

The Sizewell C Project

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EXECUTIVE SUMMARY

This document forms the first (Part 1) of two parts of SZC. Co's request to make a further change to the Sizewell C Application.

Subsequent to submission of the Application in May 2020, SZC. Co continued to engage with the Local Authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process identified potential opportunities for changing the Application to further minimise impacts on the local area and environment, whilst also reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project.

On 21 April 2021, the appointed Examining Authority (ExA) accepted for Examination 15 changes to the Application (Accepted Changes) [PD-013]. A further three changes were accepted on 10 August 2021 (Further Accepted Changes) [PD-039].

On 23 July 2021, SZC. Co notified the ExA of its intention to propose a further change to the Application [REP5-001]. The proposed change follows further engagement and design work in collaboration with Northumbrian Water Limited, which has identified the need for a change to the construction water supply strategy for the Sizewell C Project, specifically the provision of a temporary desalination plant at the main development site ('Proposed Change 19'). During the period 3 August to midnight 27 August 2021, the Proposed Change 19 was the subject of non-statutory public consultation. With the benefit of continuing engagement with stakeholders and feedback from the consultation, SZC. Co now proposes this further change to the Application.

Chapter 2 of this document:

- identifies and describes the proposed change;
- explains why the proposed change is considered necessary;
- identifies how the proposed change has been the subject of consultation and explains the issues arising from respondents;
- provides details of any implications of the proposed change for the Infrastructure Planning (Compulsory Acquisition) Regulations 2010; and
- explains whether there are any new or materially different likely significant environmental effects arising from the proposed change.

The following table provides a high-level summary of the proposed changes and their principal effects.



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Overview of Proposed Change

Proposed Change Number	Proposed Change Description	Environment Effects and Habitats and Protected Species	Order Limit Changes	New Compulsory Acquisition or Temporary Possession	Impact on Businesses or Residents
Proposed Change 19 (Temporary Desalination Plant)	A change to the Water Supply Strategy to propose new temporary infrastructure for the desalination and treatment of seawater to produce potable water suitable for construction-related activities until the Sizewell transfer main is delivered and operational.	No new or materially different likely significant effects on the environment from that reported in the ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292], [REP5-062 to REP5-069], [REP6-017]. No change to assessment conclusions presented within Shadow HRA Report (Doc Ref. 5.10 [APP-145]) and first Shadow HRA Addendum [AS-178], or new European Protected Species licence required. No change to conclusions presented within Water Framework Directive Compliance Assessment (Doc Ref. 8.14) [APP-620, APP-621, APP-622 and APP-623] and the first WFD Compliance Assessment Addendum [AS-277 to AS-279]. No change to findings presented within Eels Regs Compliance Assessment [APP-332].	None	None	No new or materially different significant effects on businesses or residents.



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The proposed change is minor in the context of the Sizewell C Project and is not so material that it constitutes a materially different project. Proposed Change 19 would not require any new other consents and licences as outlined in the **Schedule of Other Consents and Licences** (Doc Ref. 5.11(B) Ch)) submitted at **Deadline 7**. An amendment to the Water Abstraction Licence and Construction Water Discharge Activity Permit are likely to be necessary, but this is not considered likely to create an impediment to securing that or other necessary licences and consents.

The Proposed Change 19 is considered necessary to ensure the delivery of the Sizewell C Project on programme and responds directly to fresh information received from stakeholders. SZC. Co formally requests that the change is accepted for Examination.

Part 2 of this submission comprises the updates and addenda to the Application documents which would be appropriate if the proposed changes were accepted.

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SIZEWELL C PROJECT – PART 1: PROPOSED FURTHER CHANGE TO THE DCO APPLICATION – SEPTEMBER 2021

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1 INTRODUCTION

1.1 Introduction

- a) Purpose of this submission
- 1.1.1 The Sizewell C Project ('the Project') Development Consent Order application ('the Application') was submitted by the applicant ('SZC Co.') on 27 May 2020 and accepted for examination by the Planning Inspectorate on 24 June 2020.
- 1.1.2 Subsequent to the submission of the Application, SZC Co. continued to engage with the local authorities, environmental organisations, local stakeholder groups and the public with regard to the Application. This process identified potential opportunities for changing the Application to further minimise impacts on the local area and environment, whilst reflecting the additional design detail that has come forward in preparation for implementation of the Sizewell C Project.
- 1.1.3 On 21 April 2021, the appointed Examining Authority (ExA) accepted for Examination 15 changes to the Application (Accepted Changes) [PD-013]. A further three changes were accepted on 10 August 2021 (Further Accepted Changes) [PD-039].
- 1.1.4 On 23 July 2021, SZC. Co. wrote to the ExA providing notification that it wished to propose a further change to the Application [REP5-001]. In accordance with the Planning Inspectorate's 'Advice note sixteen: How to request a change which may be material' ('Advice Note 16'), a Notification Report (entitled 'Third Notification of Proposed Project Changes Report') [AS-397] was provided which identified the nature of the change proposed and advised of SZC Co.'s intention to request that the change of the nature described in the Notification Report be accepted as a change to the Application.
- 1.1.5 SZC Co. explained in the **Third Notification of Proposed Project Changes Report** [AS-397] its intention to undertake consultation on the proposed change in broad accordance with the guidance set out in Advice Note 16.
- 1.1.6 On 5 August 2021, the Planning Inspectorate responded [PD-039], noting SZC Co.'s intention to submit a request for a change to the Application. The letter provided advice on the procedural arrangements which SZC Co. should undertake (including in relation to consultation) and set out the information which the ExA would require in order to consider whether to accept the proposed changes either in whole or in part.



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- 1.1.7 This document forms the first of two parts (Part 1) of SZC Co.'s request to make changes to the Application. Details of the structure of this submission are provided in **Section 1.3**.
 - b) Scope of the submission
- 1.1.8 This submission provides the information necessary to support a formal request to the ExA to make a change to the Application. SZC Co. considers that the proposed change is not material for the reasons explained throughout this document.
- 1.1.9 The change has been the subject of non-statutory consultation undertaken between 3 August and midnight 27 August 2021 (the Consultation Document is provided as **Appendix E** to the **Consultation Report Fourth Addendum** (Doc Ref. 5.1Ad4 Ch)). This constitutes a period of 24 days, which SZC Co. considers to be appropriate and in broad accordance with Advice Note 16. Further justification for our approach is set out in Section 4 of the Consultation Report (Doc Ref. 5.1Ad4 Ch).
- 1.1.10 **Chapter 2** of this document:
 - identifies and describes the proposed change;
 - identifies how the proposed change has been the subject of consultation and explains the issues arising from respondents;
 - provides details of any implications of the proposed change for the Infrastructure Planning (Compulsory Acquisition) Regulations 2010;
 - explains whether there are any new or materially different likely significant environmental effects arising from the proposed change; and
 - explains why the change is considered necessary.
- 1.1.11 In particular, this submission provides the information requested in the ExA's letter of 5 August 2021 [PD-039] and includes the information required by Figure 3 of Advice Note 16.
- 1.1.12 Part 2 of this submission includes the updates and addenda to the Application documents necessary to describe, explain and assess the proposed change.
- 1.1.13 SZC Co. formally requests that the proposed change to the Application is accepted.



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c) Policy context

- 1.1.14 The Overarching National Policy Statement ("NPS") for Energy ("NPS EN–1") (Ref 1.1) and the NPS for Nuclear Power Generation ("NPS EN–6") (Ref 1.2) were considered by Parliament and formally designated in July 2011. Together, NPS EN-1 and NPS EN-6 provide the framework for development consent decisions on applications for new nuclear power stations which are capable of deployment by the end of 2025.
- 1.1.15 The need for the Project is established in NPS EN-1 and NPS EN-6 which lists Sizewell as one of eight potentially suitable sites for the deployment of new nuclear power stations in England and Wales before the end of 2025. NPS EN-1 confirms that all applications for development consent within the scope of the NPS should be assessed on the basis that the Government has demonstrated that there is a need for those types of infrastructure. NPS EN-1 confirms that it is Government policy that new nuclear power forms an important element of the strategy for moving towards a decarbonised, diverse electricity sector by 2050, and that nuclear power should be able to contribute to the UK's need for new capacity. The need for new nuclear power generation is described as "urgent".
- 1.1.16 Whilst SZC Co. remains confident that Sizewell is suitable for the deployment of a new nuclear power station, it is no longer possible for deployment to take place by the end of 2025. In December 2017, the Government published a Written Statement on Energy Infrastructure (ref. HLWS316) (the "2017 Ministerial Statement") which reiterated the continuing need for new nuclear and explained that the Government had begun the process of consulting on the preparation of a new NPS for nuclear power stations expected to be deployed after 2025. For projects yet to apply for development consent and due to deploy beyond 2025, which includes Sizewell C, the 2017 Ministerial Statement confirmed that 'Government continues to give its strong in principle support to project proposals at those sites currently listed in EN-6' (Ref 1.3).
- 1.1.17 In July 2018, the Government published its response to the consultation. The Government's Response (Ref 1.4) reiterated the statements made in the 2017 Ministerial Statement and confirmed again the important role of nuclear in the UK's energy future. These matters have now been confirmed most recently in the Energy White Paper Powering our Net Zero Future, December 2020 (Ref 1.5).
- 1.1.18 A more detailed explanation of the legislative and policy context of the Project can be found in **Chapter 3** of the **Planning Statement** [APP-590] and **Chapter 2** of the **Planning Statement Update** (REP2-043).



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- 1.1.19 The proposed change is minor in the context of the Sizewell C Project and is intended to safeguard the timely delivery of the Project. There is therefore a pressing need for the change to be made to the Application.
 - d) Decarbonisation and the need for new nuclear capacity
- 1.1.20 Climate change is one of the greatest global challenges we face. To meet agreed global climate change targets, CO2 emissions from all sectors must be reduced to near zero levels (Ref 1.6).
- 1.1.21 Nuclear power is the largest source of low-carbon electricity in the developed world (Ref 1.6) and the UK Government recognises that new nuclear power stations will form an important part of the country's transition to a low-carbon energy system that is resilient, diverse and value for money for end users (Ref 1.7). Nuclear generation has a lower carbon footprint than low-carbon alternatives, such as large-scale solar and carbon capture and storage and a similar footprint to wind generation. It also has a significantly lower physical footprint, requiring around 1,000 times less land than solar and 1,500 times less land than onshore wind.
- 1.1.22 The Government recognises that new nuclear power stations are critical to the country's transition to a more resilient, affordable and diverse low-carbon energy system. NPS EN-1 states:

"Nuclear power generation is a low carbon, proven technology, which is anticipated to play an increasingly important role as we move to diversify and decarbonise our sources of electricity...[i]t is Government policy that new nuclear power should be able to contribute as much as possible to the UK's need for new capacity."

- 1.1.23 Sizewell C would provide 3,340 megawatts (3.34 gigawatts) of electricity.
 - e) Approach to Submission
- 1.1.24 SZC Co.'s intention is to ensure that this submission is as clear and helpful to the ExA and interested parties as it can be.
- 1.1.25 Apart from a limited number of key documents, for instance where full updated and track changed documents are required by Advice Note 16, the Proposed Change 19 and its effects on the Application documents are set out in addenda documents. Each document is clearly identified to relate to (and be read alongside) referenced Application documents. Each addendum is drafted to a template approach which ensures a common format. The format requires that the Proposed Change 19 is clearly described and its consequences for the Application documents are clearly identified.



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- 1.2 Other submissions to the ExA and their relationship to this submission
- 1.2.1 A number of documents relating to the currently accepted DCO application are being submitted to the ExA at Deadline 7. These are as listed in the **Navigation Document** (Doc Ref 1.3(L)).
- 1.2.2 The request for the Proposed Change 19 however provides a set of updated Application documents which reflect the position should the proposed change be accepted.
- 1.2.3 A definitive document list identifying which documents are unaffected and which have been updated or made subject to addenda as part of the change request submission is provided in the **Navigation Document** (Doc Ref. 1.3(L)Ch). The documents associated with the change request are coloured green to help differentiate between those that are being submitted as part of the wider Deadline 7 submission.
- 1.3 Contents and navigating the submission
- 1.3.1 This submission is divided into two parts:
 - Part 1: introduces, describes and justifies the proposed change (Chapter 2); and
 - Part 2: comprises the updates and addenda to the Application documents which would be appropriate if the proposed change was accepted.
- 1.3.2 The draft Development Consent Order (Doc Ref. 3.1(D) Ch) and the Explanatory Memorandum (Doc Ref 8.17(E) Ch) are submitted as updated, track changed versions of the Application documents. The Environmental Statement Fourth Addendum (Doc Ref. 6.16 Ch) provides details of the proposed change. The Construction Method Statement (Doc Ref. 6.3 3D(C) Ch) provides an updated, track changed version of the description of development. Any affected figures are provided as new revisions.
- 1.3.3 The Shadow HRA Second Addendum (Doc Ref. 5.10Ad3 Ch), the Water Framework Directive Compliance Assessment Addendum (Doc Ref. 8.14Ad 2 Ch) and the Eels Regs Compliance Assessment Addendum (Doc Ref. 6.3 22O Ad Ch) consider the proposed change and confirm no change to previous findings.
- 1.3.4 An updated **Navigation Document** (Doc Ref 1.3(L)Ch) is provided in Part 2 which presents a full schedule of the Application documents and plans



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identifying those which have been changed or which are subject to no change.



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2 PROPOSED CHANGE

- 2.1 Introduction to the Proposed Change 19
- 2.1.1 SZC Co. proposes one change to the Application. The principle of the change was identified in the **Third Notification of Proposed Project Changes Report** [AS-397]. The change has been the subject of a non-statutory public consultation exercise undertaken between 3 August and midnight 27 August 2021 (the consultation document can be found at **Appendix E** to the **Consultation Report Fourth Addendum**: Doc. Ref 5.1Ad4 Ch).
- 2.1.2 This chapter introduces and explains the proposed change, which has taken account of feedback from consultation. Material relating to the proposed change can be found within Part 2 of this submission, which also explains whether the change gives rise to any new or materially different likely significant environmental effects from those identified in the **Environmental Statement** (Doc. Ref. Book 6) submitted with the Application, as updated by the by the subsequent **ES Addenda** [AS-179] to AS-292], [REP5-062 to REP5-069], [REP6-017].
- 2.1.3 To assist with navigation, **Table 2.1** provides an overview of Proposed Change 19.



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Table 2.1: Overview of proposed change

Proposed Change Number	Proposed Change Description	Environment Effects and Habitats and Protected Species	Order Limit Changes	New Compulsory Acquisition or Temporary Possession	Impact on Businesses or Residents
Proposed Change 19 (Temporary Desalination Plant)	A change to the Water Supply Strategy to propose new temporary infrastructure for the desalination and treatment of seawater to produce potable water suitable for construction-related activities until the Sizewell transfer main is delivered and operational.	No new or materially different likely significant effects on the environment from that reported in the ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292], [REP5-062 to REP5-069], [REP6-017]. No change to assessment conclusions presented within Shadow HRA Report (Doc Ref. 5.10 [APP-145]) and first Shadow HRA Addendum [AS-178], or new European Protected Species licence required. No change to conclusions presented within Water Framework Directive Compliance Assessment (Doc Ref. 8.14) [APP-620, APP-621, APP-622 and APP-623] and the first WFD Compliance Assessment Addendum [AS-277 to AS-279]. No change to findings presented within Eels Regs Compliance Assessment [APP-332].	None	None	No new or materially different significant effects on businesses or residents.



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- 2.1.4 A detailed description of the change is provided in the relevant chapter of the Environmental Statement (ES) Fourth Addendum (Doc Ref. 6.18), and a track changed version of the Construction Method Statement (Doc Ref. 6.3 3D(B) Ch) is also provided.
- 2.1.5 Proposed Change 19 would not require any new other consents and licences as outlined in the Schedule of Other Consents and Licences (Doc Ref. 5.11(B) Ch)) submitted at Deadline 7. An amendment to the Water Abstraction Licence and Construction Water Discharge Activity Permit are likely to be necessary, but are not considered likely to create any impediment to securing the necessary licences and consents.
- 2.1.6 Additional mitigation required in relation to Proposed Change 19 is set out in the Mitigation Route Map Third Addendum (Doc. Ref. 8.12 Ad3 Ch)
- 2.2 Proposed Change 19: Temporary Desalination Plant
 - a) Description and reason for the proposed change
- 2.2.1 Proposed Change 19 is for a temporary construction-phase desalination plant at the main development site. Desalination is the process of removing salt and other minerals from seawater. The desalinated water would then be treated as necessary to create potable water.
- 2.2.2 The construction process for the power station will include many activities that require a regular supply of water, both potable and non-potable. SZC Co. developed an initial water supply strategy that was included in the DCO application. This was prepared following engagement with key stakeholders including the Environment Agency and Northumbrian Water Limited (trading locally as Essex and Suffolk Water ("ESW")). This was set out in the Water Supply Strategy [APP-601], as amended subsequently by the Water Supply Strategy Update [AS-202, ES Addendum Appendix 2.2D].
- 2.2.3 The Water Supply Strategy recognised that there is likely to be insufficient potable water available locally to meet the full demands of the Project and identified options. The Water Supply Strategy Update considered this further and explained why all potable water sources apart from one – a new Sizewell transfer main from Barsham Water Treatment Works – had been discounted. Barsham Water Treatment Works is located in the neighbouring Northern/Central Water Resource Zone (WRZ). The Sizewell transfer main would be provided by ESW and does not form part of the Application.
- 2.2.4 ESW's Sizewell transfer main would involve construction of approximately 28km of replacement or new high pressure water mains, with associated infrastructure.



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- 2.2.5 ESW were commissioned by SZC Co. to undertake two tasks:
 - Undertake modelling work to confirm ESW's expectation that it is sustainable to abstract water from this WRZ. In order to determine whether the Northern/Central WRZ can sustainably provide the water required by Sizewell C, ESW are undertaking an abstraction sustainability study as part of an Environment Agency led 'Water Industry National Environment Programme' (WINEP) scheme. ESW provided interim feedback in June 2021 identifying that the Sizewell C demand may be sustainable subject to agreement with the Environment Agency.
 - Develop an implementation plan for the transfer main. In June 2021, ESW provided further information on the planning strategy and implementation schedule for the Sizewell transfer main. This confirmed that the transfer main would not be available until December 2024 at the earliest. They have also indicated that there is significant programme risk around this milestone and it may not be fully available until December 2026 (the 'most likely' Central Case); or potentially not until June 2028 or later (the Worst Case). These predicted connection dates are much later than previously expected.
- 2.2.6 For the early years of construction while the Sizewell transfer main is being constructed, SZC Co.'s expectation was that ESW would be able to balance water between the Northern/Central WRZ and the local Blyth WRZ using existing network connections with no net increase in abstraction within the Blyth WRZ. However, ESW have now confirmed that it is not feasible.
- 2.2.7 Now that SZC Co. has received this information it is clear that a temporary supplementary potable water source is necessary until the Sizewell transfer main is available. Plans were progressed for consultation on this proposed change at the earliest opportunity.
- 2.2.8 SZC Co. continues to engage closely with ESW on delivery of the Sizewell transfer main. However, the unavailability of this main for at least the first two years of construction requires a temporary additional water supply to be secured in order to meet the Project's predicted water demand.
- 2.2.9 The desalination plant will be required before the Sizewell transfer main is fully available. The desalination plant would be decommissioned once the transfer main is fully available.
- 2.2.10 Construction of the desalination plant would take approximately 4-6 months and can only commence once site clearance works are complete on the site of the future power station (the main platform). It is assumed that for the first 9-12 months of construction, potable water will need to be imported



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by road via water tanker truck. The number of tanker deliveries is likely to rise gradually during this period to approximately 40 deliveries per day. The capped HGV limits already established for the Project would remain unchanged.

- 2.2.11 The modular desalination plant would initially be capable of producing up to approximately 2,600m3 of potable water per day. In the event that the water transfer main is not complete by the 4th year of construction, an additional module would be added to the plant to create the ability to produce up to approximately 4,000m3 of potable water per day.
- 2.2.12 Once construction activity in the main platform area reaches a point where the desalination plant becomes a physical constraint, and if the Sizewell transfer main is not already delivered by that time, the desalination plant would be relocated to the temporary construction area (TCA). Any such relocation would be phased to coincide with a period of relatively low potable water demand. In order to maintain continuity of supply, the desalination plant would be installed and commissioned at the relocation site before the existing plant on the main platform is fully decommissioned.
- 2.2.13 The desalination process comprises the following core components:
 - Onshore desalination equipment.
 - Seawater intake pipe and associated headworks.
 - Brine water outfall pipe and associated diffusers.
 - Consultation on the proposed change
- 2.2.14 Proposed Change 19 was the subject of consultation in August 2021. Details of the consultation exercise, the results of the consultation and SZC Co.'s response to the consultation are set out in the Consultation Report Fourth Addendum (Doc Ref. 5.1Ad4 Ch)).
- 2.2.15 SZC Co. has reviewed and considered all relevant responses to the consultation as explained in detail within the tables at Appendix I of the Consultation Report Fourth Addendum (Doc Ref. 5.1Ad4 Ch)).
 - East Suffolk Council do not object to the proposal and seek more information, both generally and particularly in relation to localised dredging, the marine impacts of the headworks and the interaction of subterranean drilling and pipework with the beach surface. ESC agree with SZC Co. that this proposal would not introduce a significant adverse impact on coastal geomorphology or coastal processes.



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- Suffolk County Council do not object to the proposal and seek more information, particularly in relation to HGV movements and generally to understand the impacts on the water strategy.
- The Environment Agency notes that the consultation does correctly identify the environmental topics that require assessment but considers that it did not contain sufficient information for them to conduct a thorough review.
- No responses were received from Essex and Suffolk Water, the Marine Management Organisation or Natural England.
- 2.2.16 SZC Co. has had regard to all of the consultation responses, in the manner explained at Appendix I of the Consultation Report Fourth Addendum (Doc Ref. 5.1Ad4 Ch)). Few if any respondents questioned the need for the change or the means by which a continuous supply of water is proposed to be secured. The majority of consultation responses were concerned either with the impact of water trucks, bringing water to the site prior to the operation of the proposed plant or expressed concern for the localised environmental effects of the proposed plant.
- 2.2.17 In response, SZC Co. has been careful to ensure that the water trucks can be accommodated within the HGV caps already assessed. The availability of the proposed plant, of course, would obviate the need to continue the use of water trucks. In other words, the concerns expressed underline the need for the proposed change.
- SZC Co. has paid very close attention to the concerns raised in relation to 2.2.18 localised environmental effects. Detailed assessments have been undertaken on all relevant environmental topics and the results are reported as part of the Change Request. No significant environmental effects have been identified but SZC Co. recognises that this is partly a function of the careful approach proposed to the installation and operation of the plant. The Change Request commits to controls over these matters to ensure that any effects are limited.
- 2.2.19 SZC Co. has also responded to concerns on localised effects by extending the intake and outfalls further offshore and into deeper water. This approach improves dispersion of the brine water discharge within the water column whilst also minimising recirculation between the two pipes.
 - b) Impact on compulsory acquisition and temporary possession
- Proposed Change 19 requires no addition or removal of land from the Order 2.2.20 Limits and has no implications for the Infrastructure Planning (Compulsory Acquisition) Regulations 2010. It would not result in any new compulsory acquisition or temporary possession powers.



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- Environmental impacts of the proposed change c)
- The potential for any new or materially different likely significant 2.2.21 environmental effects arising from Proposed Change 19 is assessed in Part 2 of this submission.
- 2.2.22 The review concluded that there would be no new or materially different likely significant effects on the environment from those reported in the ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292], [REP5-062 to REP5-069], [REP6-017].
 - d) SZC Co.'s conclusions on the case for Proposed Change 19.
- 2.2.23 The proposed change is aimed at facilitating delivery of the Project and responding directly to information received from stakeholders.
- 2.2.24 There would be no new or materially different likely significant effects on the environment from those reported in the Environmental Statement (Doc. Ref. Book 6) submitted with the Application as updated by the by the subsequent **ES Addenda** [AS-179 to AS-292], [REP5-062 to REP5-069], REP6-017
- 2.2.25 SZC Co. requests that Proposed Change 19 is accepted.



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- 1. Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1) (London: The Stationery Office, 2011)
- 2. Department of Energy and Climate Change, National Policy Statement for Nuclear Power Generation (EN-6) (London: The Stationery Office, 2011)
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