

ExQ2: 03 August 2021**Responses due by Deadline 7: 03 September 2021**

ExQ2	Question to:	Question:
CC.2 Climate change and resilience		
CC.2.0	The Applicant	<p>General Climate Change and Policy Issues</p> <p>On 20 July 2021, the Environment Agency published updates to the climate change allowances for flood risk assessments. The changes updated peak river flow allowances to reflect the UK Climate Projections (UKCP18) and modelling for rainfall. Please indicate whether there are any differences to the Sizewell C Project assessment resulting from the new projections?</p>
CC.2.1	The Applicant, EA	<p>General Climate Change and Policy Issues</p> <p>In response to ExQ1 CC.1.17 [REP2-100], the Applicant states that: <i>"UKCP18 RCP8.5 95th percentile climate change allowance has been adopted within the assessment of flood risk, in respect of the main platform and sea defence designs, in accordance with the guidance set out in the Position Statement on the Use of UK Climate Projections 2018 (UKCP18) by GB Nuclear Industry, March 2019, which was the latest guidance at the time of the assessment"</i>. Please confirm that that still remains the latest guidance and that the assessment does not need to be updated?</p>
CC.2.2	The Applicant	<p>General Climate Change and Policy Issues</p> <p>In response to ExQ1 CC.1.7 [REP2-100], the Applicant states that the CoCP requirement to measure, monitor, and report energy and water consumption and GHG emissions during construction will be passed to SZC Co. contractors through their contracts. Contractors' performance will be monitored by SZC Co. through the recording and reporting tool, and audits will be undertaken to identify any non-compliance(s) against contractual requirements (including compliance with the CoCP). However, this means that there would be no independent third party verification of CoCP and hence DCO requirement compliance. Should the reports not be shared with other relevant independent parties with a means of ensuring that they would be effectively utilised, and actions instigated where necessary secured through the DCO?</p>
CC.2.3	The Applicant	Greenhouse Gas Emissions

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		A response has been provided to ExQ1 CC.1.3 in relation to the implications of the CCC sixth carbon budget. The Carbon Budget Order 2021 came into force on 24 June 2021, which secures the carbon budget for 2033-2037 as a matter of law. Please provide any further response and/or addition to the original response and/or the Planning Statement Update to reflect that.
CC.2.4	The Applicant	Greenhouse Gas Emissions The Applicant's response to EXQ1 CC.1.3 states that since the preparation of the ES it has undertaken a Life Cycle Carbon Assessment (LCA) and this is provided at Appendix 9A to its response [REP2-110]. TASC [REP3-145] submits that the LCA appears to provide data by way of percentages but offers no reconciliation of absolute figures in terms of the carbon debts arising from the relevant contributory elements and the calculations that use these figures to produce the summarised figures in the LCA report. Elements of the SZC project will likely decarbonise at different rates. The Applicant is requested to explain what assumptions have been adopted in the revised calculations and which transport strategies have been assumed?
CC.2.5	TASC	Greenhouse Gas Emissions The initial SoCG [REP2-067] between the Applicant and TASC identifies as an area of disagreement the adequacy of the Applicant's evidence on the carbon impacts of the construction, decommissioning and storage phases of the proposal. TASC is requested to provide further details of that criticism of the Applicant's evidence and indicate whether there has been any subsequent narrowing of the area of disagreement between the parties?
	TASC Response	TASC advise the ExA that there has been very little narrowing of the disagreement as we believe that, while we appreciate the effort from EdF to provide greater clarity, the detail necessary to justify EdF's figures has not been provided. The attached document demonstrates that, in the past and in answer to a carbon footprint question posed through the Sizewell Site Stakeholder Group regarding the 'B' plant dry fuel store, EdF was able to provide such figures in connection with the SZB DFS in a much clearer and concise manner. While the task of providing the carbon production figures for a much larger project such as SZC is no small matter, given the importance attached to the claim of the contribution SZC will or will not make to the reduction in GHGs, we feel that it is

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		<p>incumbent on EDF to provide the ExA with such detail. While we accept that the figures arrived at in the attached report and those which may be arrived at in any SZC-wide assessment cannot be precisely calculated, we believe that the effort to itemise those aspects of the project which will generate a carbon footprint should be made and ascribed a figure based on known or estimated units and metrics to allow a much clearer picture of the carbon debt SZC represents to be presented. Such greater clarity would also allow more in-depth scrutiny of the figures and adjustments as a consequence.</p>
CC.2.6	Applicant	<p>Greenhouse Gas Emissions</p> <p>TASC [REP3-145] points out that in their answer to question CC.1.3, the Applicant states that they have updated their analysis of the construction carbon footprint and calculated a revised carbon footprint of 3.8Mt. This figure compares to 6.2Mt stated in the documents submitted in January 2021. TASC have been unable to find a detailed explanation for this change in figures. Likewise, the ExA is unclear as to how this latest figure has been derived and a further detailed explanation is sought for this change, setting out how the two figures have been calculated and a reconciliation of the differences?</p>
CC.2.7	Applicant	<p>Greenhouse Gas Emissions</p> <p>The Appendix 9a to the responses to ExQ1 carbon focused life cycle assessment (LCA) of the proposed Sizewell C nuclear power plant development [REP2-110] indicates that a full LCA and EPD will come at a later point and this report is focused purely on Global Warming Potential (GWP).</p> <p>(i) Please indicate the stage at which the full LCA and EPD will be carried out?</p> <p>(ii) The report indicates that both downstream and to some extent upstream processes are outside of SZC's control – does that lack of control give any cause for concern?</p> <p>(iii) What steps, if any, does SZC propose to take in response to the recommendations of the report?</p>
CC.2.8 A		<p>Climate Change Adaptation</p> <p>The ONR in response to ExQ1 CC.1.3 (i) [REP2-159] states that information shared to date suggests it is likely that the Applicant's approach to assessing and managing climate change, including adaptation measures, will meet ONR's expectations for nuclear site licensing. Please indicate whether that remains the position at this stage of the ONR assessment?</p>

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CC.2.9	Applicant	<p>Climate Change Adaptation</p> <p>The Applicant in its comments on the EA response to ExQ1 CC.1.16 [REP3-046] indicates that is currently in talks with and will continue to engage with the landowners for the affected area, with the view to obtaining confirmation that the increased flood depth is accepted by the landowners. Please provide an update as to the progress of any such talks and indicate whether any agreement has been reached?</p>
CC.2.10	Applicant	<p>Climate Change Adaptation</p> <p>The Applicant in its comments on the EA response to ExQ1 CC.1.16 [REP3-046] states that it considers that, in accordance with the policy in EN1, paragraph 5.1.17, an increase in flood depth is acceptable. That policy exceptionally allows an increase in flood risk elsewhere if it cannot be avoided or wholly mitigated, and if the increase in present and future flood risk can be mitigated to an acceptable level taking account of the benefits of, including the need for, nationally significant energy infrastructure.</p> <p>(i) Please summarise why such an increase in flood risk cannot be avoided or wholly mitigated in this case?</p> <p>(ii) Are there any other factors other than the anticipated level of increase in flood depths that support the Applicant's view that the increase in flood depth would be acceptable?</p>
CC.2.11	EA	<p>Climate Change Adaptation</p> <p>The Applicant in its comments on the EA response to ExQ1 CC.1.16 [REP3-046] queries whether the approximation of area quoted by the EA has been calculated based on known third party landownership, excluding areas within the EDF ENGL and BEGL ownership. Please can the EA confirm if that is the case?</p>
CC.2.12	EA	<p>Climate Change Adaptation</p> <p>The Applicant in its comments on the EA response to ExQ1 CC.1.16 [REP3-046] states that a review of the change in flood depth within the third party land ownership shows that it is variable and that an increase in flood depth above 0.2m affects only approximately 15% of this area, whilst approximately 40% of this area has an increase in flood depth of less than 0.1m. In addition, there is no change in the flood extent within this third party landownership during this event. Does the EA agree that correctly reflects the position in relation to third party land?</p>

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CC.2.13	The Applicant	Climate Change Adaptation In response to ExQ1 CC.1.17 [REP2-100], the Applicant refers to the response to FR.1.2, and states that the impacts of climate change on sea level rise would be monitored and assessed at set intervals (e.g. 10 years) to determine the trajectory of the projections and consider whether any change is required. For the avoidance of doubt, please confirm that this monitoring and assessment will be included within the CPMMP and overseen by the MTF and would be in addition to any Nuclear Site Licence requirements?
CA.2 Compulsory acquisition		
CA.2.0	The Applicant	The scope and purpose of the Compulsory Acquisition Powers sought The Applicant's response to ExQ CA.1.1 [REP2-100] rejects the suggestion that the notice period pursuant to draft DCO Article 25(2) should be extended from 14 to 28 days. It is noted that ESC considers a period of 28 days to be more appropriate. Whilst there may be a greater need for urgency in the Article 24 situation where protective works are required to buildings, there would not seem to be a similar degree of urgency in relation to matters covered by Article 25. Please reconsider the notice period in Article 25(2) and explain further: (i) What consideration has been given to the interests of landowners and the difficulties they might have in allowing access, for example, to agricultural land accommodating livestock at short notice? (ii) What would be the impact upon the timing of the works overall should the notice period be extended to 28 days? (iii) Please provide further details of the types of survey and investigative works that would be undertaken pursuant to this power and justify the need for speed in carrying out those works setting out the difference that an additional 14 days would make to the entire timeline for addressing impacts that might arise from the development, if authorised.
CA.2.1	The Applicant	The scope and purpose of the Compulsory Acquisition Powers sought The Applicant's response to ExQ1 CA.1.2 [REP2-100], submits that the Applicant has a strong incentive to adopt a proportional approach to drafting restrictive covenants and to consult with the owners and occupiers of any land affected to avoid any constraint beyond that needed to ensure adequate protection and maintenance of the works. However, should landowners not be provided with such safeguards in the drafting of Article 30 to

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		ensure a proportional approach, rather than rely upon the Applicant acting upon such incentives?
CA.2.2	The Applicant	The scope and purpose of the Compulsory Acquisition Powers sought The Applicant's response to ExQ1 CA.1.17 [REP2-100] indicates that the draft DCO provides for all Order Land to be occupied temporarily prior to land being acquired permanently to ensure that only land confirmed as being required permanently is acquired, with land occupied temporarily being returned to the landowner. Article 37 authorises the Undertaker to enter onto, or temporarily occupy, the land specified for the purposes of carrying out various temporary or permanent works on that land, without having to acquire a permanent interest in the land. However, please explain further by reference to specific draft DCO articles how it would be ensured that only land confirmed as being required permanently is acquired, or would that be simply left to the discretion of the Applicant?
CA.2.3	The Applicant	The scope and purpose of the Compulsory Acquisition Powers sought The Applicant's response to ExQ1 CA.1.6 [REP2-100], sets out the interaction between draft DCO Articles 37 and 38 in relation to the time limit for the temporary possession period. However, the Article 37(3) time limit refers to that limit as being " <i>...after the end of the period of 1 year beginning with the date of completion of the part of the authorised development...</i> ". To ensure that these powers are exercised in a manner that is reasonable and proportionate, should Article 38 not contain an overall stop-gap time limit to safeguard the landowner in the eventuality that the completion of the authorised development is unreasonably delayed or there is a total failure to complete that part for reasons that are unforeseen at this time?
CA.2.4	The Applicant	The scope and purpose of the Compulsory Acquisition Powers sought The Applicant's response to ExQ1 CA.1.7 [REP2-100] provides a table setting out the total number of plots falling within each of the six classes listed in the SoR [APP-062] and the response to CA.1.8 provides further information in relation to amendments to the Order Land since the submission of the application as set out in the SoR Addendum [AS-149]. In the event that the latest changes to the application are accepted, please provide an updated table and a revised response to CA.1.8 to include those additional plots.

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CA.2.5	The Applicant	<p>Whether all reasonable alternatives to compulsory acquisition have been explored</p> <p>The Applicant's response to ExQ1 CA.1.23 [REP2-100] refers to the considerations of alternative sites in Volume 2 Main Development Site Chapter 14 Terrestrial Ecology and Ornithology Appendix 14C4 Fen Meadow Compensation Study [APP-258]. The assessment of the potential for fen meadow restoration at Pakenham Fen highlights the need for further detailed studies to determine with certainty the potential afforded by these sites. It explains the conclusion reached at that stage that each of the five sites identified for further investigation would be of sufficient area to provide fen meadow habitat capable of compensating for unavoidable losses at Sizewell. It does not appear to consider the extent of the land now required. Please provide an update summarising and explaining:</p> <p>(i) The need for this land and justifying the extent of the land sought.</p> <p>(ii) The further investigations that have been carried out and how the initially anticipated difficulties in the creation of fen meadow in this location identified in that document would be overcome?</p>
CA.2.6	The Applicant	<p>Whether adequate funding is likely to be available</p> <p>The Applicant's response to ExQ1 CA.1.25 [REP2-100], and its response to the comments on those question responses [REP5-129], refers to Government's Ten Point Plan and the Energy White Paper. It also alludes to ongoing discussions with the Government on the development of a RAB funding model and positive engagement with third party investors to secure the financing required for the project. The Applicant's response to CA.1.32 is also noted.</p> <p>(i) Can the Applicant provide any further evidence at this stage to assist in the consideration of whether financial viability has been properly assessed by it?</p> <p>(ii) Can the Applicant provide any updated evidence to support the assertions that, "<i>good progress that has been made in the ongoing discussions with the Government</i>", and that positive engagement continues to be had with third party investors to secure the financing required for the project. Please confirm that remains the position?</p> <p>(iii) The Applicant relies upon its DL2 submission in relation to the DL3 response by Stop Sizewell C [REP3-133] and does not seek to rebut or clarify the quoted comment made by EDF CEO Simone Rossi to Reuters' Global Energy Transition conference. Does that</p>

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		comment to the effect that there is no Plan B in the event the government did not advance with the legislation for the RAB model represent the Applicant's position?
CA.2.7	The Applicant	<p>Whether adequate funding is likely to be available</p> <p>The Applicant's response to ExQ1 CA.1.27 [REP2-100], and to the comments on those question responses [REP5-129] draws support from the "proven track record" of EDF Energy and the "existing substantial financial commitment" of EDF Energy Holdings Limited and General Nuclear International Limited, as evidence to support the conclusion that there is a reasonable prospect that the scheme, if granted consent, would actually be taken forward within the anticipated timescales.</p> <p>(i) Given the draft DCO Article 2 interpretation of "undertaker" and the inclusion of Articles 8 and 9, what reliance can be placed upon the track record and participation of EDF Energy Holdings Limited and General Nuclear International Limited in relation to this particular scheme?</p> <p>(ii) The Applicant relies upon its DL2 submission in relation to the DL3 [REP3-133] response by Stop Sizewell C and does not seek to rebut or clarify the quoted comment made by Sizewell C's Safety, Licencing and Assurance Director, Mike Lavelle to a meeting of the Whitehall Group on 27 May that the FID could be made in early 2023. Does that comment in relation to the anticipated timing of the FID represent the current position of the Applicant and, if so, does it have any implications for the Implementation Plan?</p>
CA.2.8	The Applicant	<p>Whether adequate funding is likely to be available</p> <p>The Applicant's response to ExQ1 CA.1.28 [REP2-100], and its response to the comments on those question responses [REP5-129], in relation to states that "Under the RAB model, updates in the cost estimate will be reflected in the funding model arrangements. In simple terms, this means the project's anticipated revenue stream (the funding from consumers) will adjust to reflect changes in the cost estimate before FID."</p> <p>(i) Does that mean that without the RAB model, and with an alternative means of funding, the changes to the cost estimate between now and FID could impact the ability of the project to secure the required financing to meet the updated cost estimate and enable the project to proceed?</p> <p>(ii) Would the RAB model be expected to include any cap on the level of funding from consumers in relation to updates in the cost estimate as the project proceeds, or would</p>

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		<p>such elements of the risk fall upon them, as opposed to private investors hence increasing the attractiveness of investing in the project to the latter?</p> <p>(iii) What reliance can be placed upon key parts of the supply chain for Hinkley Point C being re-used at Sizewell C and how would that be secured by the draft DCO?</p> <p>(iv) Please respond to the queries raised by the Stop Sizewell C DL3 comments [REP3-133] in relation to whether the predicted cost and/or contingencies include the potential for multiple adaptive approaches to the sea defences and price rises in construction materials?</p> <p>(v) Please indicate whether the assessment of the costs implications of the remaining changes, if accepted, has been concluded?</p>
CA.2.9	The Applicant	<p>Whether adequate funding is likely to be available</p> <p>The Applicant's response to ExQ1 CA.1.30 [REP2-100] and its response to the comments on those question responses [REP5-129], concludes that the combination of anticipated construction cost reductions, and financing cost reductions are expected to result in the Sizewell C Project meeting or exceeding the cost reduction target.</p> <p>(i) Please provide further details of the anticipated construction cost reductions for the Sizewell C Project compared to Hinkley Point C and the anticipated division of costs reduction between that factor and financing cost reductions.</p> <p>(ii) Please provide further details of the range of financing costs for other infrastructure assets financed under the RAB model and why the financing costs for the Proposed Development are reasonably expected to fall within that range?</p>
CA.2.10	The Applicant	<p>Whether the purposes of the proposed Compulsory Acquisition justify interfering with the human rights of those with an interest in the land affected</p> <p>The Applicants response to ExQ1 CA.1.38 [REP2-100] states that where land is required permanently (outside of the main development site) it is intended that there will be permanent legacy benefits where possible. However, the legacy benefit of the Sizewell Link Road (SLR) remains controversial. The DL5 submission of SCC [REP5-173] stating that "<i>the net legacy benefit of the Sizewell Link Road is very low</i>", and that "<i>that once traffic levels move to that for the operational phase, then the harm clearly outweighs the benefits</i>". The legacy benefit of the SLR is also raised on behalf of LJ & EL Dowley [REP5-260]. Notwithstanding the information provided in response to CA.1.70:</p>

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		<p>(i) Please provide further and clear justification for the permanent acquisition of this land as opposed to its temporary occupation during the construction period for that purpose.</p> <p>(ii) Detail the frequency and "significance" of the levels of traffic that would be generated during the construction period due to outages.</p> <p>(iii) Please provide further details to support the claim of "significant positive legacy benefits" in relation to the B1122.</p>
CA.2.11	The Applicant	<p>Whether the purposes of the proposed Compulsory Acquisition justify interfering with the human rights of those with an interest in the land affected</p> <p>The Applicant's response to ExQ1 CA.1.45 [REP2-100] is noted. Please provide the following additional information:</p> <p>(i) For the Round House, please explain why permanent acquisition as opposed to temporary possession is sought; justify the extent of the land sought in this location to accommodate the construction activities and the alternatives to the acquisition of this property that have been considered. Notwithstanding the details provided in the SoR Appendix B [REP5-036] please provide an update on the discussions between the Applicant and the freeholder.</p> <p>(ii) For 54 and 55 Stockhouse Cottages, please explain the consideration given to the impact upon these dwellings in the selection of the route for the two village bypass; provide details of the existing use of the parcel of land and justification for the extent of the land sought to be acquired. Could lesser powers than outright acquisition be used to secure and maintain the visibility splay?</p> <p>(iii) For Anninson's Cottage, please explain in detail why the land would be required for construction of the SLR and why it would need to be retained thereafter for access? Could an alternative means of access and/or lesser powers not achieve what is required?</p>
CA.2.12	The Applicant	<p>Whether the purposes of the proposed Compulsory Acquisition justify interfering with the human rights of those with an interest in the land affected</p> <p>The Applicant's response to ExQ1 CA.1.43 [REP2-100] states that in relation to the additional land design alternatives were considered to ensure that a solution which achieved lesser land take was not possible. Please provide further details of the design alternatives considered in relation to the additional land and the reasons for their rejection.</p>

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CA.2.13	The Applicant, NDA, Magnox	<p>Adequacy of the protective provisions set out in the draft DCO and the need for any other protective provisions to protect relevant interests</p> <p>The DL5 updated SoCG between the Applicant and the NDA/Magnox [REP5-100], records that NDA and Magnox still believe that plots MDS/05/06 and MDS/05/07 should be excluded from the Book of Reference (BoR), notwithstanding the draft DCO Article 26(2)(c) which precludes the Applicant from acquiring any rights held by NDA/Magnox in the plots listed and the proposed Protective Provisions.</p> <p>(i) Please provide an update in relation to the finalisation of the agreed wording of the Protective Provisions and the provision of a co-operation agreement.</p> <p>(ii) If agreement has not been reached NDA and Magnox are requested to explain further why the inclusion of these plots would be inconsistent with the regulatory regime established by the Nuclear Site Licence and Nuclear Installation Act 1965 and contrary to section 151(a) PA 2008.</p> <p>(iii) Please provide an update in relation to the additional plots that NDA and Magnox wish to see included within Article 26(2)(a).</p> <p>(iv) The Applicant is requested to provide evidence that it has undertaken diligent enquiry in relation to these plots.</p>
CA.2.14	The Applicant, SCC	<p>Adequacy of the protective provisions set out in the draft DCO and the need for any other protective provisions to protect relevant interests</p> <p>The Applicant's response to ExQ1 CA.1.67 [REP2-100], and its response to the comments on those question responses [REP5-129], records that the parties are working to ensure that the draft DCO provisions as a whole adequately secure the highway works.</p> <p>(i) Please provide an update on progress and indicate whether this will take the form of a set of Protective Provisions to be inserted as a schedule to the DCO.</p> <p>(ii) Please also clarify the position in relation to the Protective Provisions additionally sought by SCC for other topic areas.</p>
CA.2.15	The Applicant	<p>Objections to the grant of powers of compulsory acquisition and temporary possession</p> <p>The DL3 submission on behalf of Ms Dyball, Ms Hall and SR Whitwell & Co [REP3-118], opposes the proposed compulsory acquisition of this land and raises a number of issues. This has been supplemented at DL5 [REP5-246]. The Applicant has provided a responses</p>

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		<p>at various deadlines [REP3-049], [AS-153], [REP5-001], [REP5-112] and [REP5-119]. However, please clarify and provide further details in relation to the following points:</p> <p>(i) Please explain further the exploration of reasonable alternatives to the compulsory acquisition of this land including search data for the Waveney Valley and Suffolk Coastal areas and demonstrate that a diligent search for reasonable alternatives has been undertaken.</p> <p>(ii) Please explain why alternative fen meadow recreation land could not be found nearer to the proposed development, for example, on EDF land in Leiston or elsewhere in Suffolk Coastal.</p> <p>(iii) Please explain in full the need to acquire these particular plots for the proposed development.</p> <p>(iv) The Applicant's DL3 response [REP3-049] in relation to the feasibility of re-creating fen meadow at Pakenham refers to feasibility assessment work that began in March 2021 and requires 12 months of hydrological data collection. Please justify the acquisition of this land for the purpose stated in the absence of that data and the conclusion of the feasibility work.</p> <p>(v) Please confirm the area of fen meadow that would be lost as a result of the proposed development and provide full justification for the extent of the land sought to be acquired.</p> <p>(vii) The Applicant's DL3 response [REP3-049] indicates that it is not expected that all the area within the identified Pakenham site boundary will become meadow. and that the precise area of fen meadow that could be created is uncertain and subject to the outcome of ongoing studies. Please explain further why a reduced area of land would not suffice? Given the acknowledged uncertainty and the absence of relevant data, how can the compulsory acquisition proposals be regarded as necessary and reasonable and how can the extent of the land-take be regarded as proportionate?</p> <p>(viii) The Applicant's DL3 response [REP3-049] indicates that relevant hydrological data collection has not been completed. Please respond to the concerns raised in relation to the prospect of the scheme having and adverse impact upon the use of the surrounding farmland, and the local Watermill. Please explain how Requirement 14A of the draft DCO would ensure that the potential impact upon Pakenham Water Mill and other neighbouring landowners would be satisfactorily controlled or are any additional controls required?</p>

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		<p>(ix) The Applicant's DL3 response [REP3-049] indicates it is seeking to understand the impact of these proposals on landowners and to respond to their queries relating to the continued use of the land following establishment of the proposed fen meadow. Please provide an update in relation to that engagement.</p> <p>(x) What regard has been had to the livelihood and wellbeing of the farmer of the land and the implications for the cattle and arable enterprises and the agricultural operation as a whole when assessing the private loss to those who would be affected by the proposed compulsory acquisition?</p> <p>(xi) Please explain the consideration given to the human rights of these particular landowners and tenant.</p> <p>(xii) Please respond to the concerns raised in relation to the proposed removal and/or disturbance of the peat topsoil as part of the works.</p>
CA.2.16	The Applicant	<p>Objections to the grant of powers of compulsory acquisition and temporary possession</p> <p>The DL2 technical note [REP2-252], including the Fordley Road options, and DL5 submissions made Create Consulting Engineers [REP5-259] raise a number of issues on behalf of the Grant family. The Applicant's DL5 response to their earlier submissions [REP5-119], and in the written submissions arising from ISH3 in relation to Fordley Road [REP5-115] are noted. Please explain further and provide a summary response in relation to:</p> <p>(i) The regard which has been had to severance and the impact upon the existing farming operations when assessing private loss and whether the impact or the powers sought upon this landowner would be proportionate.</p> <p>(ii) Please provide an update upon the assessment of the feasibility of incorporating an underpass beneath the SLR to give access for vehicles to land that would lie to the north of the proposed road.</p> <p>(iii) Notwithstanding the comments made in relation to the Fordley Road options at DL5, please provide a detailed explanation as to why Options A and B as proposed by Create Consulting Engineers has been rejected. For Option B, what would be the extent of the additional land-take required for the embankments and why is this option not regarded as proportionate? For Option A, what would be the extent of the additional land-take required for the embankments, what is the likelihood of further land being required and why is this</p>

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		scheme not regarded as a proportionate option? For both options, what regard has been had to be benefits of including the works such as the proposed new slip road or turning head that would no longer be required.
CA.2.17	The Applicant	Objections to the grant of powers of compulsory acquisition and temporary possession The DL5 submission of FERN [REP5-197,198], refers to additional land which has been offered to be used to provide mitigation measures, but which does not appear to be included within the land proposed to be compulsorily acquired. Please provide an update in relation to the provision of mitigation at this location and whether there are any associated implications for land acquisition?
CA.2.18	The Applicant	Objections to the grant of powers of compulsory acquisition and temporary possession The DL5 submission of FERN [REP5-197,198], refers to the only access route for Farnham Manor (to its Walled Garden) and Farnham Hall residents (to their gardens and the back of their properties) being from the lane from Farnham Hall to the end of the Walled Garden. It points out that these access rights are within the Applicants site boundary. Please clarify the position with regard to these rights of access and confirm that they would be maintained throughout the construction and operation of the scheme?
CA.2.19	The Applicant	Objections to the grant of powers of compulsory acquisition and temporary possession The DL5 submissions made by Michael Horton of Savills (UK) Ltd on behalf of Mr and Mrs J & E Dowley [REP5-265], and by Create Consulting Engineers [REP5-260] raise a number of issues on behalf of their clients. The Dowleys have also made a DL5 submission on their own behalf [REP5-227]. The Applicant's DL5 response [REP5-119] and response to ExQ1 CA.1.76 are noted. Nevertheless, please explain further and provide a response in relation to: (i) Please justify the extent of the land sought to be acquired in relation to the provision of the site entrance roundabout and for the temporary construction area including a borrow pit. (ii) The consideration given to the existing use of the land and the impact on the existing farming system.

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		<p>(iii) The landowner's criticism of the lack of engagement on the part of the Applicant.</p> <p>(iv) The response to CA.1.76 refers to the scope provided by the draft DCO to reduce the area of outright acquisition and rely on the creation and acquisition of new rights instead and also to flexibility to occupy land temporarily. Is that a general response to the scheme as a whole or is there a likelihood that lesser powers could be utilised in relation to the plots in question?</p> <p>(v) The response to CA.1.76 states that the Applicant does not consider that the project would make the arable business unviable, but it is working to further understand the concerns raised by the LJ and EL Dowley Farming Partnership. What further understanding has been reached as regards the impact upon the business?</p>
CA.2.20	The Applicant	<p>Crown Land</p> <p>The Applicant's response to ExQ1 CA.1.69 [REP2-100] is noted. Please provide an update in relation to any necessary consents and agreements in respect of Crown land.</p>
CA.2.21	The Applicant	<p>Statutory Undertakers</p> <p>The Applicant's response to Ex1Q CA.1.59 is noted [REP2-100]. Please provide the relevant plot numbers for the land identified within the table submitted in response.</p>
CA.2.22	The Applicant	<p>Statutory Undertakers</p> <p>If agreement with any Statutory Undertakers has not yet been reached, please provide further details specific to each undertaker and plot to show that compliance with section 127 PA 2008 and/ or section 138 PA 2008 could nevertheless be achieved?</p>
CA.2.23	The Applicant	<p>Other Consents, Licenses and Agreements</p> <p>The Applicants response ExQ1 CA.1.70 [REP2-100] refers to the provision of an updated version of the Schedule of Other Consents, Licenses and Agreements to be provided at DL3 [REP3-011]. Please provide a further update and identify the progress made by the Applicant in its discussions with the relevant bodies. Please also indicate whether the latest requested changes, if accepted, would result in any additions to the list?</p>
CA.2.24	The Applicant	<p>The accuracy of the Book of Reference (BoR)</p> <p>Please provide details of any ongoing data monitoring and updating process for the BoR to maintain the land interest information across the scheme.</p>

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ExQ2	Question to:	Question:
CA.2.25	The Applicant	<p>The accuracy of the Book of Reference (BoR)</p> <p>Please confirm that the updated BoR, as submitted for DL5 [REP5-038], is now complete and accurately sets out the various plots and interests. If not, please identify any inaccuracies that have since come to light and provide any updates that need to be made.</p>
CA.2.26	The Applicant	<p>The accuracy of the Book of Reference (BoR)</p> <p>The Applicant's response to Ex1Q CA.1.55 is noted [REP2-100]. Please provide a further update in relation to those plots where ownership remains unknown including details of the continued inquiries and discussions that have taken place since that response was provided.</p>
CA.2.27	The Applicant	<p>The Equalities Act</p> <p>The Applicant's response to Ex1Q CA.1.42 is noted [REP2-100]. Please provide an update in relation to compliance with any duties under section 149 of the Equalities Act 2010 and in particular:</p> <p>(i) Please provide further details in relation to the response to CA.1.42 (ii) explaining the type of reasonable adjustments to processes that have been made.</p> <p>(ii) Please indicate whether any Affected Person or additional Affected Person been identified as having protected characteristics since that response was provided?</p> <p>(ii) Please explain further how during engagement with Affected Persons and/or additional Affected Person there has been consideration of and offers to meet any needs or requirements of individuals or groups?</p>
Cu.2	Cumulative impact	
Cu.2.0	The Applicant, SCC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The DL5 response by SCC to additional submissions from the Applicant comments on the response provided to ExQ1 TT.1.133 [REP5-172] states, in relation to the assessment of cumulative transport impacts, that the Applicant has been working with SCC to address its concerns on the environmental assessment of road traffic. Please indicate whether this work has been completed and whether the position in relation to cumulative traffic impact and any additional mitigation that would be required is now agreed?</p>
Cu.2.1	The Applicant, ESC	Cumulative effects with other plans, projects and programmes

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ExQ2	Question to:	Question:
		<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 consideration given to the timeline of any works to avoid disruption on a haul route for both the Sizewell C Project and the EA1N and EA2 projects.</p>
Cu.2.2	The Applicant, EA1N and EA2	<p>Cumulative effects with other plans, projects and programmes</p> <p>The initial SoCG between the Applicant and EA1N and EA2 [REP2-092] records that: <i>"..all projects involve works at Friday Street, Sizwell Gap and Snape Road and will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicant and EA1/EA1N as well as the wider community that works at Work No. 35 be coordinated as far as reasonably practicable"</i>. The Applicant's DL5 response to responses on Ex1 Cu.1.8 [REP5-129] provides further details. Please provide clarification on the following matters:</p> <p>(i) The Applicant's DL2 response to Cu.1.8 [REP2-100] states that it proposes to <i>"establish clear communications protocols between all three parties, which will be defined by terms of reference of the Transport Review Group (TRG)"</i>. The response by Scottish Power Renewables at DL3 explains that EA1N and EA2 are not members of the TRG. Please explain the role of the TRG in establishing the communications protocols without the involvement of EA1N and EA2?</p> <p>(ii) The responses by EA1N and 2 at DL2 [REP2-260,261] and DL3 [REP3-058,59], indicate that reciprocal Protective Provisions will be sought within the SZC draft DCO and a separate side agreement may be required. Please provide an update in relation to the agreement of Protective Provisions and explain how these would ensure early engagement between the parties to prevent conflict in relation to the works at Sizewell Gap and the junction of A1094/A1069 (Snape Road).</p> <p>(iii) Please indicate whether any practical steps have been agreed at this stage in relation to the co-ordination of those works?</p>
Cu.2.3	The Applicant	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL5 response to responses on Ex1 Cu.1.9 [REP5-129]. The responses by EA1N and 2 at DL2 [REP2-260,261] and DL3 [REP3-058,59] indicate that the temporal overlap of traffic demand between EA1N, EA2 and Sizewell C is clarified in</p>

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ExQ2	Question to:	Question:
		<p>the Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) Version 2 which has been submitted to that Examination. This clarification note concludes that: <i>“Due to the nature of constructing a nuclear power station, the traffic flows for the Sizewell Projects are considerably higher than those of the Projects. Utilising the Applications’ assessment framework, this large difference in traffic flows results in potentially significant cumulative impacts which are without exception triggered by the traffic demand from the Sizewell Projects”</i>. It also records in relation to cumulative noise impacts, that <i>“a high level quantitative assessment indicates that both CIA Scenario A and CIA Scenario B are likely to result in significant impacts at a small number of links. These impacts would predominantly result from increased traffic flows generated by construction of the Sizewell Projects”</i>. The Applicant is requested to respond to the conclusions of this clarification note and indicate how the identified significant impacts could be avoided and/or mitigated. Please also comment on the pedestrian amenity findings of the note and the scope for the provision of additional mitigation in that respect.</p>
Cu.2.4	The Applicant	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL5 response to responses on Ex1 Cu.1.11 [REP5-129]. The response by SCC to that Ex1 at DL2 [REP2-192] points out that the assessment referred to in the responses relates to the cumulative impact for the implementation of EA1N, EA2 and SZC. It does not take into account the possible construction of other energy projects in the vicinity. Please indicate whether there are any other energy projects which should be now be taken into account.</p>
Cu.2.5	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL5 response to responses on Ex1 Cu.1.18 [REP5-129]. The Applicant’s DL3 response states that the proposed Friday Street roundabout element of the two village bypass has been prioritised as set out in the Implementation Plan [REP2-044].</p> <p>(i) The measures set out in the Implementation Plan will be secured by a Draft Deed of Obligation which will confirm that SZC Co. shall use reasonable endeavours to carry out and complete the mitigation measures in accordance with the Implementation Plan, unless otherwise agreed with the local authority. Is the ESC content that that will provide satisfactory safeguards in relation to the potential for cumulative impacts? If not, what</p>

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ExQ2	Question to:	Question:
		<p>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 homes and businesses along the two village bypass route including during construction and seeks more mitigation such as noise attenuation fencing at the start of construction and beyond, bunds and considerate working hours. In response the Applicant states that there will be opportunity for further noise control measures to be incorporated into the detailed road design [REP3-042]. However, that does not appear to address the specific concerns raised by FERN in this respect. The Applicant is requested to provide a further explanation as to how those potential cumulative impacts upon these residents could be satisfactorily mitigated and how any such mitigation measures and their timing would be secured by the draft DCO.</p>
Cu.2.6	The Applicant, SCC	<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 DL2 response includes Appendix 13A – update to cumulative effects assessment [REP2-110].</p> <p>(i) Since the preparation of Appendix 13A has any further information come to light in relation to the Nautilus Interconnector, the Eurolink Interconnector or other projects that would require the assessment to be updated?</p> <p>(ii) Has any further progress been made in relation to the traffic management necessary to deliver the associated development and how that would be secured?</p> <p>(iii) Please provide an update in relation to the timing of the delivery of the proposed Yoxford roundabout and whether that is agreed?</p>
Cu.2.7	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant has provided its DL3 response to responses to Ex1 Cu.1.19 [REP3-046]. Please provide an update as regards progress in securing additional mitigation for recreational receptors within Receptor Group 19 including securing a PRoW Fund of an appropriate size and flexibility.</p>
Cu.2.8	The Applicant, Pro Corda, EHT	<p>Project wide effects</p> <p>The Applicant has provided its DL3 response to responses to Ex1 Cu.1.19 [REP3-046]. The responses of Pro Corda and EHT are noted. Please provide an update to those responses</p>

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ExQ2	Question to:	Question:
		and indicate whether the detailed scope and quantum of mitigation with EHT and Pro Corda has now been agreed?
CG.2 Coastal Geomorphology		
CG.2.0	The Applicant	<p>Impacts on coastal processes</p> <p>The submission of Bill Parker ‘Tsunami geohazard – Lack of transparency on the precautions and mitigating actions for the proposed Sizewell C development’ [REP2-228] submits that there is a quantifiable risk of a tsunami that the Applicant has not taken into account in the DCO application, and the level of risk is such that it makes the Sizewell C site too vulnerable to be built. The Applicant’s response to ExQ1 AI.1.4 [REP2-100] indicates that it has considered Tsunami risk to help inform the design of the Sizewell C sea defences.</p> <p>(i) Please provide further details and explanation as to how the design of the sea defences would provide adequate safeguard against this risk?</p> <p>(ii) In relation to “Storrega-type” Tsunami events, the Applicant indicates that they have an estimated return period of 1 in 10,000 years. Please explain how the design of the sea defences would respond to this risk or has provision been omitted due to the anticipated infrequent occurrence?</p> <p>(iii) Has the potential for climate change to impact upon the frequency and severity of tsunamis been taken into account in the sea defence design?</p>
CG.2.1	MMO	<p>Impacts on coastal processes</p> <p>For the permanent BLF, during the construction phase, the Applicant has provided responses to EXQ1 raised in relation to the dredge berth area including ExQ1 CG.1.9 and CG.1.13 [REP2-100]. There are conditions relating to dredging in the DML. Please indicate whether there are any outstanding concerns, or any additional controls required in relation to the impacts of any dredging, and use of the barge berthing platform.</p>
CG.2.2	MMO	<p>Impacts on coastal processes</p> <p>The DL3 submission of the MMO [REP3-070] indicates that it has not been able to review some areas in the time available. Please provide an update on your position in relation to the information submitted to date by the Applicant in relation to the coastal defences</p>

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ExQ2	Question to:	Question:
		features and the BLFs and indicate what, if any, additional information is needed to complete your assessment of potential coastal impacts?
CG.2.3	East Suffolk IDB	<p>Impacts on coastal processes</p> <p>In the SoCG [REP2-067] with the Applicant, East Suffolk IDB highlights the importance of the Minsmere Sluice in relation to surface water drainage from the catchment and therefore from the proposed development area. The Applicant has provided further details on this topic in response to ExQ1 CG.1.18 [REP2-100]. Please indicate whether the IDB has any outstanding concerns in relation to the potential for the proposed development to cause or affect the discharge from Minsmere Sluice?</p>
CG.2.4	ESC	<p>Impacts on coastal processes</p> <p>The ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], in relation to Item 3b states that in the light of SMP Policy 13.1, the Applicant should minimise the seaward extent of the coastal defence features as far as possible. The Applicant's DL5 submissions include further details of the reduced seaward extent of the coastal defences at Appendix A to the Applicant's written submissions responding to actions arising from ISH6 and Revision 2 of the Coastal Defence Features Plans [REP5-118].</p> <p>(i) In the light of the additional information and plans provided by the Applicant at DL5, are you satisfied that the HCDF is located as landward as possible?</p> <p>(ii) If not, please explain whether and, if so, why any further changes to the seaward extent of the coastal defences are sought?</p>
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>
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>

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ExQ2	Question to:	Question:
		<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? (ii) in relation to the funding of the monitoring and mitigation process by the Applicant and the duration for that to process and funding to be in place?</p> <p>(iii) the means of securing and enforcing the CPMMP provisions?</p> <p>(iv) whether this now satisfactorily addresses the details sought of the proposed secondary mitigation in the event that the SCDF-supported sediment pathway across the site frontage is interrupted?</p> <p>(vi) whether any further changes/provisions are required to safeguard the Coralline Crag from avoidable unnatural deterioration?</p>
CG.2.7	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], reasserts that the HCDF should be removed when no longer required to protect nuclear site infrastructure, and that the default position should be for the HCDF to be removed subject to assessment at the time of decommissioning. The EA's DL5 submission [REP5-148] also says they would welcome a provision made for removal of the HCDF.</p> <p>(i) Please provide an update in relation to the ongoing discussions on this topic and indicate how this would be secured by the draft DCO.</p> <p>(ii) Is the wording of the new requirement proposed by ESC agreed?</p> <p>(iii) In relation to that wording, is the last sentence relating to 'a proposal to be submitted to ESC for approval' sufficiently precise and enforceable?</p>
CG.2.8	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>ESC's DL5 written summary of oral submissions at ISH6 [REP5-144], proposes that either Thorpeness village frontage should be included in the area of assessment, or alternatively, the Applicant could provide funding to enable ESC to monitor the Thorpeness frontage. Please provide an update in relation to the ongoing discussion on this topic and, if agreed, indicate how this would be secured by the DCO?</p>
CG.2.9	The Applicant, NE	<p>Impacts on coastal processes</p>

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ExQ2	Question to:	Question:
		<p>NE's DL5 comments on the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature [REP5-158], raises a number of issues:</p> <p>(i) In relation to the effect on Minsmere, what level of certainty can the Applicant provide that HCDF exposure would not occur and should the HCDF become exposed, are any further assessments in response to the NE concerns proposed to be carried out and, if so, what is the anticipated timetable for those assessments?</p> <p>(ii) In addition, NE seeks some of the work investigating triggers to deal with the uncertainty in the SCDF to be undertaken up front for the HRA to ascertain no LSE. Please can NE clarify the exact nature of the work that is required to be carried out up front?</p> <p>(iii) Please can the Applicant clarify whether it agrees with NE on this point and at what stage it proposed to undertake the work investigating triggers to deal with the uncertainty in the SCDF?</p> <p>(iv) Does the revised CPMMP [REP5-059] incorporate the clear and precautionary triggers sought for the whole frontage and particularly the area to the north?</p> <p>(v) Does it make satisfactory provision for monitoring and undertaking beach recharge, if required? If not what further amendment would be necessary to deal with this?</p>
CG.2.10	The Applicant, EA	<p>Impacts on coastal processes</p> <p>The DL5 comments of Nick Scarr on the oral submissions made at ISH6 [REP5-253,254], refers to the suggestion by the Applicant and the EA that they have modelling with 'offshore wave patterns propagated inshore'.</p> <p>(i) Please provide clarification as to whether additional modelling with the Sizewell-Dunwich banks removed for all Flood Risk Assessment epochs and shoreline change modelling is available and/or whether that reference was in fact to the latest beach erosion assessment work in TR545 which uses wave data from a buoy offshore of the SD banks?</p> <p>(ii) If that is the case, please explain why that makes TR545 suitably precautionary including in relation to fluctuations in bank crest elevation for the duration of project?</p> <p>(iii) Please also explain how the CPMMP would, in any case, provide the mechanism to pick up fluctuations in bank topography and the consequential impacts of such a change?</p>

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ExQ2	Question to:	Question:
CG.2.11	The Applicant	<p>Impacts on coastal processes</p> <p>The DL5 comments of Nick Scarr on the oral submissions made at ISH6 [REP5-253,254], raises a number of issues including in relation to the Expert Geomorphological Assessment (EGA).</p> <p>(i) Please indicate whether a new EGA should be conducted in respect of the latest data and modelling and, if not, why not?</p> <p>(ii) Please indicate how (giving paragraph references) the submitted FRA and EGA have considered any change or degradation of the Sizewell-Dunwich banks over the lifetime of the Sizewell C project?</p> <p>(iii) Please explain the variation in the assessment of the importance of the Sizewell-Dunwich banks to Sizewell shoreline stability pre DCO, in the DCO application and post DCO?</p> <p>(iv) Please respond to the criticism that changes or degradation of the Sizewell-Dunwich banks would have the consequence of placing the exposed landward side of the main nuclear platform at increase flood risk and the northern defences could be vulnerable.</p>
CG.2.12	TASC, Nick Scarr, Bill Parker	<p>Impacts on coastal processes</p> <p>The EA DL5 comments on TR544 and TR545 [REP5-149] makes reference was to the latest beach erosion assessment work in TR545 which uses wave data from a buoy offshore of the Sizewell-Dunwich banks.</p> <p>(i) Do you agree that this effectively discounts the influence of the banks on wave height?</p> <p>(ii) Does that make it suitably precautionary, and the outputs can therefore accommodate natural dynamics including fluctuations in bank crest elevation for the duration of project?</p> <p>(iii) In any event, would the monitoring and mitigation proposed by the CPMMP provide a suitable mechanism to pick up any other fluctuations in bank topography?</p>
	TASC Response	<p>TASC do not have the expertise to provide a detailed review of coastal processes so have looked at this from a lay perspective and would defer to other IPs such as Nick Scarr and Bill Parker who have a better grasp of these matters. However, we make the following comments:-</p>

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ExQ2	Question to:	Question:
		<p>(i) The placement of the buoys landward of the Sizewell-Dunwich Bank is using data after any protective benefits from the banks being in place so TASC do not consider the modelling discounts the influence of the banks on wave height.</p> <p>(ii) To TASC, it appears that the modelling is not precautionary because it: uses data that has been recorded landward of the S-D banks; has not taken into account the potential loss of the sandbars present between the S-D banks and the shoreline; is limited in its focus on replenishment of the SCDF at the SZC site (rather than a longer stretch of coastline); uses a medium risk scenario of SLR of RCP4.5, rather than a precautionary RCP8.5; is too short-term as it does not assess up to the late 2100s</p> <p>(iii) If major impacts occur on the coastline at Sizewell, say as a result of a period of consistently high storm surges, what can be done to remedy the impacts as a result of a monitoring programme? The only option available appears to be to replenish the SCDF with yet more introduced material to cover an unnatural solid man-made feature that will in itself have impacts on coastal processes. The uncertainties are so considerable that TASC do not see any monitoring regime will be adequate in this situation.</p> <p>TASC find it totally unacceptable that at deadline 7 of the DCO process we are in a situation that the Applicant is unable to prove that the site can be protected for its lifetime, something that is so fundamental to avoid potentially catastrophic consequences. However, TASC do not see that the SZC site can be satisfactorily shown to be protected for its lifetime due to the unpredictability of the impacts of climate change. In TASC's view, if this generation does not take seriously the long term consequences of the decisions it takes today in the face of such dire warning from the IPCC, it runs the risk of being accused of a dereliction of duty and neglect at the very point where these matters should be taken into account through the planning process.</p> <p>TASC would like to see, as a minimum, a fully-funded independent flood-risk and shoreline changes assessment using the latest predictions for the impacts of climate change into the late 2100s, such as those in the July 2021 AR6 report from the IPCC.</p>
CG.2.13	Applicant, EA	<p>Impacts on coastal processes</p> <p>In relation to the EA DL5 comments on TR544 and TR545 [REP5-149]:</p> <p>(i) The EA questions whether the SCDF erosion assessment adequately considers the 'worst case predicted SCDF erosion' scenario and encourages the addition of more severe</p>

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ExQ2	Question to:	Question:
		<p>scenarios in the next stage of modelling. Is it agreed that this modelling should be undertaken and, if so when will it be carried out and be available?</p> <p>(ii) The EA indicates that it welcomes the chance to discuss further the SCDF geometry, in particular crest height, with the Applicant. Is this is a matter for detailed design stage that would be satisfactorily secured by the draft DCO?</p> <p>(iii) The EA recommends modelling more severe scenarios beyond 2099 for the SCDF and that further work is needed to explore the potential for more extreme events to occur more frequently in the future. ESC's DL5 written summary of oral submissions at ISH6 also points out that the assessment currently covers only part of the Project's lifetime. The Applicant's DL5 written summary of oral submissions made at ISH6 [REP5-111], confirms that work is underway for the modelling of the SCDF through the decommissioning phase to 2140 and is due for submission at Deadline 7. However, please clarify the position in relation to the timing and submission of the assessment to 2099, and whether it will include the more severe scenarios and exploration of extreme events mentioned by the EA. In addition, please provide a timeline for the carrying out and submission of this work.</p> <p>(iv) In relation to TR545, the EA comments on the reliance placed upon the currently bimodal wave climate. Please can the Applicant respond as regards the potential for changes to wave bimodality due to the impacts of climate change and whether this will be assessed?</p>
CG.2.14	The Applicant	<p>Impacts on coastal processes</p> <p>The Alde and Ore Association Written Submission for DL5 providing commentary on ISH 6 [REP5-187], submits that the CPMMP should have a wide geographical coverage going at least as far south as Shingle Street with appropriate time intervals for monitoring. That proposition is supported by other IPs including Mr Bill Parker.</p> <p>(i) If an extension to the monitoring area is not agreed, please explain further why the monitoring is only considered to be necessary within the area proposed;</p> <p>(ii) Without baseline monitoring for the wider neighbouring coastline how would any unusual changes and/or adverse effects resulting from the proposed development in such wider locations be recognised and mitigated?</p> <p>(iii) In any event, should funding be provided and secured in order to mitigate against such an eventuality?</p>

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ExQ2	Question to:	Question:
CG.2.15	The Applicant	<p>Impacts on coastal processes</p> <p>The DL5 submission of Mr Bill Parker in relation to ISH6 [REP5-191], highlights some areas which he submits have been overlooked in the modelling provided to date and is critical of the assumptions underlying the EGA including the use of 'reasonably foreseeable' conditions.</p> <p>(i) Please respond to those criticisms and summarise why the approach to monitoring utilised by Cefas can be regarded as robust.</p> <p>(ii) Please provide clarification on the methodology on ground strengthening and the foundations for the HCDF as highlighted by Cllr Robin Sanders at ISH6 [REP5-180].</p>
CG.2.16	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>The DL5 submission of Mr Bill Parker in relation to ISH6 [REP5-191], suggests that certain aspects should be built into the structure of the Marine Technical Forum including having meaningful local community membership and being open to public scrutiny. Please indicate whether it is agreed that such inclusion and external scrutiny would be beneficial and should be accommodated?</p>
CI.2 Community Issues		
CI.2.0	ESC, SCC	<p>Clarification</p> <p>Within the LIR [REP1-045] on page 399 para 28.26 you refer to CYDS. What is this, it does not appear in the Glossary of Terms?</p>
CI.2.1	ESC, SCC	<p>Accommodation Strategy</p> <p>The Applicant in response to the LIR and the concerns raised at ISH4 in respect of the delivery of the accommodation campus and the caravan site at the LEEIE consider that it would not be appropriate to limit worker numbers as a mechanism to ensure timely delivery of the accommodation campus. In [REP3-044] the Applicant sets out their detailed arguments as to why this is considered inappropriate (paras31.2.5 onwards).</p> <p>(i) Do you agree that the assessment of the gap between the availability of project accommodation and the total amount of accommodation required would not exceed the amount of spare capacity available in the 60-minute area?</p>

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ExQ2	Question to:	Question:
		(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?
CI.2.2	Applicant	<p>Accommodation Strategy</p> <p>In [REP3-044] you state at the first bullet point under 31.2.19 <i>"The LEEIE caravan site is delivered when the NHB workforce is around 800"</i> and at the subsequent bullet point <i>"The campus is delivered when the NHB workforce is around 2,500 (of which around 600 would be in the LEEIE caravan site, so translates to 1,900 NHB workers in the private market)"</i></p> <p>(i) In light of the strong arguments made in the preceding paragraphs that there should not be a cap on worker numbers as you do not consider this to be justified, these statements are not ones which the ExA can rely upon as there is nothing which secures the provision at these numbers is there?</p> <p>(ii) In the ES the accommodation provision at the caravan site and accommodation campus is said to be primary mitigation. To be such a thing it needs to be secured and delivered so that it can function as primary mitigation?</p> <p>The ExA notes the response arising from Written Submissions to ISH1 set out in Appendix B, if a full response to the concerns above is better addressed through the intended Deadline 6 submission that would be welcomed.</p>
CI.2.3	Applicant, ESC, 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>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>
CI.2.4	Applicant	<p>Fly Parking</p> <p>It is suggested that limiting worker numbers is not necessary or appropriate for a series of reasons throughout [REP3-044] and in responses made at the ISHs.</p>

ExQ2: 03 August 2021**Responses due by Deadline 7: 03 September 2021**

ExQ2	Question to:	Question:
		Please explain how limiting parking spaces on the main development site and having parking permits would address the problem of fly parking in the event that there was a delay in the provision of the park and ride facilities or the other proposed parking sites.