. References to SZC Co. being misleading due to the following reasons:</i></p> <p>As we know only too well at FERN (and keep saying) the CWS was an automatic designation when the corridor between the woods was wrongly designated as Ancient Woodland some years ago; it has been reappraised by Natural England and the corridor between Foxburrow Wood and Palant's Grove has now been undesignated, as seen on magic mapping. By being no longer AW it calls into question whether it is properly CWS. That corridor is denuded and of little value because of its narrowness and proximity to intensive arable farming.</p> <p><i>[References to FERN not being able to find Appendix 5C Two Village Bypass Study and Figure 5.1 in the Examination Library].</i></p> <p>Palant's Grove has been kept as AW by Natural England but on a questionable basis, relying on the hachuring shown on Hodskinson's map of 1783, which looks to be some distance further east. A small wood can be seen on the 1803, estate map, however. I repeat, the corridor became designated automatically as CWS by virtue of the corridor being mistakenly designated AW. I reattach the SCC letter which says that. Please would the ExA ask EDF to unearth any qualitative assessment of the corridor which shows that it actually has a justified CWS status, rather than having had such status ascribed automatically as a result of a mistaken (and now corrected by Natural England) designation as AW. EDF is failing to put into the planning balance the harm that will be caused to Nuttery Belt and the interconnected habitats affected by its DCO route, as well its failure so far to present expert hydrological evidence to show that there will be no threat whatsoever to Foxburrow Wood (properly AW and CWS) and Pond Wood (now designated as AW by Natural England and also as CWS, on proper assessment, not anything automatic). The overall harm caused by the Applicants' route has been woefully underestimated and not even properly investigated (see FERN's expert Ecology report), EDF is not making a fair and proper explanation for the planning balance to be considered by the ExA.</p>

		<p><i>[with reference to SZC Co. statements on Parish Council's alternative alignment]:</i></p> <p>These comments by EDF represent an exaggerated perspective. The gap between Foxburrow Wood and Palant's Grove is 103m wide and was considered wide enough for a dual carriageway proposed and drawn up in a previous consultation by the Highways Agency in 1990. The scrub woodland corridor itself is flat, as are the fields either side, north and south. What possible earthworks would be required? In design terms, it would be bad practice to provide wide verges, 24 because that will give too much sense of openness to drivers and encourage excessive speed. Any design should be sensitive to the natural environment and take as little land as possible. EDF is providing no justification from the Design Manual for Roads and Bridges for these assertions., and particularly not for the excessive 14-20 metre corridors it is assuming. Where is such specified in the DMRB? There would be some severance of farmland but that provides an opportunity, particularly on the western side, for enhanced planting. S246 Highways Act 1980 specifically provides for the acquisition of land for mitigation and no doubt SCC can confirm that it has used that statutory power to ameliorate the harmful effects of its road schemes where considered necessary. This requires a value judgement on how a scheme is to be best fitted into the natural environment. EDF's proposals for its DCO route are already woefully short on measures to conceal the alignment. Putting a bypass in the corridor between Palant's Grove and Foxburrow Wood would provide some screening but EDF would have the opportunity to use S246 powers to provide additional screening, so as to even better mitigate the intrusion of a new road into the landscape. It is, however, ironic that, in heritage terms, one would be almost back to having a roadway east of Foxburrow Wood as shown on Hodskinson's map of 1783 terms.</p> <p>Two PROWS would still be affected, it is true, but with less harm to the villagers generally (ie not just us in the Farnham Hall area or at Mollett's) because the network close to the village would be retained, unlike EDF's DCO route which causes severance and reduces the attractiveness of a walk out to and around Foxburrow Wood or up to Friday Street. EDF apparently considers an at grade crossing acceptable for the public footpath in the north; why is EDF assuming it could not do so on the more easterly route? If EDF considers that overbridges would be required, then surely that must be</p>
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		<p>true of both footpath routes affected by its DCO, and particularly so for the northern one, given its proximity to the attractions at Friday Street.</p> <p>The comments about drainage are seen with something of a hollow laugh, given EDF's failure to give assurances to the owners of Hall Cottages and Mollett's Farm. Not having the deep cutting EDF is proposing for its DCO alignment must surely reduce the issues on road drainage.</p> <p>Firstly, there is no justification given in DMRB terms for such wide corridors and we ask that the ExA questions on what possible DMRB basis EDF can justify this 25 over what is a flat area. Rather EDF should be looking at least 30 metre buffers on each side, which would still leave 50 metres within which to put in a 7.4 metre carriageway. EDF's comments serve to show that it has simply not looked properly at this area (as indeed it has not for Nuttery Belt). It is simply false to suggest that Palant's Grove is being "bisected". All EDF has to do is look at the 1803 estate map to see what areas existed as of that date. The corridor between the two areas of woodland has been allowed to grow up, hence it containing scrub growth for the most part. Yes, there will be some landscape impact but setting that against the harm caused by EDF's DCO alignment to both the built and natural environment a proper planning balance must surely be in favour of a route that causes much less harm. In bat assessments it was noted by our ecology experts (Bioscan UK independent ecology report submitted by FERN WR deadline 2) that EDF sent ecologists out to undertake walked bat transects but then failed to consider where all the bats were originating from. EDF's DCO reports the closest bat roost as 695m away when there are 2 occupied maternity listed bat roosts in Farnham Hall Estate 20m &amp; 40m from the Applicants site boundary, connected to the Ancient double hedgerow wildlife corridor, which will be severely damaged as EDF proposes it be removed yet links the roosts to AW Foxburrow Wood.</p> <p>The Parish Council's alternative also avoids both of the areas of AW because it passes between them, not through them. It would also provide a much larger buffer zone, either side, and not have the impact on hydrology that comes from such a deep cutting, on EDF's DCO alignment, much too close to the sunny western side of Foxburrow Wood, where unfortunately trees stress has been seen. EDF's DCO alignment would be a major barrier to wildlife movement, between the inter-connected habitats and sever the diverse areas of habitat biodiversity as listed in Fern's WR Deadline 2 Bioscan Report on Ecology and FERN report on Trees &amp; Woodland. EDF is already proposing bat hop overs but these have been noted to not work; we are also currently a total darkness</p>
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		<p>landscape at night which is why there are so many bats roosting at Farnham Hall Estate that use the wildlife corridor to Foxburrow Wood.</p> <p>EDF is mistaken in seeking to identify the corridor as part of Palant's Grove. The original form of that wood can be seen on the 1803 estate map. We question EDF's assessment of the area loss., especially if it is based on land take which is excessive. Please let the ExA and us see the DMRB justification. The reality is that there has been no local authority assessment of this corridor. EDF is making a false assumption, based on what ought to be a logical deduction but here the starting premise is unsound, because the corridor only became CWS as a result of it being mistakenly identified as AW. The applicant seems to continue to ignore the reality, which is that SCC confirmed that the CWS designation was automatic. The reality is that neither EDF nor the Councils have actually examined the corridor and starting from a false premise renders the entire argument unsound and to be dismissed.</p> <p>The reality is that, as with Nuttery Belt, the applicant simply does not know whether the corridor would qualify for CWS status on merit (as opposed to an automatic designation on a mistaken designation as AW). It is deeply ironic that, for its DCO route, the applicant can suggest proceeding without properly surveying Nuttery Belt and yet, when it comes to this corridor, the rules seem to change and suddenly, the applicant is contending for things that do not follow logically and are unproven in fact.</p> <p>One must also take into account other factors, such as:</p> <ul style="list-style-type: none"> <li>(I) The loss of Nuttery Belt (probably Ancient Woodland; EDF never assessed that woodland properly despite its direct land take and despite it running along a public lane but rather saying it was 'access not granted' which was clearly misleading.</li> <li>(II) The loss of 120m of double wildlife corridor ancient hedgerow</li> <li>(III) The loss of ancient/veteran trees</li> <li>(IV) Further severance and landscape intrusion by a large overbridge</li> <li>(V) The loss of wildlife amenity due to the proximity of a road at grade by the AW/CWS Pond Wood</li> <li>(VI) The severing of the central portion of highest biodiversity value</li> <li>(VII) The loss of amenity for villagers</li> <li>(VIII) The damage to heritage and related landscape setting.</li> </ul>
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	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p><u>Woodland between Foxburrow Wood and Palant's Grove</u></p> <p>SZC Co. has responded to this in its <b>Comments on Written Representations</b> [<a href="#">REP3-042</a>] (page 74) submitted at Deadline 3.</p> <p>The woodland between Foxburrow Wood and Palant's Grove is not Ancient Woodland, but is designated as Foxburrow Wood County Wildlife Site (CWS). Please see above in further response to <b>Question Al.1.16</b>.</p> <p>The connecting strip of woodland is mature woodland, with tall standards and although it has not been subject to detailed botanical survey it could not be characterised as 'scrub woodland'.</p> <p>The woodland remains an interconnecting area of woodland which provides ecological connectivity between the two Ancient Woodlands (Foxburrow Wood and Palant's Grove). Its designation is not surprising and its removal would be detrimental to the purposes of the CWS and to the well-being of the Ancient Woodlands.</p> <p><u>The two village bypass being a wildlife barrier</u></p> <p>The new road alignment is a single carriageway road, which is unlikely to prove a major barrier to movement of most mammal species. Nevertheless mammal ledges have been included in the River Alde bridge and the culverts within River Alde embankment.</p> <p>Similarly 'bat hop overs' are proposed with new woodland planting to maintain bat connectivity over the new road.</p> <p>Clearly by the same logic in respect of mammal crossings, an alternative road alignment east of Foxburrow Wood would potentially create a barrier to wildlife movement between the ancient woodlands of Foxburrow Wood and Palant's Grove.</p> <p><u>Bat assessments</u></p>
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		<p>trees in the periphery of the woodland (which are most likely to be impacted) and trees with suitability for supporting roosting barbastelle.</p> <p><u>Hydrology on Foxburrow Wood</u></p> <p>SZC Co. has undertaken ground investigation work on the Two village bypass alignment.</p> <p>The ground investigation work identified that the water table recorded in boreholes is well below the level of the cutting, so there will be no ground water effects on Foxburrow Wood.</p>
Al.1.24	The Applicant	<p><b>Site selection for the Southern Park and Ride</b></p> <p>The Site Selection Report, paragraph 5.4.7, indicates that for the Stage 1 consultation, Option 1 – Wickham Market was considered to be in the optimal position:</p> <p>(i) Please explain further why that was considered to be the case, in particular by way of comparison with a site located further south on the A12.</p> <p>(ii) Please explain further why Options 2 and 3 were considered to have the potential to cause greater issues in terms of congestion, access and highway safety compared to Option 1.</p>
	Response by SZC Co. at Deadline 2	<p>(i) Prior to Stage 3 consultation, a review of travel times from areas west of the A12 to the northern and southern park and ride sites demonstrated that the potential impacts of locating the park and ride at either Woodbridge or Martlesham would not be preferable to Wickham Market.</p> <p>If the park and ride was located at either Woodbridge or Martlesham, many construction workers living west of the A12 would likely be allocated to using the Darsham park and ride as this would be a shorter total journey time to the main development site, with a much shorter bus journey time from Darsham (circa 10 minutes) than from either Woodbridge (circa 30 minutes) or Martlesham (circa 35 minutes).</p> <p>Additional workers allocated to the northern park and ride would increase traffic using the A1120 through Yoxford High Street Conservation Area towards the A12 and north to the northern park and ride. While traffic flows on the B1078 travelling to and from the Southern park and ride would obviously reduce, other Sizewell C related LGV traffic</p>

		<p>would remain and still cause an impact that would require mitigation. Therefore, moving the southern park and ride further south to Woodbridge or Martlesham would not remove B1078 impacts and would increase impacts elsewhere (i.e. A1120 in Yoxford).</p> <p>(ii) Access to the Option 2 site at Woodbridge would be at a new fourth arm to the A12/A1152 Woods Lane roundabout. The additional arm and turning traffic would likely increase the number of collisions significantly at the roundabout. Traffic leaving the park and ride site and heading south would increase the conflict flow past the A12 southbound and A1152 arms, which would increase queuing and delays. By comparison, the Transport Assessment shows that traffic travelling to/from the Wickham Market site does affect performance of the B1078/B1116 Fiveways roundabout and does not impact A12 flows past the site.</p> <p>A new roundabout at Scott's Lane would be needed to access the Option 3 site, to accommodate the right turning movement out of the park and ride site in the evening. A new roundabout would impose additional delays to A12 traffic compared to the Wickham Market site, which does not impact A12 flows past the site. The additional traffic turning into and out of the park and ride site at the new roundabout would likely result in a small increase in the number of collisions at this location.</p>
	Response by Mr Arthur Stansfield at Deadline 3	<p><i>SZC Co. response at Deadline 2: 'If the park and ride was located at either Woodbridge or Martlesham, many construction workers living west of the A12 would likely be allocated to using the Darsham park and ride as this would be a shorter total journey time to the main development site.'</i></p> <p>It does not necessarily follow that the workers should be allocated to the Northern Park and Ride.</p> <p><i>SZC Co. response at Deadline 2: 'Option 2 site at Woodbridge would be at a new fourth arm to the A12/A1152 Woods Lane roundabout. The additional arm and turning traffic would likely increase the number of collisions significantly at the roundabout.'</i></p> <p>Is this true? Surely this also applies to Wickham Market - there will be additional collisions in the High Street and also increased danger to pedestrians and cyclists.</p> <p><i>SZC Co. response at Deadline 2: While traffic flows on the B1078 travelling to and from the Southern park and ride would obviously reduce, other Sizewell C related LGV traffic would remain and still cause an impact that would require mitigation.'</i></p>

		This indicates that Wickham Market will have substantial LGV traffic. EDF have told us that the route from the west will be A14/A12. If this is the case then the closer the park and ride site is to A14/A12 junction then the less traffic on the A12 heading north. EDF have no way of enforcing their policy and would require effective monitoring to be in a position to enforce the policy.
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co.'s response at Deadline 2 is still valid.</p> <p>The intended route for Sizewell C workers to the Wickham Market park and ride will be via the A12 northbound off-slip and through the Fiveways roundabout (B1078/B1116), accessing the park and ride via a new access on the northbound slip road to the A12, which carries two-way traffic between the Fiveways roundabout and the new access.</p> <p>The construction phase signage strategy (described at para. 4.4.35 of the <b>Construction Traffic Management Plan</b> [REP2-054]) directs Sizewell C workers along this route, which avoids Wickham Market. The <b>Consolidated Transport Assessment</b> [REP4-005] concludes that some traffic will travel thorough Wickham Market along the B1078 and SZC Co. is therefore working closely with Wickham Market Parish Council, SCC and ESC to develop a package of improvements within the village to improve safety, pedestrian amenity and provide a new cycle link to the park and ride site.</p> <p><b>Chapter 6</b> of the <b>Construction Traffic Management Plan</b> [REP2-054] describes the measures proposed to manage and monitor LGV traffic through the Delivery Management System (DMS).</p>
Al.1.25	The Applicant	<p><b>Site selection for the Southern Park and Ride</b></p> <p>The representation of Great Glemham Parish Council [RR-0438], submits that the SPR facility should be situated alongside the FMF at Sevenhills to reduce pressure on Wickham Market. What assessment has been made of existing pressures on Wickham Market and the impact that the proposed park and ride facility would have on those pressures in comparison to a location beside the FMF?</p>
	Response by SZC Co. at Deadline 2	<p>SZC Co. has not considered siting the southern park and ride adjacent to the freight management facility, as it would require workers to make a circa 45 minute bus journey (an extra 20 minutes compared to that from Wickham Market) to site after driving to the park and ride site from their home location. For many workers, including those living in Ipswich, Woodbridge and Framlingham for example, such a location would be a deviation from their most direct route to site adding time, costs and emissions to their</p>

		<p>journey. Only those living in Felixstowe would find such a location convenient. By contrast, the southern park and ride at Wickham Market would intercept trips on their route to the main development site.</p> <p>SZC Co. has developed a package of measures for the B1078 between the A140 at Coddendam and Wickham Market that would mitigate impacts along this route. The measures and funding mechanism in the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)) are described in the <b>Consolidated Transport Assessment</b> (Doc Ref 8.5(B)).</p>
	Response by Mr Arthur Stansfield at Deadline 3	<p><i>SZC Co response at Deadline 2: 'freight management facility, as it would require workers to make a circa 45 minute bus journey (an extra 20 minutes compared to that from Wickham Market) to site after driving to the park and ride site from their home location.'</i> EDF are more concerned with convenience to workers and their journey time than impact to residents of Wickham Market.</p> <p><i>SZC Co response at Deadline 2: 'those living in Ipswich, Woodbridge and Framlingham for example.'</i></p> <p>How many workers are expected to live in these towns and also in Wickham Market. For Wickham Market what will be the impact on on-street parking? There could be increased demand for on-street parking.</p>
	Response by Marlesford Parish Council at Deadline 3	<p>In its answer, the Applicant states that "SZC Co. has developed a package of measures for the B1078 between the A140 at Coddendam and Wickham Market that would mitigate impacts along this route. The measures and funding mechanism in the Draft Deed of Obligation (Doc Ref. 8.17(C)) are described in the Consolidated Transport Assessment (Doc Ref 8.5(B))." MPC is not aware that any package of measures is fully developed for the B1078 and we await further detail from the Applicant. MPC welcomes the fact that any measures that are agreed will be funded through the s106 agreement.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>Section 10.4(d) of the <b>Consolidated Transport Assessment</b> [<a href="#">REP4-005</a>] describes in some detail the road safety context along the B1078 between the A140 and B1116 in Wickham Market, as well as a package of road safety improvements proposed to be secured via a "B1078 Road Safety Contribution" in the <b>draft Deed of Obligation</b> (Doc Ref. 8.17(E)). This package of measures was developed in close consultation with SCC as the highway authority, and the intention is that SCC would deliver those improvements using the funding mechanism set out above.</p>

		<p>The Gravity Model, described in <b>Appendix 7A</b> of the <b>Consolidate Transport Assessment</b> [<a href="#">REP2-047</a>] was used to estimate the residential distribution of Sizewell C workforce. <b>Table 4, 5</b> and <b>6</b> of the appendix shows a distribution of construction workforce for early years, peak construction and operational phases respectively.</p> <p>Please see response to question TT.1.36 in relation to the management of fly-parking.</p>
Al.1.30	The Applicant	<p><b>Site selection for the Sizewell Link Road</b></p> <p>The Site Selection Report, paragraph 7.4.27, recognises that Route W located to the south of Saxmundham was best placed to intercept the Sizewell C HGVs from the south. However, it is asserted that it would not have as effectively relieved B1122 communities of traffic as more northerly routes. Please explain the basis of that assertion and why greater weight was not placed upon the relief from HGVs and other traffic travelling from the south?</p>
	Response by SZC Co. at Deadline 2	<p>The Sizewell link road as proposed would be more effective at relieving HGV impacts on communities than Route W or any other route. Whilst HGVs from the south would travel further north along the A12 before turning onto the bypass to reach the proposed alignment of the Sizewell link road than they would with a route W alignment, that section of the A12 forms a bypass to Saxmundham of significantly lower environmental sensitivity than the section of the A12 through Yoxford or than the sensitivity of the northern section of the B1122. As set out in response to <b>Question Al.1.27</b> of this chapter, those communities are much better relieved by the selected route.</p> <p>The Sizewell link road is proposed to be open to the public and SZC Co. predicts that general traffic currently using the B1122 would transfer to the proposed Sizewell link road, as the Sizewell link road follows a similar alignment to the B1122. This will not only relieve those communities of Sizewell C traffic, it would reduce existing traffic flows through the villages of Middleton Moor and Theberton. In comparison, it is unlikely that as much existing B1122 traffic would reroute via a 'W North' alignment, due to its relative remoteness from the B1122. The issue of traffic volumes on the B1122 through Yoxford, Theberton and Middleton Moor were particular issues raised during the early consultation stages and these issues would not be resolved with the 'W North' alignment. The issue of relief from the south was also an important consideration – please see the response to <b>Question Al.1.27</b> of this chapter.</p>

		The <b>Sizewell Link Road Paper (Appendix 5D)</b> to this chapter) also explains that route W is no longer a feasible option due to its physical overlap with local plan allocations around Saxmundham.
	Response by Suffolk County Council at Deadline 3	<p>SCC has set out its views on the Sizewell Link Road routeing in SCC's Written Representation [REP2-189], including that "SCC has continued to ask the Applicant for a comprehensive explanation and justification of the chosen route, but the Applicant has not provided conclusive and acceptable evidence."</p> <p>SCC notes that Appendix 5D (and its supporting appendices and sub-appendices) [REP2-108] of the Applicant's Response to ExQ1s seeks to provide that further explanation and justification, in particular in section 8.4 of Appendix 11 to Appendix 5D and in Sub-Appendix D of Appendix 11 to Appendix 5D. It is unfortunate that this explanation has only belatedly been provided.</p> <p>SCC notes that, based on the Applicant's assessment in the Visum modelling in Appendix 10 to Appendix 5D, the Sizewell Link Road as proposed offers, in comparison to the "route W"/"D2", considerably less benefit in terms of shortening journey times and journey distance (and so CO2 emissions) for the majority of construction traffic (especially HGVs), and offers no significant legacy compared to "route W"/"D2". SCC reserves its position on the adequacy of that modelling but notes that it proceeds on the premise that: Buses from the northern park and ride at Darsham would use the B1122 rather than a SLR based on "route W"/"D2" on the grounds of convenience; but that HGV construction traffic from the north would be directed to use that (longer) SLR route. SCC also notes that buses serving the Darsham Park and Ride would have a shorter/quicker journey if routed via the B1122 than via the SLR as proposed, but the modelling has assigned those buses to the proposed SLR.</p> <p>In addition, the figures presented for HDV movements on the A12 at Yoxford in the Visum modelling differ from those presented by the Applicant in its Response to ExQ Al.1.27, and the references to paras 4.1.64 to 4.1.72 of Appendix 5D in that Response are not understood.</p> <p>SCC is also not persuaded that, at the detailed design stage, it would not have been possible for an alignment evolved from "route W"/"D2" to be achieved which was compatible with the proposed Saxmundham Garden Neighbourhood. This, together with challenges to other points made in Appendix 5D paras 3.1.56 to 3.1.71, result in SCC not agreeing with the conclusions of the Environmental Appraisal Summary Table 8.14 of Appendix 11 to Appendix 5D. Furthermore, the work undertaken by the Applicant in</p>

		<p>respect of the comparisons between Route W and the proposed SLR fails to take into account the advantages that Route W would have in relieving settlements such as Saxmundham, Leiston, Coldfair Green and Knodishall of much of the SZC traffic passing through those places.</p> <p>However, SCC welcomes the provision of a clearer explanation of the Applicant's route choice than hitherto provided and, whilst it considers that the position is more finely balanced than is presented in [REP2-108], with a range of environmental and transportation benefits and disbenefits in both route options, and that no demonstrable 'best' solution emerges, it nonetheless acknowledges that the Applicant has made that choice and so formulated its proposals. SCC is therefore now focused on addressing that choice on its own merits. If the ExA wishes to further examine the feasibility and desirability of alternative routes to the SLR, SCC would be happy to provide further detail on its concerns about the route selection process.</p> <p>As referred to in the Written Representation[REP2-189]; notwithstanding SCC's concerns on the route selection process, SCC remains of the view that a relief road must be provided, and, faced with the actual proposal submitted in the DCO application before it, SCC supports the provision a new road as an acceptable way to mitigate the construction traffic impacts on the B1122 and, during the construction period, as an improvement when compared to the status quo. However, based on the environmental impacts of the proposed SLR accompanied with limited legacy benefits SCC maintains its view that the road should be removed when Sizewell C construction is complete.</p>
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. is grateful to the County Council for its revised position following its review of the information submitted at Deadline 2.
Al.1.32	The Applicant	<p><b>Site selection for the Sizewell Link Road</b></p> <p>The ES 6.7 Volume 6 Sizewell Link Road Chapter 3 Alternatives and Design Evolution, paragraph 3.3.21, confirms that once operational, the SLR would be open to general traffic during and after the construction of Sizewell C. The Consultation Report, section 8.10 - Changes to the Sizewell C Project in response to the Stage 4 consultation, indicates that a decision was made at that stage to propose the SLR as a permanent facility, rather than temporary. However, the Consultation Report Appendix G Stage 4 Issues Table f Sizewell Link Road/Theberton Bypass – records general support for removal of the SLR following the construction phase and for the land to be restored. Please explain in further detail the assessment of the consultation responses on this</p>

		topic which led to the decision to permanently retain the SLR and how that reflects the Stage 4 consultation responses.
	Response by SZC Co. at Deadline 2	<p>The removal of the Sizewell link road was included as an option within the Stage 4 consultation. The majority of the responses opposed the removal of the Sizewell link road. Question 6 of the consultation questionnaire asked:</p> <p><i>"Please provide your views on whether some or all of Sizewell link road/Theberton bypass should be removed and the land restored once Sizewell C is operational."</i></p> <p>A total of 161 responses were received to this question, of which, 41 responses gave a view on whether the Sizewell link road should be removed and land restored. Of these responses, 68% opposed the removal of the Sizewell link road after Peak Construction and 32% supported the removal of the Sizewell link road.</p> <p>In the Councils' joint response to Stage 4 (Suffolk County Council and East Suffolk Council (ESC)), ESC raised concerns about the potential environmental impact of the removal of the road. ESC raised specific concern regarding the removal of the SuDS that serve the Sizewell link road, which could have a negative impact on the biodiversity that would have established in the SuDS from the time they were constructed. ESC also raised concerns that the removal of the Sizewell link road would increase the duration of the construction phase of Sizewell C.</p> <p>Further information on the consultation responses received on the retention of the Sizewell link road has been compiled to assist the examination. This information is set out at <b>Chapter 3, Section viii</b> of the <b>Sizewell Link Road Paper (Appendix 5D</b> of this chapter).</p> <p>As a response to the Stage 4 consultation, a decision was made to propose the Sizewell link road as a permanent facility, rather than temporary. Taking account of the views expressed through consultation and engagement, SZC Co. considered that it would be preferable to avoid further disruption to local residents and the environment by removing the road and to leave it as a lasting legacy of the Sizewell C Project. The road also provides a long-term route to Sizewell C and Sizewell B, which is of continuing benefit operationally.</p>



	<p>Response by Mr Ian Galloway at Deadline 3</p>	<p>In their response the Applicant asserts; "A total of 161 responses were received to this question, of which, 41 responses gave a view on whether the Sizewell link road should be removed and land restored. Of these responses, 68% opposed the removal of the Sizewell link road after Peak Construction and 32% supported the removal of the Sizewell link road."</p> <p>This paragraph lays bare the paucity of information shared during the Pre-Application Consultation and the narrow margins by which hugely impactful decisions have been made by the Applicant and doesn't clarify if written responses (i.e. not just questionnaire answers) were included in 'the count'.</p> <p>Equally it exposes the duplicity of the Applicant whose leading public advocate is known to have quoted on more than one occasion that "...this is not a vote...".</p> <p>Taking their own statistics, the Applicant seems to be saying that; their Pre-Application Consultation occasioned just 161 responses to questions pertaining to the retention or removal of the proposed SLR.</p> <p>What we also ascertain from this is that a Parish Council acting on behalf of their residents (some of whom did resident research, held exhibitions, held Parish Meetings, etc.) only counts as one respondent to the question.</p> <p>In summary, if these figures are to be believed; then less than 28 people (68% of 41 people that expressed a view) decided that the SLR should be retained (at least in the mind of the Applicant).</p> <p>Moreover, as we know more than one Parish Council and the County Council expressed the view that the SLR should be removed, these 27.88 people (the actual percentage product of 68% of 41) were instrumental in subverting widely held views at individual, Parish Council and County Council level...a good thing it isn't a vote then!</p> <p>Incidentally, the inappropriate quoting of percentages by the Applicant is wholly typical of their presentation of data throughout the Pre-Application Consultation phase.</p> <p>Surely a better representation would be: A total of 161 responses, of which 41 expressed a view as to whether the SLR should be retained, split: Retain SLR - 28 respondents (68.3%), Remove SLR - 13 respondents (31.7%)</p>
	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p>SZC Co.'s position was set out in full at Deadline 2.</p>

Al.1.33	The Applicant	<p><b>Site selection for the Sizewell Link Road</b></p> <p>The Suffolk County Council [RR-1174] submits that the SLR should not be permanent and instead be removed after Sizewell C construction is completed for the reasons set out in paragraphs 40 and 41 of its representation. It submits that the retention of the SLR would cause a greater permanent residual landscape and ecological impact than a temporary solution, as well as resulting in permanent loss of agricultural land. Since there is no strategic transport case for permanent retention of the SLR the Council requests the road to be removed after the construction period:</p> <p>(i) Please provide a detailed response to these concerns relating to the need to retain the SLR on a permanent basis at this location.</p> <p>(ii) Whilst the proposed development would help to reduce the amount of traffic on the B1122 through Middleton Moor and Theberton during the peak construction phase of the Sizewell C Project, is it necessary for it to remain to achieve a reduction in traffic during the operational phase? And</p> <p>(iii) Please identify and explain the advantages and disadvantages of retention of the road versus its removal?</p>
	Response by SZC Co. at Deadline 2	<p>(i) As a response to the Stage 4 consultation, a decision was made to propose the Sizewell link road as a permanent facility, rather than temporary. It was considered by SZC Co. that it would be preferable to avoid further disruption to local residents and the environment by removing the road and to leave the road as a lasting legacy of the Sizewell C project for the benefit of local communities but also for the benefit of providing good quality long term access to Sizewell.</p> <p>The Councils (Suffolk County Council and East Suffolk Council) submitted a joint response to Stage 4, in which ESC raised concerns about the potential environmental impact of the removal of the road. ESC stated (para. 241):</p> <p><i>"At Stage 3, ESC raised concerns with potential adverse environmental impacts of removal of a Sizewell Link Road post the construction phase. ESC retains this view and would not support proposals to remove a Sizewell Link Road post construction. ESC considers a separate HGV route to serve the existing A and B stations as well as the new C station to be a positive legacy of the development."</i></p> <p>Further detail on environmental impacts of the removal of the Sizewell link road, and the need to retain the Sizewell link road on a permanent basis, is set out at <b>Chapter 3, Section viii</b> of the <b>Sizewell Link Road Paper (Appendix 5D</b> of this chapter).</p>

		<p>(ii) Retaining the Sizewell link road would result in a permanent reduction in traffic for communities along the B1122. The Sizewell link road would also be particularly beneficial when statutory outages, and forced/un-planned outages, occur in the operational stage of Sizewell B and C.</p> <p>This permanent reduction in traffic for communities along the B1122, as a result of the Sizewell link road, also offers other benefits, including sustained improvements in noise and air quality, particularly in Theberton.</p> <p>Further detail as to why the Sizewell link road should be retained for the operational phase, including how the Sizewell link road can help alleviate traffic from the B1122 during outages at Sizewell B and Sizewell C is set out at <b>Chapter 3, Section viii</b> of the <b>Sizewell Link Road Paper (Appendix 5D</b> of this chapter) (paragraphs 3.1.131 to 3.1.134).</p> <p>(iii) If the Sizewell link road is retained, there would be a number of advantages. Retaining the Sizewell link road would result in a permanent reduction in traffic for communities along the B1122, and would offer environmental benefits, particularly around Theberton. In the Councils' joint response to the Stage 4 consultation, the Councils state (para. 239) that the adoption of the whole Sizewell link road has yet to be agreed with SCC, however, the Councils (both Suffolk County Council (SCC) and East Suffolk Council (ESC)) summarise the environmental benefits around Theberton. Paragraph 246 of the Councils' response states:</p> <p><i>"The Councils [SCC and ESC] consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction."</i></p> <p>Retaining the Sizewell link road also will be particularly beneficial for communities along the B1122 when statutory outages occur in the operational stage of the power plant. It is estimated that during the maintenance and refuelling outages for just Sizewell C, approximately 1,000 additional staff would be required to work on site at any one time. Retaining the Sizewell link road will mean that these additional workers, and any necessary parts/ material/machinery, can avoid using the B1122, and will not have to travel through the villages of Yoxford, Theberton and Middleton Moor.</p> <p>ESC recognises the legacy benefit in retaining the Sizewell link road in the context of the Sizewell A, B and C, but also in relation to other projects, such as the Greater</p>
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	<p>Gabbard and Galloper offshore windfarms. In the Joint Local Impact Report (dated May 2021 [EN010012]), ESC states (para 16.93):</p> <p><i>"Taking additional HGV movements from the B1122 and removing its role as the abnormal indivisible load route for Sizewell B and the existing substations for National Grid and Greater Gabbard and Galloper offshore windfarms justifies retention of the Sizewell Link Road. Its retention as a dedicated and purpose-built HGV and abnormal indivisible load route to Sizewell A, B, C, and to the existing offshore windfarm related substations, justifies its permanency".</i></p> <p>SZC Co. anticipates that the existing B1122 would be downgraded by SCC to an unclassified road once the Sizewell link road is operational. As the majority of traffic would reassign to use the Sizewell link road, the B1122 will experience much lower traffic volumes and could become more popular among cyclists, helping improve cycling connectivity in the immediate area.</p> <p>The advantages of retaining the Sizewell link road are set out in more detail at <b>Chapter 3, Section viii</b> of the <b>Sizewell Link Road Paper (Appendix 5D</b> of this chapter) (paragraphs 3.1.130 to 3.1.134).</p> <p>If the Sizewell link road was temporary, a significant amount of construction activity and traffic would be required to remove the Sizewell link road.</p> <p>The Sizewell link road would need to be built to a high standard. With a 10-12 year construction period and given the scale and nature of traffic involved, it is misconceived to think the Sizewell link road could be built as some form of temporary haul road. Its construction would require a large amount of construction material quantities, as set out in <b>Volume 6, Chapter 2</b> (Description of Sizewell Link Road) of the <b>ES</b> [<a href="#">APP-446</a>].</p> <p>If the Sizewell link road was made temporary, the works would include the removal of the Sizewell link road itself, pavements, road drainage networks, utilities (cables, overhead lines) and the Pretty Road Overbridge. There would also be a need to reinstate parts of the A12 and B1122, including: removal of A12 Western Roundabout and reinstating the existing A12 alignment; removal of Middleton Moor roundabout and reinstatement of the existing B1122 alignment; and the removal of Sizewell link road tie-in to the B1122 at the eastern end of the Sizewell link road and reinstatement of the existing B1122 alignment.</p> <p>These activities would result in a significant amount of construction traffic. To construct the Sizewell link road, a large amount of material is proposed to be moved to the main development site. If the Sizewell link road was temporary, this material would have to</p>
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		<p>be transported back to the Sizewell link road site to reinstate the land to the original condition or sourced from elsewhere if that material had already been incorporated in site landscaping.</p> <p>It is estimated that to move just this material from the main development site to the Sizewell link road site to reinstate the land would require 10,556 one way truck movements alone.<sup>42</sup> This would be in addition to other construction traffic movements that would be needed for other works, including drainage and landscaping.</p> <p>The removal of the Sizewell link road has the potential for environmental impacts, and this was noted by ESC in response to the Stage 4 consultation. ESC stated (para. 241): <i>"At Stage 3, ESC raised concerns with potential adverse environmental impacts of removal of a Sizewell Link Road post the construction phase. ESC retains this view and would not support proposals to remove a Sizewell Link Road post construction."</i></p> <p>Overall, the removal of the Sizewell link road would require a significant amount of construction activity and would have environmental impacts. It would also negate the benefit that road will bring to sensitive communities at Yoxford and on the B1122 and dent the community the long term benefits of relief to and the potential enhancement of the B1122 as a local road with an emphasis on walking and cycling.</p>
	Response by Ian Galloway at Deadline 3	<p>It is not contested that a relatively small number of people residing along the B1122 could potentially benefit from lower traffic levels during; construction, operation, outages and presumably the decommissioning of Sizewell A, B and C/D.</p> <p>What is contested is whether the Applicant should effectively have a 'private road' to their front door, that after completion of SZC construction, Suffolk residents will become obliged to pay for the maintenance of, presumably through local taxation.</p> <p>Moreover, the Applicant cheerfully points out that there will be an estimated 1,000 people required during outages.</p> <p>With potentially three reactors active, outages become the new 'normal' with no Park and Rides, no bus transfers, no passenger rail services, no active management of</p>

<sup>42</sup> The figure quoted here is linked to reinstating the land if the Sizewell link road was made temporary. The total number of one way movements for **construction** of the Sizewell link road are as follows :

Import: 12,434 HGVs

Export: 10,556 HGVs

Total: 22,991

		<p>HGV/LGV, fly-parking patrols long disbanded, defined traffic routing but a fading memory, the picture looks bleak!</p> <p>The reality is, in the words of Mr Bull; "...it is a free world..." and SZC outage workers and regular SZC employees can and will route themselves wherever, however, whenever they want.</p> <p>Consequently, whilst the Applicant opines a post SZC construction 'brave new world' for Yoxford, Middleton Moor and Theberton, the reality is they can make no guarantees, and perhaps more importantly have largely shown little desire to go the 'extra mile' to engage and work with local communities prior to submitting the dDCO – 'Plus sa change'!</p>
	Response by Suffok County Council at Deadline 3	<p>SCC has set out in some detail its position on its views as Local Highway Authority on the merits of the Sizewell Link Road, and its request to remove the Sizewell Link Road after construction of Sizewell C in its Written Representation [REP2-189] and refers the ExA to this document. There are a number of issues raised in the Applicant's response above that SCC considers would be helpful to add further comments on at this stage:</p> <p>Use during outages – While there are up to 1,000 additional workers on site during outages, only a minority will need to travel along the B1122, with the majority staying in the immediate area or travelling from the south and thus using shorter and quicker routes to access the A12. Furthermore, such outages are intermittent;</p> <p>Use for AILs at other energy schemes – All of the schemes quoted will be in place by the time that it is suggested that the SLR is removed and after that, the gap between the need for the use of AILs is likely to be measured in decades. The retention of the SLR, with its ongoing environmental damage cannot be justified on such occasional use;</p> <p>Impact of operations to remove the SLR – It is accepted that there would be environmental consequences of the physical activity of removing the SLR at the end of the construction period, but this would be a short term impact by comparison with the ongoing environmental impact of leaving it in place. We do not have detailed evidence to support the HGV movements suggested by the Applicant but note that, if it was clear from the outset that the road was to be temporary, then different arrangements for the storage of materials would be in place, similar to that used for the Green Rail Route rather than hauling it all off-site and thus significantly reducing this impact.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. has set out its position in the Sizewell Link Road Response Paper submitted at Deadline 2 [<a href="#">REP2-108</a>] and notes SZC Co.'s view that the Sizewell link road should be</p>

		retained is shared by East Suffolk Council for the reasons set out in Section 2 of its <b>Comments on Written Representations</b> at Deadline 3 [ <a href="#">REP3-060</a> ].
Al.1.34	The Applicant	<p><b>Site selection for the Sizewell Link Road</b></p> <p>The representation of Ward Farming Ltd [RR-1259] is critical of the process whereby the SLR route was selected. Please respond specifically to the criticisms made by Ward Farming Ltd including of the Aecom report commissioned by EDF.</p>
	Response by SZC Co. at Deadline 2	<p>SZC Co. undertook a detailed site selection process when deciding on the Sizewell link road route. Background information on the route selection process has been compiled to assist the examination. This information is set out at <b>Chapter 4</b> of the <b>Sizewell Link Road Paper (Appendix 5D)</b> of this chapter).</p> <p>The AECOM report was commissioned by SZC Co. in April 2019 to provide a peer review of the selection of the route for the Sizewell link road and the rationale in selecting it as a preferred option.</p> <p>AECOM was asked to undertake an independent selection process to provide an independent opinion of the preferred option for the Sizewell link road. AECOM assessed each route against a number of criteria including:</p> <ul style="list-style-type: none"> <li>• Relief to Communities</li> <li>• Scale of Cost</li> <li>• Minimising Route Mileage</li> <li>• Legacy Benefit</li> <li>• Engineering Impact</li> <li>• Transport Environmental and Safety Topics</li> </ul> <p>This independent assessment concluded that Route Option Z scored the best against the assessment criteria and AECOM recommended the route as the preferred option from the four route options assessed.</p> <p>In addition to the independent assessment by AECOM, SZC Co. also commissioned LDA Design Consulting (LDA Design) to undertake an independent appraisal but focussing only on environmental considerations. The LDA Design assessment also concluded that the preferred option was Route Z (South).</p> <p>Further information on these independent reviews of the site selection process is set out at <b>Chapter 4</b>, paragraphs 4.1.23 to 4.1.37 of the <b>Sizewell Link Road Paper (Appendix 5D)</b> of this chapter).</p>

		<p>Following the DCO application submission, SZC Co has undertaken further assessment and appraisal work on the Sizewell link road options to ensure that the chosen route was the most appropriate route. This further work concludes that Route Z (the Sizewell link road) is the most appropriate route. This further work is summarised at <b>Chapter 4</b>, paragraphs 4.1.38 to 4.1.91 of the <b>Sizewell Link Road Paper (Appendix 5D</b> of this chapter).</p>
	<p>Response by Ian Galloway at Deadline 3</p>	<p>I am not a Planning Professional, nor familiar with the particular disciplines of Infrastructure Engineering. I am however, a retired independent Consultant across disciplines in the Telecommunications, Government, Local Government, Financial Services and IT sectors.</p> <p>In this connection I have been fortunate enough to commission as well as undertake Peer Reviews on behalf of clients.</p> <p>It would appear from my standpoint that there may be different interpretations of 'independent' as well as differing expectations of Peer Reviews.</p> <p>For this reason I would not wish to make any immutable claim as to the rights or wrongs of what seems to qualify as an Independent Peer Review in this particular case. I would however ask the ExA to have regard to the; who, what, how, when where and why of this particular case and formulate their own opinion of the work, its efficacy and substance.</p> <p>Moreover, I would suggest that they also fully consider whether the outlined scoring matrix provides a suitable basis for deriving the optimal route, paying particular attention to other stakeholder viewpoints.</p> <p>It maybe that differing stakeholder groups have irreconcilable points of view. However, the Applicant has never shared the richness of their model and/or their weighted priorities.</p> <p>In this regard the ExA might also wish to elicit the characteristics of each option and understand how the preferred option fulfils its role as the Applicants "...most appropriate route."</p> <p>Finally, the ExA may wish to probe the weighted importance of 'cost' within the decision matrix, relative to other considerations.</p>
	<p><b>Response by SZC Co. at Deadline 5</b></p>	<p>SZC Co. response at Deadline 2 remains valid.</p>



Al.1.35	The Applicant, SCC	<p><b>Electrical connection to the National Grid substation</b></p> <p>The Suffolk County Council [RR-1174], submits that the provision of four additional tall pylons with overhead lines on the development site would have considerable additional detrimental impact on the Suffolk Coast and Heaths AONB. The review on behalf of the Council by Pöyry Energy Limited (AFRY) indicates that the use of Gas Insulated Lines (GIL) to connect to the National Grid (NGET) substation is a feasible alternative to overhead lines and pylons. This technical report has been supplied to the applicant for consideration:</p> <p>(i) Please explain further on whether GIL would provide a viable and less impactful alternative in this location?</p> <p>(ii) If not already submitted, please provide a copy of the AFRY technical report.</p>
	Response by SZC Co. at Deadline 2	<p>(i) The use of gas insulated lines was considered but would not be feasible at Sizewell C due to unacceptable impacts on the operability and security of the site. The proposed operational site is extremely compact, thereby minimising overall land take, so all areas above ground would be occupied by buildings, roads or working areas. A number of potential routes were considered for gas insulated lines at high and low level, but in all cases the supporting structures or the lines themselves would impair either the normal operation of the power station or physical security of the site.</p> <p>A <b>Power Export Connection Technical Recommendation Report</b> has been prepared, which looks at the feasibility of the 3 main design solutions:</p> <ul style="list-style-type: none"> <li>• Underground Cable</li> <li>• Gas Insulated Line</li> <li>• Overhead Line</li> </ul> <p>Please refer to this report (at <b>Appendix 5E</b> of this chapter) for more detailed assessment of the GIL solution.</p> <p>(ii)The AFRY report was commissioned and is held by Suffolk County Council.</p>
	Response by Suffolk County Council at Deadline 2	<p>(i) SCC and its consultants AFRY consider that the use of GIL appears to be a viable, and significantly less impactful, alternative to pylons and overhead lines. This is explored in detail in SCC's Written Representation submitted at Deadline 2, and we refer the ExA to this document for further detail.</p> <p>(ii) The Written Representation has appended the AFRY report from September 2020 on</p>

		the DCO submission information (Appendix WR4a). Further appendices provide commentary from SCC and AFRY to updated technical reports from the Applicant, in Appendix 4b and 4d.
	Response by SZC Co. at Deadline 3	SZC Co. has set out its response to the SCC position in the <b>Comments on Councils' Local Impact Report</b> (Doc Ref. 9.29).
	Response by Suffolk County Council at Deadline 3	SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its views, and the evidence from its technical consultants, on the potential of the use of Gas Insulated Lines as an alternative to pylons and overhead lines. The Council had been able to see a pre-submission version of the report referred to by the Applicant as Appendix 5E and therefore its Written Representations do cover the matters raised in the Applicant's response to this question.
	<b>Response by SZC Co. at Deadline 5</b>	Refer to SZC Co. response at Deadline 3 to <b>Question LI.1.50</b> [ <a href="#">REP3-046</a> ]; this remains valid.
Al.1.36	The Applicant	<p><b>Electrical connection to the National Grid substation</b></p> <p>The ES Appendix 8.4 A Site Selection Report indicates that the 4 and 5 pylon and undergrounding options were assessed at Stage 4. The four pylon option was the preferred option.</p> <p>(i) Notwithstanding the details provided in the Site Selection Report, please explain further the safety issues and significant safety and programme-related risks associated with the construction and operation of an underground cable option that specifically apply to this location?</p> <p>(ii) Why could any adverse impact on the SSSI not be satisfactorily overcome by mitigation?</p>
	Response by SZC Co. at Deadline 2	<p>(i) The only underground solution that could achieve the required power ratings, meet requirements for inspection and maintenance access, and avoid the buildings and structures required within the Sizewell C site would be to install cables in dedicated galleries. However, detailed investigation has shown that there are no feasible options available to introduce additional galleries within the constraints of the site.</p> <p>Construction of an underground gallery solution for Unit 1 would not be feasible. The proximity of Unit 1 to Sizewell B means that constructability and space constraint issues are not surmountable.</p>

		<p>Construction of an underground gallery solution for Unit 2 could be considered but would not be acceptable due to the impacts on safety and construction schedule. It is also considered that the knock-on impacts on the environment would be unacceptable. Accommodating the gallery within the site could only be achieved by increasing the size of the main platform to the north, resulting in further loss of the Sizewell Marshes SSSI. In addition, the construction schedule would be prolonged by a significant period of time as there would still be insufficient space for all the excavations required to construct the gallery without halting or severely disrupting other construction activities. Furthermore, the reduced reliability of a cable connection introduces nuclear safety concerns, contradicting the need to ensure that risk is As Low As Reasonably Practicable (ALARP). Nuclear safety could be degraded compared to Hinkley Point C, which is not acceptable. A more detailed examination into the safety and programme related risks are set out in the <b>Power Export Connection Technical Recommendation Report</b> at <b>Appendix 5E</b> of this chapter.</p> <p>(ii) The underground cable option would result in additional permanent land take of the Sizewell Marshes SSSI. Although compensatory habitats would be put in place to offset the loss of reedbeds, ditches and wet woodlands from the SSSI based on the layout in the DCO proposals, the extent of compensatory habitats has not got an embedded 'contingency' to offset the additional habitat loss which would be associated with the undergrounding solution. If the undergrounding solution were progressed, the net habitat loss would not be fully compensated for and this would increase the magnitude of effect on SSSI habitats to significant adverse. This would represent a conflict with paragraph 5.3.7 of NPS EN-1, which requires development, as a general principle, to aim to avoid significant harm to biodiversity.</p> <p>Moving the northern edge of the platform northwards to accommodate the underground galleries would also reduce the retained SSSI corridor west of the SSSI crossing. SZC Co has already been challenged by all ecological stakeholders on the potential fragmentation effects of introducing the design for the SSSI Crossing at the eastern end of the retained SSSI corridor. Narrowing the retained SSSI corridor to the west of the SSSI crossing would reduce the value of the corridor by: reducing the habitat extent; reducing its functional width to any animals moving through the corridor; and, by bringing both construction and operational disturbance closer to the retained Leiston drain.</p>
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	Response by RSPB at Deadline 3	We have set out our position regarding the principle of SSSI loss in detail in our Written Representations, submitted at Deadline 2. We welcome the Applicant's recognition that the assessed (and not preferred) undergrounding option would result in significant (and in our view unacceptable) impacts on Sizewell Marshes SSSI, including increasing the extent of permanent land take to an extent that the compensation provided for SSSI loss would be inadequate, and further constraining the SSSI corridor to the west of the SSSI crossing. We therefore agree with the Applicant that these proposals should not be taken forward.
	Response by Suffolk County Council at Deadline 3	SCC wishes to refer the ExA to its Written Representation [REP2-189] setting out its views, and the evidence from its technical consultants, on the potential of the use of Gas Insulated Lines as an alternative to pylons and overhead lines. The Council had been able to see a pre-submission version of the report referred to by the Applicant as Appendix 5E and therefore its Written Representations do cover the matters raised in the Applicant's response to this question.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co.'s response at Deadline 3 to <b>Question LI.1.50</b> [ <a href="#">REP3-046</a> ] remains valid.

## Chapter 6 - AR.1 Amenity and recreation

AR.1.0	The Applicant, ESC, SCC	<p><b>Alde Valley Academy Leiston</b></p> <p>The off-site sports facilities are regarded as an important mitigation in assisting the assimilation of the workforce into the area. As currently set out the facility would not appear to have a time frame for delivery, or in light of the ESC [RR-0342] resolved potential drainage concerns:</p> <p>(i) Please advise on the latest position in respect of the progress of the S106, surface water management issue identified, and what the timeframe for delivery of this facility would be.</p> <p>(ii) In order to achieve the necessary mitigation what timeframe for delivery would be required?</p>
	Response by SZC Co. at Deadline 2	(i) The latest position on the off-site sports facilities is set out in <b>Schedule 10</b> of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)). It is intended that these would open around the same time as the accommodation campus but the wording is intended to provide some flexibility in order to balance the benefits of opening the facilities with the

	<p>need to plan construction works at a time that minimises disturbance for Alde Valley School. For example, we would not want the off-site sports facilities construction to disturb pupils during public exams, so it may be more appropriate for these to open slightly later than the campus rooms.</p> <p>The <b>Main Development Site Flood Risk Assessment</b> (Doc. Ref 5.2A) [<a href="#">AS-018</a>] concludes that this site is at low risk from all sources of flooding. SZC Co. notes ESC's comments on surface water flooding and will design this facility to manage surface water in accordance with the Outline Drainage Strategy (Doc Ref. 6.3 2A (A)) and in particular such that off-site flood risk is not increased. The detailed design and drainage proposals will be subject to approval by East Suffolk Council in accordance with Requirement 5 (Project wide: Surface and foul water drainage) of the <b>draft DCO</b> (Doc Ref. 3.1(C)).</p> <p>(ii) While delivery is necessary mitigation secured by the Deed of Obligation and meaningful in addressing community concerns, it is not necessarily linked to specific milestones of the Project, though would (as set out in <b>Question AR.1.0</b>), SZC Co. intends to link the opening of the off-site sports facilities to the delivery of the accommodation campus, subject to the caveats about disturbance to the school in (i) above.</p>
Response by Suffolk County Council at Deadline 2	<p>(i) Discussion on the S106 are ongoing; S106 discussions on this matter need to involve also SCC as the landowner and Alde Valley Academy as the lease holder, as well as with regard ESC's role in design, build and the ongoing management/maintenance of the off-site facilities. It is anticipated that a shared-use arrangement will be agreed between ESC and SCC/Alde Valley Academy - priority for pupils during school hours. The detailed specification of the sports pitches including flood lights, access, car parking etc. still needs to be agreed.</p> <p>Surface water drainage concerns will need to be addressed in the detailed design of the facilities; the Applicant has not yet provided appropriate evidence to demonstrate that the proposed surface water drainage approach would not increase existing surface water flood risk at the sports facilities. It is anticipated that the SCC Lead Local Flood Authority concerns can be addressed via an appropriate design solution but until the Applicant shares this information the issue currently remains unresolved.</p> <p>SCC's expectation is that the off-site sports facilities will need to be open in advance of or at the same time as the accommodation campus. However, construction of the off-site sports facilities will need to be timed so as to not adversely impact on sensitive time periods at Alde Valley Academy e.g. examination time.</p>

		(ii) The delivery of the off-site sports facilities will complement offerings to the workers at the campus, as such SCC would be keen for there to be a cap on number of workers permitted on site prior to the campus being available and for the off-site sports facilities to be operational prior to or at the same time as the campus opens.
	Response by East Suffolk Council at Deadline 2	<p>(I) ESC's expectation is that the off-site sports facilities will need to be open in advance of or at the same time as the accommodation campus. However, construction of the off-site sports facilities will need to be timed so as to not adversely impact on sensitive time periods at Alde Valley School e.g., examination time. Latest progress on the S106 is included in Schedule 10 [REP1-007] and we are progressing discussions further with the Applicant with regard to this element and ESC's role in design and build of the off-site facilities. Surface water drainage concerns will need to be addressed in the detailed design of the facilities; ESC is hopeful that this can be achieved but need to ensure it is secured through appropriate signing off of detailed design drawings incorporating an appropriate surface water drainage scheme. This could be secured via existing proposals for surface water drainage or through an alternative mechanism.</p> <p>(ii) the delivery of the off-site sports facilities will complement offerings to the workers at the campus, as such ESC would be keen for there to be a cap on number of workers permitted on site prior to the campus being available and for the off-site sports facilities to be operational prior to or at the same time as the campus opens.</p>
	Response by SZC Co. at Deadline 3	<p>(i) It is intended that these facilities would open around the same time as the accommodation campus however the description currently given by SZC Co is intended to provide some flexibility in order to balance the benefits of opening the facilities with the need to plan construction works at a time that minimises disturbance for Alde Valley School. The delivery of the facilities is the responsibility of ESC rather than SZC Co.</p> <p>Facilities will be designed to manage surface water in accordance with the Outline Drainage Strategy and in particular such that off-site flood risk is not increased. The detailed design and drainage proposals will be subject to approval by East Suffolk Council in accordance with Requirement 5 (Project wide: Surface and foul water drainage) of the <b>draft DCO</b> [<a href="#">REP2-015</a>].</p> <p>Shared use arrangements will be agreed through a management plan, with the intention that Alde Valley School users would be prioritised during the school day. Detailed specification and design are subject to further discussion between SZC Co, ESC and SCC.</p>

		(ii) As the facilities are not relied upon to mitigate adverse effects, it is not appropriate to link it to a threshold in terms of workforce numbers. Further information regarding SZC Co's position on limiting the workforce is set out in Chapter 31 of SZC Co's <b>Comments on Councils' Local Impact Report</b> (Doc Ref. 9.29).
	Response by East Suffolk Council at Deadline 3	Timing of delivery of these facilities will need to be discussed further with the Applicant. ESC consider they should be in place before the Campus is operational, this is achievable provided the funding is in place at the appropriate time to enable ESC to deliver the off-site sports facilities without adversely impacting on sensitive time periods at Alde Valley School.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. looks forward to progressing discussions on this with ESC and would welcome the delivery of the off-site sports facilities before the campus is operational if this is achievable. A detailed approach towards delivery of the facilities has been set out within Schedule 10 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(E)) that is anticipated will give sufficient control to ESC over delivery of the facilities within the timescale identified.
AR.1.1	The Applicant, ESC, SCC, Leiston and Sizewell PC.	<b>Alde Valley Academy Leiston</b> (i) In the event that the sports pitches and supporting facilities are not in place in a timely manner would the effect on the local community be regarded as significant in your view? (ii) What time frame of delivery needs to be stipulated to avoid such effects?
	Response by SZC Co. at Deadline 2	(i) and (ii) <b>Volume 2, Appendix 9E</b> (Sport and Leisure Audit and Estimated Demand) of the <b>ES</b> [ <a href="#">APP-196</a> ] sets out that the proposed facilities are not needed to mitigate for the potential effect on formal sports and leisure provision, but <b>Volume 2, Chapter 9</b> [ <a href="#">APP-195</a> ] notes that they would contribute towards community integration and cohesion in a qualitative manner. SZC Co. considers that it would (as set out in <b>Question AR.1.0</b> ) provide benefit in being linked to the delivery of the accommodation campus. Therefore, Schedule 6 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)) requires ESC in preparing a proposed timetable for the delivery of the sports facilities, to have regard to the planned occupation of the accommodation campus as set out in the <b>Implementation Plan</b> (Doc Ref. 8.4I(A)).

	Response by East Suffolk Council at Deadline 2	<p>(i) The effect on the local community is likely to be significant as there are limited facilities in Leiston currently.</p> <p>(ii) ESC considers that the off-site sports facilities should be available prior to or at the same time as the campus opening. ESC would be reluctant for the campus to be made available prior to off-site sports provision.</p>
	Response by Leiston Town Council at Deadline 2	<p>AR.1.1 Alde Valley Academy - Sports Facilities</p> <p>(i) Although it is not possible to predict demand for sports facilities in Leiston with any precision, the Town Council is aware of requests from existing clubs and organizations for improved facilities for use of existing residents of the town and surrounding villages. Leiston is a small town with limited sports provision and existing facilities are used not only by Leiston residents but also by those of Aldeburgh, Saxmundham and surrounding villages. With the predicted number of workers on Sizewell C increasing demand, there could be a significant adverse impact on both existing users and Sizewell C workers. This is likely to be felt more after the first two years when numbers of workers in the town are likely to rise dramatically. However, the early workers will have no amenities at all on site. (ii) We, therefore, believe that the sports facility must be built as soon as is feasible within the first two years. Furthermore any further recreational facilities identified as being necessary should also be provided within this timescale.</p>
	Response by Suffolk County Council at Deadline 2	<p>(i) The effect on the local community is likely to be noticeable as there are limited facilities in Leiston currently. A shortfall of sports facilities in the local area would have an adverse impact on the health &amp; wellbeing of the existing and new residents.</p> <p>(ii) SCC considers that the off-site sports facilities should be available prior to or at the same time as the campus opening. An early trigger point within the planning obligation for the payment of financial contributions should minimise the risk of non-delivery. It is suggested that a project plan for the delivery of the new facilities should be agreed between ESC and SCC/Alde Valley Academy.</p>
	Response by SZC Co. at Deadline 3	<p>See SZC Co comments on ESC and SCC response to AR.1.0 (above) – SZC Co agrees that delivery to co-incide with the delivery of the Accommodation Campus is appropriate, subject to minimising disruption to Alde Valley Academy.</p> <p>SZC Co does not agree that not delivering the proposed facilities would lead to a shortfall in sports facilities in the local or wider area, as has been assessed by SZC Co at <b>Appendix 9E to Volume 2, Chapter 9</b> of the <b>ES</b> [<a href="#">APP-196</a>]. There is no evidence that this would lead to adverse impacts on the health and wellbeing of existing or new residents. The delivery of the facilities is likely to result in a significant beneficial effect.</p>



	Response by East Suffolk Council at Deadline 3	There is a disagreement between the Applicant and ESC as to the significance of effect on the local community if the off-site sports facilities are not provided in a timely manner. However, ESC is confident that they can be delivered in a timely manner and would welcome further discussion with the Applicant to ensure we both have the same aim and timetable for delivery.
	<b>Response by SZC Co. at Deadline 5</b>	Please see response to AR.1.0.
AR.1.2	The Applicant	<p><b>Land East of Eastlands Industrial Estate (Accommodation)</b></p> <p>The application anticipates accommodation for up to 600 workers being available:</p> <p>(i) Has a plan been provided showing the layout for the site? Please clarify where this can be found and how this would be delivered through the DCO?</p> <p>(ii) How confident can the ExA be that this provision would be forthcoming in a timely manner, and be retained, and optimally occupied throughout the construction period.</p> <p>(iii) Reference is made by ESC [RR-0342] to the possibility the site may be laid out with mobile homes. These require very different space requirements and no doubt would offer very different levels of accommodation. In light of this suggestion what confidence can the ExA have in the mitigation suggested within the ES being delivered?</p> <p>(iv) In light of reference to two alternatives please explain what has been assessed within the ES and what would be delivered through the DCO.</p>
	Response by SZC Co. at Deadline 2	<p>(i) The ExA is referred to <b>Figure 2.9</b> in <b>Chapter 2 (Part 1)</b> of this report for a layout showing the caravan park.</p> <p>Schedule 1 of the Development Consent Order would authorise the development of serviced pitches for up to 400 caravans and 400 temporary car parking spaces at Work No. 1A (ee).</p> <p>(ii) The operational period for the caravan park has been added to the <b>Implementation Plan</b> (Doc Ref. 8.4I(A)), which will be secured by the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(C)). <b>Schedule 3</b> sets out that that SZC Co. shall use reasonable endeavours to deliver the caravan park in accordance with the <b>Implementation Plan</b>, unless otherwise agreed with the Accommodation Working Group.</p> <p>Experience from other major civil construction projects requiring substantial NHB civils workers (e.g. Heathrow T5, London Olympics, HPC, Sizewell B) suggests</p>

		<p>that there will be demand from workers on short-term contracts who bring their own caravans to the area around construction sites, seeking to stay as close to the site as possible.</p> <p>This is a characteristic particularly of earthworks-type roles, but also of civils construction workers in general. At HPC, for example, where earthworks are complete but the project is still largely in the 'civils phase', there are two caravan sites close to the site (private, but with commercial agreements) that have been consistently full throughout the project. There is no project-specific site at Hinkley Point C (if there were, it would likely be popular). Even now (as reported to SEAG in November 2021) there are over 300 workers in caravan accommodation at Hinkley Point C, despite being well past the early years/earthworks phase.</p> <p>The Sizewell C workforce profile sets out that in the early years of the project, there would be less than 2,000 NHB civils construction workers for the majority of the first four years. The civils peak occurs after that – and there would be substantial demand for these types of accommodation at that point. Even over the overall peak year (year seven) there would be between 1,000 and 2,000 civils workers – many of whom will seek caravan accommodation (especially if provided on a convenient, well-managed, secure, safe and site-adjacent location with direct bus links to the site).</p> <p>There is no evidence to suggest that the demand for workers bringing their own caravans would shift towards workers seeking more static caravans towards the peak (there will still be a substantial civils workforce). However, a mechanism to review this demand and respond via the Housing Fund may be appropriate and SZC Co. will consider this to potentially be a role for the tourism element of the Housing Fund.</p> <p>SZC Co. anticipates that the caravan park will be popular with workers as a result of its secure and safe management, regular and direct bus service to the main development site, proximity to both the main development site and Leiston, and the flexibility it offers in booking. It will also be priced to fill. Whilst SZC Co. cannot mandate that workers use the caravan park, it can and will work with contractors to encourage use.</p> <p>(iii) SZC Co. confirms that mobile homes would not be provided and has updated the <b>ES</b> Description of Construction chapter (Doc Ref. 6.14(A)) to confirm that individual caravans shall not exceed 7m in length and 2.55m in width (including</p>
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		<p>external elements).</p> <p>(iv) Volume 3, Appendix 2.2.A, paragraphs 3.4.237 and 3.4.240 of the ES Addendum [AS-202] describes what has been applied for and is the basis for the assessments within in the ES, including Volume 2, Chapter 9 (Socio-economics) [APP-195]. Details of how the caravan park would be delivered through the DCO is set in parts (i) and (ii) of this question. There is considered to be no alternative as mobile homes would not be provided.</p>
	Response by Stop Sizewell C at Deadline 3	The Applicant says civils workers will want to bring their own caravans. Based on reports from residents at Hinkley Point C, we are concerned about unregulated caravan sites popping up.
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. recognises Stop Sizewell C's concern and has addressed this. Paragraph 5.2.6 of the <b>Accommodation Strategy</b> [APP-613] sets out that <i>"The primary purpose of the proposed caravan park is to ensure civils construction workers who seek to bring caravans to construction projects have a designated space, thereby reducing the risk of unlicensed caravan sites, while also seeking to reduce effects on the rest of the market."</i></p> <p>Paragraph 5.2.7 [APP-613] further notes that SZC Co. also expects the market to also bring forward accommodation of this type and <i>"will be supporting this in a managed, sustainable way in-line with providers' aspirations and ESC policies."</i> This will be through a contribution in the Housing Fund to <i>"support outreach, licencing, enforcement and pre-application advice for East Suffolk Council, within the terms of the Tourist Accommodation Management Strategy"</i> (see Schedule 3 of the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(E))).</p>
AR.1.3	The Applicant	<p><b>Mitigation</b></p> <p>In light of the comments from ESC in their [RR-0342] is it agreed a financial contribution to the Suffolk Coast RAMS is an appropriate way of mitigating for the recreational disturbance likely to arise from the accommodation campus as suggested by ESC?</p>
	Response by SZC Co. at Deadline 2	SZC Co. has agreed with ESC to provide the financial contribution to the Suffolk Coast RAMS set out in their relevant representation [RR-0342] (£149,912). The purpose of this funding is to mitigate for the recreational disturbance at European sites that could potentially be caused by construction workers residing at the accommodation campus and the Land East of Eastlands Industrial Estate (LEEIE) caravan site. SZC Co. consider

		<p>that this is a robust and highly precautionary contribution because the calculations at paragraphs 1.67 and 1.68 of ESC's <a href="#">RR-0342</a>:</p> <ol style="list-style-type: none"> <li>1. Do not allow for the fact that the Zone B tariff of £321.22 per dwelling used in ESC's calculation (from the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)<sup>43</sup>) is based on there being more than one person residing in each dwelling on average. If the average residential occupancy was 2.4 people for example, this would equate to £133.84 per person and a lower RAMS contribution for accommodation campus and LEEIE based workers.</li> <li>2. ESC's RAMS calculation assumes full occupancy for a 10 year lifespan of the campus on a precautionary basis (see paragraph 1.67 of ESC's <a href="#">RR-0342</a>).</li> <li>3. Construction workers at the accommodation campus and LEEIE have a different profile to typical residents and would use European sites for recreation substantially less than the general public for reasons summarised below.</li> </ol> <p>As described at the second bullet point in paragraph 3.3.10 of the <b>Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])</b>, the workforce will be dominated by men aged 20-50, based on the national breakdown of people employed in the construction industry, and the key sport/recreation characteristics for this demographic group are as follows:</p> <ul style="list-style-type: none"> <li>• preference and higher than national average participation in organised/formal sport - main reason is to meet friends;</li> <li>• football and gym are overwhelmingly favoured as activities. The provision of formal recreation facilities for construction workers comprising a gym at the accommodation campus and sports facilities including a full-size 3G football pitch and two MUGAs at Alde Valley School adjacent to Leiston Leisure Centre is described in paragraphs 3.4.218 to 3.4.220 and 3.4.262 to 3.4.264 of <b>Volume 2, Chapter 3</b> (Description of Construction) of the <b>ES</b> (Doc Ref. 6.14(A));</li> <li>• work commitments are a significant reason for not undertaking recreation activity; and</li> <li>• other than sport, these groups are less likely to take part in recreation and leisure activities outside of the home.</li> </ul>
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<sup>43</sup> ESC (2021) Habitat Mitigation (RAMS). Available at: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>

		<p>The majority of construction workers will work in shifts, limiting the time when all workers may be looking to undertake recreation activity (first bullet point in paragraph 3.3.10 of the <b>Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])</b>). Indicative shift patterns are shown in section 1.3 of the <b>Code of Construction Practice Part B</b>(Doc Ref. 8.11(B)).</p> <p>A proportion of shifts will be during the day with '<i>time off</i>' during the hours of darkness when recreational resources at European sites are likely to be less attractive to construction workers because they are remote and unlit.</p> <p>Construction workers based in the accommodation campus and LEEIE would live alone because families would not be allowed to stay at the campus or at the LEEIE (first bullet point in paragraph 3.3.8 of the <b>Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])</b>) describes this for campus-based workers; families would also not be allowed to stay at the LEEIE caravan site).</p> <p>The majority of these construction workers are likely to return home at weekends/at the end of their working period (paragraphs 3.3.8 and 3.4.20 and of the <b>Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])</b>). It is during these periods that construction workers would be more likely to go for walks or cycle, when they will not be in the Sizewell C area and will not visit the European sites that could be affected during the construction of Sizewell C.</p> <p>Another reason why the agreed RAMS payment is considered robust and highly precautionary is because it is based on residents at typical dwellings, some of which would have dogs. Dogs are a key source of potential disturbance to wildlife at European sites, and also exercising dogs is a key reason to go for regular walks. Construction workers based at the accommodation campus (paragraph 3.3.18 of the <b>Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])</b>) and LEEIE would not be allowed dogs at their accommodation. Therefore, dogs would not be a potential source of harm from this source, and these workers would not be undertaking regular (e.g. daily) dog walks.</p> <p>East Suffolk</p> <p>RAMS payments in East Suffolk are intended to provide funding to mitigate for all potential harm due to recreational disturbance at European sites. For the Sizewell C Project, in addition to the RAMS payment SZC Co. is proposing a suite of other mitigation measures for construction workers and for people who may be displaced from the area around the construction site to European sites including:</p>
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		<ul style="list-style-type: none"> <li>• A new informal car park accessed off the B1122, a surfaced footpath, and approximately 27 hectares of new open access land, including areas where dogs will be allowed to be exercised offlead at Aldhurst Farm (paragraphs 1.2.26 and 1.2.38 of the updated <b>Rights of Way and Access Strategy</b> in <b>Volume 2, Appendix 15I</b> of the <b>ES</b> submitted at Deadline 2 (Doc Ref. 6.3 15I(A)). This car park would be increased to 20 spaces early in the construction phase to allow for additional users of the recreational access network, and funding provision for this is to be included in the Deed of Obligation.</li> <li>• Improvements to Kenton Hills car park including additional spaces, management of vegetation and signage (paragraphs 1.2.24 and 1.2.39 of the updated <b>Rights of Way and Access Strategy</b> in <b>Volume 2, Appendix 15I</b> of the <b>ES</b> submitted at Deadline 2 (Doc Ref. 6.3 15I(A)) . This would provide up to 15 additional parking spaces allowing for greater use of the recreational access network including the permissive footpath network in Kenton Hills.</li> <li>• SZC Co. is in discussion with SCC and ESC on projects which would enhance the right of way and access network, that lie outside the DCO site boundary, which will be funded by SZC Co. through the <b>Deed of Obligation</b> (a <b>draft Deed of Obligation</b> is provided in Doc Ref. 8.17(C)). These will include a number of enhancements outside European sites which will make recreational resources more attractive to use, helping to reduce displacement of people to European sites.</li> </ul> <p>Monitoring and Mitigation Plans for European sites are being developed by SZC Co. in consultation with Natural England, the RSPB and the National Trust, setting out how mitigation measures will be implemented where necessary, to ensure that recreational disturbance due to additional visitors arising from Sizewell C does not cause Adverse Effects on the Integrity (AEoI) of European sites. Two draft Monitoring and Mitigation Plans will be submitted into examination at an appropriate deadline and provide further detail. The first is submitted at deadline 2 (see the draft <b>Minsmere Monitoring and Mitigation Plan – Walberswick European Sites and Sandlings (North) European Site</b> (Doc Ref. 9.15)). These plans and the RAMS payment RAMS are elements of a broad mitigation package which will ensure that Sizewell C does not cause any AEoI of European sites.</p>
	Response by East Suffolk Council at Deadline 3	Whilst ESC welcomes and agrees with the applicant's commitment to make a financial contribution to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation

		<p>Strategy (RAMS), by way of a small point of clarification in relation to their answer to ExA question AR.1.3, ESC would make the following comment: As set out in paragraphs 8.29 and 8.30 of the LIR [REP1-045], the purpose of Suffolk Coast RAMS is to address mitigation requirements arising from the in-combination impacts of new residential developments within the RAMS zone of influence. This contribution is considered to be required in addition to the direct mitigation measures the Applicant has identified to deliver (e.g. through the Minsmere Monitoring and Mitigation Plan – Walberswick European Sites and Sandlings (North) European Site). The Council considers that both mitigation 'strands' are required to address the 'alone' and 'in-combination' impacts on European designated sites considered likely to arise from this development.</p>
	Response by RSPB at Deadline 3	<p>See Appendix 2b to our Written Representations for our critique of the predictions of increased recreational visits to designated sites from the construction workforce, including comments on the assumptions around recreational behaviour of construction workers made as part of the assessment. As discussed further below and in our comments on the Minsmere Monitoring and Mitigation Plan (also submitted at Deadline 3), we welcome the production of the Plan and the additional mitigation measures proposed, including the RAMS payment, but continue to advocate the provision of Suitable Alternative Natural Greenspace (SANG) to provide additional mitigation for the increased number of residents in the area during the construction period and note our support for Natural England's comments on this issue.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>SZC Co. is very grateful to the RSPB and other stakeholders for their active role in developing the detail of the Monitoring and Management Plans. SZC Co.'s position in relation to the need for a SANG was set out at ISH7 and is recorded in the written submissions following that hearing (see <b>Written Summaries of Oral Submissions made at ISH7: Biodiversity and Ecology Parts 1 and 2</b> (Doc Ref. 9.47)).</p> <p>In relation to the RAMS payment, SZC Co. notes that there is a close correlation between the purposes to which ESC's RAMS fund are to be applied and the measures committed by SZC Co. in the DCO and the draft Deed of Obligation. SZC Co. would be pleased to work with ESC to ensure that the RAMS payment proposed is targeted to add additional resilience to the measures it already proposes.</p>

AR.1.8	The Applicant, AONB Partnership, ESC, SCC	<p><b>AONB</b></p> <p>The AONB Partnership set out detailed concern [RR-1170] with regard to the assessment of and significance of effects on the AONB and its statutory purposes:</p> <p>(i) Can the Applicant please respond in full to these concerns in respect of recreation and amenity?</p> <p>(ii) Can the Applicant also set out the effects on the AONB and its value as a recreational and amenity area through each of the construction, operational and decommissioning phases.</p> <p>(iii) Do the Councils and AONB Partnership consider the ES has fully recognised the benefits of the AONB as a recreational and amenity area and provided for appropriate mitigation?</p>
	Response by SZC Co. at Deadline 2	<p>(i) <b>Statutory purposes of the AONB</b></p> <p>The emphasis of the AONB Partnership's Relevant Representation relates to loss of access with a particular focus on The Suffolk Coast Path/proposed England Coast Path and that it is these aspects that this response focuses in on, but references to the full Amenity and Recreation assessment are provided.</p> <p>The Countryside and Rights of Way Act 2000 confirms that the purpose of designating AONBs is the conservation and enhancement of the natural beauty of the area.</p> <p>As part of SZC Co's pre-application engagement, discussions between the Suffolk Coast and Heaths AONB Partnership, Suffolk County Council, Suffolk Coastal District Council (now East Suffolk Council) and SZC Co., were held which identified what constitutes the natural beauty and special qualities of the Suffolk Coast and Heaths AONB. The findings are presented in <b>Appendix 13 C of Volume 2, Chapter 13</b> (Landscape and Visual) of the <b>ES</b> <a href="#">[APP-217]</a>. The extensive rights of way network; the areas of designated open access land; and opportunities for a range of active and passive recreational pursuits are identified as Special Qualities Indicators, highlighting their importance to the Suffolk Coast and Heaths AONB and the ability for people to access key landscape types and other assets.</p> <p><b>Volume 2, Chapter 13</b> (Landscape and Visual) of the <b>ES</b> <a href="#">[APP-216]</a> presents an assessment of the proposed development during construction and operation on the natural beauty and special qualities of the Suffolk Coast and Heaths AONB which underpin the assessment of the impact on the statutory purpose of the AONB.</p>



		<p>A detailed assessment of the effects on public access (including effects on rights of way and open access land) within and outside the Suffolk Coast and Heaths AONB is presented in <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [<a href="#">APP-267</a>], with relevant details provided below:</p> <p><b>Loss of public access</b></p> <p>Paragraph numbers under this heading (loss of public access) refer to the updated <b>Rights of Way and Access Strategy</b> in <b>Volume 2, Appendix 15I</b> of the <b>ES</b> submitted at Deadline 2 (Doc Ref. 6.3 15I(A)) unless otherwise stated.</p> <p>Loss of public access within the AONB during the temporary construction phase will comprise:</p> <ul style="list-style-type: none"> <li>• the temporary closure of the northern section of bridleway E-363/019/0 (Bridleway 19) which runs along the western edge of the AONB. An off-road diversion is provided for this temporary closure. (Paragraph 1.2.22.);</li> <li>• the closure of permissive footpaths in Goose Hill (paragraph 1.2.27) and a short section between Bridleway 19 and the retained permissive footpath network in Kenton Hills (paragraph 1.2.25);</li> <li>• Sandlings Walk would be diverted north along the coast and then west between Minsmere Sluice and Eastbridge (but kept open) due to the above closures (paragraph 1.2.27); and</li> <li>• loss of access to areas of the beach during construction of the sea defences and beach landing facilities (paragraph 1.2.7).</li> </ul> <p>Temporary closures of PRoW E-363/021/0 and the Coast Path (comprising the Suffolk Coast Path, Sandlings Walk, the future England Coast Path) which run along the coast through the main development site, and inland diversions of the Coast Path, may also be necessary for short periods during the construction phase. However, SZC Co. has sought to minimise temporary closures of the PRoW E-363/021/0 and Coast Path, and will continue to do so throughout the pre-construction and construction phases. Further detailed design work included in the Additional Submission in January 2021 has identified that PRoW E-363/021/0 and the Coast Path would be kept open at all times except in rare circumstances where it is considered unsafe to do so, as noted in paragraphs 2.10.38, 2.10.40 and 2.10.54 of <b>Volume 1, Chapter 2</b> of the <b>ES Addendum</b> [<a href="#">AS-181</a>].</p>
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		<p>If the Coast Path needs to be temporarily closed for short periods and the inland diversion of the Suffolk Coast Path, Sandlings Walk and future England Coast Path is required during the construction phase it would follow the route shown on <b>Figure 15I.4</b> of <b>Volume 2 Chapter 15 Appendix 15.I</b> (updated Rights of Way and Access Strategy) of the <b>ES</b> (Doc Ref. 6.3 15I(A)).</p> <p>The following additional permanent provision of linear and area access is provided within, on the edge of or immediately adjacent to the AONB during the construction phase:</p> <ul style="list-style-type: none"> <li>• A new approximately 4.5km long offroad bridleway from Sizewell Gap in the south to the accommodation campus in the north (paragraphs 1.2.15 and 1.2.36). Part of this would accommodate the Bridleway 19 diversion.</li> <li>• A new bridleway link between the above offroad bridleway in the south-east field of Aldhurst Farm and Valley Road (paragraphs 1.2.19 and 1.2.36).</li> <li>• A new footpath connection between the offroad bridleway within the northern field in Aldhurst Farm and Bridleway 19 and the permissive footpath network in Kenton Hills from approximately the second year of the construction phase (paragraphs 1.2.20 and 1.2.36). This would be dedicated as a PRoW (bridleway) on the commencement of the operational phase. This is Change 15 described at section b) xii) of <b>Volume 1, Chapter 2</b> (Main Development Site) of the <b>ES Addendum</b> [<a href="#">AS-181</a>], and shown on <b>Figure 2.2.32</b> of <b>Volume 2, Chapter 2</b> (Main Development Site) of the <b>ES Addendum</b> [<a href="#">AS-190</a>].</li> <li>• A new informal car park, a surfaced footpath, and approximately 27 hectares of new Open Access land, including areas where dogs will be allowed to be exercised offlead (paragraphs 1.2.26 and 1.2.38). This car park would be increased to 20 spaces early in the construction phase to allow for additional users of the recreational access network, and funding provision for this is to be included in the Section 106 Agreement.</li> <li>• Improvements to Kenton Hills car park including additional spaces, management of vegetation and signage (paragraphs 1.2.24 and 1.2.39). This would provide up to 15 additional parking spaces allowing for greater use of the recreational access network including the permissive footpath network in Kenton Hills.</li> </ul> <p>During operation temporarily closed linear routes would be restored to their existing or new agreed alignments, and the 'coastal margin' would be defined along the coast including on the sea defences (exact area inland of the England Coast Path will be</p>
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		<p>agreed with Natural England) (paragraph 1.2.34). A permanent loss would be short sections of east-west aligned permissive footpath within Goose Hill, with an alternative east-west aligned permissive footpath provided (paragraph 1.2.32).</p> <p>Loss of access during the construction phase has been minimised and alternative and additional routes and areas provided.</p> <p><b>Compromised experience for those using routes or areas</b></p> <p>Information is provided in response to <b>Question AR.1.8 (ii)</b> in this chapter.</p> <p><b>Proposed mitigation</b></p> <p>Proposed mitigation for effects on recreational receptors is described in section 15.5 of <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267]. During the construction phase this includes:</p> <ul style="list-style-type: none"> <li>Measures set out in the updated <b>Rights of Way and Access Strategy in Volume 2, Appendix 15I</b> (Amenity and Recreation) of the <b>ES</b> (Doc Ref. 6.3 15I(A)) submitted at Deadline 2. Key measures include: <ul style="list-style-type: none"> <li>improved and new linear and area access described above;</li> <li>minimising the need for temporary path closures and diversions, and where these are unavoidable providing alternative routes so as to reduce to a minimum any disruption or loss of amenity; and</li> <li>the Coast Path would be kept open at all times except in rare circumstances where it is considered unsafe to do so. This is a substantial improvement to the position in the original DCO application where temporary closures including closure for approximately six months during construction of the BLF and a temporary diversion inland was assumed (see paragraph 3.4.68 of the updated <b>Volume 2 Main Development Site Chapter 3 Description of Construction</b> (Doc Ref. 6.14(A))).</li> </ul> </li> <li>Minimising and managing additional traffic on roads that could affect recreational receptors through a suite of measures listed in paragraph 15.5.30 of <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267], including: providing contractor accommodation at the main development site; park and ride facilities for construction workers; bus services for construction workers; provision of two BLF's and a railway connection to the main development site to maximise deliveries by sea and rail and minimise deliveries</li> </ul>
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		<p>by road; a freight management facility to manage the flow and route of HGVs on the highway network; and a package of highway improvements.</p> <ul style="list-style-type: none"> <li>• A number of the mitigation measures set out in Table 3.1 of <b>Part B of the Code of Construction Practice</b> (Doc Ref. 8.11(B)) will reduce noise at source.</li> <li>• Measures to mitigate adverse effects on visual amenity including: retention of existing vegetation where possible; screen planting; temporary earth bunds, fencing/construction hoarding to screen lower level construction activity; limiting the heights of construction elements; and controlling light pollution.</li> </ul> <p>During operation all temporarily diverted PRoW would be reinstated to their original or new routes. The Coast Path would run through the naturalistic coastal grassland/dune setting east of the new hard coastal defence, within the accessible 'coastal margin' which will be designated by Natural England under the Marine and Coastal Access Act 2009. The improved and new routes are summarised in the updated <b>Rights of Way and Access Strategy in Volume 2, Appendix 15I</b> (Amenity and Recreation) of the <b>ES</b> (Doc Ref. 6.3 15I(A)) submitted at Deadline 2) as follows:</p> <ul style="list-style-type: none"> <li>• enhanced north-south recreational routes through the creation of a 4.5km off-road multi-user bridleway for equestrians, cyclists and pedestrians. This includes off-road routes where existing rights of way and the Sustrans cycle route currently run along roads, and the creation of new routes where none exist at present;</li> <li>• a new off-road bridleway from Valley Road, connecting to the new off-road bridleway described above;</li> <li>• a new bridleway connection across Lovers Lane between the off-road bridleway within Aldhurst Farm and bridleway 19 adjacent to Kenton Hills;</li> <li>• the new linear and area public access created at Aldhurst Farm forming part of the planning permission for the construction of the new wetlands (reference DC/14/4224/FUL), including the expanded car park, a definitive footpath and approximately 27ha of Open Access land;</li> <li>• a new formalised permissive footpath from Kenton Hills car park, connecting to the extensive permissive footpath network in the woodland and to the Sandlings Walk and the Coast Path;</li> </ul>
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		<ul style="list-style-type: none"> <li>the provision of additional spaces at Kenton Hills car park, surface improvements, selective vegetation removal to create a more open environment and improvements to signage; and</li> <li>a permanent new footpath north of Leiston connecting two existing PRoW and Abbey Lane.</li> </ul> <p>SZC Co. has sought to minimise adverse effects and maximise enhancement for recreational receptors as far as reasonably possible through design and mitigation. During the operational phase the Sizewell C Project would provide permanent enhancement to recreational access within the AONB.</p> <p>(ii) The assessment of effects on recreational receptors within and outside the AONB during the construction and operational phases has been assessed in <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267]. This identifies that there would be adverse effects on some recreational receptors within the AONB.</p> <p>Consistent with the requirements of NPS EN-1, the assessment of effects on the AONB has been undertaken as part of the LVIA given its designation is routed in the value of the landscape. The assessment is recorded in <b>Volume 2, Chapter 13</b> (Landscape and Visual) of the <b>ES</b> [APP-216] as described further below. <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267] does not provide an assessment of effects on the AONB as a recreational area, as the AONB is not of itself a recreational receptor, albeit recreation activity occurs within its defined area.</p> <p>However, the status of the AONB as a nationally designated landscape has been accounted in the assessment of the value of resources (e.g. PRoW) used by receptors identified in the Amenity and Recreation assessment and within paragraphs 15.6.5 to 15.6.16 of <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267]. The value of these resources, combined with susceptibility of receptors, fed into the assessment of sensitivity in accordance with the methodology (see Table 1.4 of <b>Volume 1, Appendix 6K</b> (Amenity and Recreation Legislation and Methodology) of the <b>ES</b> [APP-171]).</p> <p>For example, users of the Sandlings Walk, Suffolk Coast Path and future England Coast Path (paragraph 15.6.6), and Regional Cycle Route 41/42, National Cycle Route 1 and the Suffolk Coastal Cycle Route (paragraph 15.6.11 of <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [APP-267]) are all assessed to be of high value because they pass through the AONB. PRoW, Open Access Land, registered common</p>
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		<p>land, permissive footpaths and the beach within the AONB are all of high value '<i>because recreation is of great importance to the AONB</i>' (paragraph 15.6.7).</p> <p>The assessment of effects on recreational receptors within the AONB within <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [<a href="#">APP-267</a>] has informed the assessment of effects on the AONB natural beauty and special quality indicators and the overall effects on the AONB at paragraphs 13.6.131 to 13.6.150 (construction phase) and paragraphs 13.6.304 to 13.6.321 (operational phase) of <b>Volume 2, Chapter 13</b> (Landscape and Visual) of the <b>ES</b> [<a href="#">APP-216</a>]. Effects on recreational receptors are assessed under the special quality 'health and wellbeing' in Table 13.14 (construction phase) and Table 13.17 (operational phase) of <b>Volume 2, Chapter 13</b> of the <b>ES</b> [<a href="#">APP-216</a>].</p>
	Response by East Suffolk Council at Deadline 2	<p>(iii) ESC is a committed and active member of the AONB Partnership. ESC considers that the ES does not fully recognise the benefits of the AONB as a recreational and amenity area and therefore the mitigating measures proposed are not adequate. The LIR [REP1-045] identifies the impacts arising from the project from a tourism perspective and references studies undertaken that demonstrate the potential adverse impacts on the location with particular reference to its importance as a recreation and amenity area. ESC agrees with many of the findings in the Summary of Effects for construction phase (table 15.11) and operational phase (table 15.12) in 6.3 Volume 2 Main Development Site Chapter 15 Amenity and Recreation [APP-267] that identifies a series of significant residual effects. To address these residual effects, a mitigation and compensation package is required. This is being discussed with the Applicant and is expected to take the form of a Natural Environment Fund to be secured through the section 106 agreement. The magnitude and form of this fund is still under discussion and therefore ESC cannot say this time that appropriate mitigation is provided.</p>
	Response by AONB Partnership at Deadline 2	<p>The AONB Partnership note that the statutory primary purpose of the AONB designation is to conserve and enhance natural beauty. There are two secondary non-statutory purposes:</p> <ul style="list-style-type: none"> <li>• To take account of the needs of agriculture, forestry, fishing and other local rural industries and of the economic and social needs of local communities, paying particular regard to promoting sustainable forms of social and economic development that in themselves conserve and enhance the area's natural beauty; and</li> <li>• To seek to meet the demand for recreation so far as this is consistent with the statutory purpose of conserving and enhancing the area's natural beauty - and which</li> </ul>

	<p>preferably supports this purpose by increasing understanding, valuation and care for the area - and is also consistent with the needs of rural industries.</p> <p>The AONB Partnership consider that the ES does not fully recognise the benefits of the AONB as a recreational and amenity area. Therefore, the AONB Partnership considers that the applicant should identify the existing recreational and amenity benefits of the area. In part this is identified by the AONB commissioned Volume and Value Study in 2020 (with 2019 figures) that notes the tourism industry is worth £228M pa and supports 5,056 jobs. Evidence of the impacts energy coast projects is further identified in the in the Suffolk Coast Destination Management Organisation/AONB study in 2019. The study showed that 29% of those polled would be a lot less or a little less likely to visit the Suffolk coast having been made aware of energy project proposals. The applicant does not appear to concur with these findings.</p> <p>Furthermore, the AONB Partnership considers that the benefits go far beyond the volume and value of tourism and that other recreational and amenity benefits accrue, including health and well-being (physical and mental), reducing demand for travel to and pressures on other naturally beautiful areas and the value of ecosystem services of the amenity.</p> <p>The AONB Partnership concur with many of the findings in the Summary of Effects for construction phase (table 15.11) and operational phase (table 15.12) in 6.3 Volume 2 Main Development Site Chapter 15 Amenity and Recreation document that identifies a series of significant residual effects. The AONB Partnership considers that the value of the recreational and amenity value of the AONB has been downplayed in the Environment Statement and that the value for wider public benefits of the AONB natural beauty and special qualities has not been fully assessed. The AONB Partnership has not been party to the discussions relating to the magnitude of any mitigation proposals that might be contained within a section 106 agreement with the local authorities relating to the AONB as a recreational and amenity area. However, it notes the section 106 agreement for the Sizewell B Dry Fuel Store in relation to that developments impacts on the AONB and findings of the Suffolk Coast Limited study (that was part funded by the AONB Partnership) into the impacts on the visitor economy of the energy projects on the Suffolk Coast.</p>
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	Response by Suffolk County Council at Deadline 2	(iii) SCC does not consider that the ES fully recognises the recreational and amenity benefits of the AONB and does not currently provide for appropriate mitigation of the impact of the development on those. SCC notes that amenity and recreational use are intrinsically linked with many of the factors that define the special qualities of the AONB (see [REP1-045] section 7), and that the ES identifies a number of significant adverse residual effects resulting from both the construction and operational phase of the proposed development. SCC has identified these impacts and the mitigation that we would expect to see in our Local Impact Report [REP1-045] at section 17, table 19.
	Response by SZC Co. at Deadline 3	<p>Issues raised by ESC, the AONB Partnership and SCC are responded to below.</p> <p>1. <i>The ES does not fully recognise the benefits of the AONB as a recreational and amenity area. The AONB Partnership considers that the applicant should identify the existing recreational and amenity benefits of the area</i></p> <p>The benefits of the AONB as a recreational and amenity area are recognised and identified in <b>Volume 2 Chapter 15</b> (Amenity and Recreation) [<a href="#">APP-267</a>], <b>Volume 2 Appendix 15G</b> (Description of Non-Significant Effects) [<a href="#">APP-270</a>] and <b>Volume 2 Appendix 15F</b> (Amenity and Recreation Baseline Report) [<a href="#">APP-270</a>] of the <b>ES</b>. As noted in paragraphs 1.1.4 to 1.1.6 of the Amenity and Recreation Baseline Report, consultees including ESC (formerly SCDC), SCC and the AONB Partnership were consulted on the amenity and recreation baseline and their comments fed into the baseline used in the Amenity and Recreation impact assessment. Existing visitor and recreational user survey information was reviewed and is listed in paragraph 1.2.2 of the Amenity and Recreation Baseline Report, including reports and research on the AONB. Where each receptor is discussed or assessed in <b>Volume 2 Chapter 15</b> (Amenity and Recreation) [<a href="#">APP-267</a>] and <b>Volume 2 Appendix 15G</b> (Description of Non-Significant Effects) [<a href="#">APP-270</a>] it is, where relevant, described whether it lies within the AONB.</p> <p>2. <i>The ES does not currently provide for appropriate mitigation of the impact of the development on the recreational and amenity benefits of the AONB</i></p> <p>SZC Co. has provided a detailed response to the mitigation measures set out within the Table 19 of the LIR. SZC Co. is in discussion with ESC and SCC to agree provision of funding by SZC Co. through the Deed of Obligation, PRoW Fund for a package of mitigation and enhancement measures to recreational resources within and outside the AONB. These will be in addition to mitigation and enhancement measures already identified within the DCO. The PROW fund will look to provide new public rights of way</p>



		<p>or open access areas or to enhance the existing public rights of way network and open access areas. The Applicant's response within the <b>Comments on Council's Local Impact Report</b> (Doc Ref 9.29) addresses this issue.</p> <p><i>3. The AONB Partnership considers that the value of the recreational and amenity value of the AONB has been downplayed in the Environment Statement and that the value for wider public benefits of the AONB natural beauty and special qualities has not been fully assessed</i></p> <p>The recreational and amenity value of the AONB has not been been downplayed in the ES. The value of recreational resources within the AONB has been fully accounted for in <b>Volume 2 Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [<a href="#">APP-267</a>] as described in SZC Co.'s response to ExQ AR.1.8 at Deadline 2 above. The value of these resources within the AONB fed into the assessment of the sensitivity of receptors to the proposed development and the assessment of impacts in <b>Volume 2 Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [<a href="#">APP-267</a>] and <b>Volume 2 Appendix 15G</b> (Description of Non-Significant Effects) [<a href="#">APP-270</a>]. As described in SZC Co.'s response to ExQ 1.8 at Deadline 2 above, this informed the assessment of effects on the AONB natural beauty and special quality indicators and the overall effects on the AONB in <b>Volume 2, Chapter 13</b> (Landscape and Visual) of the <b>ES</b> [<a href="#">APP-216</a>].</p> <p>SZC Co.'s <b>Comments on Councils' Local Impact Report</b> are provided at Deadline 3 separately (Doc Ref 9.29).</p> <p>Please also see the Response by SZC Co. for Deadline 3 in respect of SE.1.16 and the issue of Tourism, including the reasons why SZC Co. does not agree with the results of the 2019 study, as well as Chapter 2 of <b>Comments on Written Representations</b> which provides SZC Co.'s comments on the Suffolk Coast and Heaths AONB Partnership Written Representation (Doc Ref. 9.28).</p>
	Response by Ian Galloway at Deadline 3	<p>In the light of UNESCO's recent decisions in respect to The Great Barrier Reef and Liverpool what consideration has been (or is to be) given to the potential for Coastal Suffolk designations (of all types) to be threatened or removed as a consequence of the construction, operation, decommissioning and subsequent storage roles for Sizewell A, B and C?</p>

	Response by Stop Sizewell C at Deadline 3	Stop Sizewell C considers that the loss of beach, being reduced to a narrow 'coastal margin' and presence of a temporary and permanent beach landing facility will irrevocably damage the amenity value placed on the Coast Path.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. has sought to minimise harm on the AONB and Heritage Coast and does not consider that Sizewell A, B and C threaten the existence of these designations. SZC Co. has assessed effects on the recreational amenity of the Coast Path and these are presented in <b>Volume 2, Chapter 15</b> (Amenity and Recreation) of the <b>ES</b> [ <a href="#">APP-267</a> ], and in <b>Volume 1, Chapter 2</b> (Main Development Site) of the <b>ES Addendum</b> [ <a href="#">AS-181</a> ].
AR.1.12	The Applicant, ESC, SCC, National Trust, RSPB	<p><b>Displacement of Tourists/Visitors</b></p> <p>The National Trust [RR-877] and RSPB [RR-1059] indicate that they do not consider the displacement of tourists and visitors from the current pattern of visiting has been undertaken in a way which could be regarded as precautionary, it could therefore underestimate the effects on both the National Trust land at Dunwich, and the RSPB Minsmere site but also elsewhere:</p> <p>(i) Please respond to this concern.</p> <p>(ii) The National Trust and RSPB are seeking a commitment to mitigation, monitoring of activity and potential compensation – please advise on any progress that has been made in this regard.</p>
	Response by SZC Co. at Deadline 2	<p>(i) Please see response in <b>Appendix 6A – Response to ExQ1 AR.1.12</b> to this chapter.</p> <p>(ii) Two monitoring and mitigation plans are in preparation, in consultation with Natural England, the National Trust and RSPB and other stakeholders and drafts are to be submitted at an appropriate deadline. These are:</p> <ul style="list-style-type: none"> <li>• <b>Minsmere Monitoring and Mitigation Plan</b>- Walberswick European Sites and Sandlings (North) European Site, a draft is submitted at Deadline 2 (Doc Ref. 9.15); and</li> <li>• Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites (to be submitted at a future deadline).</li> </ul> <p>SZC Co. has held consultation meetings with Natural England, the National Trust and RSPB to discuss these plans, and Natural England, the National Trust and RSPB have</p>

		<p>provided comments on drafts of the Minsmere Monitoring and Mitigation Plan - Walberswick European Sites and Sandlings (North) European Site which have been addressed in the plan submitted at Deadline 2 (Doc Ref. 9.15).</p> <p>Monitoring of recreational use and disturbance at European sites to inform the need for further mitigation is an important part of these plans. SZC Co. is commissioning surveys of existing recreational users of European sites, which we are aiming to commence in early summer 2021, and will be continued during the pre-construction period to record current levels of use. Surveys will be continued during the construction and early operational phases to record changes to inform the need for mitigation and the potential nature of any such mitigation, as set out in the plans submitted or to be submitted.</p> <p>A response on the assessment of tourism effects and the proposed Resilience Funds for RSPB Minsmere and National Trust Dunwich Heath is set out in response to <b>Question SE.1.13</b> in <b>Chapter 23 (Part 6)</b> of this report. Discussions are ongoing with both parties to agree the scope and quantum of these funds which will be secured in the <b>Schedule 13</b> of the <b>Deed of Obligation</b> (latest draft Doc Ref. 8.17(C)).</p>
	Response by East Suffolk Council at Deadline 2	<p>ESC has not been directly involved in discussions with RSPB and National Trust and the Applicant regarding mitigation for perceived impacts on RSPB Minsmere and Dunwich Heath National Trust. In paragraph 17.131 of the LIR [REP1-045] ESC references potential displacement impacts and state that we welcome the precautionary approach taken by the Applicant. ESC welcome proposals for resilience funding for RSPB and NT both of who may experience an increase in construction tourists throughout the construction phase of the development.</p>
	Response by RSPB and Suffolk Wildlife Trust at Deadline 2	<p>(i)</p> <p>1. Our full comments on the Applicant's displacement calculations are provided in the report by Footprint Ecology "Review of Sizewell C application documents and evidence in relation to recreation impacts" (Liley and Saunders, 2020), which forms part of our Written Representations and can be found in the second report in Appendix 2 to that submission. The following points summarise the content of the section on "Predictions of changes in visitor use – Displaced visitors".</p>

		<p>2. The estimates of additional visitor use within the Shadow HRA Recreational Disturbance Evidence Base<sup>44</sup> Table 3.5 contain errors in their calculations:</p> <ul style="list-style-type: none"> <li>• Those visitors who did not state a location to which they would be displaced are not accounted for in these figures. This calculation has since been updated for Eastbridge and Minsmere Outer in the paragraphs 8.3.5–10 of the Shadow HRA Report Addendum (AS-173)<sup>45</sup>, as discussed in our Written Representations, but this has not been addressed for all sites.</li> <li>• Existing visitor numbers to each location appear to be estimated</li> <li>• The calculation of extra visits per year is based on the percentage of people who stated they would be displaced to a location applied to the number of people who already visit the location. This is incorrect and the percentage should be applied to the total number of people visiting locations further north around Sizewell (within and outside the Application site) from which some are likely to be displaced - the application of the percentage of all visitors being displaced to a location to the number of exiting visitors to that location does not make sense</li> <li>• It would therefore have been better to take the percentage of interviewees at each location where surveys were conducted that stated they would be displaced to different locations and then scale those figures up, based on the observation data at the relevant survey locations</li> </ul> <p>3. We also have concerns about the assumptions made in the interpretation of the visitor data. Whilst we acknowledge that surveys are one of the few options available to gather information about likely displacement, the limitations of such surveys should be acknowledged. The Shadow HRA Recreational Disturbance Evidence Base paragraphs 3.2.5-3.2.12 does discuss potential differences between stated and actual behaviour, but only the potential for fewer visitors to be displaced than stated, whereas the opposite could also occur. It is also possible that some survey respondents would not be able to adequately visualise the construction works (as no visual representation was given during the survey) and may be more likely to be displaced than they originally expected.</p>
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<sup>44</sup> Shadow HRA Report Volume 1: Screening and Appropriate Assessment Part 4 Appendix 5.10E Annex A Recreational Disturbance Evidence Base (APP-148)

<sup>45</sup> Shadow HRA Report Addendum (AS-173)

		<p>4. In conclusion, we therefore do not agree that the calculations of displaced visitors are precautionary, as the figures contain errors and the quality of the data around existing numbers of visitors is limited and hence calculations of visitor uplift are not reliable.</p> <p>5. It should be noted that we also have concerns regarding the calculation of recreational visits by the construction workforce. These are covered in the report section "Predictions of changes in visitor use – visits from the construction workforce" (again in the second report in Appendix 2 to our Written Representations).</p> <p>(ii)</p> <p>1. One of our key concerns is the lack of detail around the proposals for mitigation and monitoring of impacts of increased recreational pressure. The Application documents variously refer to monitoring and mitigation of recreational pressure on designated sites through the Rights of Way and Access Strategy<sup>46</sup> and through a monitoring and mitigation plan. However, no detailed monitoring or mitigation proposals were presented for the Minsmere-Walberswick SPA, SAC and Ramsar site or the Sandlings SPA as part of the Application.</p> <p>2. We note that there has been some progress with mitigation for the effects of the worker campus with a proposed contribution to the Suffolk Councils' Recreation Avoidance and Mitigation Strategy contained within Schedule 11 of the most recent iteration of the Draft Section 106 Agreement<sup>47</sup>. We also consider that provision of suitable alternative natural green space for additional residents during the construction period will be required.</p> <p>3. We welcome the continued engagement of the Applicant with us and others in discussions around the development of a plan for monitoring and mitigation of recreational impacts on designated sites from recreational displacement. We understand that the Applicant intends to submit mitigation and monitoring plans for the relevant protected sites to the Examination at this or a subsequent deadline. We look forward to the opportunity to update our position on the impacts of recreational pressure on protected sites and species following submission and review of these plans.</p>
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<sup>46</sup> Volume 2 Main Development Site Chapter 15 Amenity and Recreation Appendices Appendix 15I Rights of Way and Access Strategy (APP-270)

<sup>47</sup> Draft s106 Agreement (REP1-007)

	<p>Response by National Trust at Deadline 2</p>	<p>(i)  <u>Realistic v Precautionary Approach</u></p> <p>EDF have taken two approaches to estimate additional visits to locations as a result of displacement of existing users from the Sizewell area and the construction workforce; a realistic and a precautionary approach.</p> <p>The methodology for calculating the realistic approach is set out in Para.3.2.28, pdf page 438, marked page 38 of Annex A Recreational Disturbance Evidence Base contained in 5.10</p> <p>Shadow Habitats Regulations Assessment Volume 1: Screening and Appropriate Assessment Part 4 of 5, Appendix E Recreational Disturbance Assessment (Minsmere to Walkberswick SPA/SAC). This applies a percentage increase (2.33% which represents the number of respondents to the Visitor Survey who named Dunwich Heath as a location they would be displaced to) to represent displacement to Dunwich Heath based on the applicants estimated annual visitor numbers to Dunwich Heath. We disagree with this approach as it would not be visitors to our site that would be displaced to our site.</p> <p><u>The methodology for calculating the precautionary approach</u> is set out in Para.3.2.30, pdf page 439, marked page 39 of the document referenced above in para.6.8. For Dunwich Heath it applies the same 2.33% to an estimated figure of 500,000 visits/year in the Sizewell survey area. As set out in Para 3.2.27, (i. Calculation of annual visits to the area) this 500,000 figure is a rounding down of estimated annual levels of use (517,246) based on counts at each of the seven 2014 Sizewell C visitor surveys locations, with no explanation as to why a rounded down figure is deemed precautionary.</p> <p>The National Trust is further concerned that the use of 2.33% does not represent a precautionary approach to the calculation of recreational displacement to Dunwich Heath. This is because this figure does not make any allowance for:</p> <ul style="list-style-type: none"> <li>• The 56 respondents (10.89% of the total no. of respondents) who stated they would be displaced but did not name a location</li> <li>• The 13 respondents (2.5% of the total no. of respondents) who said they were not sure they would be displaced by the development</li> </ul>
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		<ul style="list-style-type: none"> <li>• The 18 respondents (3.5% of the total no. of respondents) who did not provide a response on displacement</li> </ul> <p>The NT accepts that it would be unrealistic to fully uplift the percentage increase in visitors at Dunwich Heath to reflect these three bullet points as these respondents are referring to the wider Sizewell area. However, we feel an appropriate approach that would be precautionary would have been to accommodate an allowance for this uncertainty in EDF's methodology. Given Dunwich Heath is one of the six locations identified as being most frequently mentioned (Para. 4.1.22Appendix A of Volume 2 Main Development Site Chapter 15 Amenity and Recreation Appendices 15A - 15J Part 1 of 3 link to doc) by respondents as an alternative location for recreation, it would be seem reasonable to apportion this number across six sites.</p> <p>The realistic approach that the applicant has used to inform their assessments gives a displacement figure of 4,288 for Dunwich Heath. However, we are of the opinion that using the precautionary approach set out by the applicant and factoring in adjustments to resolve both the rounding down and the uncertainty contained within the survey as explained above, would provide a figure for recreational displacement closer to 26,000 additional annual visits to Dunwich Heath.</p> <p>The National Trust is also of the opinion that the additional infrastructure proposed as a result of the changes to the application (notably the addition of a new temporary beach landing facility and conveyor which would cross the beach in front of the application site, requiring walkers to pass underneath it) would further deter people from Sizewell and displace visitors to other locations. The extent and impact of the development now proposed is therefore different from that which was used to inform the questions posed as part of the Sizewell C Visitor Surveys undertaken in 2014. Given this and preceding points made in this document the Trust remains concerned that figures used in the assessments are not precautionary.</p> <p><u>Visits by the construction workforce</u></p> <p>The applicant has sought to quantify the number of visits made to Dunwich Heath by the construction workforce in their application. The National Trust has concerns about the methodology used to estimate the use of the countryside by the workforce and believe the resultant estimates are exceptionally low and not precautionary.</p> <p>It is stated in Para 3.3.17, PDF page 447, number page 47 of Annex A: Recreational Disturbance Evidence Base (Link) that a mid-range estimate (between what is</p>
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		<p>uncertain) has been set at around 10% to represent the likelihood of campus, private rented sector and tourist accommodation based workers (who do not have dogs with them – this is 4,800 workers) visiting outdoor informal recreational resources around Sizewell once a week. The National Trust believes the use of the 10% figure is very low and would question whether it represents a precautionary approach to estimating the number of additional visits to the countryside that could be made by the construction workforce. It is of note that the 2018/19 MENE report (Monitor of Engagement with the Natural Environment: Headline report and technical reports 2018 to 2019) states 65% of adults spend time in the natural environment at least once a week. The use of this figure would clearly increase the number of estimated visits to Dunwich Heath by the construction workforce without dogs by 6.5 times. We remain unclear as to the justification and evidence on which the 10% figure has been based.</p> <p>The 10% figure is then multiplied to reflect a theoretical number of annual visits and adjusted down to allow for shift patterns and holidays. To make this figure site specific a percentage has been derived for each named location from a survey of Non-home based outage workers in 2016 (see para 15.6.52, pdf page 64, number page 61, Environmental Statement - Volume 2, Chapter 15, Amenity and Recreation) Link which asked workers where they visited in 'the countryside around Sizewell', as well as 'other' and 'open space, park or playing field in town or village'. Given the long lead-in time for this development proposal it is of concern to the Trust that the assessment of visits to the countryside (including our site) by the construction workforce is reliant on a single survey of construction workers. Given the applicants unique position to access this type of audience the Trust would have expected the applicant to draw on a more comprehensive evidence base in support of estimates contained within its submission.</p> <p><u>Uncertainty over use of figures in documents</u></p> <p>The Trust is also concerned that the use of figures by the applicant is inconsistent and it is difficult to follow where and how these figures have been used. This is compounded when different totals are used, for example;</p> <p>It is stated in 6.3 Volume 2 Main Development Site Chapter 14 Terrestrial Ecology and Ornithology Appendix 14B1 Plants and Habitats Synthesis Report Para 1.3.52 pdf page 23, marked page 20, that 'The Recreational Disturbance Evidence Base has estimated that the total number of additional visits to the wider countryside by the construction</p>
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		<p>workforce would be 60,000 per year.' This figure is then assigned to key locations but does not add up to the number specified.</p> <p>Table 3.9: Estimated numbers of construction worker visits to locations per year included in Annex A: Recreational disturbance evidence base of Appendix E: Recreational Disturbance Assessment (PDF page 450) does not include a total column that aggregates the numbers of visits by workers without dogs and workers with dogs. If it did it would state a figure of 32,706 for total visits by construction workers. This does not accord with the above total figure (60,000) contained within the Plants and Habitats Synthesis Report or its breakdown of key locations.</p> <p>Table 2.1 of the Shadow HRA report Appendix E: Recreational Disturbance Assessment (PDF page 320) does not include in its total the visits by construction workers with dogs. The inconsistent use of figures is of great concern when trying to establish whether the approach adopted by the applicant is precautionary and when seeking clarity over the figures applied to consideration of our site. We currently have a range of visits by construction workers quoted to be 327 or 2,000. We presume this disparity makes it difficult for EDF, other managers of sites and regulators to clearly understand the impacts or mitigation requirements related to recreational displacement. We have asked for clarity on this matter from EDF but have yet to receive a clear and concise explanation regarding the use of figures in each assessment.</p> <p>(ii) The applicant has stated in discussions and correspondence with the National Trust and RSPB that it will provide a Resilience Fund to mitigate impacts and address risks caused by the Sizewell C development on National Trust land at Dunwich Heath and RSPB land at Minsmere and that both organisations would also have access to other mitigation funds. Provision for Third Party Resilience Funds is set out in Schedule 13 of the Draft Section 106 Agreement draft dated 7 April 2021.</p> <p>The National Trust sent the applicant a list of suggested scope and measures which it considered could be covered by the fund on 8th March 2021. At a meeting with the applicant on 18th March 2021, the applicant advised that it would respond to the suggested scope and measures. After follow up requests from the NT, the applicant advised on 21st May 2021 that they had considered the proposed measures and set out their initial response. However, this unfortunately coincided with the time when we were working towards finalising our Written Representation ready for submission on 2nd June. The</p>
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		<p>NT has therefore not had the opportunity to review this. The National Trust welcomes further engagement with the applicant and will be providing dates for further discussion following 2nd June. Therefore the scope and content of this fund is not yet agreed.</p> <p>The applicant has also indicated that the National Trust would have access to the following monitoring and mitigation:</p> <p><u>Minsmere and Sandlings (North) Recreational Monitoring Plan and Natural Environment Fund</u></p> <p>The purpose of this plan is to mitigate for risks and possible effects of any net additional users at across its geographic scope. This scope covers the National Trust Dunwich Heath and Beach site. Measures to reduce the potential disturbance on designated species and habitats, as well as impacts on our operational infrastructure are likely to be required.</p> <p>The National Trust has had several meetings with the applicant's consultants to discuss the monitoring and mitigation plan and welcomes this engagement to develop effective measures. The National Trust was provided with an initial draft of the document on 19 August 2020. This draft lack any real content. At a meeting with EDF on the 16 November 2020 the National Trust provided an indication of what monitoring and mitigation measures would be expected to manage any negative impacts on Dunwich Heath and the wider site</p> <p>SAC/SPA/SSSI features. A second draft of EDF's document was received on 26 January 2020 following which further comments in writing were provided by the Trust on 16 February 2020.</p> <p>A third draft of the Monitoring and Mitigation Plan now titled for Minsmere-Walberswick European sites and Sandlings (North) European site was circulated by the applicant to stakeholders on 12 May 2021. This provides greater detail of survey and mitigation proposals. As of 2 June 2021 the NT has not yet had the opportunity to respond in writing to this latest draft and therefore all matters of concern remain not agreed and that we are hopeful of more engagement following the submission of this written representation.</p> <p>It is our understanding that Minsmere and Sandlings (North) Recreational Monitoring Plan would be secured through the s.106 Agreement. Measures included in this plan could be funded through the Dunwich Heath Resilience Fund or the Natural Environment</p>
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		<p>Fund. The National Trust has been engaged with other stakeholders and the local authorities about the scope of the Natural Environment fund. However, the local authorities are leading on this and therefore the NT has not been involved in recent discussions with the applicant about this. Therefore the scope and content of the monitoring and mitigation plan and these funds are not yet agreed.</p> <p><u>Tourism Fund</u></p> <p>A Tourism Fund is proposed to reduce the risk of perceived changes in visitor behaviour in the Suffolk coast area from materialising e.g. through development of or support for a tourism strategy/action plan, future research and monitoring, marketing and promotional activities, and capital investment.</p> <p>The National Trust has been engaged with other stakeholders and the local authorities about the scope of this fund. However, the local authorities are leading on this and the NT has not been involved in recent discussions with the applicant.</p>
	Response by Suffolk County Council at Deadline 2	<p>SCC has not been directly involved in discussions with RSPB and National Trust and the Applicant regarding mitigation for perceived impacts on RSPB Minsmere and Dunwich Heath National Trust.</p> <p>In para. 17.131 of the LIR [REP1-045] the Councils reference potential displacement impacts and state that we welcome the precautionary approach taken by the Applicant. The LIR states that we welcome proposals for resilience funding for RSPB and NT both of whom may experience an increase in construction tourists throughout the construction phase of the development.</p>
	Response by SZC Co. at Deadline 3	<p>Please see SZC Co.'s responses to the RSPB and Suffolk Wildlife Trust, and the National Trust in <b>Appendix 6A</b> of this document for the Deadline 3 response to this question.</p>
	Response by RSPB at Deadline 3	<ol style="list-style-type: none"> <li>i. See Appendix 2b to our Written Representations for our critique of the predictions of increased recreational visits to designated sites from displaced visitors and from the construction workforce. See also our comments on the Shadow HRA Second Addendum, also submitted at Deadline 3, for our comments on the implications of the projected uplift in additional visits arising from the revised calculations.</li> <li>ii. We welcome the production of the Minsmere Mitigation and Monitoring Plan for recreational impacts and our comments on this have also been submitted at</li> </ol>

		<p>Deadline 3. In summary, we are pleased that our recommendations regarding monitoring locations and mitigation measures have been included in the Plan. We have made some further comments around the further development of this Plan, but we note that our main remaining concern is around the need for the Applicant to provide SANGs (alongside the measures in this Plan) to provide further mitigation of the impacts of the increased number of residents in the area, again noting our support for Natural England's comments on this issue.</p> <p>We also note the need for a similar recreational monitoring and mitigation plan for the Alde-Ore Estuary SPA and Ramsar site and the southern part of the Sandlings SPA. We understand that such a plan is under development and look forward to the opportunity to comment at a future Deadline.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>The <b>Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary European Sites</b> (Doc Ref. 9.56) has been included within the Applicant's submission at Deadline 5. The Applicant's position is summarised in response to ExQ AR.1.7 and the issues were examined at ISH7, including the extent to which the Applicant's assessment has been precautionary. Please refer to the Applicant's written submissions following ISH7 (Doc Ref. 9.47). SZC Co. is pleased to be working with the stakeholders to optimise the Monitoring and Management Plans.</p>
AR.1.15	The Applicant, SCC	<p><b>PROW</b></p> <p>[RR-809] Miss Maria Toone and [RR-765] Martin Freeman have both expressed concern in respect of the potential safety risks for horse riders by diverting Bridleway 19. Please respond to these concerns and explain how the diversion would address the safety concerns for horse riders, cyclists, and other highway users.</p>
	Response by SZC Co. at Deadline 2	<p>The proposed diversion of Bridleway 19 runs from at the western end of Sandy Lane where it meets Lovers Lane, to the northern end of Bridleway 19 where it joins Eastbridge Road. Existing bridleways (Bridleways 19 (E-363/019/0) and E-363/013/0) currently run along the carriageway of Lovers Lane between Sandy Lane and the B1122 Abbey Road (see Figure 15I.1 of the updated <b>Rights of Way and Access Strategy in Volume 2, Appendix 15I</b> of the <b>ES</b> submitted at Deadline 2 (Doc Ref. 6.3 15I(A))). There is currently no safe walking, cycling or horse riding route segregated from the carriageway along this section of Lover's Lane. The alternative proposed diversion within Aldhurst Farm will provide an off-road route for equestrians, cyclists and pedestrians which is safer than the existing on-road bridleways. Paragraph 1.2.12 of of</p>

		<p>the updated <b>Rights of Way and Access Strategy</b> in <b>Volume 2, Appendix 15I</b> of the <b>ES</b> submitted at Deadline 2 (Doc Ref. 6.3 15I(A)) explains that the proposed diverted bridleway route includes provision for controlled and uncontrolled road crossings suitable for equestrians, cyclists and pedestrians, and a level crossing would be provided in connection with the construction phase rail route.</p> <p>The section of the proposed off-road bridleway between Sandy Lane and Sizewell Gap would be entirely new, and provide an off-road route for equestrians, cyclists and pedestrians as a safer alternative to using the public highway on Sandy Lane and Sizewell Gap. Currently there is a narrow footway along the eastern side of Lover's Lane and a broader footway and cycleway on the south side of Sizewell Gap.</p> <p>The off-road bridleway will be set back from the roads and screened by vegetation as far as possible. The design of the bridleway and its road crossings have been developed with reference to British Horse Society design guidance and following several rounds of public consultation which received written and in person responses from local horse riders. New highway crossings will include signalised Pegasus crossings which offer the highest degree of safety to equestrians, enabling them to wait in a dedicated area until traffic has stopped at a red signal before crossing. Please see <b>Volume 2, Appendix 15I, Figure 15I.1</b> (Amenity and Recreation) of the <b>ES</b> (Doc Ref. 6.3 15I(A)) for the locations and types of proposed road crossings. The detail on the specification for the crossings will be agreed with SCC.</p> <p>The southern end of the proposed off-road bridleway exits onto Sizewell Gap, and cyclists and pedestrians will be able to cross onto the existing off-road cycleway and footway south of the road. This connects to Leiston and Sizewell, and bridleways south of Sizewell Gap. SZC Co. will consult SCC on equestrian use of this road crossing and section of Sizewell Gap.</p> <p>The width and surface type of the new bridleway will be suitable for equestrians, cyclists and pedestrians, and the principle of providing 3m of paved path plus 2m of grass surface has been agreed with SCC. The detailed specification will be agreed with SCC.</p>
	Response by Suffolk County Council at Deadline 2	<p>The alternative route provided for the temporary closure of public bridleway 19 is proposed as an off-road route from Sizewell Gap to the north end of the closed bridleway at Round House, Eastbridge Road. SCC continues to discuss these provisions through the SoCG and design workshops but is generally satisfied that the proposed route will not be on the road and it will have a dual surface, one of which will be unsurfaced to enable segregation of horse riders. The designs propose the use of</p>

		Pegasus crossings for crossings on Lovers Lane near to Valley Road, Abbey Road south and Abbey Road north at the site entrance (2 crossings). An uncontrolled crossing is proposed at the south end of the proposed bridleway at Sizewell Gap road and for Abbey Lane and the access to Leiston Abbey. The DCO includes speed restrictions on Lovers Lane and the B1122 (Abbey Road) [RR-809] and [RR-765] are correct in highlighting that the proposed bridleway does not meet either of the two existing bridleways on the south side of the Sizewell Gap road and therefore requires horse-riders to use the road or the existing shared footway/cycleway.
	Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
	Response by Stop Sizewell C at Deadline 3	There are relatively few bridleways in the area and the loss to horseriders of Bridleway 19 is significant.
	<b>Response by SZC Co. at Deadline 5</b>	No further comments to add to SZC Co. response for Deadline 2.
AR.1.22	The Applicant, SCC, ESC	<p><b>Southern Park and Ride</b></p> <p>As part of the proposal to improve access to the Southern Park and Ride it is suggested [RR-762] that this may require traffic regulation orders to remove on street parking along the B1078.</p> <p>(i) Is this correct?</p> <p>(ii) If so, how many parking spaces would be removed?</p> <p>(iii) Where is it anticipated the residents using these spaces would park in the event that this is undertaken?</p> <p>(iv) What assessment has been undertaken to ensure no one with protected characteristics would be adversely affected by such a proposal?</p>
	Response by SZC Co. at Deadline 2	SZC Co. has been working closely with SCC, ESC and Wickham Market Parish Council (WMPC) to develop a package of improvements for the village that will widen footways, improve pedestrian crossing facilities and control traffic speeds through the careful application of footway build-outs and kerb re-alignment. As part of the scheme proposals SZC Co. proposes to rationalise car parking along the B1078 through Wickham Market, creating safe places for pedestrians to cross, improving visibility from property accesses and creating highway geometry that encourages slower speeds.

	<p>(i) Yes. Traffic Regulation Orders will be required to modify the current parking restrictions along the B1078 in Wickham Market.</p> <p>(ii) On the B1078 between Border Cot Lane and Spring Lane, the peak number of vehicles parked along the High Street during a parking occupancy survey in 2019 was recorded as 22; the future capacity would be 17 (loss of five spaces). The capacity of the long parking bay along High Street between Spring Lane and Lower Street would be reduced from 12 to 10 spaces – however the parking survey recorded a maximum of 10 cars parked along the kerbside east of Spring Lane at peak, suggesting that the future design would be sufficient to accommodate demand. On Border Cot Lane parking for seven cars will be provided on the southern side between the High Street junction and Riverside View. This represents a reduction of approximately 3 cars compared to the existing situation, taking into account the presence of crossovers already present. There would be no change in parking provision west of Riverside View.</p> <p>(iii) During high parking demand periods (typically late evening and overnight), a small number of drivers would need to find alternative parking within Wickham Market. The 2019 parking survey showed spare capacity on side-roads. Barhams Way was found to have adequate spare on-street parking capacity for displaced parking, with a public footpath linked directly back to the B1078 High Street (around 120m in length).</p> <p>(iv) The majority of parking along the B1078 in Wickham Market is unmarked. No blue-badge spaces are marked. The scheme proposals include marked parking bays, and so could incorporate marked blue badge parking bays, should that be required.</p> <p>SZC Co. recognises that loss of parking is an important issue for WMPC and continues to work with the Parish to minimise any parking loss. SZC Co. is currently seeking acceptance from the Parish to present the scheme proposals to the community through a public consultation process in the summer.</p> <p>The Wickham Market scheme would be delivered by SCC and funding secured through <b>Deed of Obligation</b> (latest draft of the <b>Deed of Obligation</b> provided in Doc Ref. 8.17(C)).</p>
Response by East Suffolk Council at Deadline 2	<p>ESC is invited to and attends meetings held by the Applicant with Wickham Market Parish Council, chaired by SCC Highways. Specific responses to the questions asked should come from the Applicant and SCC. SCC as local highway authority would be the responsible authority for updating traffic regulation orders. ESC would need to be involved if resident parking zones were to be introduced but we are not aware of any such proposals for Wickham Market. ESC is keen to ensure residents are fully aware of</p>

		proposals and have the opportunity to comment through the proposed public consultation programme by Wickham Market Parish Council. ESC expects any resident with protected characteristics identified through the public consultation exercise to be supported and not disadvantaged or adversely affected by proposals in Wickham Market.
	Response by Suffolk County Council at Deadline 2	<p>(i) As part of the Wickham Market Improvement Scheme some changes to the parking restrictions on the B1078 High Street between Border Cot Lane and the Deben Bridge are proposed. A Traffic Regulation Order would be required.</p> <p>(ii) The design is not developed to a point where the exact number of parking spaces being removed can be given.</p> <p>(iii) While great efforts are being made to maximise the retention of on-street parking there is a delicate balance between this, road safety (in particular for pedestrians) and minimising delays and congestion. There is no legal requirement to provide or protect onstreet parking, but a formal legal consultation process would normally be required to introduce any restrictions. SCC would expect that, as part of our consent with regard to Article 22 on this matter, we would expect there to be a consultation with local residents. This process will enable residents to respond to the proposals. However, it is clear that the removal of car park spaces will negatively impact local residents, and the local characteristics mean that provision of alternative car parking in the near vicinity of the lost car parks will be challenging.</p> <p>(iv) The matter of provision of disabled parking has been a matter of discussion with Wickham Market Parish Council, but no final agreement has been reached regarding what, if any, provision will be made. Formal restrictions to provide disable bays would be included within a traffic regulation order. Alternatively informal (but unenforceable) disabled bays can be provided without legislation. In either case the bays would be available to any road user with the necessary dispensation, not just residents.</p> <p>However, this will not mitigate impacts on other people with protective characteristics, such as elderly people who are not classified as disabled, or children. To SCC's knowledge, no assessment has been undertaken on impacts on people with protected characteristics.</p>



	Response by SZC Co. at Deadline 3	Discussions are on-going with Wickham Market Parish Council, SCC and ESC at a monthly Sizewell C Transport Workgroup on Wickham Market to agree a scheme which will be put to public consultation to gather views. The proposed scheme is also undergoing a Stage 1 road safety audit (RSA) to identify any safety concerns at the preliminary design stage. Based on feedback from residents and the findings of the RSA, SZC Co. will refine the scheme, and confirm the arrangements for on-street parking. The <b>Initial Statement of Common Ground</b> with East Suffolk Council and Suffolk County Council [ <a href="#">REP2-076</a> ] ref. MI09 sets out the current position.
	Response by Mr Arthur Stansfield at Deadline 3	<p><i>SZC Co response at Deadline 2: 'On the B1078 between Border Cot Lane and Spring Lane, the peak number of vehicles parked along the High Street during a parking occupancy survey in 2019 was recorded as 22; the future capacity would be 17 (loss of five spaces). The capacity of the long parking bay along High Street between Spring Lane and Lower Street would be reduced from 12 to 10 spaces – however the parking survey recorded a maximum of 10 cars parked along the kerbside east of Spring Lane at peak, suggesting that the future design would be sufficient to accommodate demand.'</i></p> <p>The capacity of 22 could be as many as 24 by my inspection of the parked cars between Border Cot Lane and Spring Lane.</p> <p><i>SZC Co response at Deadline 2: 'The capacity of the long parking bay along High Street between Spring Lane and Lower Street would be reduced from 12 to 10 spaces.'</i></p> <p>The capacity here by my inspection of parked cars was 15 spaces with a further 3 from Lower Street towards the bridge. The use of Barhams Way for displaced parking has not been discussed in meetings with EDF. There seem to be fewer parked cars now than before Covid in certain locations Wickham Market. It is difficult to know the number of parked cars as things return to a more normal situation. If EDF workers rent property in Wickham with multiple tenancy then this could result in 3 or 4 cars per house. This will lead to further pressure on on-street parking</p>
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. will continue engagement with SCC, ESC and Wickham Market Parish Council through the public consultation process, to agree a set of proposals which achieve the stated benefits whilst minimising impact on parking.

AR.1.23	The Applicant, ESC, SCC	<p><b>Southern Park and Ride</b></p> <p>A number of RRs including [RR-521, RR-588, RR-762 and RR-898] indicate that the location of the P&amp;R would adversely affect Wickham Market during construction and subsequent operation as a consequence of the additional traffic.</p> <p>(i) Please advise how the effects on the character and amenity of the town and its residents have been considered in selecting the location for the P&amp;R and</p> <p>(ii) what mitigation if any would be secured to ensure that the effects are kept below a significant level?</p>
	Response by SZC Co. at Deadline 2	<p>(i) The Site Selection report [<a href="#">APP-591</a>] sets out the site requirements and filter stages that SZC Co. has progressed to identify Wickham Market as the preferred option for the southern park and ride site.</p> <p>A number of refinements to the design were made in response to the Stage 4 consultation comments received that aim to improve both the character and amenity of the residents of Wickham Market. Those refinements include:</p> <ul style="list-style-type: none"> <li>• refinements to the lighting design including incorporation of measures to reduce light spill; and</li> <li>• with regards to reducing delay through Wickham Market, SZC Co. has been working with the Parish Council to bring forward a public realm improvement scheme within the public highway which would represent the first phase of the implementation of the Wickham Market Neighbourhood Plan (rather than temporarily removing on-street parking on the B1078 or constructing a diversion route via Valley Road and Easton Road)</li> </ul> <p>(ii) Any additional mitigation would be secured through the Deed of Obligation (latest draft of the Deed of Obligation is provided in Doc Ref. 8.17(C)). The public realm improvement scheme would address elements of the pedestrian safety, and cycling, walking and disability access routes policies of the draft Wickham Market Neighbourhood Plan, as well as deliver a number of the potential improvement works identified in the transport and movement section of the Neighbourhood Plan. Measures are currently exploring the introduction of village gateways, pedestrian crossings, narrowing of roads/widening of pedestrian routes, and demarcation of parking bays.</p>

Response by East Suffolk Council at Deadline 2	<p>For matters relating to additional traffic ESC defers to SCC as local highway authority. The siting of the Park and Ride at Wickham Market – in the parish of Hacheston, evolved through pre-app consultation process to ensure that it did not adversely impact on an area of high archaeological importance.</p> <p>The siting and design, although not complete, has continued to evolve including introduction of a landscape bund in the Change submission following requests from Wickham Market Parish Council. Additional mitigation is being discussed with the Applicant, the Parish Council, and SCC.</p>
Response by Suffolk County Council at Deadline 2	<p>(i) Selection of the park and ride site was a matter for the Applicant. SCC has no comment to make on this point.</p> <p>(ii) The Wickham Market Improvement Scheme is intended to be the method by which mitigation can be provided to keep the impacts of the SZC construction traffic below a significant level. SCC notes that these improvements are focused on Wickham Market and exclude the B1078 east of the parish boundary (Deben River Bridge) to the Southern Park and Ride access. Discussions with the Applicant are ongoing regarding this matter.</p>
Response by SZC Co. at Deadline 3	No further comments to add to SZC Co. response for Deadline 2.
Response by Mr Arthur Stansfield at Deadline 3	<p><i>SZC Co response at Deadline 2: 'with regards to reducing delay though Wickham Market, SZC Co. has been working with the Parish Council to bring forward a public realm improvement scheme within the public highway which would represent the first phase of the implementation of the Wickham Market Neighbourhood Plan (rather than temporarily removing on-street parking on the B1078 or constructing a diversion route via Valley Road and Easton Road) (ii) Any additional mitigation would be secured through the Deed of Obligation (latest draft of the Deed of Obligation is provided in Doc Ref. 8.17(C)). The public realm improvement scheme would address elements of the pedestrian safety, and cycling, walking and disability access routes policies of the draft Wickham Market Neighbourhood Plan, as well as deliver a number of the potential improvement works identified in the transport and movement section of the Neighbourhood Plan. Measures are currently exploring the introduction of village gateways, pedestrian crossings, narrowing of roads/widening of pedestrian routes, and demarcation of parking bays.'</i></p>

		Does it address pedestrian safety, and cycling, walking and disability access policies of the Neighbourhood Plan? There have been no discussions with the Neighbourhood Plan Committee. The proposals may well make it less safe for cyclists. Very little has been said concerning cyclists by EDF or their consultants during our meetings, certainly nothing has been offered from the cyclists' perspective.
	<b>Response by SZC Co. at Deadline 5</b>	Cycling has been considered as a mode within Wickham Market, and the needs of cyclists balanced against other road users and Wickham Market residents. The highway layouts are designed to encourage low traffic speeds through the village, and therefore make it attractive for cycling. The carriageway and footways are highly constrained through most of the village, making it difficult to provide cycle lanes, or other physical cycling measures. A shared off-carriageway pedestrian/cycle path along the B1078 between Wickham Market and the southern park and ride access forms part of the proposals, designed to encourage Sizewell C workforce living in Wickham Market or nearby, to cycle to the park and ride.
AR.1.25	The Applicant, SCC	<p><b>Two Village Bypass</b></p> <p>Residents of Marlesford and Glemham including [RR-1018, RR-758] express concern regarding the adverse effect increased traffic would have from the proposed development, in combination with the positioning of the Southern Park and Ride. This combined with the lack of a bypass to the villages, could result in unacceptable impacts in terms of access to the A12 and severance from the facilities on the southern side of the A12.</p> <p>Please respond to these concerns setting out how you consider the effects are mitigated.</p>
	Response by SZC Co. at Deadline 2	Schedule 16 of the <b>Draft Deed of Obligation</b> (latest draft is provided in Doc Ref. 8.17(C)) identifies a Marlesford and Little Glemham Improvement Contribution to be used by SCC for the design and implementation of local improvements to mitigate Sizewell C impacts. The proposed improvements include new 30mph speed limit through Marlesford and extension of the existing 40mph speed limit, traffic calming, gateway features, new and wider footways and crossings. The Applicant considers that these measures adequately mitigate any potential effects.

	Response by Suffolk County Council at Deadline 2	SCC does do not consider that the traffic impacts on these communities have been sufficiently mitigated. Review of the Environmental Assessment of traffic forms an ongoing workstream with the Applicant; SCC is currently of the opinion that there is an impact that requires mitigation. However, the Applicant has also shown a commitment towards developing a strategy for mitigating impacts at these locations, and we welcome this dialogue, of which we will provide appropriate updates to the Examining Authority.
	Response by SZC Co. at Deadline 3	SZC Co. will continue to liaise with the Councils and parish council to agree proportionate transport mitigation to be funded by the Marlesford and Little Glemham Improvement Contribution to be secured through the <b>Draft Deed of Obligation</b> (Doc Ref. 8.17(D))
	Response by Marlesford Parish Council at Deadline 3	We welcome the fact that the Applicant is willing to contribute to the provision of traffic mitigation measures in the two villages (notwithstanding that MPC and Little Glemham Parish Council believe that the two villages should be bypassed). In their response to this question, the Applicant states "The proposed improvements include new 30mph speed limit through Marlesford and extension of the existing 40mph speed limit, traffic calming, gateway features, new and wider footways and crossings. The Applicant considers that these measures adequately mitigate any potential effects." MPC is reserving its position on this matter until it has seen more detailed proposals. Specifically, it is concerned about the safety of pedestrians crossing the A12 in both villages and it also has concerns about junction and private access onto the A12 for vehicles turning right. We continue to work with SCC Highways and the Applicant to find a set of satisfactory mitigation measures. We note that in its response to this question, SCC recognise the ongoing discussion, but are not yet satisfied that the measures proposed by the Applicant are adequate.
	<b>Response by SZC Co. at Deadline 5</b>	SZC Co. continue to engage with SCC, ESC and MPC on a set of proposals that mitigate the project effects in Marlesford. See response to <b>Question TT.1.112</b> in relation to the status of discussions on the transport effects.
AR.1.27	ESC, SCC	<b>Public Sector Equality Duty</b> A number of RRs including [RR-681, 0790, 993] have been received identifying people with protected characteristics who indicate they would be disadvantaged by the proposed development.

		<p>(i) Do the Councils consider adequate regard has been made to people with protected characteristics in identifying impacts and subsequently setting out appropriate mitigation?</p> <p>(ii) If in answering the above in the negative, what additional work should be undertaken to improve the assessment?</p> <p>(iii) What additional mitigation might be available?</p>
	Response by SZC Co. at Deadline 2	No response from SZC Co. is required.
	Response by East Suffolk Council at Deadline 2	<p>ESC notes that the responsibility to be satisfied that the Public Sector Equality Duty has been met rests with the Secretary of State. However, in context of these questions, ESC's comments are as follows:</p> <p>(i) The Applicant submitted an Equality Statement [APP-158] as part of their submission and to identify where equalities impacts may be relevant in the decision-making process. There may be some instances where ESC is concerned that impacts to persons of protected characteristics has not been identified and therefore specific mitigation proposed such as with regard to severance of roads in locations resulting in elderly, infirm, young, disabled as an example struggling to cross a road. Direct mitigation is rarely proposed but could be secured in some instances.</p> <p>(ii) It may be that, working with the Applicant, ESC can identify further areas where mitigation could be proposed to address concerns arising from possible failure to address potential impacts. ESC also notes and agrees with proposals for Public Services Resilience Funding for the Council that could be used to address some of these impacts by ESC.</p> <p>(iii) Additional mitigation is difficult to identify at this point but an appropriately resourced Public Services Resilience Fund should suffice.</p>
	Response by Suffolk County Council at Deadline 2	<p>We note that the responsibility to be satisfied that the Public Sector Equality Duty has been met rests with the Secretary of State. However, in this context of these questions, SCC's views are as follows:</p> <p>(i) SCC considers that adequate regard has not been made to people with protected characteristic. While it is considered that overall the Applicant's Equality Statement [APP 158] appears to identify impacts on people with protected characteristics, this is not comprehensive in relation to community safety and community cohesion impacts. The LIR [REP1-045], at para 28.29 onwards, refers to a number of potential impacts in</p>

		<p>relation to community safety and community cohesion which may have a disproportional impact on people with protected characteristics, such as hate crime, criminal exploitation and violence against people. The Equality Statement also does not include reference to impacts on schools and early year places and safeguarding and additional provisions at school; these impacts are covered in the LIR ([REP1-045] para 27.9-27.22).</p> <p>The mitigation proposals by the Applicant do not in general appear to focus on specific mitigation for people with protected characteristics within the community, although [APP 158] refers to SZC's commitment to recruiting a diverse workforce and to implement initiatives to deliver diversity within the workforce.</p> <p>(ii) Further assessments may be required when details of mitigation measures are being confirmed by the Applicant, including for each measure who is going to be responsible to address the equality related impacts. SCC considers that, where applicable, this should be in the form of specific equality impact assessments, considering the impact on people with protected characteristics, before any final decisions are made about what activities are going to be delivered. In addition, whichever organisation is the lead for an activity should be responsible for undertaking an equality impact assessment for it. The responsibilities should be clearly set out in obligations, and if any of these responsibilities fall to one of the Councils, the costs related to these assessments should be covered by the Applicant.</p> <p>(iii) Consideration should be given how mitigation and compensation measures can and will support and protect people with protected characteristics, e.g. the Community Fund. The Public Services Resilience Fund needs to be set up and scaled so that the project does minimise impacts on public services, many of which provide services particularly to people with protected characteristics in terms of age and disability, which are the characteristics identified by the Applicant as most disproportionately affected (Table 1.1. in [APP 158]).</p> <p>The LIR also identifies mitigation measures/action plans in relation to community safety and community cohesion which could be delivered by the Councils, and should be funded by the Applicant (see LIR para 28.48-28.63 and LIR Annex N).</p> <p>Required mitigation for school and early years settings, in relation to impacts on young people and their education and wellbeing, are covered in the LIR (para 27.51-27.53). The Applicant recognises the disproportionate effect of construction traffic impacts on the elderly and those with mobility issues, in terms of accidents and road safety; access</p>
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		<p>and accessibility; community severance; and pedestrian fear and intimidation. In the LIR, SCC lists a number of locations where highway improvements are, or might be required (tables 14-17). Improvements to pedestrian facilities may particularly reduce the impact of people of these protected characteristics, to reduce severance, improve access and reduce pedestrian fear and intimidation.</p> <p>With regard to support of people with protected characteristics in the Sizewell C workplace, the LIR proposes as an additional measure to give consideration and support regarding the various faith groups likely to be present on site (para 28.61).</p> <p>SCC also notes that the "Study on the impacts of the early-stage construction of the Hinkley Point C (HPC) Nuclear Power Station" (Oxford Brookes University 2019, commissioned by SCC and other local authorities) (LIR APPENDIX 2: 1 [REP1-089], page 34) highlights for HPC that the monitoring system is not delivering enough disaggregated information on characteristics of the workforce, such as family composition, nationality, gender, disability etc that would allow better estimation and management of project impacts on local services, including arrangements for people for protected characteristics.</p> <p>SCC considers that the 'principles' described in the Rights of Way &amp; Access Strategy para 1.1.4 [APP-270] does cover parties with protected characteristics, but these principles should be extended to cover all sites, including the Sizewell Link Road and the 2 village bypass where many PRoW are affected. The Strategy does not address the effects of increased traffic on the wider highway network such as the A12.</p> <p>SCC notes that the Applicant has indicated to the Councils that funds will be available to deal with equality issues as they arise (or based on best practice of the bodies that apply the funds in pre-mitigation circumstances), and that the Councils have input into the monitor/manage stage of implementation for those funds so there is a mechanism in place to deal with equality. SCC will be seeking further detail on this matter.</p> <p>See also answer to ExQ HW1.17, regarding effects on the elderly.</p>
	Response by SZC Co. at Deadline 3	<p>SZC Co does not agree that adequate regard has not been made to people with protected characteristics in identifying impacts and subsequently setting out appropriate mitigation.</p> <p>To clarify, SZC Co submitted an <b>Equality Statement (EqS)</b> [<a href="#">APP-158</a>] as part of the DCO – this is not an Equality Impact Assessment, but is intended to draw upon assessments within the DCO application and guide to where equalities impacts may be relevant and have been considered, in order to inform the DCO decision-making</p>



		<p>process. The Public Sector Equality Duty (PSED) in terms of decision-making sits with the Secretary of State, who may be supported by the recommendation of PINS, and the EqS is intended to help the Secretary of State conclude on the decision.</p> <p>As set out in the EqS (para 1.2.5), everyone affected by a development will have some protected characteristics under the Act (such as age, race, and sex), and they will not all be equally affected. That does not, however, necessarily constitute an equality effect. The question for the Public Sector Equality Duty is whether there are disproportionate or differential impacts that have been considered. However, by assessing certain impacts (e.g. on school places) we are dealing directly with differential or disproportionate impacts on persons with protected characteristics that we have identified.</p> <p>A further point about mitigating equality impacts is that mitigation is not always automatically different for equality considerations. For example, elderly people may be more affected by noise, but mitigation to reduce noise as much as is reasonably possible would not be specific mitigation for elderly people, but general mitigation that also reduce effects on potentially disproportionately affected elderly people. Similarly, public safety impacts could affect groups with protected characteristics differentially, but mitigation that reduces all impacts will avoid differential equality impacts.</p> <p>The EqS signposts to where potential differential or disproportionate impacts may occur and highlights where mitigation may be required. In most cases, the mitigation takes the form of funds so that public sector bodies can administer them in ways that avoid, reduce or mitigate residual equalities impacts.</p> <p>If that mitigation funding is supporting an existing council service like social care / community safety / integrated care – the PSED is with the Councils just like any other application of service, and the Applicant and Councils need to make sure that the remit of the funds (e.g. the Public Services Resilience Fund, the Housing Fund, and School Capacity and Support Contributions) is sufficiently flexible for the Councils to apply them under their existing terms of service (which themselves are already subject to Equality Impact Assessment).</p> <p>As far as the planning decision goes, the Examining Authority and Secretary of State can be reassured that appropriately scaled funds are available to deal with reasonable equality issues as they arise (or based on best practice of the bodies that apply the funds in pre-mitigation circumstances), and that the Council has input into the</p>
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		<p>monitor/manage stage of implementation for those funds so there is a mechanism in place to deal with equality.</p> <p>SZC Co welcomes the positive engagement between themselves, ESC and SCC in developing a Public Services Resilience Fund to reduce the risk of effects on groups that may be differentially or disproportionately affected as a result of their Protected Characteristics, and may be more vulnerable to the effects of the Project.</p>
	Response by Marlesford Parish Council at Deadline 3	<p>SCC particularly notes the need for improvements to pedestrian facilities which may reduce the impact on people with protected characteristics by reducing severance, improving access and reducing pedestrian fear and intimidation. MPC agrees with this stance and with the efforts that SCC are making to secure meaningful financial contributions from the Applicant to address adverse impacts.</p>
	<b>Response by SZC Co. at Deadline 5</b>	<p>Please see response to AR.1.25 in relation to proposals for pedestrian improvements in Marlesford, to be secured through the <b>draft Deed of Obligation</b> (Doc Ref. 8.17(E)).</p>