



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference EN010012

Deadline 8: *24 September 2021*

Analysis of Control Documents

20026200 East Suffolk Council

1 Introduction

- 1.1 This document sets out East Suffolk Council's analysis of the gaps and inconsistencies in the suite of control documents as presented in Table 2 of the Applicant's response to the ExA's commentary on the dDCO is [REP7-058].
- 1.2 The Applicant has, in Table 2 of the document referred to in paragraph 1.1 above, split the documents into 'level 1'(covered in section 2 of this document) and 'level 2' documents (covered in section 3 of this document). This document follows the approach used by the Applicant.

2 Level 1 documents: Control Documents

Code of Construction Practice (CoCP) (REP5-078 Revision 4)

- 2.1 This is a Certified document listed in Schedule 22 and Article 2 of the dDCO. CoCP is incorrectly defined in the dDCO. Schedule 22 refers to 8.11(A). The current version is 8.11(C) which only appears in the name of the PDF, not on the face of the document. The most recent version is revision 4 but Schedule 22 states revision 2. Definition in Schedule 22 needs to be corrected.

Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP) (REP5-088 Revision 2)

- 2.2 Schedule 22 which currently does not refer to a revision number ought to do so. Reference to this document throughout application documentation needs to be consistent. Is it the 'Terrestrial Ecology Monitoring and Mitigation Plan' or 'Terrestrial Monitoring and Mitigation Plan'?

Drainage Strategy (REP2-033 Revision 2)

- 2.3 Referred to in the examination library and on the title page of the document as 'Outline Drainage Strategy'. Reference to this document throughout application documentation needs to be consistent. Is it the 'Outline Drainage Strategy' or the 'Drainage Strategy' or do both of these documents exist? If the latter, how do these two interrelate?

Rights of Way Strategy (REP3-013 Revision 3)

- 2.4 Schedule 22 lists this as the Public Rights of Way Strategy and refers to revision 1. In the examination library and on the title page this is referred to as 'Rights of Way and Access Strategy'. The draft DCO refers to this as the 'Public Rights of Way Strategy'. Reference to this document throughout application documentation, including Schedule 22 of the draft DCO, needs to be consistent. Is it, 'Rights of Way Strategy', 'Rights of Way and Access Strategy' or the 'Public Rights of Way Strategy'?

Section 1.3 Lighting Management Plan (APP-182, Revision 1)

- 2.5 Schedule 22 needs to be amended to refer to the correct document revision.
Outline Landscape and Ecology Management Plan (OLEMP) (REP1-010, Revision 2)
- 2.6 Schedule 22 needs to be amended to refer to the correct document revision.
Fen Meadow Strategy (Volume 1, Chapter 2, Appendix 2A.9D of 6.14 of the ES)
- 2.7 This document can be found under [\[AS-209\]](#) not [AS-208] as suggested by the Applicant. Table 2 now also includes Draft Fen Meadow Plan [REP6-026] which is also now referred to in Schedule 22 of the dDCO
Marsh Harrier Compensatory Habitat Report (REP3-053, Revision 1) and Marsh Harrier Habitat Report [REP2-119]
- 2.8 Schedule 22 needs to be amended to refer to the correct document revisions.
Two Village Bypass Landscape and Ecology Management Plan (REP5-077, Revision 2)
- 2.9 Schedule 22 needs to be amended to refer to the correct document revision. Article 2 needs to be amended to provide a correct definition for this document, the document itself is titled "Two Village Bypass Landscape and Ecological Management Plan".
Sizewell Link Road Landscape and Ecology Management Plan (REP5-076, Revision 2)
- 2.10 Schedule 22 needs to be amended to refer to the correct document revision, the document itself is titled "Sizewell Link Road Landscape and Ecological Management Plan".
Supply Chain Strategy
- 2.11 . The Supply Chain Strategy is referred to in the Deed (REP7-041, tracked) on p. 56 as Doc 8.9. Appendix B should be given its PINS reference. However, the provisions for approval of the Supply Chain Work Plan pursuant to the SCWS-see pp. 67-69-are not clear, they appear to be "viewed and discussed".
Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary (REP5-122, Revision 1)
- 2.12 This document is referred differently on the face of it to how it is referred to in the Applicant's submission. Referred to in the examination library and on the title page of the document as 'Monitoring and Mitigation Plan for Sandlings (Central) and Alde, Ore and Butley Estuaries European Sites'.
Conventional Waste Management Strategy (APP-194, Revision 1)
- 2.13 This is referred to in the examination library and on the title page of the document as 'Waste management Strategy'. Is it the 'Conventional Waste Management Strategy' or is it the 'Waste Management Strategy'?
- 2.14 Provision in the CoCP for approval of the Waste Management Plan pursuant to this Strategy is unclear and not adequate.

Materials Management Strategy

- 2.15 Provision in the CoCP for approval of the Waste Management Plan pursuant to this Strategy is unclear and not adequate.

Implementation Plan

- 2.16 The commitments within the Implementation Plan should be stronger or provided directly in the dDCO. 'Reasonable endeavours' are not sufficient. Separate submissions have been made in this regard.

3 Level 2 documents: Documents for approval by discharging authority

Outline Dust Management Plan (Level 1 document: CoCP)

The requirement in respect of the ODMP at 4.1.3 must ensure that the ODMP is approved prior to commencement of works (as per drafting for noise mitigation in CoCP 3.1.3). ESC understands that the Applicant proposes to make this change in the next iteration of the CoCP, to be submitted at Deadline 8.

Site-specific written schemes of investigation (Level 1 document: OAWSI)

- 3.1 There appears to be a lot of archaeological investigation still outstanding. Can the Applicant please clarify why this is?

Site-specific post-excavation assessments (Level 1 document: OAWSI)

- 3.2 Requirement 3(6)(a) to be amended to explicitly state that any post-excavation assessments are to be carried out in accordance with the OAWSI.

Site-specific archaeological management plan

- 3.3 This document is not provided. Further information on this document should be provided in the OAWSI.

Footpath implementation plans (Level 1 document: Rights of Way Strategy)

- 3.4 The Level 1 document (Rights of Way Strategy) should be amended to make it clear that any Footpath Implementation Plans must be in accordance with the Rights of Way Strategy.

Landscape and ecology management plan (Level 1 document: Outline LEMP)

- 3.5 The executive summary should be amended to refer to the 'Landscape and Ecology Management Plan' rather than the 'Landscape and Ecological Management Plan'.

Sediment Sampling Plan (Level 1 document: none)

- 3.6 Applicant to confirm where this document can be located and what its purpose is.

Fish Impingement and Entrainment Monitoring Plan (Doc Ref. 9.89) (Level 1 Document Draft Fish Impingement and Entrainment Monitoring Plan)

- 3.7 These documents are referred to as “a fish entrapment and impingement monitoring plan” and “Draft Fish Entrapment and Impingement Monitoring Plan”. Correct document name should be used for consistency.