



The Sizewell C Project

9.109 SZC Co. Response to Request for Further Information at Deadline 8

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1 INTRODUCTION

- 1.1.1 On 20 September 2021, the Examining Authority published a Rule 17 Letter: Request for further information [[PD-052](#)]. This note responds to those parts which are addressed to the Applicant and a response was requested for this Deadline 8. SZC Co. will respond to the other parts of the letter at the deadlines requested by the ExA.

2 RESPONSE TO REQUEST FOR FURTHER INFORMATION

Table 2.1: SZC Co Response to ExA’s Request for Further Information

ExA Comment	SZC Co. Response
<p>Sizewell Link Road – Design Considerations.</p> <p>As referred to by Mr Merry of Suffolk County Council during ISH13 on 16 September 2021 [EV-142e], the original design speed for the Sizewell link road was 50mph. However, the current design is a 60mph road. Please can the Applicant explain the rationale for the chosen speed of 60mph as opposed to a lesser design speed. If the Sizewell link road was a lesser speed than 60mph, please can the Applicant confirm whether this would lead to reduced impacts in respect of air quality, noise, landscape and the historic environment? If the design speed were reduced would not that road more appropriately meet the tests set out in the National Policy Statement by minimising impacts?</p>	<p>The Sizewell link road was originally designed as a 50mph road, as described in the Stage 3 Pre-Application Consultation, para. 10.7.2 [APP-075]. The alignment of the road, and selected design speed, was intended to provide a direct and attractive route, which serves to bypass the communities on the B1122 including Middleton Moor and Theberton. The highway geometry sought to follow the topography and avoid constraints while minimising the number of design departures and relaxations. Through consultation, Suffolk County Council (SCC) and Suffolk Constabulary raised concerns around the practical enforceability of the 50mph speed limit, expressing a preference for a 60mph speed limit to be adopted instead. The design speed for the Sizewell link road was therefore changed to 60mph. Increasing the Sizewell link road speed limit to the proposed 60mph only allows cars and LGV to travel at 60mph, as the National Speed Limit on single carriageway roads is 50mph for HGV and buses.</p> <p>The horizontal and vertical geometry of the Sizewell link road designed for 60mph remained the same as for the 50mph design speed, and SCC accepted that there would be more design departures required to achieve the 60mph design</p>



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ExA Comment	SZC Co. Response
	<p>speed. The design departures have been discussed with SCC and agreed in principle. The design and character of the Sizewell link road therefore has not fundamentally changed from the original 50mph design, and therefore reducing to 50mph would not alter the assessed impacts in terms of landscape, visual impact and historic environment.</p> <p>For the reasons set out above, a lower design speed of 40mph would also not be supported by Suffolk Police. To achieve a safe road at this speed would require significant geometric / engineering constraints along the full length of the road to constrain driver speeds. Whilst Sizewell C HGVs and buses are constrained to use the Sizewell link road during construction period, drivers of all other vehicles can decide whether to use the B1122 or Sizewell link road. Therefore, to be an effective bypass the Sizewell link road needs to be an efficient and attractive route for non-Sizewell C drivers and Sizewell C car and LGV drivers. At 40mph the Sizewell link road, which is already slightly longer than the B1122, would be less attractive and would result in more traffic travelling on the B1122 through Theberton and Middleton Moor. A lesser design speed would undermine the effectiveness of the Sizewell link road in providing traffic relief along the B1122 during Sizewell C construction and as a legacy scheme beyond.</p>

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ExA Comment	SZC Co. Response
<p>Accommodation Campus</p> <p>Can the Applicant explain, for Deadline 8 on 24 September 2021, the distinction between the terminology used in the draft Deed of Obligation [REP7-041] (Housing Fund and Housing Contingency Fund) and the terminology used in Appendix 3B of [REP7-057] (Housing Fund – Contingent elements, Housing Fund-non contingent elements) so that there is a full understanding of how the various components of the ‘Housing Fund’ are proposed to work and the figures presented in both documents are made up.</p>	<p>In Schedule 3 of the Draft Deed of Obligation submitted at Deadline 7 [REP7-040] the contingent elements of the Housing Fund to be paid under the heading ‘<i>Housing and Homelessness Services Resilience Measures</i>’ (a total of £1,266,823) was included in the total amount defined by the Definitions in that Schedule as part of the Housing Fund.</p> <p>To align with Appendix 3B of [REP7-057] and correctly represent the contingent/non-contingent elements of the Housing Fund, this has been rectified within the next iteration of the Draft Deed of Obligation (Doc Ref. 8.17(G)).</p> <p>A table summarising these figures – confirming consistency in overall sums, but a difference in definitions between Appendix 3B of [REP7-057] and Schedule 3 of the Draft Deed of Obligation submitted at Deadline 7 [REP7-040] – and how this has been rectified in the next iteration of the Draft Deed of Obligation (Doc Ref. 8.17(G)) is included as Appendix A.</p>
<p>Appendix C to the Applicant’s Response to the Examining Authority’s commentary on the DCO [PD-038]</p> <p>A commentary with questions is set out at Annex A to this letter. Please respond at Deadline 8, 24 September. East Suffolk Council should note there are points directed to both the Applicant and East Suffolk Council.</p>	<p>Refer to SZC Co. response in Table 2.2.</p>



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ExA Comment	SZC Co. Response
<p>Parameter plans and approved plans – which take precedence? – art 4 of the dDCO and Requirement 8</p> <p>The ExA stated at ISH14 that it would issue questions on specific Requirements. The questions are at Annex B to this letter. Please respond at Deadline 8, 24 September. There are points directed to both the Applicant and East Suffolk Council.</p>	<p>Refer to SZC Co. response in Table 2.3.</p>

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Table 2.2: SZC Co Response to ExA’s Request for Further Information: Annex A Strategies and plans secured by the DCO and DoO – commentary and questionnaire

ExA Comment	SZC Co. Response
<p>1. The Applicant’s note “Structure of Control Documents and Subsequent Approvals” (Appendix C to Book 9, 9.72, Applicant’s response to the ExA’s Commentary on the DCO [REP7-058], hereinafter referred to as the Structure Note) came out of the ExA’s questioning of various Codes, outline Plans, Strategies and the like. The ExA was assured there was a framework in the DCO and other regulatory documentation which delivered robust obligations and controls. It explains that level 2 documents are to be approved by various bodies and are enforceable by the requirements, DML or DoO. Let us do a worked example to test this.</p>	<p>An updated version of the ‘<i>Structure of Control Documents and Subsequent Approvals</i>’ is appended to this response as Appendix C. This reflects the review of control documents which has been carried out since Deadline 7, responses to other ExA questions and continued discussions with stakeholders.</p>
<p>2. Worked example 1 – the Dust Monitoring and Management Plan</p> <p>2.1. Table 2 tells us this sits under the CoCP (a level 1 document) and is a level 2 document for approval. The approving body is ESC and the securing mechanism is Reqt 2.</p> <p>2.2. The CoCP (Rev 5 submitted at D7 submission) says “Further details of dust monitoring and management will be set out in a Dust Monitoring and Management Plan (DMMP) that would be prepared before relevant construction works commence. The frequency, methods and indicative locations</p>	<p>Since Deadline 7, the Applicant has undertaken a full review of the Level 1 control documents and revised versions are submitted at this Deadline 8. The exercise was two-fold:</p> <ol style="list-style-type: none"> 1. clarify securing mechanisms; and 2. refine the language used to describe commitments. <p>Please see section 1.3 of Appendix C for a full explanation of how this was carried out.</p> <p>Secondary approvals Introductory text has been added to all Level 1 control documents to explain the procedure for any further approvals</p>



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ExA Comment	SZC Co. Response
<p>for dust monitoring would be agreed with ESC through the DMMP and secured by Requirement. The DMMP would be submitted to ESC for approval and would be implemented as agreed”.</p> <p>2.3. However, there is nothing in the CoCP to provide a procedure for that. Nor does a word search for “dust” in the dDCO produce any procedure. Nor can the ExA find anything for that in the DoO. Questions which arise are (a) what is the procedure, (b) what are the time limits and dispute resolution procedure and (c) is there a fee structure?</p> <p>2.4. The same quotation from the CoCP says the frequency, methods and locations for monitoring would be both agreed “and secured by a Requirement”. he “would be” suggests a future requirement. There is no mechanism for that to come into existence. Is there an existing requirement in the dDCO which is being referred to?</p> <p>2.5. Reqt 2 states that “The construction of the authorised development and the removal and reinstatement of the temporary works must be carried out in accordance with the Code of Construction Practice, unless otherwise approved by East Suffolk Council”. It is unclear from the wording of Reqt 2 whether the Dust Monitoring and Management Plan or other level 2 documents referred to in the Structure Note are</p>	<p>required by that document. If the document is secured via the dDCO then the procedure, disputes mechanism and fees provisions in Schedule 23 of the dDCO apply to any subsequent approvals unless the document itself states otherwise. Equally if a document is secured via the DoO then the procedure, disputes mechanism and fees provisions in the DoO apply to any subsequent approvals unless the document states otherwise. There are instances where it is more appropriate for a governance group established by the DoO to approve a Level 2 document or details. Where that is the case, this has been expressly stated in the Level 1 control document and then the DoO procedure, disputes mechanism and fees provisions apply.</p> <p>DMMP in the CoCP Specific to the DMMP, the CoCP has been updated to clarify the position. The requirement to for a Dust Monitoring and Management Plan to be submitted and approved by ESC prior to the relevant construction works commencing is in paragraph 4.1.3, Part B of the CoCP. Further paragraph 4.1.3 states ‘<i>The frequency, methods and indicative locations for dust monitoring must be set out in the the DMMP submitted to ESC for approval. The DMMP must be submitted to ESC for approval and must be implemented as approved. The DMMP must be submitted to and approved by ESC before relevant construction works commence</i>’.</p>

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ExA Comment	SZC Co. Response
<p>documents which must be complied with in order to comply with Reqt 2. It needs to be made crystal clear in the DCO that that are.</p> <p>2.6. A word search for Dust Monitoring and Management Plan in the DoO Rev 7 does not produce any results.</p> <p>2.7. Table 2 says the relevant governance group is the Environment Review Group (“ERG”). This, like the other groups, is to be found in the DoO. Sch 11 Natural Environment para 13 seems to be the complete statement and incorporates other parts and definitions in Sch 11. (In passing the ExA notes that the definition of the ERG1 states that it is “constituted in accordance with and having the functions ascribed to it by paragraph 13.1”. Para 13.1 does not go that far. The reference should be to para 13 as a whole. The definitions of other groups make a similar error. But it is not the job of the ExA to check the Applicant’s preparation and drafting.)</p> <p>2.8. Nowhere in para 13 are there any functions relating to the Dust Monitoring and Management Plan. A word search for Dust Monitoring does not return any hits.</p> <p>2.9. The ExA questions whether the ERG is in fact meant to be monitoring or governing the Dust Monitoring and Management Plan. It questions the enforceability of the DMMP. This is</p>	<p>Requirement 2 Requirement 2 has been updated as shown in red below at Deadline 8 for the avoidance of doubt (Schedule 2, dDCO Doc Ref. 3.1(I)) states: <i>“The construction of the authorised development and the removal and reinstatement of the temporary works must be carried out in accordance with the Code of Construction Practice and the subsequent plans approved under the Code of Construction Practice, unless otherwise approved by East Suffolk Council.”</i></p> <p>DoO The DoO has been updated at this Deadline 8 and the corrections suggested by the ExA in 2.7 incorporated. The functions of the governance groups have evolved through further engagement with stakeholders and the DoO has been updated to describe the general function of each governance group, recognising that the governance groups framework incorporates an element of flexibility so that the groups are able to respond to circumstances as they evolve during the construction period. Within the Level 1 documents it has been clarified what must be submitted to each governance group for approval and for information and when a governance group must be consulted. This is not reflective of the full extent of the activities of the governance groups which is why it is more</p>

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ExA Comment	SZC Co. Response
<p>disappointing as the DMMP was chosen at random to work through the explanations given to the ExA during the Examination, and to test how the plans are secured and enforced.</p> <p>2.10. Nor are there any references to a Soil Management Plan, a Main Site Noise Monitoring and Management Plan, or to any Associated Development Sites Noise Monitoring and Management Plans, all of which are said in the Structure Note to come under the ERG. Nor is the CoCP referred to in the functions of the ERG.</p>	<p>appropriate to have a general description of their function within the DoO.</p> <p>Other plans secured by the CoCP The CoCP has been updated to clarify which Level 2 documents are required for approval under it, by whom and when. The Draft MDS Noise Monitoring and Management Plan (Appendix B to Part B of the CoCP (Doc Ref. 8.11(E))) has been appended to the CoCP with the Draft NPR Noise Monitoring and Management Plan (Appendix A to Part C of the CoCP (Doc Ref. 8.11(E))). The requirement for a MDS NMMP to be submitted to and approved by ESC before any vegetation clearance works on that site are carried out is at paragraph 3.1.3, Part B of the CoCP and the requirement for an AD NMMP to be submitted to and approved ESC before any vegetation clearance works on each site are carried out is at paragraph 3.1.3, Part C of the CoCP.</p> <p>The requirement to for a Soil Management Plan to be submitted and approved by ESC prior to soil stripping operations commencing is in paragraph 9.4.4, Part B of the CoCP.</p>
<p>3. But to return to Table 2 of the Structure Note, what it says about the Overarching Archaeological Written Scheme of Investigation, Peat Strategy and Drainage Strategy and Estate</p>	<p>No further comments from the Applicant.</p>



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ExA Comment	SZC Co. Response
<p>Wide Management Plan is correct. They are all to be approved by one of the Councils.</p>	
<p>4. There is however an error with the TEMMP which is said to be for the approval of the EWG, whereas Reqt 4 actually gives approval to ESC. And the Construction Emergency Plan is said not to require approval. However, Reqt 5(3) clearly contemplates approval, presumably by SCC and so Reqt 5 needs to state this clearly and if the Structure Note is to be revised it should be corrected.</p>	<p>Requirement 4 requires the authorised development to be carried out in accordance with the TEMMP (Doc Ref. 9.4(B)) unless otherwise approved by ESC following consultation with Natural England and the Environment Agency.</p> <p>The EWG is listed as the ‘<i>relevant governance group</i>’ because the TEMMP includes a commitment to report the outcome of monitoring to the EWG. The Level 1 control documents have been updated to clarify the role of the discharging authority pursuant to Requirement 4, and the role of the governance group in relation to the commitments in the TEMMP. Appendix C has also been updated to clarify this.</p> <p>Requirement 5A relating to the construction emergency plan is under discussion with SCC. At Deadline 10 the requirement will be updated to clarify that approval of this plan is not necessary. Appendix C has been updated accordingly.</p>
<p>5. The references to the relevant governance groups on page 1 of Table 2 are however puzzling. Three are referred to – ERG, Ecology Working Group, and Planning Group. Yet none of them appear to have any functions with regard to the Level 1 or 2 Control Documents on page 1. The functions of the Planning Group in the DoO are hard to discern apart from being a dispute resolution body for the Working Groups. Please will the</p>	<p>The ‘relevant governance group’ was inserted based on which group will have oversight of the activities controlled by that Level 1 document (or subsequently approved Level 2 documents). In most cases, this is the group to which the reporting required under the Level 1 and Level 2 documents must be submitted. Appendix C has also been updated to clarify this.</p>

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ExA Comment	SZC Co. Response
<p>Applicant check whether the other Governance Groups actually have any functions in relation to the Level 1 and 2 Documents allocated to them by Table 2 and confirm the position, and make any necessary amendments</p>	
<p>6. Coastal Processes Monitoring and Mitigation Plan. The approval mechanism is correctly described in Table 2 page 2. However separate plans are to be submitted to ESC and to the MMO, with the possibility of different results. How is that to be avoided?</p>	<p>Condition 17(5) of the DML states: <i>“If requirement 7A of Schedule 2 of the Order is discharged prior to discharge of this condition 17, the undertaker must notify the MMO in writing and this condition 17 will be deemed to be discharged unless the MMO states otherwise to the undertaker in writing within 7 days of such notification.”</i></p> <p>As the MMO and ESC have different jurisdictions and areas of expertise, and the CPMMP approved under both the DML and the DCO must be in general accordance with the Draft CPMMP (Doc Ref. 6.14 2.15.A(B)), the Applicant considers there to be a low risk that the two decision-making bodies will arrive at inconsistent conclusions as to the appropriate content of the CPMMP. The obligation on ESC to consult the MMO pursuant to Requirement 7A(1) before making its decision, and the equivalent obligation on the MMO under condition 17(1) should also serve to make such an outcome unlikely. However, in the event the two bodies reach inconsistent conclusions the undertaker would be able to resolve any dispute using the mechanisms found in Schedule 23 or Schedule 20A as appropriate.</p>

ExA Comment	SZC Co. Response
	The Applicant is waiting for confirmation from the MMO that the amended wording of condition 17(5) is acceptable. If included in the order as made, the deemed discharge provision would reduce the risk of inconsistency in decision-making.
7. Page three is correct, except that the ExA has the concerns as to whether the functions are actually allocated to the relevant governance groups, set out in paragraph 5 above.	Please see Applicant's response to paragraph 5.
8. Page 4. There are some points here. 8.1. What is described as a Fish Impingement and Entrainment Monitoring Plan has a different name in the DML where it is a Fish Entrainment and Impingement Monitoring Plan.	Condition 50 of the DML (Schedule 20 of the dDCO (Doc Ref. 3.1(I))) submitted at this Deadline 8 has been updated to refer to the ' <i>Fish Impingement and Entrainment Monitoring Plan</i> ' and the ' <i>Draft Fish Impingement and Entrainment Monitoring Plan</i> ' which aligns with the document title at Doc Ref. 9.89(A).
8.2. There are no obligations to comply with the Marine Mammal Mitigation Protocol, the Site Integrity Plan, the Sabellaria Reef Management and Monitoring Plan, the Fish Impingement and Entrainment Monitoring Plan	This has been rectified at Deadline 8. Condition 40(5) of the DML (Schedule 20 of the dDCO (Doc Ref. 3.1(I))) states that ' <i>The SIP and the MMMP must be implemented as approved by the MMO</i> '. Condition 45(2) of the DML (Schedule 20 of the dDCO (Doc Ref. 3.1(I))) states that ' <i>The construction of Work No 2B must be carried out in accordance with the SRMMP as approved by the MMO</i> '.

ExA Comment	SZC Co. Response
	Condition 50(2) of the DML (Schedule 20 of the dDCO (Doc Ref. 3.1(I))) states that ‘ <i>The FIEMP must be implemented as approved in writing by the MMO</i> ’.
8.3. Housing Supply Plan and Tourist Accommodation Plan. The ExA presumes the Applicant means the Private Housing Supply Plan (PHSP). Please will the Applicant confirm	This is correct.
8.3.1. Private Housing Supply Plan – this is influential in the release of the Housing Fund. £2,000,000 is paid 1 month after approval of the PHSP and then £1,139,661 “from the first anniversary of approval to sixth anniversary” – DoO Sch 3, para 2.7.2 (B). Should this say this sum is to be paid on EACH anniversary? It is unclear at the moment. ESC spend the money on accommodation purposes – the types of initiatives and the aim – 1200 bedspaces before 6 th anniversary of Commencement Date (see para 2.7.6). SZC provide six-monthly reports of demand and use (para 2.7.4). AWG can review the PHSP in the light of that and how ESC have spent the money.	The amount of £1,139,661 should be paid on EACH anniversary of approval to sixth anniversary. The remaining provisions as interpreted here by ExA are as they are intended by the Applicant.
8.3.2. Tourist Accommodation Plan – required by para 2.8.1 and then payments are made to support tourist accommodation initiatives in the plan. Then annual payments to support Accommodation Providers, reports and plan revisions if AWG require them	The provisions as interpreted here by ExA are as they are intended by the Applicant.

ExA Comment	SZC Co. Response
<p>8.3.3. On the RE issue as a whole, there are other plans and most recently in Rev 7 of the DoO - a Housing Contingency Fund. The ExA presumes this is to be the Project Accommodation Delay provisions described at Appendix 3B of the Appendices to the Applicant’s responses to ExQs2 [REP7-057]. Please will the Applicant confirm. On these provisions, the ExA comments:</p> <p>8.3.3.1. The delivery of any remedy is dependent on the private sector</p> <p>8.3.3.2. That sector will already be motivated by rents, so if there is a problem still it is difficult to see how it will be solved</p> <p>8.3.3.3. If the NHB workers number jumps from (in the case of the caravan park) 849 the day the survey is finalised to any number above 850, however high there is an immediate problem</p> <p>8.3.3.4. But that problem will not be known until six months later and then there is a three-month delay until the caravan park is finished.</p> <p>8.3.3.5. The same problems will affect the Housing Contingency Fund in the case of the Accommodation Campus.</p>	<p>The provisions as interpreted here by ExA are as they are intended by the Applicant.</p> <p>However, for clarity (to align with the proposals and breakdown of the Housing Fund as described in Appendix 3B of [REP7-057], the Housing Contingency Fund has two elements as now set out in the Draft Deed of Obligation (Doc Ref. 8.17(G)):</p> <ol style="list-style-type: none"> 1) An element for Housing and Homelessness Services Resilience Measures, including Residential Care Home Closure Contingency, released on evidence of housing market stress (regardless of delivery of Project Accommodation); and 2) An element for Project accommodation delay as per provisions described at Appendix 3B of [REP7-057]. <p>A detailed response to queries raised by ExA at paragraphs 8.3.3.1 to 8.3.3.5 and by extension 8.3.4 is provided at Appendix B to this document.</p>
<p>8.3.4. Some of the points in 8.3.3. were explored at ISH14. The ExA asks the Applicant to set out their response and explanation carefully in their postISH14 summary at Deadline 8. Similarly, ESC is asked to set out its position carefully in its post-ISH14 summary. Question 8.3.3.3 was not put. Question 8.3.3.4 was mentioned but not followed up. The Applicant’s</p>	<p>A detailed response to queries raised by ExA at paragraphs 8.3.3.1 to 8.3.3.5 and by extension 8.3.4 is provided at Appendix B to this document. This is also set out in the Written summary of Oral Submissions at ISH14 (Doc Ref. 9.103)</p>



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ExA Comment	SZC Co. Response
<p>answer to Question 8.3.3.5 is assumed to be the same as the answers to Questions 8.3.3.1 and 8.3.3.2 but please will the Applicant confirm or explain otherwise</p>	
<p>8.4. Annual Skills Implementation Plans: whilst these have to be produced, the ExA cannot then see what is to be done with them, what difference they make</p>	<p>Annual Skills Implementation Plans (ASIPs) are produced by the Regional Skills Co-ordination Function and are important in defining the direction, amount, application and reviewing the effectiveness of funding and other measures set out in Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(G)).</p> <p>ASIPs are critical in ensuring that the mitigation proposed in Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(G)) are applied proportionately. While the Workforce Delivery Strategy sets the Project’s own needs for workforce delivery, it is the role of the ASIP to – for example:</p> <ul style="list-style-type: none"> a) ensure that the Asst Skills Enhancement and Capability (ASEC) Fund and Investments have ready and willing recipients, and meet the purpose of these measures as defined by the Deed of Obligation; b) ensure that the region has the right pipeline of skills infrastructure to support the Project to deliver on Apprenticeship Strategies; and c) ensure the effectiveness of the Sizewell C Outreach Fund.

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ExA Comment	SZC Co. Response
<p>8.5. The Apprenticeship Strategy is actually to be part of the Workforce Delivery Strategy which is its Level 1 Control Document. There is no approval by ESEWG but instead the document is produced in consultation with them. In addition, the Workforce Delivery Strategy is in fact for the approval of the ERG which does not sound right. There is no requirement for approval of the Supply Chain Work Plan. What should be the position on these matters?</p>	<p>It is correct that there is no approval by SEWG for the Apprenticeship Strategy (or the Workforce Delivery Strategy). As described in Schedule 7 of the Draft Deed of Obligation (Doc Ref. 8.17(G)), these documents set the Project’s own needs and approach to delivery of opportunities.</p> <p>These are then taken by the Regional Skills Co-ordination Function and used to develop the Annual Skills Implementation Plan – in terms of Apprenticeships (for example), the ASIPs will set out how the region’s skills and training infrastructure will use funding and measures to align with the opportunity created by the Project and develop a pipeline for throughput of people to access the proposed apprenticeships in the Apprenticeship Strategy.</p> <p>The Workforce Delivery Strategy is not for the approval of ERG, as set out above.</p> <p>The Supply Chain Work Plan does not require the approval of any group – it is for information to set out how the Project will enact the provisions of the Supply Chain Strategy.</p>
<p>8.6. The Annual Skill Implementation Plans, are actually approved by the ERG in the DoO, but the substantive question is, what is then done with it? Where is it implemented?</p>	<p>See response to 8.4.</p>
<p>8.7. In relation to the Supply Chain Work Plan the ExA cannot see any requirement for it to be approved.</p>	<p>The Supply Chain Work Plan does not require the approval of any group – it is for information to set out how the Project will enact the provisions of the Supply Chain Strategy.</p>

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ExA Comment	SZC Co. Response
9. Page 5. The measures described on this page appear to be in order.	No response required from the Applicant.
10. Page 6. The measures described on this page appear to be in order.	No response required from the Applicant.

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Table 2.3: SZC Co Response to ExA’s Request for Further Information: Annex B Questions arising from ISH14 (DCO and allied documents), Agenda Item 4

ExA Comment	SZC Co. Response
<p>(a) In the case of Art 4(2) and the GRR, TVB and SLR to which it applies, the vertical deviation is 1 metre up or down, but the Parameter Plans and Approved Plans only apply laterally. Please will the Applicant confirm that a 1 metre up and down deviation would be within the Parameter Plans?</p>	<p>No. This is not correct. There are no parameter plans listed in Schedule 6 of the DCO that relate to the GRR, TVB or SLR. So far as those works are concerned, the limit of deviation listed in Article 4(2) apply to the relevant Work Plans and to the relevant Approved Plans within Schedule 7.</p> <p>The relevant Works Plans and Approved Plans set out the proposed location and layout of the proposed rail infrastructure, which are then secured by Requirement 18 (Rail Infrastructure). Requirement 18 secures the works to be delivered in accordance with the design principles set out in Tables 2.1 and 3.8 of the AD Design Principles [REP3-023]. Paragraph (2) of Requirement 18 allows for alternative detailed designs to be submitted to ESC for approval. Any such alternative details must be within the defined vertical limits of deviation set by Article 4 of the Draft Order and in general accordance with the design principles set out in Tables 2.1 and 3.8 of the AD Design Principles.</p> <p>The location and layout of the proposed Sizewell link road and the two village bypass are set out within the relevant Work Plans and within the relevant Approved Plans listed in Schedule 7, compliance with which is secured by Requirement 22 (Highway Works). The limit of deviation set out in Article 4(2) would then</p>

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ExA Comment	SZC Co. Response
	<p>apply to those plans. These works cannot commence until detailed designs of the highway works have been submitted to and approved by SCC. These details must be in general accordance with the design principles set out in the AD Design Principles.</p> <p>Paragraph (2) of Requirement 22 allows for alternative detailed designs to be submitted to ESC for approval. Any such alternative details must be within the defined vertical limits of deviation set by Article 4 of the dDCO and in general accordance with the design principles set out in the AD Design Principles.</p> <p>Article 4(1)(b) then provides a restriction of no more than +/- 1m to the levels stated in respect of Work Nos. 11 and 12.</p> <p>This limit of deviation is consistent with the Rochdale envelope assessed in the ES.</p>
<p>(b) Req 11 – Approved Buildings on the MDS, a list of works which are all part of Work No.1, but the Req only applies the Parameters Plans to alternative plans. In answer to the question, what happens if there is a difference between the Parameter Plans and the plans referred to in Req 11(1)? The Applicant explained that Req 11 applies to buildings that have been designed – see also the reference to Approved Plans. Therefore, the reference in Req 11(2) to alternative plans (and</p>	<p>Detailed site layout drawings have been provided for the main development site and these are set out in Schedule 7 (Approved Plans). Detailed elevations have also been provided for the MDS and are set out in Schedule 7 (Approved Plans). As explained at ISH14, all of the approved plans are consistent with and sit within the parameters shown on the parameter plans, the purpose of which is summarised below.</p>

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ExA Comment	SZC Co. Response
<p>only alternatives) being in accordance with Parameter Plans is proper.</p>	<p>(See Written summary of Oral Submissions at ISH14 (Doc Ref. 9.103)).</p> <p>As with any development, changes to the design or layout of the development are inevitable. A series of additional parameter plans, setting out a larger envelope that the ES has taken into account, have been provided that define the parameters within which any revised building must be contained. Any revised details submitted pursuant to requirement 11(2) must be consistent with those parameter plans and require the approval of ESC.</p> <p>Deadline 5 Submission - 9.54 SZC Co. Comments on Submissions from Earlier Deadlines (Deadlines 2-4) - Revision 1, Appendix K sets out a detailed review of each plan and how they relate to any relevant parameter plan [REP5-119].</p>
<p>(c) Req 12 – MDS reserved matters, the Parameter Plans apply to some buildings on the MDS, but not all. Why? It was explained by the Applicant that between them, Reqs 11, 12 and 13 cover all the buildings, structures and plant on the MDS. Req 13 requires the buildings to which is applies to be in accordance with the relevant Parameters Plans.</p>	<p>Requirement 12 only applies to those buildings where the detailed designs have not been submitted for approval at this stage. The ‘<i>outline</i>’ development consent that would be granted in respect of these buildings would then be subject to reserved matters submissions made pursuant to Requirement 12. Requirement 11 relates to the buildings which have detailed designs already. Requirement 13 then defines a parameter in which a series of smaller ancillary structures can be erected without further approvals. These must, however, be</p>

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ExA Comment	SZC Co. Response
	in accordance with the detailed design principles set out in the Design and Access Statement.
(d)Req 12A sports facilities – there is no reference to Parameters Plans in the Req. Why is this? How has the design been assessed in the ES? (Applicant)	Requirement 12A is concerned with the proposed sports facilities at Leiston, and requires details of the layout, scale and external appearance of those buildings and associated landscape works to be approved by ESC. Those details must be in general accordance with the ‘ <i>Proposed Site Plan Leiston Leisure Centre Phase (PDB17-033-06-02-P1)</i> ’. This illustrative design has informed the Environmental Statement (set out in Figure 2.12, Volume 2, Chapter 2 of the Environmental Statement [APP-183] and then described in Section 2.9 of Volume 2, Chapter 2 of the Environmental Statement [APP-180]), which confirms that the proposals relate to the creation of a 3G pitch and two multi use games areas. The proposals do not include the erection of buildings or other structures, and there is no need for a specified parameter plan in relation to that development.
(e)Req 12B is the BLFs and the HCDF – Parameter Plans apply.	Correct. The Operational Parameter Plans [REP2-009] include details regarding the location of these elements.
(f) Req 12C – SSSI crossing – there is no reference to Parameter Plans. How is this acceptable? (Applicant)	Requirement 12C (Main development site: SSSI crossing) governs both the temporary SSSI crossing (paragraph (1)) and the permanent SSSI crossing (paragraph (2)). Pursuant to requirement 12(1) the temporary SSSI crossing must be built in accordance with the two plans identified at sub-paragraphs (a) and (b). These plans define the location and

ExA Comment	SZC Co. Response
	<p>design of the temporary construction SSSI crossing and variations to the design must be approved by ESC.</p> <p>Pursuant to requirement 12C(2) construction of the permanent SSSI crossing must not commence until details of layout, scale and appearance have been submitted to an approved by ESC. The details must be in '<i>general accordence</i>' with the drawing entitled Main Development Site SSSI Crossing (SZC Operational) (July 2021) (Drawing Ref: SZC-SZ0100-XX-000-DRW-100205). That plan sets out the location and illustrative design for the crossing. In addition, requirement 12C(2)(b) sets specific limits to what may be approved by reference to elements of the design which have been identified as of particular importance through the process of environmental impact assessment. ESC could only approve details that did not give rise to new or materially different environmental effects to those set out in the ES. This approach is consistent with the Rochdale envelope set for the project.</p>
(g)Req 13 – MDS ancillary structures – Parameter Plans specifically apply	<p>Correct. Requirement 13 relates to a number of ancillary buildings and structures within the nuclear island. These Works must be carried out in accordance with the Operational Parameter Plans [REP2-009] and associated tables [AS-202] and in general accordance with the Design Principles set by chapter 5 of the Design and Access Statement.</p>
(h)Req 17 – Accommodation campus – the Parameter Plans are applied by this Req and take precedence	<p>Requirement 17 states that Work No. 3 (accommodation campus) must not be commenced until a statement of</p>

ExA Comment	SZC Co. Response
	<p>compliance has been submitted to and approved by ESC. The Statement of Compliance must set out how detailed design principles in Table A.1 of the Main Development Site Design and Access Statement have been incorporated into the designs. The location and height of the structures must be in accordance with Main Development Site Construction Parameter Plan (SZC-SZ0100-000-DRW-100046).</p>
<p>(i) Req 20 – Associated development sites buildings, structures and landscape – Park and Rides and the Freight Management Facility. There are no Approved Plans and the Parameter Plans only apply to variations. Is the reason for this that the Associated Development Design Principles referred to in Req 20(1) have been assessed in the ES? (Applicant)</p>	<p>This is not correct. Approved Plans (Schedule 7) include Part 4 – Northern Park and Ride – Work No. 9, Part 5 - Southern Park and Ride – Work No. 10, Part 8 – Freight Management Facility – Work No. 13. A Statement of compliance for each site must be submitted and approved to discharge Requirement 20, which would demonstrate how each relevant design principle had been complied with. Requirement 20(3) ensures that the development is constructed in accordance with the Approved Plans. Paragraph (4) then allows variations to be submitted to ESC for approval, providing that such variations are consistent with the relevant plans listed in Schedule 6 (Parameter Plans).</p>
<p>(j) Other Works where Parameter Plans don't seem to be applied are Work 11C (the TVB footbridge); Work 12C (SLR road bridge); and Part 2 (Other Associated Development). Please will the Applicant explain why this is proper.</p>	<p>Parameters are only provided for those works where either full details are not yet available, or where defined changes may be consistent with the Rochdale envelope approach taken in the ES. There are no parameters plans for the rail or highway works, as the Rochdale Envelope for these works is set by the relevant Approved Plans and Works Plans (see Article 3 and Requirements 18 and 22 and the defined limits of deviation shown on the Work Plans and identified in Article 4). In</p>



SIZEWELL C PROJECT – SZC CO RESPONSE TO
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ExA Comment	SZC Co. Response
	addition, these works must be carried out in accordance with the relevant Associated Development Design Principles.
(k) Please will East Suffolk Council and Suffolk County Council state whether they agree with the ExA's summary in questions (b) and (c) above of the Applicant's explanations given during ISH14.	No response required from the Applicant.

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SIZEWELL C PROJECT – SZC CO RESPONSE TO
REQUEST FOR FURTHER INFORMATION

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APPENDIX A: RESPONSE TO REQUEST FOR FURTHER
INFORMATION – HOUSING FUND CONFIRMATION (APP 3B
AND DOO) 210921

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Appendix 3B to SZC Co Response to ExA Q2 [REP7-057]				Deadline 7 Deed of Obligation [REP7-040]				Subsequent Draft DoO (Doc Ref. 8.17(G))			
Definition		Sub-Total Amount	Total Amount	Definition	Paragraph Reference	Sub-Total Amount	Total Amount	Definition	Paragraph Reference	Sub-Total Amount	Total Amount
Non-Contingent Housing Fund	Private Housing Market Supply	£8,837,965	£11,877,965	Housing Fund	Para 2.7 (Private Housing Market Supply)	£8,837,965	£13,144,788	Housing Fund	Para 2.7 (Private Housing Market Supply)	£8,837,965	£11,877,965
	Tourist Accommodation Market Supply	£1,000,000		Housing Fund	Para 2.8 (Tourist Accommodation Market Supply)	£1,000,000		Housing Fund	Para 2.8 (Tourist Accommodation Market Supply)	£1,000,000	
	Housing and Homelessness Services Resilience Measures	£500,000		Housing Fund	Para 2.9.1 (A) (Housing and Homelessness Services Resilience Measures)	£500,000		Housing Fund	Para 2.9 (Housing and Homelessness Services Resilience Measures)	£500,000	
	Staff Resourcing	£1,540,000		Housing Fund	Para 2.4	£1,540,000		Housing Fund	Para 2.4	£1,540,000	
Contingent Housing Fund	Housing and Homelessness Services Resilience Measures	£1,266,823	£10,356,823	Housing Fund	Para 2.9.1 (B) (Housing and Homelessness Services Resilience Measures)	£1,050,000	£9,090,000	Housing Contingency Fund	Para 3.1 (Housing and Homelessness Services Resilience Measures)	£1,050,000	£10,356,823
					Para 2.9.2 (Housing and Homelessness Services Resilience Measures)	£216,823				Para 3.2 (Residential Care Home Closure Contingency)	
	Tourist Accommodation Market Supply (LEEIE Caravan Site)	£1,050,000		Housing Contingency Fund		£1,050,000		Housing Contingency Fund	Para 4.3.1 (A)	£1,050,000	
	Private Housing Market Supply (Campus Phase 1)	£4,020,000		Housing Contingency Fund	Para 3.3	£4,020,000		Housing Contingency Fund	Para 4.3.1 (B)	£4,020,000	
Private Housing Market Supply (Campus Phase 2)	£4,020,000	Housing Contingency Fund		£4,020,000	Housing Contingency Fund	Para 4.3.1 (C)	£4,020,000				
TOTAL		£22,234,788				£22,234,788				£22,234,788	



SIZEWELL C PROJECT – SZC CO RESPONSE TO
REQUEST FOR FURTHER INFORMATION

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**APPENDIX B: DETAILED RESPONSE TO QUERIES RAISED
BY EXA AT PARAGRAPHS 8.3.3.1 TO 8.3.3.5 AND BY
EXTENSION 8.3.4**

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1 INTRODUCTION

1.1 ExA Request for Additional Information

1.1.1 The ExA, in **Annex A** to its [Request for Additional Information at Deadline 8](#), referring to comments on the **Draft Deed of Obligation**, notes in respect of Project Accommodation and the Housing Fund that on provisions described at **Appendix 3B** of the **Appendices to the Applicant's responses to ExQs2 [REP7-057]**:

8.3.3.1. The delivery of any remedy is dependent on the private sector

8.3.3.2. That sector will already be motivated by rents, so if there is a problem still it is difficult to see how it will be solved

8.3.3.3. If the NHB workers number jumps from (in the case of the caravan park) 849 the day the survey is finalised to any number above 850, however high there is an immediate problem

8.3.3.4. But that problem will not be known until six months later and then there is a three-month delay until the caravan park is finished.

8.3.3.5. The same problems will affect the Housing Contingency Fund in the case of the Accommodation Campus

8.3.4. The ExA asks the Applicant to set out their response and explanation carefully in their post-ISH14 summary at Deadline 8.

Question 8.3.3.3 was not put.

Question 8.3.3.4 was mentioned but not followed up.

The Applicant's answer to Question 8.3.3.5 is assumed to be the same as the answers to Questions 8.3.3.1 and 8.3.3.2 but please will the Applicant confirm or explain otherwise.

1.2 ExA Q3 (CI.3.0)

1.2.1 Additionally, the ExA seek clarification (from both ESC and the Applicant) on the ability of agreed Housing Fund contingency payments to mitigate additional effects should Project Accommodation be delayed at CI.3.0, setting out the following questions which were also raised at ISH12 and ISH14:

- (i) *Are ESC now confident this would avoid adverse effects in the event that there was a shortage of accommodation and this shortage coincided with large numbers of workers at the site.*

- (ii) *Will the agreed financial remedy ensure that additional bed spaces are in place in advance of when they were required, or at least in a timely manner?*
- (iii) *In light of the recognised adverse effects of not having sufficient accommodation in a timely manner adversely affecting the more vulnerable groups in society. What reassurances can the ExA have that their interests would be properly safeguarded?*
- (iv) *If there remains disagreement or the ExA consider that this financial remedy were not sufficiently robust, do ESC have a preferred mechanism for delivery of the accommodation and a suggested wording for a requirement or other form of mechanism for securing provision of the accommodation.*

1.3 SZC Co Response

- 1.3.1 To assist the ExA, SZC Co has collated this document for submission at Deadline 8 in order to provide a consolidated response to the issues set out above, drawing together and supplementing previous submissions at earlier deadlines that are relevant to the consolidated response.

2 SZC CO RESPONSE

2.1 Introduction / Background and Overview

2.1.1 The ExA has asked SZC Co (and ESC) to provide more information to substantiate their view that, should the Project Accommodation be delayed, the Housing Fund and the Housing Contingency Fund have the ability to mitigate for additional short-term demand on the housing market arising from the delay of Project Accommodation.

2.1.2 SZC Co and ESC agree that the Housing Fund and Housing Contingency Funds are capable of doing this, and welcome the opportunity to set out in full the context to the assessment of demand and impacts and development of mitigation.

2.1.3 However - it is important to consider not just the ability of contingency funding to respond to potential additional demand should the delivery of the Project Accommodation be delayed, but also to consider that the likelihood of the additional effects arising is very small due to the commitments given to the delivery of the accommodation, SZC Co.'s direct interest in ensuring its timely provision and due to inherent conservatism in the assessment and the approach to non-contingent mitigation (which is already comprehensive).

2.1.4 On that basis, the following key points should be taken into account, and are explained more fully throughout this document:

- 1) The approach to the **assessment of effects on the housing market is highly conservative** based on assumptions of available supply of accommodation, location of uptake, sectors used and number of NHB workers – this means that the ‘assessment case’ represents a worst case scenario, and it is likely that there is a very precautionary level of mitigation secured in the Deed of Obligation.
- 2) Related to this, the assessment in **Volume 2, Chapter 9** of the **ES [APP-195]** and the **Accommodation Strategy [APP-613]** on which the approach to mitigation via the Housing Fund is based, **assumes a later delivery of Project Accommodation than set out in the Implementation Plan** – so delay in Project Accommodation does not represent a deviation from the scale of impact assessed in the ES. Delay to the delivery of Project Accommodation may give rise to additional demand for accommodation, however it will not necessarily lead to additional effects, especially once committed (non-contingent) mitigation is taken into account.

- 3) The assumptions for **delivery of bed spaces through the Housing Fund is both precautionary** (in that it mitigates for at least 100% of identified demand in the private rented sector), **conservative** (in terms of the estimated number of bedspaces it could produce) **and flexible** with the ability for front-loading – this means that the peak effects will be mitigated as a minimum, and that the provision of bedspaces can be expanded and front-loaded to deal with any delay in the delivery of Project Accommodation, meaning that any delay that results in the release of contingency funding would occur within a very benign environment.
- 4) **Late delivery of Project Accommodation is highly unlikely** - the Project is committed to providing it (and it is very much in its interests to do so) – this means that the late delivery of accommodation is not a likely eventuality, and as set out in (3), any delay can be mitigated.
- 5) The **Housing Fund is both responsive and pro-active**, and can deliver additional accommodation quickly through strong and forward looking governance, monitoring and planning.
- 6) The role of unconventional supply is likely to be important. **Volume 2, Chapter 9** of the **ES [APP-195]** and the **Accommodation Strategy [APP-613]** take no account of so-called “latent” accommodation. This is likely to be popular with both landlords and workers. Evidence from both Sizewell B and Hinkley Point C show that significant numbers of workers rented spare rooms in people’s houses with around 20% choosing this option. Landlords benefit from a tax break and the rents they charge tend to relate to the workers’ allowances rather than the prevailing private sector rents. Minor grants to bring forward this type of accommodation have been very popular at HPC and delivered 1,500 bedspaces in the first 3 years. No allowance for that has been made in the Sizewell C assessment.

2.2 Conservative Approach to Assessment

2.2.1 SZC Co has previously set out the elements of the conservative nature of the assessment of effects on housing market in **Chapter 31** of **SZC Co’s Response to the Councils’ Local Impact Report [REP3-044]** from **paragraph 31.2.11** on electronic page 282.

a) Conservative Assessment of Demand for Accommodation

2.2.2 Sizewell C will seek to maximise the level of home-based (HB) workforce, but considered that an ‘assessment case’ approach was needed in order to test and develop a robust and conservative Housing Fund.

- 2.2.3 **Volume 2, Chapter 9, Appendix 9A** (Workforce Profile) of the ES [\[APP-196\]](#), **Table 1.9** provides detail on the assessment case for non-home-based (NHB) workers, which suggests an average rate of 29.5% HB workforce over the first four years of construction.
- 2.2.4 By comparison, Hinkley Point C has achieved an average rate of 45% HB workforce between 2017 and 2020 inclusive, and at its lowest point was 36%, still well-above Sizewell C's conservative estimate.
- b) **Conservative Assessment of Supply of Accommodation**
- 2.2.5 Overall, there are three broad areas of conservatism in the 'supply' side of the assessment:
- 1) the amount of PRS accommodation – which for assessment purposes has been assessed as 'static' when in reality there is natural growth of the PRS each year;
 - 2) no allowance has been made for the use of other 'latent' accommodation - including accommodation that exists now as spare rooms, which the Housing Fund will help bring to the market; and
 - 3) assumptions about the amount and availability of tourist sector accommodation
- 2.2.6 A key component of this is that the assessment doesn't include latent accommodation (including spare rooms and accommodation not currently on the rental market) which has been popular (for both landlords and workers) at Hinkley Point C, and can be delivered quickly and cheaply. At Hinkley Point C around 20% of non-campus NHB workers are in accommodation that is new to the market since the assessment was undertaken – the equivalent at SZC would be nearly 600 NHB workers.
- 2.2.7 The Housing Fund can be relied upon to deliver this type of accommodation quickly and effectively and in substantial numbers – at Hinkley Point C, by the end of March 2019, the local authorities had (between them) delivered over 1,500 bed spaces using this type of initiative alone (in latent accommodation and through more efficient and new provision of other private accommodation. This is particularly relevant to the ability to quickly deliver bedspaces through the Housing Contingency Fund.
- 2.2.8 As set out in **SZC Co's Response to the Councils' Local Impact Report** [\[REP3-044\]](#) and in **SZC Co's Written Summary of Oral Submissions at ISH4** [\[REP5-109\]](#) even at the peak (of both workforce and tourist season), there is plenty of tourism accommodation supply and the Project would only account for about 4% of tourist accommodation in East Suffolk.

- 2.2.9 Discounts applied based on conservative assumptions about how much tourist accommodation might be available or affordable to NHB workers effectively reduced the amount of tourist accommodation considered available and affordable to workers by around 70% (to c. 7,600 in the 60-minute area and c. 5,700 in East Suffolk).
- 2.2.10 The market (defined broadly and including people renting out spare rooms) will respond as it has in Somerset for Hinkley Point C – but it is important to work with ESC to make sure that in the short term there is as limited disruption as possible in these areas and this is the purpose of the Tourist Accommodation Supply element of the Housing Fund.
- c) Timing of Delivery (Assessment Case and Implementation Plan)
- 2.2.11 The assessment at **Volume 2, Chapter 9** of the **ES** (Socio-economics) [[APP-195](#)] is based on the assumptions set out in the **Accommodation Strategy** [[APP-613](#)] (**Figure 5.1** and **paragraphs 4.1.1** and **5.3.2**) assumes that the Accommodation Campus is delivered at the start of Y4.
- 2.2.12 This is later than is set out in the **Implementation Plan** [[REP2-044](#)] at **Plate 1.1** which shows the Accommodation Campus being delivered after 30 months – Q3 Year 3 – when the peak NHB workforce is estimated to be at 2,320.
- 2.2.13 As such, late delivery (later than that identified in the Implementation Plan) would not increase effects identified in **Volume 2, Chapter 9** (Socio-economics) of the **ES** [[APP-195](#)] and the **Accommodation Strategy** [[APP-613](#)].
- 2.2.14 The Draft Deed of Obligation (Schedule 3) now includes a long-stop linking the completion of the LEEIE Caravan Site and each Phase of the Accommodation Campus to reported NHB workforce numbers, with any default on that position resulting in release of Housing Contingency Funds. The longstop date for Phase 1 of the Accommodation Campus (when the workforce is expected to be 3,000) is Q1 of Year 4, so it is aligned with the assessment in **Volume 2, Chapter 9** (Socio-economics) of the **ES** [[APP-195](#)] and the **Accommodation Strategy** [[APP-613](#)].
- 2.2.15 The assessment therefore already considers the effects and mitigation for a worse scenario than the Project is proposing to deliver. Late delivery of the campus compared to the Implementation Plan would not therefore automatically give rise to additional impacts requiring immediate mitigation.
- 2.2.16 It should also be noted that Project Accommodation long-stops and Housing Contingency triggers are linked to monitoring of the NHB workforce – not accounting for the type of accommodation they use. At any point in

time a proportion would be in owner occupied accommodation, which **Volume 2, Chapter 9** (Socio-economics) of the **ES [APP-195]** and the **Accommodation Strategy [APP-613]** has not identified as a significant adverse effect.

2.2.17 If Project Accommodation is delayed, then it is most likely NHB workers would be displaced into the tourist sector – where, as demonstrated, there is not a significant capacity constraint – and then the rented and latent sectors – which have grown substantially since the assessment and will contribute to grow, supported by the Housing Fund.

2.3 Conservative Approach to Housing Fund Delivery

2.3.1 The mitigation provided via the Housing Fund (at **Schedule 3** of the **Draft Deed of Obligation**) which has been developed in collaboration with East Suffolk Council is sufficient to fully mitigate effects on the housing market.

2.3.2 The Housing Fund is agreed by SZC Co and ESC to have the ability to provide at least 1,200 bedspaces in the Private Rented Sector (PRS) and latent accommodation sectors.

2.3.3 SZC Co has previously set out the conservative nature of assumptions about bedspace delivery from the Housing Fund in **Chapter 31** of **SZC Co's Response to the Councils' Local Impact Report [REP3-044]** from **paragraph 31.2.35** on electronic page 286.

a) Comparison to Hinkley Point C

2.3.4 The evidence from Hinkley Point C is that more bedspaces are likely to be delivered at both lower cost and faster than are being assumed - the Housing Fund at Hinkley Point C has already provided over 2,533 bedspaces (at January 2021, approx. five years from the start of construction), compared to 1,000 predicted at the outset, and the Councils there predict that they will be able to deliver 3,900 by peak – an average run rate per quarter of 150 compared to Sizewell C's modest estimated run rate of c. 50 per quarter (to reach the estimated 1,200 by peak).

2.3.5 The consequence of this is that, while the assessment considers that 1,200 bedspaces can be delivered by peak – and that this would fully mitigate the impact - in reality, the Housing Fund could have delivered well in excess of that figure by the time that the Implementation Plan sets out that the Accommodation Campus should be available, and then have capacity to deliver more up to the peak.

2.3.6 A comparison of these run-rates and their implications is set out at **Appendix 1**.

2.3.7 A further consideration is that the Hinkley Point C Housing Fund has achieved the delivery of these new bedspaces at a far less expensive rate than has been modelled at Sizewell C. As set out in **paragraph 4.3.3 of SZC Co’s Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130]**; at Hinkley Point C the Housing Fund has delivered bedspaces – to-date – on an average cost of just under £2,100 per bedspace. This is significantly more cost-effective than anticipated when scaling the Housing Fund. The Hinkley Point C Project’s Accommodation Strategy anticipated that a mid-range scenario for the Housing Fund could deliver around 1,000 additional bed spaces by the peak of construction, at a rate of £5,000 per bedspace. So far therefore, the Hinkley Point C Housing Fund has delivered more than twice the amount of bedspaces, at 42% of the estimated cost per bedspace, suggesting that the Sizewell C Housing Fund is particularly conservative in this regard.

b) **Reliance on the Private Sector**

2.3.8 The ExA has raised a concern that:

The delivery of any remedy is dependent on the private sector

2.3.9 This is broadly true of any housing fund and is an important part of the approach to a balanced accommodation strategy as set out in the **Accommodation Strategy [APP-613]**. Sizewell C can rely on the private market to deliver supply (organically, and via the Housing Fund) as it did during the construction of Sizewell B, and has done (exceeding expectations) at Hinkley Point C.

2.3.10 SZC Co note however that this is not entirely dependent on the private market – the Housing Fund allows for East Suffolk Council and social housing providers to increase supply.

2.3.11 SZC Co and ESC have set out an agreed, indicative breakdown of the measures that could be used to deliver capacity in the private housing market in the first six years of construction – summarised below in **Table 1**:

Table 1: Indicative mix of bedspaces for Private Housing Supply Plan

Measure	Indicative Bedspaces	Indicative Cost
Support rent / deposit guarantee	500	£755,000
Equity loans to residents in OO / PRS	31	£800,000
Equity loans to residents in SR	30	£700,000
Empty Homes	217	£1,627,500
Loans / Grants / Guaranteed lets	336	£2,060,465

Subsidising development	105	£2,800,000
Tackling under-occupation	9	£95,000
TOTAL	1,228	£8,837,965

2.3.12 The experience at Hinkley Point C is that individual householders have been very keen to bring forward new supply, including spare rooms.

2.3.13 The Hinkley Point C Housing Fund has seen particular success in bringing bedspaces forward quickly and relatively inexpensively through minor improvement grants and loans to home-owners and landlords, to improve the quality of accommodation and bring previously uninhabitable spaces to the market.

2.3.14 By the end of March 2019 (approx. 3 years from the start of construction), Hinkley Point C’s Housing Fund had delivered over 1,500 bed spaces using this type of initiative alone.

2.3.15 This is important for the contingency element of the Housing Fund - bedspaces would primarily be delivered through grants and loans for minor improvements (for which there is evidence of sustained and substantial output), but could also be delivered through similarly quick measures – such as support for deposit guarantee, or measures that support people to remain in their homes.

2.3.16 The ExA has raised a further concern that:

That sector will already be motivated by rents, so if there is a problem still it is difficult to see how it will be solved

2.3.17 SZC Co consider that it is important to consider how the market responds to demand rather than focus on rents, for several reasons:

- i) There is little evidence of rising rents around Hinkley Point C, or housing market stress, but the market has clearly responded quickly and effectively in terms of significantly increasing supply – as set out in **SZC Co’s Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021** [[REP2-130](#)];
- ii) The private housing market responds to demand over time and the Housing Fund will be spent over the entirety of the pre-construction peak period; and
- iii) There is no evidence from Hinkley Point C that the market response was concentrated in the early years – the Housing Fund has continued

to deliver new bedspaces every year (as summarised in six-monthly reporting to the Socio-economic Advisory Group at Hinkley Point C¹).

- 2.3.18 The long-stop dates for all three SZC Housing Fund contingency payments for delay in delivery of Project Accommodation are well before the point when the NHB workforce is expected to peak.
- 2.3.19 The Housing Fund is expected to deliver new capacity all the way to the peak, i.e. it is based on the (correct) assumption that the private sector will continue to respond to rising demand.
- 2.3.20 There is no reason to expect that the delivery of bedspaces from the Housing Fund would be any different at Sizewell C from Hinkley Point C, or that the private housing market would respond (regardless of the Housing Fund) any differently at Sizewell C than Hinkley Point C.
- 2.3.21 The primary reason for this is that – as set out in **SZC Co’s Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130]** from **Paragraph 4.2.18** (electronic page 19) - despite some local perceptions, the housing markets are broadly similar in terms of the number and character of properties and bedspaces, and rental costs.
- 2.3.22 Indeed – the Sizewell C Housing Fund could be relied upon to be even more effective than Hinkley Point C, because:
- i) It draws on learning from Hinkley Point C (see **SZC Co’s Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130]** – **Section 4.4** (from electronic page 21));
 - ii) It is a larger overall fund (scaled conservatively as set out above) compared to Hinkley Point C;
 - iii) It will have a more flexible and responsive approach to governance;
 - iv) It will have a dedicated, funded team of 4 officers solely employed to deliver initiatives. SZC Co has committed to funding officer resource to implement these initiatives in the first seven years of the Construction Period – totalling £1.54m for 1 x Private Sector Housing Officer; 1 x Housing Needs Officer; 1 x Development Officer; and 1 x Project Support Officer; and
 - v) It has a separate fund for providing resilience measures that will deal with evidence housing market stress regardless of Project

¹ <https://www.sedgemoor.gov.uk/SEAG>

Accommodation – this part of the fund did not exist at HPC and will leave the core element of the Housing Fund to focus on boosting supply.

2.4 Reliance on Delivery of Project Accommodation

a) Importance to Project Delivery

2.4.2 Bespoke, on-site accommodation is an important part of SZC Co.'s workforce strategy to manage and support the efficient and productive delivery of the Sizewell C Project, as well as mitigate for accommodation, transport and community safety effects.

2.4.3 The multi-faceted role of the Project Accommodation in providing primary mitigation and project delivery benefits is set out from **paragraph 9.7.116** of **Volume 2, Chapter 9** of the **ES** [[APP-195](#)].

2.4.4 It is strongly in the Project's interest to deliver the campus and the LEEIE caravan pitches when they are needed early in the construction phase. As set out in **Volume 2, Chapter 9, paragraph 9.7.117** (Socio-economics), of the **ES** [[APP-195](#)], Sizewell B provided a successful 900-room on-site campus during construction and was regularly at capacity with an average waiting list of over 100 workers. Similarly, at Hinkley Point C the on-site accommodation campus has been very popular, as have the two caravan sites closest to the construction sit (at which contractors have block-booked accommodation). **Volume 2, Chapter 9, Paragraph 9.7.118** [[APP-195](#)] notes that at Hinkley Point, the on-site campus is particularly sought after by contractors and that caravan accommodation is popular with the civils workers who have formed the majority of the workforce to date. HPC campus occupancy data from January to April 2021 demonstrates that on the busiest days of the week, the Hinkley Point Campus is very close to full capacity (94% average on Mondays, 99% average on Tuesdays, 98% average on Wednesdays, 89% average on Thursdays). **Appendix 12A to SZC Co's response to ExA's First Written Questions** [[REP2-110](#)] shows a letter in support of the Hinkley campuses from Bylor, the Tier 1 main civils work contractor, making this point.

2.4.5 As set out in **SZC Co's Written Summary of Oral Submissions at ISH 12**, there would be internal financial consequences for SZC Co. if the accommodation campus and caravan park are not delivered on time and in line with projected levels of NHB workforce – if the NHB workforce is more dispersed this would result in substantial additional transport costs, potential need for payment for travel time and consequential productivity losses meaning that SZC Co. has a very strong incentive to deliver the campus in line with increasing demand.

b) Commitments and Requirements

- 2.4.6 SZC Co. has added commitments to delivery in the **Draft Deed of Obligation** at **Schedule 3**, to complement and reinforce the commitments already given to the **Implementation Plan** in **Schedule 9** (Doc Ref. 8.17(G)).
- 2.4.7 The **Draft Deed of Obligation** at **Schedule 3** sets out that – unless otherwise agreed with the Accommodation Working Group – reasonable endeavours shall be used to deliver the Project Accommodation in accordance with the Implementation Plan.
- 2.4.8 However – this now goes further to include a long-stop linking the completion of the LEEIE Caravan Site and each Phase of the Accommodation Campus to reported NHB workforce numbers, with any default on that position resulting in release of Housing Contingency Funds.

c) Principle of Contingency Payments

- 2.4.9 The generation of bedspaces from the non-contingent element of the Housing Fund will not have been maximised at the point of the Implementation Plan setting out delivery of the Accommodation Campus. As such, the contingency element can be thought of as bringing forward measures that would have happened later, and so would be effective in delivering supply to fill the gap.

i. *LEEIE Caravan Site*

- 2.4.10 The **Implementation Plan** [[REP2-044](#)] shows the LEEIE Caravan Park being delivered after 12 months – the end of Q4 Year 1 - when the peak NHB workforce is estimated to peak at 815. It cannot practically be delivered sooner due to the need for site preparation works, including utilities diversions and the need for site access works.
- 2.4.11 The financial remedy for late delivery would only arise if there is a default in committed delivery – and it would act both as an incentive to SZC Co to deliver the LEEIE Caravan Park, and secure that in the event this mitigation is not delivered, that East Suffolk Council has adequate additional resources to mitigate subsequent additional impacts – for example to support additional capacity in existing sites and enhance its licensing and enforcement activities and prevent unauthorised use of caravan sites by workers.
- 2.4.12 The proposed additional release of up to £1,050,000 would be valuable in offering grants and loans to local providers to allow them to re-configure, expand and manage their sites to increase capacity (for both workers and tourists), and also be precautionary in dealing with e.g. issues of unlicensed

sites very quickly (where the Council already has experience, but may lack the resource).

2.4.13 It will be at the discretion of the Accommodation Working Group to determine the most effective use of funds – this may include support for individual providers to expand effective supply (by, for example, amending licenses, reconfiguring sites, or developing site infrastructure), or for Council enforcement action on illegal sites.

ii. *Accommodation Campus*

2.4.14 The **Implementation Plan** [REP2-044] shows the Accommodation Campus being delivered after 30 months – Q3 Year 3 – when the peak NHB workforce is estimated to peak at 2,320.

2.4.15 SZC Co estimates that the NHB workforce would reach 2,500 in Q4 Year 3, and is expecting to open Phase 1 of the Accommodation Campus prior to the Workforce Survey reporting more than 2,500 NHB workers, in-line with the assessment of effects on the housing market in **Volume 2, Chapter 9** (Socio-economics) of the **ES** [APP-195] and the **Accommodation Strategy** [APP-613].

2.4.16 The financial remedy for late delivery would only arise if there is a default in committed delivery – and it would act both act as an incentive to SZC Co to deliver the Campus, and secure that in the event this mitigation is not delivered on-time, that East Suffolk Council has adequate additional resources to mitigate subsequent additional impacts should they arise – for example to support the delivery of accommodation equivalent to the average per-bed space rate of *Support rent / deposit guarantee* and *Loans / Grants / Guaranteed lets* measures.

2.4.17 This is likely to be – in reality – a bringing forward of mitigation that would otherwise have been provided later, if it is needed at all.

2.5 Front-loading, and dealing with the potential ‘lag’

a) Front-loading

i. *LEEIE Caravan Site*

2.5.2 As set out in **Schedule 3** of the **Draft Deed of Obligation** (Doc Ref. 8.17(G)) SZC Co has committed to provide £100,000 in non-contingent funding to ESC within 6 months of Commencement, and then £81,819 annually thereafter, to support towards planning advice, information, licencing and support and loans to Accommodation Providers to enable the reconfiguration, expansion or any other increase in capacity of tourist accommodation in East Suffolk.

- 2.5.3 As such, at around the point of implementation of the LEEIE Caravan Site, ESC will have received around £180,000 in non-contingent payments via the Tourist Accommodation Supply Plan to spend on measures that would have precautionarily sought to reduce any effects. SZC Co. has already received significant interest from caravan site owners and expects the market to respond positively to SZC demand.
- ii. *Accommodation Campus*
- 2.5.4 As set out in **Schedule 3** of the **Draft Deed of Obligation** (Doc Ref. 8.17(G)) SZC Co has committed to provide £2,000,000 in non-contingent funding to ESC within 6 months of Commencement, and then £1,139,661 annually thereafter for the period up to peak (estimated as seven years from Commencement), to deliver accommodation in the area.
- 2.5.5 By the end of Year three (when the Accommodation Campus is due to open), East Suffolk Council will have received at least £3.1m and SZC Co (and ESC) expect that to have delivered at least 550 bedspaces, and then to deliver at least 200 per year thereafter.
- 2.5.6 This is a conservative estimate - during the early years at Hinkley Point C the Housing Fund delivered in excess of 2,000 bedspaces, against an overall target of 1,000 (at peak), at a quarterly 'run rate' of 127 bedspaces per quarter to-date, and is projected to provide an average run-rate of 150 per quarter up to the peak of the construction workforce. Sizewell C's assumed run-rate of bedspace provision is around a third of this.
- 2.5.7 As demonstrated above, the Hinkley Point C Housing Fund has seen particular success in bringing bedspaces forward quickly and relatively inexpensively through minor improvement grants and loans to homeowners and landlords, to improve the quality of accommodation and bring previously uninhabitable spaces to the market. By the end of March 2019, the local authorities had (between them) delivered over 1,500 bed spaces using this type of initiative alone.
- 2.5.8 If projected Hinkley Point C rates are achieved at Sizewell C, then over 1,500 bedspaces will have been delivered by the time the Implementation Plan sets out that the Accommodation Campus is delivered. If actual Hinkley Point C rates are achieved then over 1,100 bedspaces will have been delivered by the time the Implementation Plan sets out that the Accommodation Campus is delivered.
- 2.5.9 At that point, the NHB workforce will be 2,320. Of those NHB workers, 600 are expected to be in the LEEIE caravan site leaving 1,720 in existing accommodation. The Housing Fund will have provided between 550 and 1,500 bedspaces leaving between 220 and 1,180 in currently existing

accommodation (of all types). This is unlikely to have significant effects, would be split between tourist, owner-occupied and latent and rented sectors, and spread over the 60-minute area.

- 2.5.10 The ability of the Housing Fund to over-provide, and provide bedspaces earlier, means that the peak effects will be mitigated as a minimum, and that the provision of bedspaces can be expanded and front-loaded to deal with any delay in Project Accommodation, meaning that any delay in Project Accommodation that results in the release of contingency funding would occur within a very benign environment.

b) Dealing with the potential ‘Lag’

- 2.5.11 The ExA raises a concern that:

If the NHB workers number jumps from (in the case of the caravan park) 849 the day the survey is finalised to any number above 850, however high there is an immediate problem

- 2.5.12 To clarify, SZC Co’s position is that there is no evidence that there would be an immediate problem at 850 NHB workers. The trigger has been set at this conservative level based on two things. Firstly, the evidence shows that there have not been significant problems with previous NHB workforces of 850 at planned SZB outages. Secondly, it broadly aligns with the fastest potential delivery (i.e. the trigger could not be much lower than 850).

- 2.5.13 This is a highly precautionary approach compared to Hinkley Point C, where Project Accommodation was opened in June 2018 (HPC site campus with 500 bedspaces) and December 2018 (Sedgemoor Campus in Bridgwater with 1,000 bedspaces), shortly after the workforce survey undertaken in March 2018², recorded 1,578 NHB workers, of which 1,121 were in private rented accommodation, without causing observable housing market stress.

- 2.5.14 The ExA raises a further concern that:

that problem will not be known until six months later and then there is a three-month delay until the caravan park is finished.

- 2.5.15 **Appendix 3B to SZC Co’s Response to ExA Q3s [REP7-057]** stated that payments would be made within three months of a workforce survey reporting exceedance of identified thresholds of NHB workers for each phase.

² <https://www.sedgemoor.gov.uk/SEAG>

- 2.5.16 SZC Co notes the concerns raised by the ExA at ISH 12 (on 15/09/21) that this may result in a potential gap of up to 9 months between the trigger threshold being reached and payment being made.
- 2.5.17 SZC Co notes that there is a delay in release of money from the Housing Contingency Fund – but not in completing the Project Accommodation, which will continue in the meantime. The Housing Contingency Fund payment acts as an additional incentive to deliver on-time and to provide additional mitigation. SZC Co is committing to deliver the Project Accommodation, as set out above.
- 2.5.18 SZC Co also notes that the delay in payment of the Housing Contingency Fund is just as likely to be a gap of three months (as up to 9 months), and on average would be 6 months – which is the difference between the **Implementation Plan [REP2-044]** and **Volume 2, Chapter 9** (Socio-economics) of the **ES [APP-195]** and the **Accommodation Strategy [APP-613]**.
- 2.5.19 Taking the example of the proposed trigger point for payment on late delivery of Phase 1 of the Accommodation Campus, at that point, the NHB workforce is not forecast to rise very quickly (see **Appendix 9A to Volume 2, Chapter 9** of the **ES** (Socio-economics) [APP-196]). In the nine months after the NHB workforce is expected to reach 2,500, it is estimated to rise by only a further 400 to 2,900.
- 2.5.20 Prior to, and during, the delivery of Project Accommodation, monitoring will not be limited to 6-monthly workforce surveys – for example, the Sizewell C Project will collect induction information at on-boarding of workforce. This does not tell us about the proportion of NHB workforce, but does provide a useful source of information on rates of workforce growth and forecast workforce.
- 2.5.21 Additionally, the Sizewell C Project will also be able to readily report on how construction is progressing, including construction of Project Accommodation, to aid the Council in timing of delivery of bedspaces through the Housing Fund. The Accommodation Working Group will meet at least every six months – and in all likelihood more regularly in a situation such as this in order to provide as much information and notice as possible of delays relative to the Implementation Plan.

A.1. Comparison of Housing Fund Delivery and Predicted Demand for Accommodation, and Delivery of Project Accommodation

2.5.22 The following table sets out schematically:

- a) the quarterly peak estimated NHB workforce;
- b) the proportion of that workforce anticipated to be in the private rented sector;
- c) Housing Fund (£) release;
- d) Housing Fund delivery – based on assessment case (peak provision of 1,200 bedspaces);
- e) Housing Fund delivery – based on observed and predicted Hinkley Point C rates of bedspace delivery; and
- f) Delivery dates for Project Accommodation (Implementation Plan and Environmental Statement).

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Year	Quarter	NHB Workforce Profile (and PRS demand within)				Housing Fund Delivery				Project Accommodation	
		NHB Workers (Ave)	Of which PRS	NHB Workers (Peak)	Of which PRS	For Private Housing	Assessment Case	HPC Rates (HPC Rates (Implementation Plan	ES Vol 2, Ch 9
Year 1	Q1	263	109	288	120	£2,000,000	-	-	-		
	Q2	397	165	488	203		-	-	-		
	Q3	660	275	709	295		55	-	-		
	Q4	778	324	816	339	£500,000	109	127	150	LEEIE Caravan Site	
Year 2	Q1	805	335	839	349	£1,139,661	164	254	300		LEEIE Caravan Site
	Q2	937	390	995	414		218	381	450		
	Q3	1,096	456	1,165	485		273	508	600		
	Q4	1,411	587	1,504	626		327	635	750		
Year 3	Q1	1,723	717	1,837	765	£1,139,661	382	762	900		
	Q2	2,093	871	2,145	892		436	889	1,050		
	Q3	2,262	941	2,321	966		491	1,016	1,200	Accommodation Campus	
	Q4	2,460	1,024	2,538	1,056		545	1,143	1,350		
Year 4	Q1	2,741	1,140	2,864	1,192	£1,139,661	600	1,270	1,500		Accommodation Campus
	Q2	2,996	1,247	3,048	1,268		655	1,397	1,650		
	Q3	3,028	1,260	3,112	1,295		709	1,524	1,800		
	Q4	3,310	1,377	3,519	1,464		764	1,651	1,950		
Year 5	Q1	3,904	1,625	4,044	1,683	£1,139,661	818	1,778	2,100		
	Q2	4,318	1,797	4,447	1,850		873	1,905	2,250		
	Q3	4,594	1,912	4,608	1,918		927	2,032	2,400		
	Q4	4,570	1,902	4,582	1,907		982	2,159	2,550		
Year 6	Q1	4,628	1,926	4,742	1,973	£1,139,661	1,036	2,286	2,700		
	Q2	4,923	2,049	5,033	2,094		1,091	2,413	2,850		
	Q3	5,039	2,097	5,171	2,152		1,145	2,540	3,000		
	Q4	5,504	2,290	5,598	2,330		1,200	2,667	3,150		
Year 7	Q1	5,685	2,366	5,728	2,384	£1,139,661	1,200	2,794	3,300		
	Q2	5,857	2,437	5,884	2,448		1,200	2,921	3,450		
	Q3	5,884	2,448	5,884	2,448		1,200	3,048	3,600		

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SIZEWELL C PROJECT – SZC CO RESPONSE TO
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APPENDIX C: REVISION 3 OF THE STRUCTURE OF CONTROL DOCUMENTS AND SUBSEQUENT APPROVALS

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1 STRUCTURE OF CONTROL DOCUMENTS AND SUBSEQUENT APPROVALS

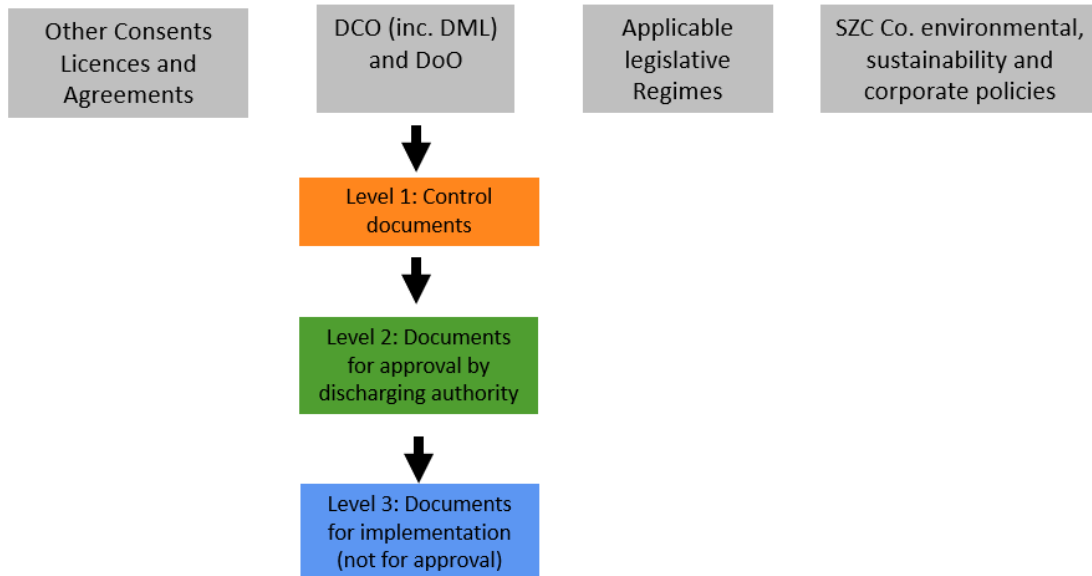
1.1 Overview

1.1.1 This note responds to the questions raised in ISH1 and subsequent hearings about the status of the various *'strategies'* and *'plans'* relied on in the DCO Application.

1.1.2 It sets out the levels of documents within the application and the status of each level. **Plate 1** sets the **Development Consent Order (DCO)** (Doc Ref. 3.1(I)) and **Deed of Obligation (DoO)** (Doc Ref. 17(G)) in the context of other controls on the Sizewell C Project and demonstrates how the different levels of documents relate to each other. **Table 1** lists out the plans and strategies referred to in the **dDCO** and **Table 2** lists out the plans and strategies referred to in the **DoO**. These tables show which level a document is, the documents it relates to, where it is secured, and which body is responsible for approving the named Level 2 documents and any updates to the Level 1 documents. For each Level 1 document there is a specific governance group who will have oversight of the activities controlled by that document. The formal role of the relevant governance group is set out within each Level 1 document where it is relevant.

1.1.3 The principles behind the consenting strategy are set out in Chapter 10 of the **Planning Statement** [[APP-590](#)]. The **DCO Explanatory Memorandum** (Doc Ref. 3.2(G)) and the **DoO Explanatory Memorandum** (Doc Ref. 8.20(E)) both explain the obligations within each document and the consenting approach that has been taken. The **Mitigation Route Map** (Doc Ref. 8.12(D)) sets out in full the commitments which are required to mitigate the impacts identified in the **Environmental Statement** and where these are secured. This note does not replace the **Mitigation Route Map** but instead focuses on the *'plans'* and *'strategies'* within the application.

Plate 1: Structure of controls



- 1.1.4 The DCO would grant SZC Co. the authority and necessary powers to deliver the authorised development. The Articles and Schedules of the DCO mandate the scope and limit of those powers as well as controls which must be complied with through the construction and operation of Sizewell C.
- 1.1.5 Schedule 2 (requirements) sets out a series of commitments and controls that relate to the terrestrial works. The marine licence (DML) is Schedule 20 of the DCO and will be deemed if the Sizewell C DCO is granted. The DML authorises certain activities within the marine environment but again includes limits and controls on those activities and how the activities are carried out. The **draft DoO** commits SZC Co. to a further level of control and includes obligations on SZC Co. to act in a certain way to minimise the impact of any harm resulting from the construction and operation of Sizewell C. SZC Co. will be legally bound by all of the obligations listed in these documents as explained in **Appendix C** (Enforcement under the Evolving Approach) to the Written Submissions arising from ISH1 [\[REP5-113\]](#).
- 1.1.6 The DCO and DoO do not govern the delivery of Sizewell C in isolation. The **Schedule of other consents, licenses and agreements** [\[REP3-011\]](#) sets out the main relevant controls, license and agreements which are required to construct and operate Sizewell C pursuant to different legal regimes containing their own enforcement mechanisms. Some of these have their own structures of control document (e.g. the Water Discharge Activities Permit will require a chlorination strategy). SZC Co. will also be

bound by all relevant legislation at the time of construction and operation which includes environmental and health and safety legislation.

1.1.7 Draft protected species licences (and accompanying ecology mitigation strategies) and ecology method statements have been submitted to the examination, which have informed the monitoring and mitigation measures set out within the **Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP)** [[REP5-088](#)]. These draft license applications and supporting strategies have been submitted to provide visibility to all stakeholders and they will be submitted to Natural England under the Wildlife and Countryside Act 1981 and consented and enforced under that legislation. Where a species is not protected under this regime, SZC Co. has committed to the appropriate protection through the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11(D)) and the **TEMMP**.

1.2 Updates at Deadline 8

1.2.1 This note has been updated for deadline 8 in response to the discussion at ISH14 (Doc Ref. 9.103), the **ExA's Further Commentary on the dDCO** [[PD-042](#)], **the Request for Further Information – Rule 17** issued on 20 September 2021 [[PD-052](#)] and evolving discussions with stakeholders.

1.2.2 Since Deadline 7, the Applicant has undertaken a full review of the Level 1 control documents and revised versions are submitted at this Deadline 8. The exercise was two-fold:

- clarify securing mechanisms; and
- refine the language used in relation to commitments.

Clarify securing mechanisms

1.2.3 Introductory text has been added to each of the Level 1 control documents to:

- explain that this is a Level 1 control document with specific reference to how it is legally secured;
- describe the relationship of this document with any related Level 1 control documents; and
- list any Level 2 or subsequent documents which are required for approval by this Level 1 document and describe how they will be approved and by whom;

- explain that references to SZC Co. should be read as '*the undertaker*' and Standard text will be added to explain that.

1.2.4 References to other Level 1 documents within a Level 1 document have been checked to ensure that they include the document reference and securing mechanism.

Refine the language used in relation to commitments

1.2.5 All Level 1 documents have been reviewed and updated where necessary regarding:

- Any references to contractors have been checked and where necessary clarification has been provided that SZC Co. is responsible for compliance. At times it is useful for the stakeholders to understand the description of how SZC Co. will manage its contractors to ensure compliance on such a large project and it also makes the documents more user-friendly to those who will be implementing them.
- If a Level 1 document is a compliance document (i.e. the undertaker must act in accordance with the plan) then commitments are phrased as '*must*'. If a Level 1 document is a control document which informs a subsequent approval (i.e. a future plan must be in general accordance with this strategy) then commitments are phrased as '*will*'. The Subsequent Level 2 document will be a compliance document and commitments will then be phrased as '*must*'. Limited uses of the words '*would*'/ '*should*'/ '*could*' have been retained in the Level 1 documents. Each time such terms are used, the usage has been checked and is considered to be appropriate. For example, where it is used in the conditional, the term describes the assessment or describes the expected outcome.
- Caveats throughout the Level 1 control documents have been checked to ensure that they are necessary to the delivery of the project and do not undermine any assumptions relied upon in the environmental impact assessment. As explained in our **Response to ExA Commentary on the dDCO** [REP7-058]. This is how the following terms are used:
 - '**Where practicable**': means that the action should be done unless the degree of risk in a particular situation cannot be balanced against the time, trouble, cost and physical difficulty of taking measures to avoid the risk. In practice this means that something that would avoid a significant impact must be done in almost all circumstances. It would only be acceptable not to take the relevant step if there would not be a significant impact as a result, and therefore the risk would be low.

- **‘Where possible’** or **‘as soon as possible’**: this is used to ensure that something happens in almost all instances, or as soon as it can be done.

1.2.6 References to other legal regimes have been checked and it has been clarified how other relevant consents, licences and/or permits relate to the Level 1 document where they are referred to.

1.3 Level 1: Control Documents (Strategies and Plans Secured by the DCO and DoO)

1.3.1 The **Level 1 Control Documents** will either be certified under the **DCO** at grant or annexed to the **DoO** at the point of signing. They are either by topic or by site and set out the controls required over the project to ensure that the works are implemented within the limits of the environmental impact assessment. Some Level 1 Control Documents specify all measures assumed and needed by the EIA and do not have Level 2 documents underneath them and works must be carried out in accordance with these documents.

1.3.2 There are some documents which are secured through the **dDCO** which control the design of the Sizewell C Project. These documents are not included in this note but approach to parameters and securing design approval is set out in Section 2.6 of the **Written Submissions Arising from ISH1** (Doc Ref. 9.48).

1.3.3 The **CoCP** is a Level 1 control document. Although there are a number of ‘*strategies*’ or ‘*outline plans*’ which have informed the obligations included in the **CoCP**. These documents are listed in **Table 2** and include:

- Outline Soil Management Plan [\[REP3-018\]](#);
- Conventional Waste Management Strategy [\[APP-194\]](#);
- Materials Management Strategy [\[AS-202\]](#);
- Outline Dust Management Plan [\[APP-213\]](#); and
- Dredge Disposal Site Characterisation Report [\[APP-328\]](#).

Ecology consenting regime

1.3.4 A number of ecological mitigation strategies, draft licences and licensable and non-licensable method statements for protected species at the main development site are appended to **Volume 2 Chapter 14** of the **ES** [\[APP-224\]](#) and **Volume 1, Chapter 2, Section 2.9** of the **ES addendum** [\[AS-181\]](#)

and have been submitted at subsequent deadlines. These two sets of documents have a different status within the examination.

1.3.5 Draft licences and licensable method statements and mitigation strategies – these are submitted to the examination for information only. They form the applications to Natural England under the Wildlife and Countryside Act 1981 for protected species licences. The documents describe the species and activities which are licensable and the measures the applicant proposes to take to make these activities acceptable. Natural England will issue protected species licences with conditions that they consider appropriate as the regulator. These are included in the **Schedule of other Consents, licences and Agreements** [\[REP3-011\]](#). These are:

- Project wide Bat Licence (Doc Ref. 9.92) and MDS Bat Mitigation Strategy [APP-252];
- MDS Badger Licence Method Statement [REP5-049] and MDS Badger mitigation strategy [APP-225];
- MDS Water Vole Licence [REP5-50] and MDS Water Vole Mitigation Strategy [APP-252];
- MDS Natterjack Toad Licence [REP5-053] and MDS Natterjack Toad Mitigation Strategy [APP-252];
- MDS Deptford Pink Licence [REP5-052];
- MDS Otter Draft Method Statement [REP5-051];
- NPR Great Crested Newt Licence (Doc Ref.6.4 7A.5(A));
- TVBP Badger Method Statement [REP5-054];
- TVBP Water vole Method Statement [REP5-055];
- SLR Great Crested Newt Licence (Doc Ref. 6.7 7A.5(A)); and
- RAIL Great Crested Newt Licence (Doc Ref. 9.93).

1.3.6 Non-licensable method statements and mitigation strategies – these cover activities and species which are not protected by the Wildlife and Countryside Act 1981 but require particular construction practices or mitigation measures. The majority of these secured through the **CoCP** and are Level 1 control documents and must be complied with under Requirement 2. Any changes to these statements and strategies must be approved and will be submitted to the Ecology Working Group for approval.

For clarity of status, these documents have been appended to the **CoCP**. These are:

- MDS Bat Non-licensable Method Statement [[APP-252](#)];
- MDS Reptile Mitigation Strategy (Doc Ref. 9.88)
- MDS Reptile Non-licensable Method Statement [APP-252];
- MDS GCN Method Statement [AS-209]
- MDS Otter Method Statement [REP5-051].
- MDS Freshwater Fish and Aquatic Invertebrates Mitigation Strategy (Doc Ref. 8.11 A(D));
- NPR Bat Non-licensable Method Statement [APP-362];
- NPR Reptile Non-licensable Method Statement [APP-362];
- SPR Bat Non-licensable Method Statement [APP-395];
- SPR Reptile Non-licensable Method Statement [APP-395];
- TVBP Bat Non-licensable Method Statement [[APP-426](#)];
- TVBP Great Crested Newt Non-licensable Method Statement [APP-426];
- TVBP Otter Non-licensable Method Statement [APP-426];
- TVBP Reptiles Non-licensable Method Statement [APP-426];
- SLR Bat Non-licensable Method Statement [APP-462];
- SLR Reptile Non-licensable Method Statement [APP-462];
- FMF Bat Non-licensable Method Statement [APP-524];
- FMF Reptile Non-licensable Method Statement [APP-524]; and
- RAIL Reptile Non-licensable Method Statement [APP-556].

1.3.7 The **TEMMP** is secured by Requirement 4. This Level 1 control document sets out the monitoring regimes that SZC Co. is committed to in relation to terrestrial ecology. This monitoring will be in addition to any monitoring required by Natural England as part of the protect species licence process.

1.4 Level 2: Subsequent Approvals (submitted post DCO/DoO)

1.4.1 On a project of this scale and complexity, it is not always possible for the Level 1 control documents to include the detail necessary to ensure that the correct practices and limits are applied in every context. Therefore, where appropriate, Level 2 documents must be produced for a further approval. In most cases the Level 2 documents submitted for approval must be in general accordance with the relevant Level 1 document. In their approval of Level 2 documents, the relevant discharging authority will consider compliance with the Level 1 control documents and whether any deviations are appropriate.

1.4.2 The **CoCP** includes requirements for a series of Level 2 documents which will demonstrate how the controls in the **CoCP** for particular environmental topics will be controlled across the project. These were collectively referred to as ‘*subject specific management plans*,’ however, for clarity reference to this term has been removed and replaced by the specific names of the plans. These Level 2 plans will be subject to approval from the local planning authority and are to demonstrate to the relevant local authority how the measures within the **CoCP** will be implemented throughout the construction of the project. These are:

- Main Development Site Noise Monitoring and Management Plan (Draft: Doc Ref. 9.68(A));
- Associated Development Site Noise Monitoring and Management Plans;
- Soil Management Plan; and
- Dust Monitoring and Management Plan.

1.4.3 The **CoCP** also refers to Level 2 documents which are secured and approved directly under the **DCO** or the **DoO** for completeness (e.g. the **Coastal Processes Monitoring and Mitigation Plan** [\[REP5-059\]](#)). For Deadline 8 specific references have been added to the CoCP to provide clarity on where these Level 2 documents are secured.

1.5 Level 3: Implementation Documents

1.5.1 SZC Co. will require its contractors to prepare Construction Environment Management Plans (CEMPs) for its approval. These plans will demonstrate to SZC Co. how the specific works will be carried out in accordance with all relevant legislation and guidance: including the relevant Level 1 and Level 2 documents (most notably the **CoCP**, **OWSI** [\[REP3-022\]](#) , **TEMMP** and the

Construction Method Statement (Doc Ref. 6.3 3D(B))). The **CoCP** sometimes refers to particular elements of the CEMPS which are relevant to a particular topic to give context to SZC Co's confidence that the measure in the **CoCP** will be complied with. The CEMPs will include, among other things:

- Environmental Incident Response Plan;
- Soil Resources Plan;
- Site waste management plan;
- AIL delivery and logistics plan;
- Emergency Flood Action Plan;
- Community Engagement Strategy;
- Construction Emergency Plan;
- Fire prevention plans;
- Biosecurity control procedures plan; and
- Communicable disease management plan.

1.5.2 There are other Level 3 implementation documents which will be prepared by other bodies or groups under the **DoO**. These will explain how particular mitigation will be implemented where another body is responsible for the mitigation. These are as follows:

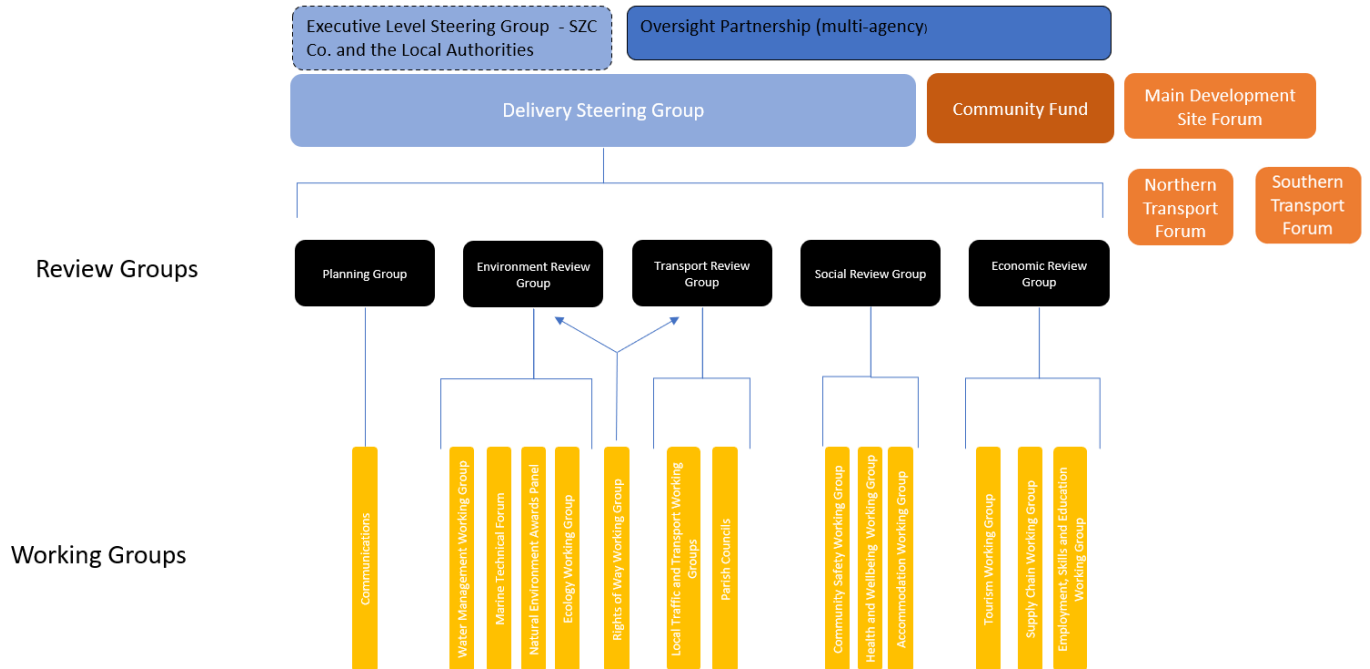
- Flood Risk Emergency Plans – prepared by the contractor and approved by SZC Co. in consultation with the Environment Agency;
- Private Housing Supply Plan - prepared by ESC and approved by the Accommodation Working Group;
- Tourist Accommodation Plan - prepared by ESC and approved by the Accommodation Working Group;
- PROW Communications Plan - prepared by ROW Working Group;
- Annual Tourism Fund Implementation Plan - prepared by ESC and approved by Accommodation Working Group; and
- Annual Skills Implementation Plan - prepared by Regional Skills Co-ordination Function (SCC).

1.6 Monitoring, Reporting and Governance

- 1.6.1 Monitoring and reporting will be provided to ESC, MMO, SCC, the Ecology Working Group, the Environment Review Group and Delivery Steering Group, as relevant. The governance groups are established by the **DoO**.
- 1.6.2 Through the Level 1 and Level 2 documents SZC Co. has or will set out detailed monitoring and reporting regimes. As the construction period is 9 to 12 years it is not inconceivable that the environmental setting may change and the potential harms identified in the EIA either do not come to pass or are different from what was predicted. The monitoring regimes have been carefully designed to ensure that data is captured on sensitive receptors and identified areas of harm. It has been designed to provide appropriate oversight of the implementation of the project for the discharging authority and other relevant statutory bodies to review the effectiveness of mitigation and have regard to remedies that would be agreed with and implemented by SZC Co.
- 1.6.3 The **DoO** sets out a comprehensive governance structure (see **Plate 1**) which will review monitoring results and reports and agree any additional mitigation which is necessary as a result. The monitoring results will be reported to the relevant governance groups and the **DoO** gives authority to the groups to consider that data and instruct/agree particular actions in the event that certain triggers are reached. These triggers are set out in either the **DCO**, **DoO** or the Level 1 control documents; or there are situations where it is most appropriate for the governance group to agree the triggers as part of their approval of Level 2 documents.

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Plate 2 Visual Representation of Governance Structure



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SIZEWELL C PROJECT – STRUCTURE OF CONTROL DOCUMENTS AND SUBSEQUENT APPROVALS

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Table 1: Strategies and Plans Secured by the DCO

Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
CoCP (Doc Ref. 8.11(E))	Dust Monitoring and Management Plan Soil Management Plan	ESC	Rqt. 2	Environment Review Group
CoCP Part B and Part C: non-licensable method statements and mitigation strategies in paragraph 1.4.6.				Ecology Working Group
Freshwater Fish and Aquatic Invertebrates Mitigation Strategy (Appendix A, Part B, CoCP)				Ecology Working Group
CoCP Part B: Draft Main Development Site Noise Monitoring and Management Plan (Appendix B, Part B, CoCP)	Main Development Site Noise Monitoring and Management Plan			Environment Review Group
CoCP Part C: Draft Northern Park and Ride Noise Monitoring and Management Plan (Appendix A, Part C, CoCP)	Associated Development Sites Noise Monitoring and Management Plans			Environment Review Group
Overarching Archaeological Written Scheme of Investigation (Doc Ref. 6.14 2.11.A(B))	Site-specific written schemes of investigation Site-specific post-excavation assessments Archaeological updated project design	SCC	Rqt. 3	Environment Review Group

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Peat Strategy (Doc Ref. 6.3 16G(A))	Peat archaeological written schemes of investigation	SCC	Rqt. 3	Environment Review Group
	Site-specific archaeological management plan	SCC	Rqt. 3	Environment Review Group
Terrestrial Ecology Monitoring and Mitigation Plan (Doc Ref. 9.4(B))		ESC	Rqt. 4	Ecology Working Group
Drainage Strategy (Doc Ref. 6.3 2A(C))	Details of surface and foul water drainage systems	SCC and ESC	Rqt. 5, 13A, 22	Water Working Group
Estate Wide Management Plan (Doc Ref. 9.88(A))		ESC	Rqt. 5C	Ecology Working Group
Rights of Way and Access Strategy (Doc Ref. 6.3 15I(D))	Public Rights of Way Implementation Plans	SCC	Rqt. 6A	Rights of Way Working Group
Main Development Site Water Monitoring and Response Strategy (Doc Ref. 6.14 2.14.A (A))	Water Monitoring Plan	ESC	Rqt. 7	Water Management Working Group
Draft Water Monitoring Plan (Doc Ref. 9.87(A))				

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
Draft Coastal Processes Monitoring and Mitigation Plan (Doc Ref. 6.14 2.15.A (B))	Coastal Processes Monitoring and Mitigation Plan	ESC/ MMO	Rqt. 7A, DML 17	Marine Technical Forum
Construction Method Statement (Doc Ref. 6.3 3D(D))		ESC	Rqt. 8	Planning Group
Section 1.3 Lighting Management Plan (Doc Ref. 6.3 2B(B))		ESC	Rqt. 9	Environment Review Group
	SSSI Flood Risk Monitoring and Adaptive Defence Plan	ESC	Rqt. 12C	Environment Review Group
Outline Landscape and Ecology Management Plan (Doc Ref. 8.2(B))	Landscape and Ecology Management Plan	ESC	Rqt. 14	Environment Review Group
Fen Meadow Strategy (Doc Ref. 6.14 2.9.D(A))	Fen Meadow Plan	ESC	Rqt. 14A	Ecology Working Group
Draft Fen Meadow Plan (Doc Ref. 9.64(A))				
Wet Woodland Strategy (Doc Ref. 9.8(A))	Wet Woodland Plan	ESC	Rqt. 14B	Ecology Working Group
Draft Wet woodland plan (Doc Ref. 9.108)				
Westleton Marsh Harrier Compensatory Habitat Strategy (Doc Ref. 9.35(A))	Marsh Harrier Implementation Plan	ESC	Rqt. 14C	Ecology Working Group

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
On-site Marsh Harrier Compensatory Habitat Strategy (Doc Ref. 9.16(A))				
Section 1.4 Lighting Management Plan (Doc Ref. 6.3 2B(B))		ESC	Rqt. 15	Environment Review Group
Two Village Bypass Landscape and Ecology Management Plan (Doc Ref. 8.3 A (B))		ESC	Rqt. 22A	Ecology Working Group
Sizewell Link Road Landscape and Ecology Management Plan (Doc Ref. 8.3 B (B))		ESC	Rqt. 22A	Ecology Working Group
Draft Rail Noise Mitigation Plan (Doc Ref. 6.14 9.3.E(A))	Rail Noise Mitigation Plan	ESC	Rqt. 25	Environment Review Group
	Marine Environment Management Plans	MMO	DML 18	Marine Technical Forum
	Marine Archaeological Written Schemes of Investigation	MMO	DML 19	Marine Technical Forum
	Fisheries and Liaison Co-existence Plan	MMO	DML 20	Marine Technical Forum
Outline Vessel Management Plan (Doc Ref. 9.65B)	Vessel Management Plans	MMO	DML 31a	Marine Technical Forum
	Maintenance Activities Plan	MMO	DML 34	Marine Technical Forum

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Level 1 Control Document	Level 2 Documents for Approval	Level 1 and 2 Approval by	Securing Mechanism	Relevant Governance Group
	Sediment Sampling Plans	MMO	DML 36	Marine Technical Forum
	Aids to Navigation Management Plan	MMO	DML 38	Marine Technical Forum
Draft Marine Mammal Mitigation Protocol (Doc Ref. 6.3 22N(B))	Marine Mammal Mitigation Protocol	MMO	DML 40	Marine Technical Forum
Draft Site Integrity Plan (Doc Ref. 5.10Ad 9A(B))	Site Integrity Plan	MMO	DML 40	Marine Technical Forum
Draft <i>Sabellaria</i> Reef Management and Monitoring Plan (Doc Ref. 9.90(A))	<i>Sabellaria</i> Reef Management and Monitoring Plan	MMO	DML 45	Marine Technical Forum
Draft Fish Impingement and Entrainment Monitoring Plan (Doc Ref. 9.89(A))	Fish Impingement and Entrainment Monitoring Plan	MMO	DML 50	Marine Technical Forum
	Smelt Monitoring Plan	MMO	DML 51	Marine Technical Forum

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Table 2: Strategies and Plans Secured by the DoO

Level 1 Control Document	Level 2 Documents for Approval	Approval by	Securing Mechanism	Relevant Governance Group
	Private Housing Supply Plan (prepared by ESC)	AWG	DoO Sch 3	Accommodation Working Group
	Tourist Accommodation Plan (prepared by ESC)	AWG	DoO Sch 3	Accommodation Working Group
	Construction Workforce Delivery Strategy including an Apprenticeship Strategy (prepared by SZC Co.)		DoO Sch 7	Employment, Skills and Education Working Group
	Annual Skills Implementation Plans (prepared by SCC)	Economic Review Group	DoO Sch 7	Employment, Skills and Education Working Group
	Operational Employment Strategy (prepared by SZC Co.)	Employment, Skills and Education Working Group	DoO Sch 7	Employment, Skills and Education Working Group
Supply Chain Work Plan			DoO Sch 7	Supply Chain Working Group
Implementation Plan (Annex I, DoO (Doc Ref. 8.17(G)))			DoO Sch 9	Planning Group

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SIZEWELL C PROJECT – STRUCTURE OF CONTROL
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	Sports Facilities Management Plan (prepared by ESC)	SZC Co	DoO Sch 10	N/A
	Land Management Skills and Scheme (managed by ESC and SCC)		DoO Sch 11	Employment, Skills and Education Working Group
	Informal Recreation and Green Space Plan (prepared by SZC Co.)	SCC	DoO Sch 11	Environment Review Group
Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary (Annex V, DoO (Doc Ref. 8.17(G)))			DoO Sch 11	Environment Review Group
Monitoring and Mitigation Plan for Walberswick and Sandlings (North) (Annex U, DoO (Doc Ref. 8.17(G)))			DoO Sch 11	Environment Review Group
Noise Mitigation Scheme (Annex W, DoO (Doc Ref. 8.17(G)))			DoO Sch 12	Environment Review Group
	Annual Tourism Fund Implementation Plan and subsequent Tourism Fund Implementation Plans (prepared by ESC)	Tourism Working Group	DoO Sch 13	Tourism Working Group
	Suffolk Local Network Signage Strategy (prepared by SZC Co)	SCC	DoO Sch 16	Transport Review Group
Construction Traffic Management Plan (Annex K, DoO (Doc Ref. 8.17(G)))			DoO Sch 16	Transport Review Group

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Construction Worker Travel Plan (Annex L, DoO (Doc Ref. 8.17(G)))			DoO Sch 16	Transport Review Group
Traffic Incident Management Plan (Annex M, DoO (Doc Ref. 8.17(G)))			DoO Sch 16	Transport Review Group
	Operational Travel plan (prepared by SZC Co)	SCC	DoO Sch 16	Transport Review Group
	PROW Communications Plan (prepared by the Rights of Way Working Group)		DoO Sch 16	Rights of Way Working Group

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