



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 7 – 3 September 2021

East Suffolk Council's (20026200) Response to Examining Authority's Second Round
of Written Questions

Part 3

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Examining Authority’s Second Written Questions			
CC.2 Climate change and resilience – No Questions for ESC			
CA.2 Compulsory acquisition – No Questions for ESC			
Cu.2 Cumulative impact			
Cu.2.1	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant’s comments on response to EXQ1 Cu.1.3 [REP3-046], indicates that discussions are ongoing with SCC, ESC and parish councils with a view to agreeing the proposed scheme of local improvements. Please indicate whether any</p>	<p>Discussions are ongoing with Marlesford and Little Glemham with SCC and the Applicant. SCC as local highway authority and the Applicant are best placed to advise on a likely timetable for agreement and whether any works may disrupt the haul route for both Sizewell C and East Anglia One North and East Anglia Two. As proposals are likely to include pedestrian crossings on the A12 (which will need</p>

		<p>agreement has been reached and set out the consideration given to the timeline of any works to avoid disruption on a haul route for both the Sizewell C Project and the EA1N and EA2 projects.</p>	<p>assessment from a noise and air quality perspective) and the potential for traffic calming measures or wider footways could all result in disruption to the highway necessitating possible road closures, diversions or contraflows during construction. Impact on the main transport route for these nationally significant projects will need to be considered in scheduling the highway works.</p>
Cu.2.5	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL5 response to responses on Ex1 Cu.1.18 [REP5-129]. The Applicant's DL3 response states that the proposed Friday Street roundabout element of the two village bypass has been prioritised as set out in the Implementation Plan [REP2-044].</p> <p>(i) The measures set out in the Implementation Plan will be secured by a Draft Deed of Obligation which will confirm that SZC Co. shall use reasonable endeavours to carry out and complete the mitigation measures in accordance with the Implementation Plan, unless otherwise agreed with the local authority. Is the ESC content that that will provide satisfactory safeguards in relation to the potential for cumulative impacts? If not, what revisions to the wording of the Deed of Obligation and/or other means of securing the early delivery of the Friday Street roundabout are sought?</p>	<p>(i) ESC is discussing with the Applicant whether 'reasonable endeavours' is strong enough. We are aware and support SCC as highway authority in seeking to secure caps on HGV numbers until key highway mitigation measures are in place such as the Two Village Bypass (which includes the Friday Street roundabout). ESC considers that having the roundabout early in the Implementation Plan with caps on HGVs should be sufficient to ensure its early delivery in the construction phase.</p> <p>(ii) This question is for the Applicant to respond to.</p>

		<p>(ii) The DL3 response by FERN draws attention to the potential for cumulative impacts upon homes and businesses along the two village bypass route including during construction and seeks more mitigation such as noise attenuation fencing at the start of construction and beyond, bunds and considerate working hours. In response the Applicant states that there will be opportunity for further noise control measures to be incorporated into the detailed road design [REP3-042]. However, that does not appear to address the specific concerns raised by FERN in this respect. The Applicant is requested to provide a further explanation as to how those potential cumulative impacts upon these residents could be satisfactorily mitigated and how any such mitigation measures and their timing would be secured by the draft DCO.</p>	
Cu.2.7	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL3 response to responses to Ex1 Cu.1.19 [REP3-046]. Please provide an update as regards progress in securing additional mitigation for recreational receptors within Receptor Group 19 including securing a PRoW Fund of an appropriate size and flexibility.</p>	<p>SCC is the public rights of way authority and has been working with ESC and the Applicant on a PROW Fund to be paid to SCC to carry out improvements on the rights of way network. These discussions are advanced and will be reflected in the Deed of Obligation submitted by the Applicant at Deadline 7. ESC is satisfied that additional mitigation for recreational receptors in Receptor Group 19 will be secured via this Fund.</p>

CG.2 Coastal Geomorphology

CG.2.4	ESC	<p>Impacts on coastal processes</p> <p>The ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], in relation to Item 3b states that in the light of SMP Policy 13.1, the Applicant should minimise the seaward extent of the coastal defence features as far as possible. The Applicant's DL5 submissions include further details of the reduced seaward extent of the coastal defences at Appendix A to the Applicant's written submissions responding to actions arising from ISH6 and Revision 2 of the Coastal Defence Features Plans [REP5-118].</p> <p>(i) In the light of the additional information and plans provided by the Applicant at DL5, are you satisfied that the HCDF is located as landward as possible?</p> <p>(ii) If not, please explain whether and, if so, why any further changes to the seaward extent of the coastal defences are sought?</p>	<p>(i) The recently retreated position of the HCDF is welcomed but it remains significantly further seaward of the defence line established by Sizewell A and B. It may also extend further seaward if an adaptive profile is required by future flood risk assessments. Further changes are sought because, in ESC's view, the Applicant has not provided sufficient evidence to demonstrate that variants on the HCDF design have been explored with a view to minimising the seaward footprint. A particular case in question is described below. Notwithstanding this, ESC accepts that the MDS footprint must not encroach upon the SSSI to landward of proposed development.</p> <p>(ii) Refer to (i). A further landward position of the HCDF may be achievable through a different design of the HCDF armour system which uses concrete armour units instead of large armour stones. If proved viable, the use of concrete units would enable (possibly necessitating) a steeper slope at the armour face. A steepening in armour slope could yield a significant saving on the footprint, equal to the slope difference multiplied by the vertical height of the slope.</p> <p>For concrete armour units, the beach regain would be reduced marginally due to a small increase in the crest elevation needed to limit overtopping, but the net result should still be a saving on beach coverage.</p> <p>The Applicant's Design Report (9.13 Sizewell C Coastal Defences Design Report) [REP2-116] lists, in</p>
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			<p>qualitative terms, reasons why not to use a steeper slope / concrete armour, but these reasons are not substantiated or demonstrated formally.</p> <p>ESC seeks the provision of quantified information to demonstrate the merits of rock armour (at 1:3 slope) versus the use of concrete armour units (at a steeper slope), subject to both meeting the same required design standards.</p>
CG.2.5	MMO, ESC, EA, MMO	<p>Impacts on coastal processes</p> <p>The Applicant's DL5 written submissions responding to actions arising from ISH6 Appendix A para 1.2.4 [REP5-118] refers to four additional terrestrial piles (above Mean High Water Spring) are required to support the two additional removable deck spans for the permanent BLF that are required now that the HCDF does not extend as far seaward as it did previously. Are there any concerns relating to the provision of these additional piles?</p>	<p>A modelling assessment is due from CEFAS to evaluate the potential for scour around these piles. ESC awaits the results of the EIA on beach receptor. ESC PRoW may dispute extra piles for decreased beach access and amenity value.</p>
CG.2.6	ESC, MMO, EA, NE, RSPB, National Trust, Alde and Ore Association, Mr Bill Parker	<p>Impacts on coastal processes</p> <p>At DL5 the Applicant submitted a revised version of the CPMMP [REP5-059]. Please indicate whether there are any further concerns:</p> <p>(i) as regards the wording of that draft plan including in relation to the geographical extent of the proposed monitoring, the means of monitoring and future mitigation to maintain</p>	<p>(i) ESC has provided detailed comments on the latest CPMMP to the Applicant at Deadline 6 [REP6-032]. The following items A) to C) are important issues taken from that feedback.</p> <p>A. The one-dimensional modelling of soft coastal defence feature report (TR544) [REP2-115] and the operational modelling of SCDF report (TR545) [REP3-048] explore and advise the application of SCDF materials which are more erosion resistant than the natural beach sediment. This would logically lead to the SCDF retreating at</p>

		<p>the shingle transport corridor and mitigation triggers?</p> <p>(ii) in relation to the funding of the monitoring and mitigation process by the Applicant and the duration for that to process and funding to be in place?</p> <p>(iii) the means of securing and enforcing the CPMMP provisions?</p> <p>(iv) whether this now satisfactorily addresses the details sought of the proposed secondary mitigation in the event that the SCDF-supported sediment pathway across the site frontage is interrupted?</p> <p>(vi) whether any further changes/provisions are required to safeguard the Coralline Crag from avoidable unnatural deterioration?</p>	<p>a slower rate than the adjacent natural beaches, as well as reducing its sediment yield. Retreat of the natural beach would at some point overtake that of the more resilient SCDF. The resulting misalignment in the shoreline could have a similar impact as that of the HCDF, i.e. presenting a blockage to longshore sediment transport.</p> <p>We request that the rationale regarding the interference with longshore transport be amended to include the potential impacts of a misaligned shoreline; for example, to:</p> <p><i>Maintain a continuous shingle beach to avoid or minimise the impacts of an exposed HCDF and/or misalignment between the SCDF and the natural shoreline (blockage potentials) to longshore shingle transport and downdrift erosion.</i></p> <p>Both the scope of monitoring and the setting of mitigation triggers will need to be reviewed and extended as necessary to meet any additional demands arising from the prospect of misaligned shorelines. Outside of the formal process, ESC has asked the Applicant to provide more substantiated details of the impacts of a misaligned shoreline (also known as recessed shores) on the natural longshore transport, being a precursor to the establishment of Triggers and appropriate mitigations.</p> <p>B. The CPMMP describes several data gathering/monitoring techniques, saying that the advantages of each of these methods and recommendations for their applications under</p>
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			<p>the CPMMP remain under review, but will be finalised for approval prior to the commencement of construction of the HCDF/SCDF by ESC and the MMO following consultation with the MTF.</p> <p>ESC's concern is with timing; i.e. the methods should be in place and operating sufficiently in advance of construction in order to capture baseline conditions ahead of the coast being affected by the construction works.</p> <p>C. The CPMMP states: The mitigation is warranted because, if no intervention is undertaken, shoreline recession is likely to expose the HCDF within the timeframe of 2053 – 2087 (i.e., within the Sizewell C operational phase). Avoiding an exposed HCDF prevents dividing the otherwise continuous shingle beach in two and partially or fully blocking the longshore shingle transport corridor.</p> <p>ESC's concern is that the Applicant confines its scope of mitigation to a singular impact, that being exposure of the HCDF; whereas, and as alluded to elsewhere, there are other conditions that could jeopardise the continuity of longshore shingle transport.</p> <p>Confirmation from the Applicant is sought, that mitigation will be provided for all with-scheme related impacts on the natural sediment transport regime, be they due to adverse misalignment of the shoreline, exposure of the HCDF, or any other negative conditions thus arising (e.g. shore disturbance,</p>
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			<p>should it be necessary to deepen the HCDF toe, at some point, or for adaptive design).</p> <p>(ii) It is understood that under the terms of the DCO the costs of administering and delivering all aspects of the monitoring and mitigation process will be paid for entirely by the Applicant. Also, that the monitoring and mitigation process will continue while the development has potential to cause significant negative effects on coastal processes, unless and until amended by a future Cessation study. Any recommendations to reduce the scope of or cease monitoring and mitigation will require agreement of the Approval authorities. The only possible exception to this is in regards to the Thorpeness Village frontage where ESC has challenged the Applicant to include it in the baseline monitoring area. There may be a cost sharing agreement (ESC, the Applicant) created to deliver monitoring over this area. This is presently being explored by ESC for further discussion with the Applicant.</p> <p>(iii) ESC is the joint Approving and Enforcing Authority for implementation of the CPMMP, along with the MMO. ESC's area of jurisdiction is to landward of the MHWS contour, which may move landward over time. ESC has powers to enforce provisions within the CPMMP that are required to protect ESC's interests. ESC is broadly satisfied with this arrangement.</p> <p>(iv) Secondary mitigation methods are described in principle in the CPMMP. A likely mitigation method would be beach</p>
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			<p>recharge for instance. ESC fully appreciates that it is not possible to predict just when any of the given secondary mitigation methods may have to be deployed.</p> <p>However, ESC consider that further analysis needs to be carried out by the Applicant to better gauge the likely future demands, and broad-scale timing as to when secondary mitigation might come into play (Triggers). This concern is heightened by the recent one-dimensional modelling of soft coastal defence feature report (TR544) [REP2-115] and the operational modelling of SCDF report (TR545) [REP3-048] which describe and advocate the application of erosion resistant properties to the SCDF; whilst providing longevity and economy to the SCDF, same measures have the potential to cause recessed shorelines within the natural beaches north and south. See also (i) a. and c. above.</p> <p>(v) n/a</p> <p>(vi) Section 2 of the CPMMP v2 (page 28 of 77) states: <i>'because of its important roles in defining the edge of the coastal sediment cell and bank stability SZC Co. proposes to extend the proposed five-yearly background environmental monitoring of Sizewell – Dunwich Bank (see Section 2.3) to include the Thorpeness Coralline Crag outcrops and ensure that any unexpected natural changes which may affect impact detection are identified.'</i></p>
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			<p>Section 2.3 adds: <i>'A full sandbank and nearshore bathymetry survey would be conducted once every five years as part of the background monitoring.'</i></p> <p>There is no mention of proposed mitigation if the Coralline Crag is found to be deteriorating, but ESC welcomes the inclusion of this important receptor in the monitoring schedule.</p>
CG.2.7	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], reasserts that the HCDF should be removed when no longer required to protect nuclear site infrastructure, and that the default position should be for the HCDF to be removed subject to assessment at the time of decommissioning. The EA's DL5 submission [REP5-148] also says they would welcome a provision made for removal of the HCDF.</p> <p>(i) Please provide an update in relation to the ongoing discussions on this topic and indicate how this would be secured by the draft DCO.</p> <p>(ii) Is the wording of the new requirement proposed by ESC agreed?</p> <p>(iii) In relation to that wording, is the last sentence relating to 'a proposal to be submitted to ESC for approval' sufficiently precise and enforceable?</p>	<p>(i) On e-page 63 (of 76) in [REP5-059] (version 2 of the CPMMP) it states: <i>'SZC Co. has since agreed that the default position will be removal of the HCDF.... Within ten years prior to the end of decommissioning, a Sizewell C Co. monitoring and mitigation cessation report will be submitted to the MMO and ESC (or the equivalent future authorities) for their approval... The cessation report will include an Assessment of the impacts from removal of HCDF at end of decommissioning.'</i></p> <p>ESC welcomes this agreement to remove the HCDF as the default position and in accordance with a future EIA, but would prefer that this commitment is included in the DCO, or at the least the CPMMP expresses the default position as a commitment.</p> <p>(ii) For the Applicant to comment - no such requirement has been included in the DCO to date.</p> <p>(iii). ESC considers the wording to be sufficient for its purposes; if the ExA considers this may need to be assessed</p>

			then it could be covered by the subsequent application for EIA development process set out in regulation 22 of the Infrastructure Planning (EIA) Regulations 2017, since it would be in pursuance of a requirement.
CG.2.8	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], proposes that either Thorpeness village frontage should be included in the area of assessment, or alternatively, the Applicant could provide funding to enable ESC to monitor the Thorpeness frontage. Please provide an update in relation to the ongoing discussion on this topic and, if agreed, indicate how this would be secured by the DCO?</p>	Further to text in 2.6 (ii) above ESC is in discussion with the Applicant to establish, and potentially jointly fund, a separate monitoring plan for Thorpeness that would produce information able to be integrated with the Sizewell C CPMMP outputs. If agreed the CPMMP would need to include provision for inclusion of the data / findings produced by the Thorpeness monitoring plan.
CI.2 Community Issues			
CI.2.0	ESC, SCC	<p>Clarification</p> <p>Within the LIR [REP1-045] on page 399 para 28.26 you refer to CYDS. What is this, it does not appear in the Glossary of Terms?</p>	Young People Taking Action (the CYDS Project) is a youth group in Leiston.
CI.2.1	ESC, SCC	<p>Accommodation Strategy</p> <p>The Applicant in response to the LIR and the concerns raised at ISH4 in respect of the delivery of the accommodation campus and the caravan site at the LEEIE consider that it would not be appropriate to limit worker numbers as a mechanism to ensure timely delivery of the accommodation campus. In [REP3-044] the Applicant sets out their detailed arguments as</p>	(i) ESC notes that in 31.2.9 the Applicant claims that the total amount of accommodation required is never greater than the number of bedspaces which SZC Co. assessed to be the minimum amount of spare capacity available in the 60-minute area. However, we know from the experience at Hinkley Point C in Somerset that works have honey-potted to residential accommodation as close to the construction site as they can. In East Suffolk there is limited private rented accommodation available close to the site. It is therefore

		<p>to why this is considered inappropriate (paras31.2.5 onwards).</p> <p>(i) Do you agree that the assessment of the gap between the availability of project accommodation and the total amount of accommodation required would not exceed the amount of spare capacity available in the 60-minute area?</p> <p>(ii) Are there particular concerns for a smaller geographical area, reflective of the likely greater pressure on accommodation the nearer to the site you are?</p>	<p>likely that any undue delay to provision of the accommodation campus would result in enormous pressure on the private rented sector which is already stretched and only available to working households given the discrepancy in Local Housing Allowance rates and rental value in the area, in closer proximity than 60-minutes to the construction site. ESC do not consider a cap on workers at 7000 (only 900 under the peak workforce) would have a significant impact on the Applicant's ability to deliver the project should the campus be delayed. The campus would have to be significantly delayed beyond its suggested provision by the end of Year 3 of construction for the project to be impacted by this suggested cap.</p> <p>(ii) In ESC there is limited private rented or tourist accommodation available in the towns and villages closest to the site which workers would gravitate in accordance with the Applicant's Gravity Model. Our concern is that landlords may perceive workers as being able to pay more and ESC may find people being displaced by workers in these areas to the large town centres where the demand is already very high. The Housing Fund (details in the Deed of Obligation at this deadline) is designed to build resilience in the locality but is predicated on the campus being in place by the end of Year 3 to absorb a large number of the non-home-based workers to support and mitigate any impact on the more vulnerable cohort seeking housing in the area affected.</p>
CI.2.3	Applicant, E SC, SCC	<p>Accommodation Strategy</p> <p>(i) The Housing Fund it is understood is intended to support the housing market, adding a degree</p>	<p>Implementing the accommodation strategy will comprehensively pre-empt and mitigate predicted impacts on the housing market. We have recently revised, strategic</p>

		<p>of resilience and support the provision of additional capacity. Please explain how this is intended to work from the monitoring of the local housing market through to ensuring that capacity is maintained and the most vulnerable are safeguarded.</p> <p>The ExA have read what has been set out in para 31.2.49 onwards of [REP3-044], but it remains unclear how this would be proactive rather than reactive.</p>	<p>policies that help inform interventions across all areas to be impacted specifically the East Suffolk Council's Homelessness and Rough Sleeping Strategies.</p> <p>The actions within the Accommodation Strategy that the Housing Fund will support, will commence at an early stage, before the full influx of workers. We will at this early stage support the development of affordable housing schemes, provide resources to facilitate downsizing and upsizing of tenant moves and deliver grants for renovation to help create additional bedspaces. The additional staff resources will enable us to work with existing and prospective private landlords to proactively inspect and improve their accommodation to meet good standards, with the potential to introduce an accreditation scheme. This will support improvements for existing vulnerable residents as well as create new accommodation. ESC will offer tenancy support, money advice and debt support and deliver tenancy sustainment support to enable move on or staying put. If we are to protect those most vulnerable from being impacted negatively, including in the more rural areas of the District, we need to commence this activity at an early stage and not wait for the problems to arise. Pressures within the housing markets often have negative effects on those most vulnerable and we are committed to prioritize all the above-mentioned actions within the strategy that will seek to mitigate those negative impacts. We will also make best use of social housing partnerships, the opportunity for action to bring empty homes back into use and the development of HMOs in appropriate locations. We will above all offer</p>
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			<p>support to tenants and in particular vulnerable people in the community, to improve their chances of accessing and remaining in rented accommodation thus preventing homelessness. Regular monitoring of the impact of the workforce on both local housing market and local community will maximise opportunities and mitigate impacts. This will also ensure a legacy of new accommodation and initiatives within which to tackle ongoing housing challenges.</p>
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