



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

Contents

Examining Authority Second Written Questions	3
G.2 General and Cross-Topic Questions.....	3
Ag.2 Agriculture and soils – No Questions for ESC	5
AQ.2 Air Quality	5
AI.3 Alternatives – No Questions for ESC	10
AR.2 Amenity and Recreation.....	10
Bio.2 Biodiversity and ecology, terrestrial and marine.....	11
Part 1 – Matters to be dealt with in writing following ISH7 – wet woodland.....	11
Part 2 – Matters to be dealt with in writing following ISH7 – protected species.....	12
Part 3 - Matters to be dealt with in writing following ISH7 – Designated sites - No Questions for ESC.....	17
Part 4 - Matters to be dealt with in writing following ISH7 – Sabellaria Spinulosa.....	17
Part 5 – matters arising from the Applicant’s replies to ExQs1 [REP2-100].....	17
HRA.2 Habitats Regulations Assessment.....	19
CC.2 Climate change and resilience – No Questions for ESC	19
CA.2 Compulsory acquisition – No Questions for ESC	19
Cu.2 Cumulative impact	19
CG.2 Coastal Geomorphology.....	21
CI.2 Community Issues	29
DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants’ responses to ExQs1 (all para numbers are prefixed DCO.) .	32
FR.2 Flood risk, ground water, surface water.....	33

HW.2 Health and wellbeing	34
HE.2 Historic environment (terrestrial and marine)	35
LI.2 Landscape impact, visual effects and design	36
NV.2 Noise and Vibration	42
R.2 Radiological considerations	47
SA.2 Section 106.....	47
SE.2 Socio-economic	47
TT.2 Traffic and Transport – No Questions for ESC.....	48

Examining Authority Second Written Questions			
ExQs2	Question To:	Question:	East Suffolk Council's (ESC) Response
G.2 General and Cross-Topic Questions			
G.2.14	The Applicant, SCC, ESC	<p>Policy and Need</p> <p>The ExA's ExQ1G 1.12 questioned whether the Planning Statement [APP-590], paragraph 3.9.2, was correct to state that it was appropriate to treat EN-1 and EN-6 as providing the primary policies relevant to the determination of the application. The responses to that ExQ1 from the Applicant, ESC and SCC together with the Applicant's comments on the responses received from ESC and SCC are noted [REP3-046]. In the decision dated 19 February 2021 relating to the application for the Wheelabrator</p>	<p>It is common ground that s105 of the Planning Act 2008 applies to decision-making for this project as Sizewell C will not be developed before the end of 2025.</p> <p>Section 105 requires the following to be taken into account:</p> <ul style="list-style-type: none"> - any local impact report - any prescribed matters - anything else that is considered important and relevant <p>Matters are duly prescribed by the Infrastructure Planning (Decisions) Regulations 2010, as amended, and are (paraphrased):</p>

		<p>Kemsley K3 Generating Station and Wheelabrator Kemsley North Waste-To-Energy Facility Order the Secretary of State for Business, Energy and Industrial Strategy, at paragraph 6.3, states: “As set out above, sections 104 and 105 of the Planning Act 2008 set out the procedures to be followed by the Secretary of State in determining applications for development consent where National Policy Statements have and do not have effect. In both cases, the Secretary of State has to have regard to a range of policy considerations including the relevant National Policy Statements and development plans and local impact reports prepared by local planning authorities in coming to a decision. However, for applications determined under section 104, the primary consideration is the policy set out in the National Policy Statements, while for applications that fall to be determined under section 105, it is local policies which are specifically referenced although the National Policy Statements can be taken into account as ‘important and relevant considerations’.” It is recognised that there are obvious differences on the facts between that particular case and the Sizewell C Project application. Nevertheless, further comments are sought on the principle of the approach to the primacy of policy in a s105</p>	<ul style="list-style-type: none"> - the effect on listed buildings, conservation areas and scheduled ancient monument - the effect on navigation, the marine environment and legitimate uses of the sea - the effect on biological diversity <p>Thus, five areas are specifically mentioned, together with any other matters that are considered to be important and relevant. Local policies are not specifically mentioned in s105 albeit ESC considers them to be important and relevant matters for the decision-maker to take into account.</p> <p>East Suffolk Council and Suffolk County Council have submitted an extensive joint local impact report [REP1-044]-[REP1-101] Main LIR doc: [REP1-045]. The summary of the report (pages 475-528 of [REP1-045]) focuses almost exclusively on impacts and mitigation, with some discussion of Local Plan policies to assist the ExA and Secretary of State. ESC has not identified any conflict between relevant policies in EN-1 / EN-6 and the Local Plan. However, in the event of any conflict, ESC accepts that the policies in the NPSs should prevail. .</p>
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		case, as expressed by the Secretary of State in that decision.	
Ag.2 Agriculture and soils – No Questions for ESC			
AQ.2 Air Quality			
AQ.2.1	SCC, ESC	<p>Electric Charging Points</p> <p>(i) What policies do SCC and ESC rely upon to encourage or require electric charging point provision?</p> <p>(ii) Is the number currently proposed policy compliant?</p>	<p>I) Suffolk County Council have an electric vehicle charging guidance in place for parking at residential and non-residential developments in section 3.4.2 of the Suffolk Guidance for Parking (SGfP)[3]. The guidance considers that ‘Local planning authorities will take into account this technical guidance in their planning decisions; as such it will be a material document in planning considerations’.</p> <p>ii) In the response to ISH3 (REP5-174 SCC made the following comment:</p> <p>SCC is working with the applicant to confirm an appropriate provision of cycle parking, motorcycle parking and electric vehicle charging provision as per our Deadline 3 response. CWTP 4.7.15: EV Charging guidance for Park and Ride and FMF sites is considered to be closest to B1 Business and B2 General Industrial uses in the Suffolk Guidance for Parking. This requires 20% of all spaces to be fitted with a charging system, with an additional 20% of parking spaces with the infrastructure in place for future connectivity. This should be increased to 25% fitted spaces and 25% future connectivity for the site accommodation campus (i.e. C1 Hotel use). In the CTWP REP2-055 the Applicant is only proposing 5% of the spaces to have charging points and a further 5% to have passive electric vehicle provision. Therefore, the measures</p>

			<p>proposed by Sizewell C do not comply with the SCC Parking Guidance.</p> <p>The Applicant has since committed to increase this provision to 20% but this matter is still under discussion and is not yet formalised.</p> <p>[3] https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf</p>
AQ.2.2	Applicant, E SC, SCC	<p>Air Quality Management Areas (AQMAs)</p> <p>There does not yet appear to be an agreed position in respect of the likely effects in terms of emissions from construction traffic on the air quality standards within the two AQMAs at Woodbridge and Stratford St Andrew.</p> <p>(i) Please advise the ExA of the latest position and what controls may be put in place to ensure the air quality in both areas is maintained at suitable levels throughout the construction programme.</p> <p>(ii) The ExA understand a commitment has been made by Scottish Power to limit the number or proportion of HGVs which do not meet the highest emissions standards. If this is correct, in light of the higher number of vehicles associated with this development is it not reasonable to expect a similar restriction for this development,</p>	<p>Answer to question (i)</p> <p>ESC's and SCC's joint LIR [REP1-045] highlighted in paragraph 19.1, that a suitable cap on non-Euro VI HGVs will avoid significant impacts in the Stratford St Andrew AQMA. However, concerns were also noted in section 19.30 in the LIR regarding the monitoring and mitigation strategy, in the event of non-compliance with the 8% cap.</p> <p>The Applicant subsequently submitted an updated Code of Construction Practice (CoCP) at Deadline 5 [REP5-078] which included:</p> <p>A commitment to a cap of 8% non-Euro VI HDVs.</p> <p>Where a vehicle cannot meet Euro VI requirements, it will achieve Euro V standards. If HDVs cannot meet Euro V standards, justification for exemption should be provided with information on how emissions will be mitigated.</p> <p>That HDVs will be monitored and reported through the Transport Review Group (TRG).</p> <p>ESC consider the Euro Standard controls and management satisfactory to minimise and mitigate the risk of exceedances</p>

		<p>or an even higher standard in light of the higher numbers of vehicles?</p> <p>(iii) In the event a commitment is made to ensure a proportion of the 'cleanest' vehicles is made, how would this be secured, monitored, and managed throughout the construction programme?</p>	<p>of air quality standards from HDVs in the Stratford St Andrew AQMA.</p> <p>As such, ESC no longer has concerns regarding potential air quality impacts within the Woodbridge AQMA. Air quality monitoring in the Woodbridge AQMA will be retained. Any concerns regarding non-compliance with air quality standards will be discussed and managed in the Environmental Review Group (ERG).</p> <p>Answer to question (ii)</p> <p>The commitment to 92% of total annual HDVs being Euro VI standard is consistent with, and in some respects exceeds, the commitment agreed with Scottish Power Renewables.</p> <p>Answer to question (iii)</p> <p>This commitment has been made by Sizewell C in the CoCP submitted at Deadline 5. This specifies the required Euro Standards for HDVs, which will be monitored through a vehicle registration scheme.</p> <p>Performance against this specification will be managed through the TRG. If any performance issues should be identified, additional mitigation requirements will be agreed and monitored by the TRG.</p>
AQ.2.3	Applicant, E SC	<p>Non-Mobile plant</p> <p>(i) It is noted from the evidence submitted that discussions are ongoing about the proportion of non-mobile plant that may be prescribed to be at the highest emissions standards. Is there an agreed position as to the standard that needs to</p>	<p>If this refers to Non-Road Mobile Plant:</p> <p>Answer to question (i)</p> <p>The agreed minimum NRMM standard is Stage IV and the % cap on non-stage IV is 15% per annum, as detailed within the CoCP submitted at Deadline 5.</p> <p>Answer to question (ii)</p> <p>The position is agreed between ESC and the Applicant.</p>

		<p>be achieved or the proportion of equipment this should apply to?</p> <p>(ii) If the position is not agreed can each party clearly set out their bottom line as to the standard they consider should be achieved and why?</p> <p>(iii) Is it expected these standards would apply across the whole development, or are different standards expected at the different sites?</p>	<p>Answer to question (iii) It is expected that these standards will be applied at the main and associated development sites.</p> <p>If this refers to non-mobile plant (i.e. generators): Smaller capacity generator plant will be classed as NRMM. Larger capacity plant would be regulated by the EA, and it is not for ESC to set requirements on emissions standards for this plant.</p>
AQ.2.4	Applicant, ESC, SCC	<p>CoCP As currently drafted, there is an exemption for 'community/local suppliers' in the standard of vehicle that may be allowed.</p> <p>(i) How is the community/local supplier defined?</p> <p>(ii) Do the mechanisms for monitoring ensure that these operators can be clearly identified?</p> <p>(iii) In seeking to support local suppliers in this way can the air quality standards that need to be achieved still be met?</p>	<p>Questions i) and ii) are for the Applicant/SCC to respond.</p> <p>iii) ESC understands that there is an aspiration that local suppliers will seek to comply with the requirement to use Euro VI HDV. If this is not possible the vehicles would fall into the 8% non-Euro VI allowance and as such will not affect the predicted impacts on air quality.</p>
AQ.2.5	Applicant, ESC	<p>CoCP Non-Road Mobile Machinery (NRMM) (i) Does an annual basis for calculating the 15% of NRMM which could be non-Stage IV plant achieve a suitable degree of control? Will this for example be a rolling twelve-month period or annually by a specific date?</p>	<p>Answer to question (i) ESC considers that the 15% cap on annual NRMM with a less stringent standard than stage IV is satisfactory. The Applicant should confirm whether this is annual or rolling, although ESC considers that either would be acceptable.</p> <p>There are concerns regarding the placement of NRMM relative to human health and ecological receptors, and the</p>

		<p>(ii) If a high proportion of non-stage IV plant was used during a particular period how would this knock on to construction for the rest of the reporting period if limited amounts of Stage IV plant were available?</p> <p>(iii) In the event the 15% could not be reached what would be the consequence?</p>	<p>placement of NO₂ monitoring locations to capture NRMM air quality impacts. However, it is expected that this risk can be managed, provided suitable detail is provided in the dust monitoring and management plan (DMMP) that the Applicant has committed to, which will require agreement and sign-off by ESC.</p> <p>Answer to question (ii) This question is to be addressed by the Applicant.</p> <p>Answer to question (iii) In this event, there would be a risk of potentially significant adverse impacts at human health and/or ecological receptors. Such risks could potentially be managed, for example by increasing the separation between non-compliant NRMM and receptors. Baseline or operational phase air quality monitoring data may also be useful to inform the assessment of these risks. Any departure from the 15% commitment would need to be fully assessed to ensure that significant impacts would not arise, and this would need to be agreed by ESC and potentially other stakeholders (e.g. Natural England). If significant impacts due to NRMM emissions cannot be avoided, there would ultimately be a risk that construction activities using this plant would need to be temporarily halted. ESC anticipates that any such non-compliance and further assessment would be reported to and managed by the Environment Review Group.</p>
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AI.3 Alternatives – No Questions for ESC			
AR.2 Amenity and Recreation			
AR.2.2	Applicant, E SC, SCC	<p>Leiston Sports Facilities</p> <p>Within the Deed of Obligation [REP5-083] page 60 para 2.2.6 reads “If all requisite consents for the Leiston Sports Facilities cannot be obtained, East Suffolk Council shall repay the remainder of the Sports Facilities Works Contribution to SZC Co and enter into discussions in good faith about the appropriate provision of alternative facilities.”</p> <p>(i) What additional consents are required? (ii) In the event they are not granted how would the recreational provision be provided? (iii) The wording suggests there remains some doubt as to the provision of the facility, yet it has been included as primary mitigation in the ES assessment [Section 15.5 APP-267]. Please clarify the situation</p>	<p>These questions are primarily for the Applicant to respond to but from ESC perspective and understanding.</p> <p>(i) additional consents will be required from Alde Valley Academy and SCC as lessee and leaseholder of the land for the 3G pitch. ESC will need to obtain authorisation from ESC Cabinet to enter into a contract with SZC Co. and our leisure contract partners to build the facilities should they be consented in the DCO.</p> <p>(ii) ESC is not aware of any alternative available should these facilities not be provided in this location by ESC under contract to SZC Co.</p> <p>(iii) ESC is confident that the facilities will be able to be provided as proposed, Alde Valley Academy and SCC have been very supportive and encouraging to date.</p>
AR.2.3	Applicant, E SC, SCC	<p>Public Sector Equality Duty</p> <p>In response to FWQ AR1.27 ESC identified that concerns remained over whether all potential impacts had been properly identified for people with protected characteristics and consequently whether mitigation appropriate to those individuals/groups had been identified. Additionally, SCC did not consider there had been a comprehensive assessment in relation to community safety or community cohesion.</p>	<p>(i) There have been further positive discussions with SCC as local highway authority and the Applicant on the potential for additional crossings on the A12, B1122 and B1125, which was the particular area of concern raised by ESC in our response to FWQ AR1.27.</p> <p>(ii) ESC has had positive discussions with the Applicant regarding Public Services Resilience Funding to ESC in regards to community safety aspects. The detail of this will be in the Deed of Obligation submitted at this Deadline by</p>

		<p>(i) Can each party please provide an update on your positions to inform the ExA as to the suitability of the assessments, the conclusions reached, and the mitigation offered.</p> <p>(ii) Please advise on the latest positions in the discussions on the establishment of the Public Service Resilience Fund and Community Funds and whether these now have elements within them to address the concerns identified for people with protected characteristics?</p>	<p>the Applicant. ESC is satisfied that with this funding, residual possible impacts to persons of protected characteristics can be addressed and mitigated for.</p>
Bio.2 Biodiversity and ecology, terrestrial and marine			
Part 1 – Matters to be dealt with in writing following ISH7 – wet woodland			
Bio.2.1	Natural England, ESC, SCC	<p>Please will Natural England, ESC and SCC set out their views on (a) the need and reasons for wet woodland compensation and (b) any concerns they have over establishing wet woodland</p>	<p>(a) ESC considers that wet woodland compensation is required as, although this habitat is not specifically referred to in the citation for the Sizewell Marshes SSSI, it is one of the habitats which supports the wide range of invertebrate taxa which is part of the reason for the designation of the site.</p> <p>Wet woodland is also a UK Priority habitat, under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), and therefore its loss should be compensated.</p> <p>(b) ESC does not have any specific concerns over the actual process of establishing wet woodland. However, as set out in our responses at Deadline 2 [REP2-173] and Deadline 5 [REP5-145], we are concerned about both the time between the loss of wet woodland from the SSSI and the creation of replacement wet woodland, and the geographical separation</p>

			<p>of the proposed compensation sites (except for the one on the Sizewell Estate) and the area to be lost.</p> <p>With regard to the point on timings, we are particularly concerned that proposed compensation on the Sizewell Estate cannot begin until after the construction of the power station has finished, as the area is needed for marsh harrier compensation. This will mean that a period of at least several decades will elapse between the habitat being lost and replacement wet woodland being established at the closest compensation site. This will mean that there is no opportunity for species from the SSSI reliant on wet woodland to colonise the new habitat before the existing is lost. ESC considers that compensation should be provided through the Natural Environment Fund, the quantum of which is anticipated to be agreed following sight of the draft Deed of Obligation which is to be submitted at this Deadline 7.</p> <p>With regard to geographical location, with the exception of the proposed site in the northern part of the Sizewell Estate, the other proposed compensation sites are located a considerable distance from the SSSI area to be lost. This will mean that there is no opportunity for the natural colonisation of the new habitats by species (particularly invertebrates) from the Sizewell Marshes SSSI.</p>
Part 2 – Matters to be dealt with in writing following ISH7 – protected species			
Bio.2.5	ESC	Please will ESC explain its concern about roost loss and comparison with the total roost	ESC's concern about roost loss and comparison with the total roost resource on the wider Sizewell Estate is that the overall roost resource on the wider Sizewell Estate has never been

		resource on the wider Sizewell Estate – see para 8.5.2 of the LIR [REP1-045]	<p>fully surveyed. Due to this, ESC do not consider that it is possible for the Applicant to assert that the loss of the roost resource proposed is Not Significant based on the wider retained resource.</p> <p>Whilst the Applicant’s statement in [REP3-044] that conifer plantations such as Goose Hill “offer limited roosting resource” is not disputed, as there is much similar habitat on the Sizewell Estate (for example at Kenton Hills) and also much semi-mature woodland which offers very limited bat roosting opportunities (such as on the Northern Mound), a simple comparison of woodland type lost vs woodland type retained does not provide a subtle enough assessment of the degree of significance of lost roosting resource.</p> <p>However, notwithstanding the above, the Council acknowledge that as part of the Natural England licensing process a quantity of replacement bat roosting opportunities will be set (including both the erection of bat boxes and also other features suitable for roosting bats along with the potential early-veteranisation of existing trees on the Estate). Subject to quantity (understood to currently be between 1:1 and 3:1 dependent on the roost features to be lost), type and installation locations proposed, ESC considers that level of impact assessed in the Environmental Statement may be achievable.</p>
Bio.2.6	Applicant, Natural England, ESC	The attention of the Applicant, Natural England and ESC is drawn to the ExA’s comments in the commentary on the DCO (issued on the same day as ExQs2) to its observations	ESC notes the ExA’s observations on the drafting of the Bat Mitigation Strategy [APP-252] in Appendix A of the commentary on the draft Development Consent Order (dDCO). To assist the Examination, ESC would welcome a

		<p>on the drafting of the Bat Mitigation Strategy [APP-252]</p>	<p>detailed analysis of the full suite of control documents as presented in Appendix A of the Applicant's Written Submissions arising from ISH1 document [REP5-113].</p> <p>It is considered that this analysis for each level 1 document should set out:</p> <ul style="list-style-type: none"> a. Whether it has been issued (and examination library reference, link and current revision) b. Whether it is a certified document c. Whether it is correctly defined in the DCO d. Whether the DCO requires it to be produced e. Whether the DCO requires it to be complied with f. Whether the document itself actually contains mitigation g. Whether the document (or mitigation) can differ from the certified version <p>For each level 2 document it should set out:</p> <ul style="list-style-type: none"> a. Whether an outline version has been issued (with reference, link and revision) b. Whether the level 1 document requires it to be produced c. Whether the final version must be in accordance with the outline (or other wording) d. Whether the level 1 document requires it to be complied with e. Whether the document itself actually contains mitigation
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			<p>f. Whether the document (or mitigation) can differ from the outline version</p> <p>In terms of specific questions raised by the ExA in relation to the Bat Mitigation Strategy, ESC offers the following comments on the questions posed in the Appendix:</p> <p>Q1 – No ESC comment, question to the Applicant</p> <p>Q2 – ESC agrees with the ExA comment that consent requirements should not cause unnecessary or undue delays to the construction process, as the Applicant claims. It is a common practice for major projects, and other developments more generally, to build into their program appropriate timescales allowing sufficient time to seek consent in advance of the relevant works to avoid unnecessary construction delays.</p> <p>Q3 – No ESC comment, question to the Applicant.</p> <p>Q4 – No ESC comment, question to the Applicant.</p> <p>Q5 – Question to the Applicant, however ESC believes that this should refer to Figure 14C1A.1 rather than Figure 14C1.1.</p> <p>Q6 – Question to the Applicant, however ESC’s understanding is that these titles refer to the same document.</p>
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			<p>Q7 – Whilst it is acknowledged that the final ratios are for Natural England to agree, ESC agree with the ExA that they should be defined now.</p> <p>Q8 – Question to the Applicant. ESC would welcome clarification on this. It appears that at least some of the ratios quoted have now been superseded by later information provided by the Applicant. For example, [REP3-044] states that “Appropriate replacement ratios for mitigation potential roost features will be agreed with a minimum of 1:1 replacement, with up to 3:1 replacement for high potential roost features.”</p> <p>Q9 – The observation by the ExA is a concern shared by ESC and is something that must be resolved, as it essential that implementation of all necessary mitigation measures is adequately secured. In relation to bats, as set out in our Deadline 5 submission [REP5-138] we are particularly concerned that the proposed ‘dark corridors’ for bat connectivity across the Temporary Construction Area (TCA) whilst referenced at multiple points in examination documentation, are not secured in the draft DCO.</p> <p>Q10 – No ESC comment, question to the Applicant.</p>
Bio.2.7	Applicant, E SC	In relation to bat roosts at Goose Hill, there is a dispute between the Applicant and ESC; ESC maintains that the ES and the Updated Bat Impact Assessment [AS-208] contradict each other (see LIR para 8.53). There is considerable	<p>At Deadline 3 the Applicant provided their 2021 survey results for trees with bat roost potential on the Main Development Site [REP3-035]. ESC provided comments on this report in our Deadline 5 submission [REP5-138]. Since</p>

		<p>detail about tree counts. What progress is there on resolving this?</p>	<p>these submissions the Applicant and ESC have continued to engage on this matter.</p> <p>Whilst ESC maintains that contradiction does exist between the ES and the Updated Bat Impact Assessment (possibly due to the evolution of information between the preparation of the two documents), we also note that the 2021 survey report provides additional information in relation to the numbers of bat roost features in Goose Hill and that additional mitigation measures are to be proposed as part of the Natural England licence (please see our answer to question Bio.2.5 above in relation to this). Notwithstanding our comments on the 2021 survey report submitted in [REP5-138] (which are primarily related to concerns about surveying of trees in other parts of the MDS), it appears likely that the 2021 survey report provides a reasonably accurate assessment of the trees with bat roost potential in Goose Hill.</p>
Part 3 - Matters to be dealt with in writing following ISH7 – Designated sites - No Questions for ESC			
Part 4 - Matters to be dealt with in writing following ISH7 – Sabellaria Spinulosa			
Part 5 – matters arising from the Applicant’s replies to ExQs1 [REP2-100]			
Bio.2.19	Applicant, ESC	<p>Bio.1.78. (a) The Applicant states that the mitigation or enhancements for associated development on sites on third party land are to be secured in the Deed of Obligation. Why are they not in the DCO?</p> <p>(b) For measures on the main development site the measures “would remain within EDF Energy ownership and control”. “EDF Energy”, an undefined entity in the response, is neither the</p>	<p>ESC notes the limited land that is currently owned by the Applicant (although we understand the group of companies of which the Applicant is part owns the main site). The Applicant is yet to provide ESC with any title to the order land or any details for the proposed structure of land acquisition for the order land.</p> <p>ESC’s general position in relation to the mitigation for associated development on sites on third party land is that,</p>

		<p>proposed undertaker nor the Applicant. However, if all the measures are secured pursuant to requirements, which the ExA understands from the preceding parts of the Applicant's response is the case, it will be for the undertaker to ensure that it has the necessary rights to carry out the mitigation on the land of "EDF Energy", or any other landowner. Please will the Applicant and ESC confirm that this is also their understanding and will ESC please state whether or not it considers the arrangements to be acceptable and enforceable.</p> <p>(c) There are many references in the ES to the use of the EDF Energy Estate to deliver mitigation. Given that the Applicant (and would-be undertaker) has clarified that it owns very little land for the development, how does it propose to deliver the mitigation on the EDF Energy Estate?</p>	<p>where possible, this should be secured in the DCO and it is the undertaker's responsibility to ensure that it has the necessary rights to carry out the mitigation on the land, regardless of who owns it.</p> <p>ESC is open to consideration of binding the undertaker rather than the landowner/prospective landowner in respect of the commitments proposed to be included in the Deed of Obligation, so long as such a vehicle is no less effective and has no fewer remedies than the conventional vehicle provided under section 106. We have set out at [REP3-061] and [REP5-139] what ESC would require (as a minimum) for the dDCO and/or Deed of Obligation (as appropriate) to provide, for such arrangement to be acceptable and enforceable.</p>
Bio.2.25	Applicant, E SC, SCC	<p>Bio.1.145 - The draft non-licensable method statement is referred to. Attention is drawn to the ExA's comments on this in commentary on the DCO issued with these ExQs2.</p>	<p>ESC notes the ExA's comments on the confusion over the naming and referencing of the documents referred to in the Bat Mitigation Strategy at [APP-252] which, according to the Applicant, should be read alongside the strategy. ESC agrees that the references need to be clarified by the Applicant and that consistent document naming is required to ensure that all parties understand which documents are being referred to.</p>

HRA.2 Habitats Regulations Assessment			
HRA.2.5	Natural Engl and RSPB and Suffolk Wildlife Tru st East Suffolk Council	<p>Mitigation for recreational pressure - Minsmere Monitoring and Mitigation Plan (MMP) [REP5-105] and Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites [REP5-122]</p> <p>Could you comment on the latest mitigation package in respect to Minsmere and recreational pressure, as provided by the Applicant at Deadline 2 and updated at Deadline 5 [REP5-105]. Does this satisfy your concerns with regards to the stated need for additional strategic off-site measures to mitigate for recreational pressure? Could you also comment on the MMP for Sandlings (Central) and Alde, Ore and Butley Estuaries, which has also been submitted at Deadline 5 [REP5-122].</p>	<p>ESC has provided comments in our submission at Deadline 6 (REP6-032, p.91) where we state in respect of [REP5-105]: As set out in our Deadline 3 submission [REP3-062], as this plan is for mitigating impacts on European designated sites, ESC primarily defers detailed comment to Natural England (as the statutory nature conservation organisation) and those organisations with responsibility for managing the sites (particularly the RSPB, National Trust and Forestry England). However, ESC welcomes the amendments to the plan made following our comments at Deadline 3.</p> <p>[REP5-122]: As this plan is for mitigating impacts on European designated sites, ESC defers detailed comment to Natural England (as the statutory nature conservation organisation) and those organisations with responsibility for managing the sites (particularly the RSPB, National Trust, Suffolk Wildlife Trust and Forestry England).</p>
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 Applica nt, 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 agreement has been reached and set out the</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 assessment from a noise and air quality perspective) and the</p>

		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.	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.
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>(ii) The DL3 response by FERN draws attention to the potential for cumulative impacts upon</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>

		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.	
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>	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.
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</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

		<p>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>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 qualitative terms, reasons why not to use a steeper slope / concrete armour, but these reasons are not substantiated or demonstrated formally.</p>
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			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.
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>	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.
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 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>(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 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</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>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 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>
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			<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, 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</p>
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			<p>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 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>
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			<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> <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</p>
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			the inclusion of this important receptor in the monitoring schedule.
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 to 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 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.</p>
CG.2.8	The Applicant, ESC	<p>Impacts on coastal processes</p>	Further to text in 2.6 (ii) above ESC is in discussion with the Applicant to establish, and potentially jointly fund, a separate

		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?	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	Clarification 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?	Young People Taking Action (the CYDS Project) is a youth group in Leiston.
CI.2.1	ESC, SCC	Accommodation Strategy 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 to why this is considered inappropriate (paras 31.2.5 onwards). (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	(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 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

		<p>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>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 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>Implementing the accommodation strategy will comprehensively pre-empt and mitigate predicted impacts on the housing market. We have recently revised, strategic 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</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>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 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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DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants’ responses to ExQs1 (all para numbers are prefixed DCO.)			
DCO.2.0	The Applicant, ESC, SCC, Natural England, MMO	Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation	ESC has provided commentary on this in our submission at D7: ESC comments on Deadline 6 submissions.
DCO.2.6	Applicant, ESC, SCC	1.54 Please update the ExA on the position. In particular what are the views of the councils on fees?	<p>The Applicant’s response to DCO1.54 is noted and welcomed. However, ESC would remind the Applicant that it has been agreed that on any Requirement to be discharged by ESC as lead authority, SCC will be consulted and vice versa. There is therefore no Requirement that would not involve consultation with another body.</p> <p>ESC understands that the draft Deed of Obligation to be submitted by the Applicant at D7 will acknowledge fees will be paid to ESC for the consideration of the discharging of Requirements.</p>
DCO.2.9	Applicant, E SC	1.75–The ExA will consider this response further and in the light of ISH1	ESC welcome the ExA considering this further.
DCO.2.10	Applicant, ESC	1.97 – what is the position if notice of end is not given?	ESC welcome the Applicant’s response to this question.
DCO.2.14	Applicant, ESC	1.128 –“In the Applicant's view, the proposed Natural Environment Improvement Fund in its final form is likely to meet the policy tests for obligations set out in National Policy Statement”. “Likely” sounds rather tentative.	The draft Deed of Obligation to be submitted at Deadline 7 has, at Schedule 11, the proposed Natural Environment Fund proposals set out. ESC considers that the submitted version complies with the policy tests for obligations in that they are necessary, directly related to impacts arising from the development and are fairly related in scale to the development as a whole.

DCO.2.15	Applicant, ESC	(i) Please include the TEMMPP in the documents to be certified by the SofS. (ii) There are some concerns about including the entire ES as one certified document given its size. Evidence of that is the length of the ES Signposting Document [REP2-025] at 108 pages. Should it be broken down in the certification provisions?(iii) Additionally, given its complexity, the ExA would welcome views from the Applicant, ESC and SCC on the inclusion and certification of a guide if a suitable document exists in the examination documentation.	ESC agrees with the concerns raised by the ExA particularly regarding the length of the ES if it is to be included as a certified document. ESC would welcome provision by the Applicant of a schedule of certified documents to serve as a guide.
FR.2 Flood risk, ground water, surface water			
FR.2.10	Suffolk County Council, Environment Agency, East Suffolk Internal Drainage Board, East Suffolk Council	Ancillary Construction Area (ACA) (or LEEIE) Drainage Strategy Technical Note. Appendix B [REP5-120] sets out the drainage design for the ACA. Provide any comments you have in relation to the strategy set out in this document.	ESC defers to the Environment Agency, the East Suffolk Internal Drainage Board, and Suffolk County Council as Lead Local Flood Authority to provide detailed response to this Appendix. There have been previous concerns with regards to the strategy proposed for this site which lies to the north of an area of Leiston prone to surface water flooding (subject to its own Leiston Surface Water Management Plan led by SCC working with Anglian Water, Environment Agency, and the IDB as well as local stakeholders). The Strategy acknowledges the limitations with the site from an infiltration perspective which is welcomed. However, we need to be satisfied that the storage required prior to discharge to watercourse is adequate and that discharge to watercourse, in particular if to the Sizewell Marshes SSSI, does not have an adverse impact on biodiversity. To avoid an impact on biodiversity any discharge should be at a rate no greater than the existing greenfield runoff rate and it is essential that the quality of any water being discharged is no worse than that currently in the accepting

			<p>watercourse. The design of the drainage system should include the mechanisms to adequately capture and remove any pollutants, control discharge rates and monitor both the water quality and the rate of water discharge to confirm that these are within acceptable thresholds. The drainage strategy should also document what the thresholds for discharge are and what the relevant pollutant parameters are to allow for transparent monitoring and reporting.</p>
HW.2 Health and wellbeing			
HW.2.2	Applicant, ESC, SCC	<p>Dust Monitoring and Particulate Matter</p> <p>(i) In light of the advice from Public Health England in responses to FWQ AQ.1.35 and AQ.1.42 can you confirm that the Dust Management Plans will 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.</p>	<p>ESC considers that the information provided with regard to Dust Management Plans does not yet provide sufficient information to confirm satisfactory control of dust and airborne particulate matter.</p> <p>The Applicant's outline dust management plan only provides a series of suggested control measures for specific construction activities to minimise dust emissions. ESC has asked the Applicant for more detail on the location of construction activities, mitigation measures and proposed air quality monitoring locations. The Applicant has committed to submitting a dust monitoring and management plan (DMMP) and flow chart to show the relationship of the different dust management documentation. Following receipt ESC will confirm whether the DMMP contains sufficient information to enable effective inspection and control of dust impacts.</p> <p>Once the monitoring locations are agreed through the DMMP, these will be discussed within the Environmental Review Group (ERG). The Applicant has already committed to the ERG, which ESC will form part of. One purpose of this group is to discuss air quality monitoring results, with a minimum</p>

			meeting frequency of 6 months. This is considered satisfactory for review of progress against annual mean particulate concentrations (dust, PM ₁₀ and NO ₂). In addition, alert levels will be set to address concerns regarding short term dust, PM ₁₀ and on-site NO ₂ air quality standards. In the event that air quality alert levels are breached, short notice meetings would need to be held to discuss additional mitigation required.
HE.2 Historic environment (terrestrial and marine)			
HE.2.0	ESC, SCC, Historic England	MDS: Requirement 3: Archaeology and Peat Noting discussions at ISH1 on 6 July 2021 and the subsequent submission by the Applicant [REP5-106], are you content with the inclusion of the term 'general accordance' in Requirement 3 [REP5-029]?	As this question is specific in relation to requirement 3 which is archaeology specific, ESC defer to Suffolk County Council as the responsible authority for archaeology.
HE.2.8	SCC, ESC	Sizewell Link Road: Hill Farmhouse Noting the response made at [REP3-044], do you concur that in respect of the historic interest the construction and operation of the SLR would result in a minor adverse effect which would not be significant?	Please note that the Hill Farmhouse that should be referred to here is the one that falls within the parish of Farnham and is affected by the Two Village Bypass and not the Sizewell Link Road, as stated in the question. We have reviewed the response made by the Applicant at [REP3-044] and we concur with the Applicant's conclusion that in respect of the historic interest of the Grade II listed Hill Farmhouse, Farnham, the construction and operation of the Two Village Bypass would result in a minor adverse effect which would not be significant.
HE.2.10	The Applicant, SCC, ESC, Historic England	Enhancement to Proposed Mitigation Schemes Please provide an update on discussions regarding potential enhancement of mitigation schemes for the below assets:	ESC can confirm that officers have participated in one meeting with the Applicant that included District and County Council colleagues (landscape, ecology and environmental protection) in respect of a general discussion on mitigation proposals that consist of landscaping in relation

		(i) Theberton Hall (ii) Abbey Cottage (iii) Farnham Hall (iv) Hill Farmhouse (v) Barrow Cemetery Group (FMF site)	<p>to: Theberton Hall, Farnham Hall and Hill Farmhouse (Middleton, not Farnham). There have been no discussions in respect of Abbey Cottage. The Barrow Cemetery Group (Freight Management Facility) is under the consideration of County Archaeology colleagues and not ESC. Historic England was not a party to the meeting.</p> <p>The meeting was an initial scoping meeting only, with the potential for further meetings in the future to address specific technical issues arising from land ownership, future management, associated costs, maintenance liabilities in the long term, and the provision of technical drawings and information. The actual design of the mitigation was not discussed.</p>
LI.2 Landscape impact, visual effects and design			
LI.2.1	SCC, ESC, Natural England, The AONB Partnership, National Trust, Stop Sizewell C, TASC	Additional Construction Visualisations Additional illustrative day and night-time construction photomontage visualisations are to be produced from four Representative Viewpoints [REP5-117]. Please comment on the suitability of the selected locations.	ESC considers that the additional nominated (REP5-117) illustrative day and night-time construction photomontage visualisation viewpoints are suitable for the purpose of giving an understanding of peak construction activity from a range of contrasting aspects and with important public accessibility.
LI.2.3	The Applicant, SCC, ESC	Design Review Panel Please provide an update regarding discussions on the proposed role of a design review panel.	ESC has provided the Applicant with further detail on the existing RIBA Suffolk Design Review Panel and how it operates.
LI.2.4	ESC, SCC	Design Review Panel	

		Paragraph 1.4.18 of [REP5-110] confirms that the design review panel would be used to provide independent support for the processing of design submissions defined by the requirements. Are you content with the proposed timing of the role?	ESC is in discussion with the Applicant regarding the appropriate timing of a Review Panel and the specific building design that it would relate to as it will only be utilised in relation to buildings that are design critical (prominent) and non-nuclear specific. It is anticipated the Review Panel would be instigated primarily in relation to the turbine halls and operational service centre. It is accepted that this would form part of the discharge of requirements phase post-decision.
LI.2.7	ESC, SCC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	SSSI Crossing – Design Amendment Please review the amended SSSI crossing design [REP5-010] and provide comment.	<p>ESC has reviewed and noted the revised design for the SSSI crossing [REP5-010]. In respect of landscape related issues only, the revised designs are considered acceptable subject to submission of planting details for the embankments which can be dealt with at discharge of requirements stage. The previously submitted indicative landscape strategy plan for the embankments has been agreed as acceptable.</p> <p>In relation to ecology related issues, for the construction phase whilst the increase in the height between the base of the bridge deck and the ground to between approximately 6.1m and 6.8m is welcomed, it is noted that the design of the crossing includes a drainage pipe on the eastern side which lowers the crossing height in this area to approximately 5m. This is below the minimum height of 6m that the Environment Agency have requested in order to prevent the crossing structure resulting in significant fragmentation effects (particularly on invertebrates), and it is therefore a concern that the proposed crossing structure will result in an increased impact over other designs which are available. The Applicant has indicated that it may be possible to amend the</p>

			<p>design of the drainage pipe so as to ensure a minimum height of 6m and confirmation of the position is expected from the Applicant.</p> <p>For the operational phase, the reduction of the operational width of the bridge section of the crossing to 15m is noted and welcomed. The increase in the height between the base of the bridge deck and the ground to a minimum of 6m (and up to 6.8m in some areas) is also welcomed.</p>
LI.2.9	<p>The Applicant, ESC, Natural England, The AONB Partnership, Stop Sizewell C, TASC</p>	<p>Alternative Outage Car Park Note</p> <p>Please review and comment on the content of the SCC submission [REP5-171].</p>	<p>ESC has provided the following comment in our Deadline 6 submission [REP6-032]:</p> <p>SCC has responded to the ExA request at ISH5 to provide greater detail on how it considered an alternative to the proposed outage car park at Goose Hill could be achieved. ESC notes SCC's response but would like to highlight some concerns.</p> <p>At para. 13 page 3, SCC suggest that the Applicant sets up a "call-off" contract with one or more local farmers or landowners to permit temporary parking on their land should it be required in the event of an unplanned outage clashing with a planned outage. SCC does recognise that such use would require discussion with the local planning authority. As the local planning authority for the East Suffolk administrative area, ESC is concerned that any such arrangements would be unlikely to be acceptable in the countryside location (possibly within or visible from the AONB) in such an ad hoc manner. Appropriate and safe highway access would be required, and it is unlikely that such fields would be appropriate for vehicle parking without additional work including potential re-</p>

			<p>surfacing, any such temporary parking arrangement would have an unacceptable visual impact, be harmful to vehicle and pedestrian safety, lead to drainage problems in many areas, and cause community disruption and concern. Temporary facilities to facilitate park and ride from such areas would also add to the landscape and visual impacts and are likely to be objected to by local residents in most rural locations that are well related to the road access routes.</p>
LI.2.22	<p>ESC, SCC, Natural England, The AONB Partnership, National Trust</p>	<p>Design and Access Statement – Overarching Design Principles and Detailed Built Development Principles</p> <p>Several amendments and additions have been made to Tables 5.1 and 5.3 of the DAS [REP5-070]. Please review and comment on the amendments and additions.</p>	<p>Landscape: ESC has no further response in respect of landscape issues in relation to this matter.</p> <p>Design: Please note that in the Tracked Changes Version of the DAS that ESC has reviewed, there are, in fact, no amendments or additions to Table 5.1 Overarching Design Principles that were made for submission at Deadline 5 (July 2021). If changes made prior to Deadline 5 are referred to here by the question, we welcome those that have been included on sustainability (Overarching Design Principles 76-78).</p> <p>For Table 5.3 Detailed Built Development Principles, a new principle has been added – number 80 – to recognise the Main Access Building’s distinct location and function at the main site entrance. ESC welcomes the inclusion of this principle which draws attention to the particular nature of this building and its specific function and setting. As a result of its inclusion ESC is hopeful that a considered design will be</p>

			<p>provided at a later stage. ESC supports the addition of Detailed Built Development Principle 80.</p> <p>If changes made to Table 5.3 prior to Deadline 5 are referred to here by the question, ESC welcomes those that have been included in relation to colour palette, colour options, specification and setting for the Turbine Halls, OSC and interim spent fuel store, all to be agreed with ESC (Detailed Built Development Principles 56-57).</p>
LI.2.23	ESC, SCC, Natural England, The AONB Partnership, National Trust	<p>Design and Access Statement – Overarching Design Principles</p> <p>In respect of Overarching Design Principles 17-21 [REP5-070], are you satisfied that the proposed design of the MDS meets the objectives of these principles?</p>	<p>ESC confirms that the proposed design of Sizewell C expresses itself clearly in plan layout and three dimensions as a master-planned composition with a strong over-riding concept behind the organisation of built form within the proposed site. ESC acknowledges that the composition relates across to the pre-existing stations at A and B in terms of the placement of volumes and forms, and the effect of that in three-dimensions and in long and short views across all three sites. ESC acknowledges that the design includes a clear approach to the appearance of some buildings from a distance through the choice of cladding and the manipulation of the cladding grid at differing distances, the effect of which may be to mitigate perceived scale.</p>
LI.2.24	ESC, SCC, Natural England, The AONB Partnership, Theberton and Eastbridge	<p>Design and Access Statement – Accommodation Campus Design Principles</p> <p>Please review and comment on the revised design principles contained within Table A.1 [REP5-075].</p>	<p>Landscape: In respect of land matters pertaining to the accommodation campus, ESC is satisfied with relevant references within these design principles.</p> <p>Design: Appendix A – Accommodation Campus - Table A1 Key Design Principles, p242 [REP5-075]. The additions here were first proposed by the Applicant in their June submission</p>

	Parish Council, Stop Sizewell C, TASC		<p>comments on Responses to the ExA's First Written Questions (ExQ1) Volume 1 - SZC Co. Responses [REP3-046] They were due to be discussed at ISH 5 in which ESC participated but ESC had not seen or reviewed the Document at that stage. ESC is satisfied with the proposed amendments and additions to the Key Design Principles for the Accommodation Campus at Principle numbers 1,2,4,7,13,14,15 and 16. ESC is pleased to note that all of ESC's previous suggested additions have been incorporated in one way or another. We believe that these changes strengthen the Principles and are essential to ensure that they are comprehensive in their benchmarking of design quality. We are therefore content to support the amendments and additions to Table A1 at Appendix A of the DAS.</p>
LI.2.26	The Applicant, ESC	<p>Design and Access Statement – Accommodation Campus Design Principles</p> <p>Principle 13 in Table A.1 [REP5-075] refers to the colour of buildings and the consideration to be given to the Suffolk Coast and Heaths AONB Guidance on the Selection and Use of Colour in Development document. In contrast, Detailed Built Development Principle 56 in Table 5.3 [REP5-070] includes the need for the agreement of ESC in respect of cladding colours for the turbine halls. Whilst noting the content of Requirement 17 [REP5-029], what consideration has been given to a similar level of involvement of ESC in respect of the colour finish of the accommodation campus buildings?</p>	<p>ESC consider that it is for the Applicant to advise the Examiners what consideration has been given to ensuring that there is a similar level of involvement by ESC in respect of the colour finish of the accommodation campus buildings to those on the MDS.</p>

LI.2.30	The Applicant, SCC, ESC	Associated Development Sites – Requirement 2 2A SCC [REP5-176] considers they should be the discharging authority for Requirement 22A as the proposed landscaping is on highway land. Are discussions regarding this matter underway?	This is under discussion. There is some concern that some of the landscaping would be outside the area the highway authority would be willing to adopt. We therefore need to decide if the landscape requirement is best dealt with holistically by ESC or in part by SCC and in part by ESC.
NV.2 Noise and Vibration			
NV.2.2	Applicant, SCC, ESC	Quiet Road Surfacing (i) What additional acoustic benefit might be expected if this surface were to be used for the Sizewell Link Road and the Two Village Bypass? (ii) Would a different maintenance regime from a standard road be required in the event this surface were to be adopted to maintain the acoustic benefits it may bring? (iii) Is this now being factored into the discussions? (iv) In the event that quiet road surfacing were to be offered how would this be secured?	SCC is the responsible authority for road noise so ESC defer to the highway authority, SCC, on this issue.
NV.2.5	Applicant, ESC	Operational Noise (i) The Main Development Site (MDS) night-time noise threshold is not yet agreed with ESC. Should the ExA consider the Council view more appropriate as a safeguard for the future noise levels, would there be implications for the operation of the station at the MDS? (ii) Would there be alternative or different mitigations available which may be able to be applied which could safeguard the night-time	ESC considers this question is best answered by the Applicant as we are not able to determine the implications on the operation of our proposed noise threshold. Equally we are not best placed to determine alternative or different mitigation, but would certainly welcome further engagement with the Applicant on this matter to determine what options may be available. ESC would, however, note that in ISH 8 the Applicant gave specific examples of equipment at HPC where noise reduction was and was not practicable. It is the view of ESC

		<p>noise environment in the event the noise threshold is not agreed? Are there implications for the operation of the plant?</p>	<p>that statements regarding the viability or otherwise of operational power station noise reduction should be fully justified in detailed, engineering terms in a way which specifically references the individual noise sources listed in Table A2 of Appendix 11C to Volume 2 Chapter 11 of the ES [APP-205].</p> <p>Table A2 indicates that there is a difference of 30 dB between the highest and lowest sound power levels for individual items of plant serving the power station. It is unclear from the assessment what contribution these individual sources make to the predicted cumulative noise level at each receptor, but this suggests that there might be opportunities for noise reduction on an item-by-item basis which could have significant benefits in terms of controlling cumulative noise levels at individual receptors. Again, if this is not the case then ESC consider that this should be justified in both acoustic and engineering terms.</p> <p>While ESC accept that a nuclear power station has very specific requirements in terms of the mechanical plant serving it and that the Applicant is best placed to understand this, it is also the case that many types of mechanical plant noise can often be reduced at source through appropriate engineering. This can have a cost implication, but ESC consider that this should be balanced against the need to ensure the lowest practicable noise levels, which the Applicant agreed during ISH 8 should always be the aim. If it is not possible to reduce noise from individual items of plant using engineering methods as a result of the specific technical requirements of the power station, then this should be reasonably justified.</p>
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NV.2.6	Applicant, E SC	<p>Noise Mitigation Scheme (NMS)</p> <p>As things currently stand the NMS is a draft with further assessments to be undertaken and to be agreed with ESC, potentially to be undertaken in phases. There are then a series of additional stages to be gone through. Stage 3 gives the owner 28 days to respond.</p> <p>(i) Stage 4 gives no commitment or time period for the Applicant to organise the survey and to provide the specification to the owner. Why should there not be an obligation on the Applicant to respond in a timely manner?</p> <p>(ii) What happens in the event the property is not found to be suitable for adaption?</p> <p>(iii) Should the property be suitable and the property owner progresses to receive two quotes, what happens if they are not received within 28 days?</p> <p>(iv) At stage 5 the Applicant makes a formal offer, but there is no obvious commitment to honour either of the quotes received, is this specified somewhere?</p> <p>(v) If a formal offer is made to the owner at this point, this appears to trigger a three month embargo on the works that have been identified as triggering the need for the insulation/mitigation scheme. Is this correct?</p> <p>(vi) It is understood that at stage 6 following works being undertaken, that this would need to be verified as being carried out prior to any</p>	<p>ESC has and continues to engage with the Applicant on the NMS including the matters raised in this question. Our submission of comments on the redrafted NMS (submitted at Deadline 6) responds to many of the issues raised by the ExA and we have discussed these matters with the Applicant with a view to a further redraft of the NMS.</p>
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		<p>payment being made. What time frame would this be undertaken within and what timeframe would be in place to make the payment?</p> <p>(vii) Please provide an update to the NMS to provide clarity on the above points.</p>	
NV.2.7	Applicant, ESC	<p>Noise Mitigation Scheme</p> <p>(i) Please provide an indication of over what time frame you consider a receptor who qualified for noise mitigation under the scheme could reasonably expect to undertake the necessary works and receive payment for them from the beginning to the end of the process. (ii) How does this fit with the latest implementation plan which indicates works on the rail line would commence in Q2 2023? [REP2-044]</p>	<p>ESC considers this question best answered by the Applicant who will be responsible for these aspects of the Noise Mitigation Scheme.</p>
NV.2.9	Applicant, Network Rail, ESC	<p>Rail Noise Mitigation</p> <p>Additional assessments of rail noise were undertaken in Woodbridge and Saxmundham to consider the implications of the rail strategy in respect of house boats and park homes.</p> <p>(i) Please provide an update on what the noise mitigation proposed is to be and how this would be secured.</p> <p>(ii) In the event screening in these locations would facilitate an improved noise environment for these receptors, has a similar option been considered for other receptors along the line?</p> <p>(iii) Could this be secured in the event it was considered appropriate?</p>	<p>(i) ESC considers this question best answered by the Applicant as they are proposing the mitigation for these receptors. We have been and continue to be in discussion with the Applicant and have requested that mitigation for these, and indeed all receptors, is not restricted to certain things but that all forms of mitigation are available and considered as part of a bespoke mitigation scheme for each individual property taking account of its circumstances and specific impacts.</p> <p>(ii) Acoustic Barriers along the rail track to provide mitigation for sensitive receptors has and continues to be a matter of discussion with the Applicant. Where it is a viable option to install screening, we would encourage and welcome this as part of the Rail Noise Mitigation Strategy and the Applicant's</p>

			<p>consideration of mitigating and minimising noise impacts in line with relevant policy requirements.</p> <p>(iii)ESC considers this could be secured as part of the Rail Noise Mitigation Strategy along with other mitigation schemes that form part of the requirement to mitigate and minimise noise impacts.</p>
NV.2.10	Applicant, Network Rail, ESC	<p>Noise and Vibration from Rail Freight</p> <p>ESC have sought additional clarification in respect of the uncertainties of the predictions of noise and ground borne vibration from rail activities. Can the ExA be updated on the current position regarding this updated information and whether the parties are agreed now as to the suitability of its forecasting, and the consequential assessments of noise and vibration and the consequential suitability of any mitigation</p>	<p>ESC's request for clarification remains outstanding and subject to requests for information as submitted to the Examination at Deadline 6.</p>
NV.2.11	ESC, Applicant (ii only)	<p>Operational Noise at Leiston Leisure Centre</p> <p>(i) Please confirm that page 63 section 165 20j of the Deadline 5 Response to Deadline 3 and 4 submissions from the Applicant the noise level should be 55 dB LAeq(T).</p> <p>(ii) Please explain how the installation of the noise barrier at the necessary point in the programme is secured through the DCO or other legal mechanism?</p>	<p>(i) Yes, this is a typographical error and should read 55 dB LAeq(T).</p> <p>(ii) Requirement 12A of the draft DCO (June 2021) [REP2-015] suggests that details of landscape works would be prepared by the Applicant and submitted to ESC for approval. ESC expect the barrier to form part of the proposed design and would not approve were the barrier not shown in detail.</p>

R.2 Radiological considerations			
SA.2 Section 106			
SA.2.0	The Applicant, ESC, SCC, Natural England, MMO, Trinity House	Attention is drawn to the Commentary on the DCO which includes commentary on the Deed of Obligation	Noted. ESC will respond separately to the Commentary on the DCO.
SE.2 Socio-economic			
SE.2.0	The Applicant, SCC, ESC, Network Rail	<p>Rail Services</p> <p>In trying to understand the socio-economic and community effects which may result from the development. Can you assist the ExA in understanding the status of the Rail Prospectus referred to within the LIR [REP1-045]. This appears to indicate that in order to support economic growth in the region upgrading of the rail line to improve both passenger and freight capacity during the construction period for the development is sought.</p> <p>(i) What status in planning terms does this document have?</p> <p>(ii) Would operating the night time rail freight service as proposed prevent the delivery of rail improvements during this period?</p> <p>(iii) Had the Council's or Network rail developed a mechanism to fund the rail improvements</p>	<p>(i) SCC as author will confirm the status of this document [REP1-101].</p> <p>(ii) Any rail improvements, if restricted to daytime because of Sizewell C over-night freight, would have to be scheduled around the passenger services and most likely require cancellations / bus replacement service for the passenger service which would be disruptive. Rail improvements would be severely restricted by the combination of daytime passenger services and night-time Sizewell C freight trains.</p> <p>(iii) ESC will defer to SCC and Network Rail to respond to this section. ESC does not have any identified rail improvements in the CIL Infrastructure List.</p> <p>(iv) [APP-610] Economic Statement does not appear to consider any impact the proposal may have on the potential delivery of rail improvements during the construction phase of Sizewell C. The Applicant is best placed to advise further in relation to this.</p>

		<p>envisaged within the prospectus, by for example requiring developer contributions through the Community Infrastructure Levy or other mechanism?</p> <p>(iv) Did the socio economic assessment consider the implications of effects of the DCO scheme on the potential delivery of rail improvements during the proposed construction programme?</p>	
TT.2 Traffic and Transport – No Questions for ESC			