



The Sizewell C Project

9.82 Written Submissions Responding to Actions Arising from Open Floor Hearing 10 (24 August 2021)

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SIZEWELL C PROJECT –
WRITTEN SUBMISSIONS ARISING FROM
OPEN FLOOR HEARING 10

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1 OPEN FLOOR HEARING 10

1.1 Introduction

1.1.1 This document contains the Applicant's written submissions responding to actions arising from Open Floor Hearing 10 (OFH10) held on 24 August 2021.

1.1.2 This document corresponds to the Applicant's **Written Summaries of Oral Submissions made at OFH10** (Doc Ref. 9.78) submitted at Deadline 7.

1.2 Signposting Document

1.2.1 **Table 1.1** sets out each matter that was raised orally at OFH10 and signposts to where this has been addressed previously by SZC Co. in the suite of Application documents.

Table 1.1: Signposting Table in response to matters raised at OFH10

Prior submissions into the Examination	Matter raised at OFH10	SZC Co. Response
Russ Rainger: East Suffolk Councillor for Aldeburgh and Leiston Ward		
None	Concerns surrounding the cumulative impact of the Sizewell C Project, particularly relating to traffic and national grid infrastructure.	<p><u>Cumulative traffic impact</u></p> <p>Response extracted from the Applicant's response to First Written Questions [REP2-100] ExQ1 Cu.1.22:</p> <p><i>"SZC Co. proposes to manage Sizewell C construction traffic through the implementation of a Construction Traffic Management Plan [REP2-054] and Construction Worker Travel Plan [REP2-055], which would be monitored on a quarterly basis throughout the construction phase and reviewed through a Transport Review Group (TRG). The TRG would include representatives from SZC Co., the local authorities and Highways England. A Transport Contingency Fund is to be established by SZC Co. through the Deed of Obligation [REP5-082] and made available to the TRG in the event that</i></p>

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		<p><i>further mitigation or corrective actions are required. SZC Co.”</i></p> <p><u>National Grid infrastructure</u> Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 Cu.1.20:</p> <p><i>“The Grid Connection Statement [APP-583] explains at paragraph 1.3.8 that it is the responsibility of National Grid to develop and maintain the National Electricity Transmission System.</i></p> <p><i>Any studies into the implications of planned / emerging energy projects on the existing 400 kV network would be carried out by National Grid as part of this responsibility.</i></p> <p><i>SZC Co. is continuing engagement with National Grid to inform the need for any works required to the transmission network (refer to the Statement of Common Ground with National Grid [REP2-072].”</i></p> <p>Please also refer to the cumulative impact assessments in the Environmental Statement (ES) [APP-575] and ES Addenda [AS-189] (Doc Ref. 6.18).</p>
	‘Loss of the jetty proposal’ and rejection of marine-led strategy.	<p>Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 Bio.1.26:</p> <p><i>“The January 2021 submission has significantly increased the proposed use of marine transport routes over the May 2020 submission. The May 2020 submission was developed around an Integrated Transport Strategy [APP-175]</i></p>

Prior submissions into the Examination	Matter raised at OFH10	SZC Co. Response
		<p>(paragraph 4.3.47) The proposals included the permanent BLF described in [APP-180] (paragraph 2.4.66) and [APP-184] (paragraph 3.4.52). At that time, the permanent BLF was proposed as the import route for AILs (discrete and large single loads). Other construction-phase goods and materials were proposed to be brought to site by road and rail (e.g. [APP-184] paragraph 3.3.18). The Applicant had tested and consulted on other alternatives to the proposed permanent BLF, and selected the BLF option to support the transport strategy at that time [APP-190] (paragraphs 6.2.97/ 6.2.98). The January 2021 Additional Submission recognised the potential to increase utilisation of the marine transport route [AS-181] (paragraph 2.2.54). This included increasing the quantity of AILs that could be delivered via the permanent BLF [AS-181] (paragraph 2.2.55), and introducing the temporary BLF as an additional route for marine import of bulk materials and possibly other cargo [AS-181] paragraph 2.2.68. SZC Co considers that, at the May 2020 submission alternatives to the short-jetty BLF had been considered and the most appropriate solution had been selected given the transport strategy at that time. Through the January 2021 submission, SZC Co. has significantly increased marine transport through the introduction of the temporary BLF and the enhancement of the permanent BLF, to reduce road-based transport demands.”</p>
	Mitigation for the Area of Outstanding Natural Beauty	<p>Please refer to ExQ1 LI.1.2 in the Applicant’s response to First Written Questions [REP2-100] for a detailed account of the substantial weight given by the Applicant to the conservation of the natural beauty of the landscape and countryside in the Suffolk Coast and Heaths AONB in accordance with paragraphs 5.9.9 and 5.9.12 of the NPS EN-1.</p>

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		<p>In addition, the main development site landscape and visual chapter of the ES (Volume 2, Chapter 13 of the ES) [APP-216, updated by AS-181 and AS-206] presents the assessment and mitigation on the Suffolk Coast and Heaths AONB.</p> <p>In addition, the Natural Environment Fund within Schedule 11 of the Deed of Obligation (Doc Ref. 8.17(F)) seeks to fund measures to mitigate the landscape and visual effects of the Project by employing projects to deliver sustainable and long-term management and maintenance of woodlands, hedges and other established vegetation that contribute to the conservation and enhancement of landscape character and that provide or enhance the size, quality and connectivity of locally characteristic habitats to improve the resilience of wildlife to a changing climate and other pressures such as habitat fragmentation, including those within the AONB.</p>
	Impact on the coast	<p>Please see the Applicant's response to First Written Questions [REP2-100] ExQ1 CG.1.0 for more detail on the assessment of potential impacts on the coastal geomorphology.</p> <p>As detailed in Volume 2, Chapter 20 (Coastal Geomorphology and Hydrodynamics) of the ES [APP-311, updated by AS-181 and AS-237], the Sizewell frontage is comparatively stable compared to neighbouring shorelines. The Soft Coastal Defence Feature (SCDF) is deliberately sacrificial and will erode with time releasing sediment into the local sediment system. When the SCDF has eroded to pre-defined levels it will be recharged ('topped up' with sediment) such that a beach is maintained between the HCDF and the sea. This will ensure that the</p>

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		<p>HCDF does not interrupt the prevailing sediment transport processes.</p> <p>Detailed 1 dimensional and 2 dimensional modelling has predicted the impacts of severe storms on the SCDF to ascertain its longevity and likely need for recharge (replacement of sediment) during the operation of Sizewell C (see <i>Storm Erosion Modelling of the Sizewell C Coastal Defence Feature (Revision 1)</i> [REP3-048] and <i>Preliminary design and maintenance requirements for the Sizewell C Coastal Defence Feature - Revision 2</i>) [REP3-032]. Both of these reports have been updated to assess impacts during the decommissioning phase and are submitted at Deadline 7 (Doc Refs 9.31(A) and (9.12(B), respectively). These reports demonstrate very clearly that the SCDF will perform as intended to mitigate potential impacts from the HCDF on longshore sediment transport mechanisms.</p> <p>Once agreed with the Marine Technical Forum' triggers on when to perform recharge will be set with the Coastal Processes Monitoring and Mitigation Plan (CPMMP) (latest version (Revision 2) submitted at Deadline 5 [REP5-059]). The CPMMP will form the main monitoring and mitigation report (for the sea defences as well as other marine/coastal infrastructure such as the BLF) to be approved under Requirement 7A of the draft DCO (Doc Ref. 3.1(G)) and Marine Licence Condition (17) (Doc Ref. 3.1(C)).</p> <p>Furthermore, detailed design work on the sea defences has moved the HCDF 5m landward and removed the abutment at the BLF to reduce</p>

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		potential impacts further (see <i>Temporary and Permanent Coastal Defence Feature Plans</i> [REP5-015]).
	Lack of engagement with local communities.	SZC Co. detailed in oral submissions how the project has and continues to engage with local communities, this can be found in the Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130] .
Tony Fryatt, East Suffolk Councillor for Carlford and Fynn Valley Ward		
None	Traffic safety due to increase in Sizewell C traffic (HGVs and cars), particularly the B1078 corridor	Refer to Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)).
	Vegetation maintenance on the B1078 is not sufficient alone	SZC Co. has developed a package of measures for the B1078 between the A140 at Coddensham and Wickham Market that would mitigate impacts along this route. The measures and funding mechanism in the draft Deed of Obligation (Doc Ref. 8.17(F)) are described in the Consolidated Transport Assessment [REP4-005] .
	Safety concerns relating to the B1078/B1079	
	Enforcement of speed limits	SZC Co. has engaged with Suffolk County Council and Suffolk Constabulary to agree the proposed speed limits. The basis for setting all speed limits is that they should be self-enforcing and seek to reinforce driver's assessment of what is a safe speed to travel for the conditions and environment of the road. They should encourage self-compliance. This has been the basis for agreeing the proposed package of road safety improvements along the B1078.
Regan Scott: S.A.G.E		

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PDB-092 REP2-412 REP2-413 REP2-414 REP3-127 REP5-262 REP5-262a REP5-262b	<p>Policy used (NPS EN1 and EN6) is insufficient due to changes in circumstances and policy development since.</p>	<p>Response extracted from the Applicant's response to First Written Questions [REP2-100] ExQ1 G.1.4:</p> <p><i>"The Planning Statement Update (Doc Ref 8.4Ad) provides an update of the planning policy position set out in the Planning Statement [APP-590]. It presents a review of relevant changes and developments in national policy and law which have arisen since the submission of the application in May 2020 and how they may affect the approach to decision making presented in the Planning Statement.</i></p> <p><i>This includes a review and assessment of the implications of the following:</i></p> <ul style="list-style-type: none"> • Updated Energy and Emissions Projections 2019 (October 2020) • Government response to CCC progress report (October 2020) • The Ten Point Plan for a Green Industrial Revolution (November 2020) • National Infrastructure Strategy (November 2020) • Response to the National Infrastructure Assessment (November 2020) • The Sixth Carbon Budget: The UK's path to Net Zero (December 2020) • Energy White Paper – Powering our Net Zero Future (December 2020) <p><i>The Planning Statement Update also addresses the outcome of challenges in the Courts to the DCO decision on the proposals for two gas-fired generating units at the Drax Power Station, which have arisen since the preparation of the Planning Statement as well as a review of the recommendation report of the ExA on the Wylfa Newydd Power Station Project published after</i></p>

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		<p><i>the withdrawal of the application. The Planning Statement Update considers the implications of the above for the application of the NPS policy to the Sizewell C Project. The changes made to the application do not affect the approach and interpretation of legislation or policy set out in the Planning Statement as updated by the Planning Statement Update.”</i></p> <p>Please also refer to the Applicant’s response to Second Written Questions (Doc Ref. 9.71) and Written Summaries of Oral Submissions Made at ISH9 (Doc Ref. 9.80) for more detail.</p>
	Good Design – Change applications during the Examination ‘violate’ this	Refer to Appendix 18A of the Applicant’s response to First Written Questions [APP-211 , electronic page 149] which discusses the design approach of the Project.
	There is no support from Government for new nuclear	<p>Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 G.1.9:</p> <p><i>“The Planning Statement Update (Doc Ref 8.4Ad) provides a review of both the Government response to the CCC 2020 progress report to Parliament and the Ten Point Plan. Both strengthen and support the need for new large scale nuclear projects.</i></p> <p><i>The Government response to CCC in October 2020 recognises the challenges of increasing demand for electricity in meeting 2050 net zero targets and finds that renewable sources like wind and solar will need to be complemented by non intermittent sources of power to deliver a reliable system, and that this will need to come from low carbon sources, including nuclear. The</i></p>
	There is a lack of urgency from EDF	
	SMRs should be considered as another nuclear option	

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		<p><i>report does not make any recommendations or targets in relation to large scale nuclear but informed Government publications and policy in November and December 2020 (including the Energy White Paper).</i></p> <p><i>The Ten Point Plan followed the response to CCC in November 2020 and set out actions for the next ten years necessary to accelerate the path to net zero and, by doing so, support the economic recovery from the impact of coronavirus. This includes ‘Delivering New and Advanced Nuclear Power’ as Point 3, which highlights the increasing need for low carbon electricity and that new nuclear power will both produce low carbon power and create jobs and growth across the UK. It confirms that Government is ‘pursuing large-scale nuclear as well as future technologies through investment in SMRs and AMRs’.</i></p> <p>Please refer to the Applicant’s response to ExQ2 G.2.4 in the Applicant’s response to Second Written Questions (Doc Ref. 9.71) for more detail on AMRs and SMRs.</p>
Sarah Whitelock: Aldeburgh Business Association		
None	Impact on local businesses due to reduction in tourism	<p>Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 G.1.27:</p> <p><i>“SZC Co. and regional stakeholders agree that a Tourism Fund is an appropriate way to ensure potential changes in visitor activity do not result in economic consequences. SZC Co. has shared with East Suffolk Council and Suffolk County Council a proposed approach to the Tourism Fund including its release, scope, implementation (including Tourism Programme</i></p>
	Impact on local economy due to influx of workforce	

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		<i>Manager Role), and governance. These matters are detailed in the Draft Deed of Obligation (Doc Ref. 8.17(F)) and largely agreed with details of areas of disagreement set out within the Draft Statement of Common Ground between SZC Co, ESC and SCC [REP2-076].”</i>
	Increase in traffic on already stretched roads	Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 Cu.1.22: “SZC Co. proposes to manage Sizewell C construction traffic through the implementation of a Construction Traffic Management Plan [REP2-054] and Construction Worker Travel Plan [REP2-055] , which would be monitored on a quarterly basis throughout the construction phase and reviewed through a Transport Review Group (TRG). The TRG would include representatives from SZC Co., the local authorities and Highways England. A Transport Contingency Fund is to be established by SZC Co. through the Deed of Obligation [REP5-082] and made available to the TRG in the event that further mitigation or corrective actions are required. SZC Co.”
	Development cuts the AONB in half, severing walking routes and public rights of way	Please refer to ExQ1 AR.1.8 of the Applicant’s response to First Written Questions [REP2-100] for a detailed response to this concern.
	Negative impact on Suffolk festivals and associated income	Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 SE.1.36: “SZC Co. and stakeholders recognise the need for the Tourism Fund to ensure that stated

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		<i>intention based on perceptions of the Project's effects does not materialise into actual changes in visitor behaviour. As such, the Tourism Fund should be used to promote, enhance and market the area, and reduce perceptions that perceived effects known to be sensitivities for returning visitors are actually happening (where the EIA concludes that they are not significant). The Tourism Fund would be secured through the Deed of Obligation (see Draft Deed of Obligation, Schedule 15 (Doc Ref. 8.17(F))."</i>
	Limited trickle-down impact in construction workforce	Please refer to ExQ1 SE.1.17 of the Applicant's response to First Written Questions [REP2-100] for a detailed response to this concern.
Dr David Robb		
PDB-057 REP2-254 REP2-255 REP2-256	Increase in traffic on already stretched roads	<p>Response extracted from the Applicant's response to First Written Questions [REP2-100] ExQ1 Cu.1.22:</p> <p><i>"SZC Co. proposes to manage Sizewell C construction traffic through the implementation of a Construction Traffic Management Plan [REP2-054] and Construction Worker Travel Plan [REP2-055], which would be monitored on a quarterly basis throughout the construction phase and reviewed through a Transport Review Group (TRG). The TRG would include representatives from SZC Co., the local authorities and Highways England. A Transport Contingency Fund is to be established by SZC Co. through the Deed of Obligation [REP5-082] and made available to the TRG in the event that further mitigation or corrective actions are required."</i></p>

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	No engagement with local communities	SZC Co. detailed in oral submissions how the project has and continues to engage with local communities, this can be found in the Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130] .
	Late change applications show poor planning of the Project.	Summarised extract from [AS-004] : <i>‘Since submission of the application, SZC Co. has continued to engage with stakeholders with a view to securing common ground and has continued with detailed project development. The changes proposed reflect design evolution or refinement, respond to feedback from engagement and deliver improvements to the Project and reduce scheme impacts’</i>
Nicola Pilkington: Resident of Wissett		
REP2-394 REP2-395 REP2-396 REP5-255 REP6-069	Monitoring of air quality levels throughout construction	Response extracted from the Applicant’s response to First Written Questions [REP2-100] ExQ1 AQ.1.10 : <i>“The monitoring of air quality during construction will be undertaken in accordance with the measures set out in Table 4.2 of the CoCP Part B (Doc Ref. 8.11(B)). Baseline dust monitoring would be undertaken at least 3 months prior to commencement of construction activities on the main development site. Monitoring results would be reported to ESC monthly throughout the monitoring period and reviewed through the Environment Review Group (ERG).”</i>
	Monitoring of PM10 and PM2.5 concentration levels	Extract from Written Summaries of Oral Submissions made at ISH8 (Doc Ref. 9.79):

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		<i>“Dr Richard Lowe, on behalf of the Applicant, explained that the Applicant was proposing to carry out PM10 monitoring, but that it was not currently proposed to undertake PM2.5 monitoring, and that this position was agreed with East Suffolk Council (ESC).”</i>