



# The Sizewell C Project

## 9.112 SZC Co. Response to Request for Further Information at Deadline 9

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None provided.

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None provided.

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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 9. 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><b>Project Enhancement</b></p> <p>Several references have been made by the Applicant in respect of additional measures which have been referred to as ‘enhancement’ or ‘corporate social responsibility measures’. For Deadline 9 on 30 September 2021, please can the Applicant provide a project-wide table which lists those measures which are considered enhancement or corporate social responsibility measures as opposed to mitigation.</p>	<p>Please refer to <b>Appendix A</b> of this document for a project-wide table of enhancements proposed.</p>
<p><b>Main Development Site – Flood Risk Assessment</b></p> <p>The Statement of Common Ground with the Environment Agency [REP7-090] identifies at point MDS_FRA8 in Table 2.5 that landowner consent needs to be sought for increase in flood depth at the tank traps and that Natural England need to be consulted. Can the Applicant provide, at Deadline 9, an update of the position with respect to agreement for the increase in flood depth.</p>	<p>A summary of landowner engagement on the main development site coastal flood risk was provided within <b>Appendix C of SZC Co’s Written Submissions responding to actions arising from Issue Specific Hearing 11: Flooding, Water and Coastal Processes</b> [<a href="#">REP8-125</a>]. An updated version of this appendix has been included within <b>Appendix B</b> of this document.</p>

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## APPENDIX A: SUMMARY OF PROJECT ENHANCEMENTS

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## **PLATES**

None provided.

## **FIGURES**

None provided.

## **APPENDICES**

None provided.

## 1 INTRODUCTION

1.1.1 On 20 September 2021, the Examining Authority (ExA) published a **Rule 17 Letter: Request for further information [PD-052]**. For Deadline 9, the ExA requested:

*“... please can the Applicant provide a project-wide table which lists those measures which are considered enhancement or corporate social responsibility measures as opposed to mitigation.”*

### a) Approach

1.1.2 In **Table 2.1** SZC Co. has responded to the ExA’s question by identifying those measures which it considers to go beyond simply mitigating for the adverse impacts of the proposed development and measures proposed as an enhancement or as corporate social responsibility measures, as opposed to mitigation.

1.1.3 It is important, however, for care to be taken in applying the distinction.

1.1.4 Some measures which are proposed as mitigation for adverse effects also deliver enhancements (referred to as ‘*mitigation and enhancement*’). For example, the two village bypass is a proportionate mitigation measure to address the impacts of construction traffic on affected communities. It will be effective at mitigating those impacts during the construction period, but its positive effect clearly goes beyond this, both during construction and into the long term. The inherent benefits which it brings are material considerations, and they are important and relevant to the decision. Similarly, other measures are intended to enhance and maximise the public interest benefits that the proposed development would deliver. An obvious example would be those measures which are intended to provide greater access to employment opportunities for local residents. Such measures, and the public interest benefits that they deliver, are also properly to be regarded as material considerations and they are important and relevant to the decision. These mitigation and enhancement measures should be taken into account by the decision-maker.

1.1.5 Measures which are not directly related to the mitigation of the anticipated effects of the project (positive or adverse), and are proposed as enhancement or corporate social responsibility measures are referred to here as ‘*enhancement or social responsibility*’. An example of such a measure in this case is the Environment Trust, the nature and relevance (or otherwise) of which was addressed in submissions in ISH14 (see **Written Summary of Oral Submissions at ISH14 [REP8-124]** at **paragraphs 1.3.18 to 1.3.22**)).

1.1.6 Consequently, the information set out in **Table 2.1** of this document sets out the measures considered by the Applicant as “*enhancements or corporate social responsibility measures*”, but inclusion within the Table does not imply that a measure should be regarded as immaterial to the decision. . The weight that is to be attached to each measure and the enhancements that it provides is a matter of planning judgment for the decision-maker, and is not addressed in this document.

b) Law and policy

1.1.7 The Applicant has set out its understanding of the law and policy on materiality and weight (with a focus on planning obligations) in **section 2** of the **Explanatory Memorandum** for the **Draft Deed of Obligation** [[REP7-043](#)]. It has invited other Interested Parties to indicate if they regard that analysis as incorrect or materially incomplete, but in the absence of any such suggestion it commends that document to the ExA.

1.1.8 Whilst the analysis in **section 2** of the **Explanatory Memorandum** should be read and understood as a whole, the following points are of particular relevance, when considering the measures set out in **Table 2.1** below:

- In principle, any consideration which relates to the use and development of land is capable of being a material consideration. Whether a particular consideration falling within that broad class is material in a particular case will depend on the circumstances.
- In considering whether or not a particular planning obligation may be taken into account by the decision-maker as a material consideration a threefold test is to be applied, equating the ambit of “material considerations” with the ambit of the power to impose planning conditions, namely whether the obligation in question:
  - is for a planning purpose;
  - is fairly and reasonably related to the development; and
  - is not so unreasonable that no reasonable planning authority could have imposed it.
- The third of these criteria is directed to planning obligations and conditions, whereas the first two also fall to be considered in determining what is ‘material’ more generally (see below). Planning obligations satisfying these criteria may be treated as material planning obligations.

- In addition, the Secretary of State’s policy is that in order for a planning obligation to be taken into account it must be relevant to planning, necessary to make the development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. The policy must be taken into account when determining the weight to be given to any obligation.

1.1.9 When considering the materiality of enhancement resulting from measures other than those which are the subject of planning obligations (e.g. associated development), the first and second of the *Newbury* criteria are relevant (see *R (Wright) v. Resilient Energy Severndale Ltd.* [2019] UKSC 53; [2019] 1 WLR 6562). ‘Material’ in the context of development control decision-making means material to the development which is proposed. To be material, a consideration must serve a planning purpose, i.e. it must relate to the character of the use of the land. It must also fairly and reasonably relate to the development proposed. Provided that a measure satisfies those criteria, it is material. If the public interest benefits that it delivers go beyond that which is necessary to mitigate an adverse impact, those public interest benefits are still material considerations provided that they relate to the use of the land.

1.1.10 Two further factors are relevant here.

- All of the associated development that is proposed as part of this application has been demonstrated to be consistent with the “Associated development principles” set out in paragraphs 5 and 6 of the DCLG Associated Development Guidance. Those principles require, inter alia, that the associated development has a direct relationship with the principal development, either supporting its construction or operation or helping to address its impacts. The associated development must not be an aim in itself, but should be subordinate to the principal development. Furthermore, it should be proportionate to the nature and scale of the principal development. If a particular element of associated development is accepted as satisfying those core principles, it can properly be granted development consent. Those principles act as a safeguard to ensure that associated development is not promoted simply for the purpose of delivering extraneous benefits unrelated to the principal development. The effects of any associated development, both positive and negative, fall to be treated as material considerations applying the *Newbury* criteria. That is the case even if some of those benefits go beyond what is needed in order to mitigate the adverse effects of the principal development. For example, the land use benefits of a bypass properly categorised as associated development



do not cease to be material once the adverse impacts (of the principal development) the bypass is designed to mitigate come to an end. Those benefits relate to the character of the use of the land, and they are directly related to the development to be permitted. Thus, they are material to the decision whether to approve the development.

- The decision-maker must also comply with Regulation 21 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Regulation 21(1) requires the decision-maker to examine the environmental information, reach a reasoned conclusion on the significant effects of the proposed development on the environment taking into account that examination, and integrate that conclusion into the decision as to whether an order is to be granted. The 'significant effects' will include both significant adverse and significant positive effects, and hence the reasoned conclusion on both must be taken into account.

1.1.11 Finally, **Table 2.1** necessarily reflects the Applicant's views as to what is to be regarded as *enhancement or corporate social responsibility measures as opposed to mitigation*. Other Interested Parties may well take a different view in relation to individual measures (e.g. Suffolk County Council has said that it regards the Environment Trust as mitigation that should be treated as a material consideration). Where that is the case, it will be a matter for those Interested Parties to make submissions to the Examining Authority to substantiate their views and for the decision-maker to decide.

## 2 SUMMARY OF PROJECT ENHANCEMENT AND SOCIAL RESPONSIBILITY MEASURES

**Table 2.1: Summary of project enhancement and social responsibility measures**

Topic	Measure	Type	Details
Socio-economics	Employment, Skills and Education Strategy and Supply Chain Strategy, including measures set out in Schedule 7 of the <b>Draft Deed of Obligation (DoO)</b> [REP8-088].	Mitigation and enhancement	<p><b>Volume 2, Chapter 9</b> of the <b>ES</b> [APP-195] identifies that there will be a moderate to major beneficial effect on the labour market in terms of recruitment and economic effects, and on unemployment and economic inactivity, and on businesses in the potential Sizewell C supply chain, when considering primary mitigation within the Employment, Skills and Education Strategy and Supply Chain Strategy. As such, the measures within those Strategies, having been developed into a formal suite of measures within Schedule 7 of the <b>Draft DoO</b> [REP8-088], can be considered to provide enhancements which go well beyond the mitigation of any impacts and to provide enhanced benefits.</p> <p>(Within this, SZC Co identifies some limited potential risks related to increased labour market churn as a side-effect of these positive and enhanced effects. However, these risks, along with risks that Suffolk County Council has raised relating to cumulative demand for skills, are mitigated by measures in Schedule 7 including:</p>

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Topic	Measure	Type	Details
			<ul style="list-style-type: none"> <li>• Asset Skills Enhancement Capability Fund and Investments;</li> <li>• Sizewell C Employment Outreach Initiatives; and</li> <li>• Sizewell C Jobs Service.)</li> </ul>
Socio-economics and amenity and recreation	Leiston Sports Facilities	Mitigation and enhancement	<p>The Leiston Sports Facilities are presented as part of a suite of precautionary primary mitigation for the potential risk of community cohesion and community integration effects in <b>Volume 2, Chapter 9</b> of the <b>ES [APP-195]</b>.</p> <p>They are also identified by <b>Volume 2, Chapter 9</b> of the <b>ES [APP-195]</b> as providing for major beneficial effects on the provision of sports and recreation facilities in the local area for the immediate and long term benefit of the local community, so they serve two purposes and may be considered both part of a suite of mitigation measures, and an enhancement. The Leiston Sports Facilities are secured by the <b>DoO [REP8-088]</b>, Schedule 10.</p>
Transport	Wickham Market Improvement Scheme ( <b>DoO</b> , Sch.	Mitigation and enhancement	<p><b>Volume 3, Appendix 2.C</b> of the <b>Fourth ES Addendum [REP7-032]</b> submitted at Deadline 7 does not identify significant effects due to the Sizewell C Project at Wickham Market. Nevertheless SZC Co.</p>

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Topic	Measure	Type	Details
	16, Section 5.2, <a href="#">[REP8-088]</a> )		has committed to deliver an improvement scheme in Wickham Market which mitigates non-significant Sizewell C impacts and provides a legacy benefit to the village. The proposed Wickham Market improvement scheme in the <b>DoO, Schedule 16</b> <a href="#">[REP8-088]</a> , will provide wider footways and new crossings points, improved cycle connectivity, improved public realm and highway changes to improve safety and encourage slower traffic speeds.
Transport	Leiston Improvement Scheme ( <b>DoO</b> , Sch. 16, Section 5.3, <a href="#">[REP8-088]</a> )	Mitigation and enhancement	<b>Volume 3, Appendix 2.C</b> of the <b>Fourth ES Addendum</b> <a href="#">[REP7-032]</a> submitted at Deadline 7 identifies significant effects due to the Sizewell C Project at Leiston. The Leiston Improvement Scheme, along with additional primary and tertiary mitigation identified in the <b>Fourth ES Addendum</b> , mitigates the effects of Sizewell C in Leiston. The Leiston Improvement Scheme in the <b>DoO, Schedule 16</b> <a href="#">[REP8-088]</a> , goes further however, by providing legacy improvements to the public realm and town squares (e.g. wider footways, new crossings, greening spaces).
Transport	Marlesford and Little Glemham ( <b>DoO</b> , Sch.	Mitigation and enhancement	<b>Volume 3, Appendix 2.C</b> of the <b>Fourth ES Addendum</b> <a href="#">[REP7-032]</a> submitted at Deadline 7 does not identify a significant effect due to the Sizewell C

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Topic	Measure	Type	Details
	16, Section 5.4, <a href="#">[REP8-088]</a> )		Project at Marlesford or Little Glemham. Nevertheless SZC Co. has committed to deliver an improvement scheme in Marlesford and Little Glemham, which mitigates non-significant Sizewell C impacts and provides a legacy benefit to the villages. These improvements in the <b>DoO, Schedule 16</b> <a href="#">[REP8-088]</a> , include changes to speed limits, quiet road surfacing, new and improved footways and pedestrian crossings.
Transport	A12 Improvement contribution ( <b>DoO</b> , Sch. 16, Section 8, <a href="#">[REP8-088]</a> )	Mitigation and enhancement	The <b>Consolidated Transport Assessment</b> <a href="#">[REP4-005]</a> describes a detailed traffic modelling study of the A12 between Seven Hills and Melton, which concluded that Sizewell C Project would not have a significant negative effect on journey times along the A12. Nevertheless SZC Co. has committed to a funding contribution towards capacity improvements on the A12, the A12 MRN Contribution, secured by Schedule 16 of the <b>DoO</b> <a href="#">[REP8-088]</a> . Those improvements would be delivered by Suffolk County Council as part of their MRN (Major Road Network) scheme, or if DfT funding is not secured for that scheme, the funds would be used by SCC to make other improvements to the A12. The funding contribution towards the A12 would benefit all traffic using the A12 over the Sizewell C construction period and beyond.

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Topic	Measure	Type	Details
Transport	B1122 Corridor Repurposing Scheme (DoO, Sch. 16, Section 10, [REP8-088])	Mitigation and enhancement	<p>Completion of the Sizewell link road will create an efficient and direct route for traffic to bypass communities along the B1122, most notably Middleton Moor and Theberton. It creates a lasting benefit of a significantly greater scale than a simple mitigation of assessed effects.</p> <p>With the Sizewell link road open, traffic flows on the B1122 are forecast to drop significantly, creating an opportunity to re-purpose the B1122 corridor to create a safe and attractive corridor for cycling and walking between schools, colleges, homes and places of work. SZC Co. has committed to implementing the B1122 Corridor Repurposing Scheme via the Schedule 16 of the DoO [REP8-088]. Once implemented the scheme will create safe, connected and quiet routes linking key destinations through the corridor. This scheme is not provided purely as a form of mitigation, but also as a legacy benefit to the communities along and around the B1122.</p>
Transport	Leiston Cycling and Walking Improvements (DoO, Schedule 16, Section 9, [REP8-088])	Mitigation and enhancement	<p>SZC Co. has committed to funding for Suffolk County Council to deliver a network of cycling and walking schemes in and around Leiston. These improvements will dove-tail with other improvements secured via Schedule 16 of the DoO [REP8-088] (e.g. PRow,</p>

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			Leiston Improvement Scheme and B1122 Corridor Repurposing Scheme) to create a safe, connected and attractive network of links through the town and to local destinations and regional cycling routes. The measures help mitigate the short term effects of the project but the scale and consequence of enhancement is transformative as a legacy benefit to Leiston residents and nearby communities.
Transport	Two Village Bypass	Mitigation and enhancement	The permanent bypassing of Farnham and Stratford St Andrew delivers a major, lasting legacy benefit for two communities on the A12 who have fought for years for relief from traffic. Despite repeated efforts from SCC, there has been no bypass and there is no prospect of a bypass being secured except through the Sizewell C Project. The positive effects of the bypass both during the Sizewell C construction period and into the long term far exceed the adverse impacts of the Sizewell C Project.
Transport	Level crossing enhancements – secured through a Framework agreement with Network Rail.	Mitigation and enhancement	The Framework Agreement with Network Rail commits to the funding and delivery of eight level crossing enhancements on the East Suffolk Line. In some cases, such as at Darsham, it is arguable that the safety enhancement exceeds what is necessary for Sizewell C’s temporary construction phase. In all

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			cases, however, permanent safety benefits are achieved for the benefit of local communities well after Sizewell C has finished running freight trains.
Noise and vibration	Glazing and ventilation provision for railway noise	Mitigation and enhancement	The <b>Noise Mitigation Scheme (Annex W of the Draft DoO [REP8-087])</b> sets out the steps that SZC Co. must take to provide improved insulation to properties likely to be subject to a significant observed adverse effect on health and quality of life (SOAEL). For railway noise, the provisions in the <b>Noise Mitigation Scheme</b> go beyond what is required by policy for railway noise by providing insulation at noise levels below SOAEL and providing a ventilation-oriented solution at noise levels down to LOAEL (the lowest observed adverse effect level). All properties that qualify have the opportunity for permanent benefit from the mitigation of a short term effect.
Noise and vibration	Glazing and ventilation provision for main development site construction noise	Mitigation and enhancement	The <b>Noise Mitigation Scheme (Annex W of the Draft DoO [REP8-087])</b> sets out the steps that SZC Co. must take to provide improved insulation to properties likely to be subject to a significant observed adverse effect on health and quality of life (SOAEL). For construction noise related to the main development site, the provisions in the <b>Noise Mitigation Scheme</b> go beyond what is required by

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			policy by providing insulation at noise levels below SOAEL and again offer a long term benefit to properties affected by a temporary impact.
Noise and vibration	Glazing and ventilation provision for properties fronting the B1122	Mitigation and enhancement	The <b>Noise Mitigation Scheme (Annex W of the Draft DoO [REP8-087])</b> sets out the steps that SZC Co. must take to provide improved insulation to properties likely to be subject to a significant observed adverse effect on health and quality of life (SOAEL). The insulation package is also offered to the owners of properties fronting the B1122, irrespective of the expected level of noise. This offer is made to 82 no. properties, which are listed in <b>Annex G of the Draft DoO [REP8-088]</b> . Those properties can elect to receive a long term benefit to mitigate a short term impact.
Noise and vibration	Glazing and ventilation provision and sensory garden for Pro Corda Trust at Leiston Abbey	Mitigation and enhancement	The <b>Noise Mitigation Scheme (Annex W of the Draft DoO [REP8-087])</b> sets out the steps that SZC Co. must take to provide improved insulation to properties likely to be subject to a significant observed adverse effect on health and quality of life (SOAEL). The insulation package is offered to Pro Corda Trust for their residential accommodation, in light of the particular sensitivities of those staying at the premises, despite expected noise levels well below

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			<p>the eligibility thresholds at the property. This commitment is set out in Schedule 12 of the <b>Draft DoO</b> <a href="#">[REP8-088]</a>.</p> <p>In addition, a contribution towards provision of indoor and outdoor sensory spaces suitable for children with autism and other special educational needs and disabilities is provided in Schedule 13 or the <b>Draft DoO</b> <a href="#">[REP8-088]</a>.</p>
Noise and vibration	East Suffolk line – track improvements.	Mitigation and enhancement	<p>A process is included in the <b>draft Rail Noise Mitigation Plan</b> <a href="#">[REP8-071]</a> to enable further engagement with Network Rail and East Suffolk Council with the objective of delivering upgrades to the East Suffolk line track infrastructure. The final version of the document is secured by requirement 25 of the Draft DCO. The enhancements are not required to avoid SOAEL but would serve to minimise noise from Sizewell C freight trains. Such improvements are not yet committed, but where delivered they would provide a benefit from the effects of any rail traffic into the long term.</p>
Natural Environment	Estate-wide landscaping and management proposals	Mitigation and enhancement	<p>Measures to optimise the operational phase of the proposed development include minimising land take for built development and infrastructure within and outside the Estate. This would maximise the area</p>

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	<p>(refer to <b>Proposed Landscape Masterplan</b> [<a href="#">REP8-024</a>], <b>Outline Landscape and Ecology Management Plan</b> [<a href="#">REP8-076</a>] and <b>Estate Wide Management Plan</b> [<a href="#">REP8-109</a>])</p>		<p>available for establishing the estate wide vision as set out in Chapter 8 of the Design and Access Statement (DAS) (secured pursuant to Requirement 14) and implementing the Estate Wide Management Plan (EWMP) (Requirement 5C). These will together deliver a substantial and long term enhancement to local landscape character, biodiversity, amenity, and the natural beauty and special qualities of the Suffolk Coast and Heaths AONB.</p> <p>Following construction, the temporary construction area at the main development site would be restored to a new landscape founded on the concept of establishing the Suffolk Coast and Heaths AONB landscape in microcosm by creating a mosaic of some of its most valued habitats comprising locally characteristic Sandlings habitat, including approximately 121 hectares of dry Sandlings grassland and 51 hectares of mixed woodland. Once fully established, this habitat mosaic would have a higher biodiversity value than the existing habitats (a Biodiversity Net Gain of 18%), specifically as extensive arable areas and plantations would be replaced with locally characteristic semi natural habitats at scale.</p>

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			<p>Hence SZC Co. would not simply restore the land within the main development site boundary, which has been temporarily used during construction, to its current landscape of arable farmland and plantations, but create a mosaic of locally rare and threatened characteristic Sandlings and coastal habitats.</p> <p>This long term landscape scale enhancement to an area within the Suffolk Coast and Heaths AONB will significantly improve the ecological, landscape and amenity value of the area, complementing the landscapes to the north at the RSPB Minsmere Reserve and National Trust’s Dunwich Heath and south of the Sizewell Gap at The Walks and Aldringham Common.</p> <p>The transformative landscape legacy also provides the opportunity for building greater resilience to habitats and species, through creating bigger, better and better connected habitats along the Suffolk Coastline, notably though linkages with areas to the north and south of the Estate and provide an enhanced experience for local communities and visitors to the area in an expansive naturalised landscape along a substantive stretch of the coast</p>

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Topic	Measure	Type	Details
			within the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast.
Natural Environment	Habitat resilience measures within the <b>Terrestrial Ecology Monitoring and Mitigation Plan</b> [ <a href="#">REP8-089</a> ]	Mitigation and enhancement	A sound understanding of the role and effect of recreational pressure on the protected species and habitats of the local area has been secured over and above anything that previously existed that will support the long term management of these assets in addition to supporting the structuring of mitigation as part of the HRA and EIA. The long term monitoring and mitigation commitments in the <b>TEMMP</b> , secured by requirement 4 of the Draft DCO, provide a process of guardianship and protection which is not otherwise in place.
Natural Environment	Wardening and monitoring	Mitigation and enhancement	Monitoring of visitor numbers and behaviour is proposed that will enhance the understanding of use of European sites by visitors. Additional wardening resource is proposed covering the Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC), Minsmere–Walberswick Special Protection Area (SPA), Minsmere–Walberswick Ramsar site and part of the Sandlings SPA. These measures are proposed notwithstanding the limited effects forecast from the Sizewell C Project and will help guide the behaviour of all those who visit. These

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			measures are secured by Schedule 11 of the <b>DoO</b> [ <a href="#">REP8-088</a> ].
Natural Environment	Bat barn	Mitigation and enhancement	Provision of a Bat Barn to provide additional roost features. This considered as enhancement if there is no loss of roost resource at Upper Abbey Farm and subject to the success of can be other avoidance and mitigation measures.
Natural Environment	Natterjack toad habitat creation	Mitigation and enhancement	To compensate for the temporary loss of foraging natterjack toad habitat, SZC Co. is proposing to provide additional aquatic and terrestrial habitats for natterjack toad. The current proposals include the provision of four ponds and terrestrial enhancements including sand banks, scrapes and heather patches. Whilst mitigating the effects during the construction period, the proposals will provide an enhancement in the long-term.
Natural Environment	Additional artificial otter holt	Mitigation and enhancement	In addition to the creation of an artificial otter holt as re-provision for loss of an existing holt, SZC Co. is proposing to provide a second artificial otter holt as an enhancement. This additional artificial otter holt would be located within The Grove woodland to the south-east of the wetland development area to provide a permanent resting site / feature for use by otters.

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Topic	Measure	Type	Details
Natural Environment	Additional ponds at the Sizewell link road.	Mitigation and enhancement	In addition to the eight ponds required to compensate for the loss of four ponds identified to support great crested newt at the Sizewell link road site, SZC Co, is proposing to create and additional six ponds. These additional ponds have been proposed as part of the landscaping scheme as an enhancement to the existing aquatic habitats present within the site.
Natural environment	Creation and funding of a charity for the benefit of the natural environment and AONB in Suffolk/East Suffolk. (Environment Trust)	Enhancement or social responsibility	SZC Co is negotiating an agreement with East Suffolk Council and Suffolk County Council pursuant to which SZC Co commits to set up a charity, to be registered with the Charities Commission, which will have the object of conserving and improving the physical and natural environment and AONB in Suffolk/East Suffolk. The precise objects of the charity are still under negotiation. But following establishment of the charity, SZC Co will provide funding in the amount of £1.5m per year for each year of the construction and each of the first twenty years of the power station's operational life. For all subsequent years of the power station's operational life SZC Co. will fund the charity in the amount of £750,000 per year. The Trustees of the charity must act independently of SZC Co and the Councils. It is expected that the charity will also seek funding from other third party sources.

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Topic	Measure	Type	Details
			<p>The Trustees may appoint an advisory committee to assist with their decision-making.</p> <p>The setting up and funding of this charity is not necessary to mitigate the effects of the Project, but is being offered by SZC Co. as part of the lasting positive legacy it wishes to leave in East Suffolk/Suffolk as part of developing the power station.</p>
Amenity and recreation	PRow improvements and new PRow as set out within the <b>Rights of Way and Access Strategy</b> [REP8-055] and <b>Rights of Way and Access Plans</b> [REP8-008]	Mitigation and enhancement	<p>The Sizewell C Project would provide an enhanced public right of way (PRow) and permissive network including the establishment of approximately 6.4 km of new PRow at the main development site during the construction phase which are retained permanently, that better connect areas of landscape and Leiston to its surrounding landscape. The new permanent PRow created before or during construction include:</p> <ul style="list-style-type: none"> <li>a new approximately 4.5km length off-road bridleway from Sizewell Gap in the south to Eastbridge Road in the north, via the accommodation campus. The northern part of this will incorporate the diversion of Bridleway 19 during construction (mitigation during construction), and the southern part will be a</li> </ul>



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Topic	Measure	Type	Details
			<p>new route (enhancement during construction). The whole route will be retained during operation as a permanent enhancement;</p> <ul style="list-style-type: none"> <li>• a new bridleway between Valley Road and the off-road bridleway described above, providing access for workers from the caravan site at the Land East of Eastlands Industrial Estate (LEEIE) (mitigation during construction), and a permanent enhancement during operation providing improved connection between Leiston and the AONB rights of way network;</li> <li>• a new PRoW (footpath) linking existing PRoW and the B1122 south of the green rail route constructed as part of PRoW diversions around the green rail route during construction (mitigation) will be retained permanently (enhancement); and</li> <li>• a new PRoW (footpath) within Aldhurst Farm will be available during construction (mitigation) and retained permanently (enhancement).</li> </ul> <p>Following construction, the Sizewell C Project would establish a further 3.3km of new PRoW (bridleways) connecting the new off-road bridleway within Aldhurst Farm with Bridleway 19, and a new bridleway through Kenton Hills, Goose Hill to the Coast Path and the</p>

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Topic	Measure	Type	Details
			<p>accessible coastal margin. The bridleway from Bridleway 19 and the coast would be the route of Sandlings Walk and secured by the Draft DCO. This will be a permanent enhancement. These measures go beyond short term mitigation to create a legacy of enhancement.</p>
Amenity and recreation	PROW Fund	Mitigation and enhancement	<p>In addition to the establishment of new PRoW as outlined within the <b>Rights of Way and Access Strategy</b> <a href="#">[REP8-055]</a>, SZC Co. has committed to funding for Suffolk County Council to deliver a network of public rights of way improvement schemes in and around the main and associated development sites. These improvements will dove-tail with other improvements secured via Schedule 16 of the <b>Draft DoO</b> <a href="#">[REP8-088]</a> (e.g. Bridleway 19 diversion and the link between Aldhurst Farm and Kenton Hills) to substantially improve connectivity in the surrounding areas. The scale of enhancement is substantial and the improvements within the fund go far beyond mitigation and provide a clear legacy benefit to users of the Public Rights of Way network.</p> <p>The PROW Fund identifies 19 no. separate projects which are considered enhancements providing legacy benefit. Examples of Fund projects include:</p>

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Topic	Measure	Type	Details
			<ul style="list-style-type: none"> <li>• Creation of a Bridleway along the former railway line. This is a very popular and well used route northwards of Aldeburgh providing links to Thorpeness and strategically onwards to Leiston and provides an opportunity for a safe off-road route for both leisure and commuting. The railway line is currently a permissive path and this would formalise and enhance its use.</li> <li>• Upgrade of Aldringham-Cum-Thorpe FP4, FP43, FP42 and FP40. This would formalise use of the former railway line which offers a desire line along a wide, surfaced route for all users including accessibility and cycling.</li> </ul>
Amenity and recreation	Aldhurst Farm access improvements	Mitigation and enhancement	Provision of a new car park (20 spaces), a new PRoW (surfaced footpath), a network of informal footpaths, and 27ha of new open access land where dogs can be exercised off-lead, signage, seating, and a bird hide at Aldhurst Farm. This will provide mitigation during construction, and be retained permanently (enhancement). This area connects with other accessible areas to form a comprehensive natural open space network supported by new and improved connections that will support the community's

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Topic	Measure	Type	Details
			enjoyment of the area and provide ongoing resilience of the European sites post construction.
Amenity and recreation	Kenton Hills car park	Mitigation and enhancement	Improvements to Kenton Hills car park including enlarging by approximately 15 spaces, surface and signage improvements, vegetation management provided during construction (mitigation) and retained permanently (enhancement).
Amenity and recreation	Off-road bike skills trail in Kenton Hills	Mitigation and enhancement	Creation of an off-road mountain bike skills trail within Kenton Hills coniferous woodland. Accessed via a new permissive foot and cycleway connection across Lover's Lane, from the new off-road bridleway within Aldhurst Farm, which will be available from approximately the end of the second year of construction (connection to be made a definitive bridleway during operation).
Amenity and recreation	RAMS contribution	Mitigation and enhancement	SZC Co. will provide a sum of £150,000 (the Recreational Disturbance Avoidance Mitigation Contribution) to be used by East Suffolk Council towards mitigating the recreational disturbance impacts of the Sizewell C Project, to reduce the impact of potential increased levels of recreational use on European sites (see Schedule 11, paragraph 7 of the DoO [REP8-088]) (mitigation). It is likely that this

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Topic	Measure	Type	Details
			will lead to measures which will provide permanent legacy benefits beyond the construction phase (enhancement).
Historic Environment and Landscape	Works secured in Schedule 8 of the DoO <a href="#">[REP8-088]</a> to conserve and enhance the historic significance of Upper Abbey Farm	Mitigation and enhancement	<p>During the construction phase, works to stabilise and enhance structures within the farmyard of Upper Abbey Farm and to remove intrusive vegetation will be completed prior to the first occupation of the accommodation campus. They address the loss of heritage significance through change to setting during the construction phase on Upper Abbey Farmhouse (LB 1216394) and Barn north of Upper Abbey Farmhouse (LB 1216655).</p> <p>During the operational phase, these works will provide a legacy benefit in terms of improvements to the longer-term conservation of the assets and their setting.</p> <p>In addition to supporting longer-term conservation of the assets and their setting, these works will protect and enhance this feature of local landscape character at the transition from areas of farmland to areas of coastal Sandlings habitats following construction of Sizewell C.</p>

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Topic	Measure	Type	Details
Historic environment	Contribution secured in Schedule 8 of the DoO [REP8-088] towards measures for survey and consolidation of the Scheduled Monument SM 1014520 and improved interpretation of the Second Leiston Abbey Site, and towards the development and implementation of a landscape and access masterplan for the Second Leiston Abbey Site.	Mitigation and enhancement	<p>These works comprise additional mitigation to address the loss of heritage significance through change to setting during the construction phase, assessed as major adverse prior to mitigation. During the operational phase, these works will provide a legacy benefit in terms of improvements to the longer-term conservation of the Second Leiston Abbey Site and its setting. English Heritage set out in the "Envisioning Sustainable Conservation: Sustainable Conservation Management Strategy &amp; Stewardship Vision 2021 - 2041 (Free-to-Enter Site Pilot)" report submitted at Deadline 8 [REP8-154], 2.6(A) that "<i>Leiston Abbey has stood in a predominately ruinous, dynamically deteriorating, state for.c500 years, significantly longer than it was occupied as an Abbey. With much of the surviving fabric of the Abbey's various phases now in generally poor condition. Notably, the site has deteriorated from average to poor condition since it was last fully surveyed in 2008.</i></p> <p><i>Sitewide the inherently vulnerable fabric is beginning to succumb to progressively fast rates of deterioration, increasing the possible risks of both material falling from height and the accretive loss of heritage significance".</i></p> <p>Not only will the Deed of Obligation contribution allow a holistic and sustainable approach to the future</p>

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Topic	Measure	Type	Details
			<p>management, conservation and maintenance of the Second Leiston Abbey Site but this will comprise a new approach, proposed to be piloted at Leiston, to <i>"finding sustainable solutions to the challenges we face around conservation defects and long term maintenance, helping reduce risk, build resilience and find new opportunities to promote and deliver English Heritage's charitable objectives."</i></p>
Groundwater and surface water	Water control structure(s)	Mitigation and enhancement	<p>The water control structure(s) incorporated into the realigned Sizewell Drain provide primary mitigation for the very minor predicted changes in water level associated with the drain realignment. However, the water control structure(s) and associated monitoring/management regime will further improve the resilience of the SSSI by maintaining more stable water levels that are within a beneficial range for longer, as well as providing enhanced protection against naturally occurring drought. The rapid fine tuning of water levels has not been previously achievable in the system and represents a particular benefit to the SSSI which goes well beyond the mitigation of any Sizewell C impact. Water levels within the main development site are then secured by Requirement 7 of the Draft DCO.</p>

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			<p>In addition to the above, the Temporary Marine Outfall and subsequent Combined Drainage Outfall and spine drain can be used to divert excess stormwater away from the SSSI to sea discharge. This offers an opportunity to deploy this mitigation and management infrastructure to alleviate naturally occurring flooding in the SSSI and up to Minsmere Sluice.</p>
Groundwater and surface water	Water Levels Management Group	Mitigation and enhancement	<p>The DoO <a href="#">[REP8-088]</a> commits the Applicant to establish and support a Water Levels Management Group. This Group has a remit outside of the DCO to consider the wider ranging pressures and opportunities for the Sizewell Marshes SSSI, in terms of protection, resilience and future adaptation. The Group builds on a strong base of excellent land management established between EDF Energy (NGL) and Suffolk Wildlife Trust, and extends it to a wider group of landowners and stakeholders, who have an interest in preserving the unique habitat and ecological features of the SSSI and developing a forward looking plan for adaptation in the face of a changing climate and in the context of a Shoreline Management Plan policy for managed realignment to the immediate north of the proposed Sizewell C.</p>

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			This Group will therefore also derive and drive greater value from the baseline and construction phase monitoring, using it for a purpose that extends beyond the monitoring and management envisaged under the DCO. This data will underpin the decision-making of the Group in setting a plan for future adaptation in the context of a changing coastline.
Coastal geomorphology and hydrodynamics	Placement and recharge of soft coastal defence feature (SCDF)	Mitigation and enhancement	As the soft coastal defence feature (SCDF) erodes it will release sedimentary material to downdrift beaches (i.e. adjacent beaches depending on the prevailing direction of sediment transport). This will serve to slow erosion on those adjacent shores, and the benefit would be maintained while the SCDF is recharged. In this regard, the presence and ongoing maintenance of the SCDF is beneficial because it will preserve the position of the coastline at this location which would otherwise erode and retreat landward without the presence of Sizewell C.
Marine ecology and fisheries	Contribution to fish passes in the River Alde (at Snape Maltings) and the River Blyth (Blythford Bridge).	Mitigation and enhancement	SZC Co. will make a contribution of £500,000 to these two schemes (see Schedule 11 paragraph 9.1 of the <b>DoO</b> to be submitted at Deadline 10) to mitigate potential impacts on eels under the Eels Regulations (based on Environment Agency concerns on uncertainty as to whether the Sizewell C Project would

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			have impacts on glass eel). However, the removal of these barriers will benefit all migratory fish including, for example, smelt. A further contingency fund of up to £250,000 has been allocated to support other schemes in the River Alde and the River Blyth to mitigate impacts on smelt should monitoring indicate this (Schedule 11 paragraph 9.5 of the <b>DoO</b> to be submitted at Deadline 10). As above, improvement to rivers by removing barriers will be beneficial for all migratory fish species.
Marine ecology and fisheries	Contribution to coastal habitat enhancements	Mitigation and enhancement	SZC Co has allocated £500,000 to contribute to coastal habitat enhancements (Schedule 11 paragraph 9.5 of the <b>DoO</b> to be submitted at Deadline 10) such as saltmarsh creation from managed realignment schemes to mitigate impacts on marine fish species should monitoring demonstrate that entrapment of fish is significantly greater than predicted in the Environmental Statement. If these schemes are delivered, they would not only mitigate impacts on fish but also provide beneficial habitat for other wildlife, for example birds and invertebrates.
Compulsory Acquisition and Property	Property Price Support Scheme	Enhancement or social responsibility	SZC Co. has introduced the discretionary Property Price Support Scheme (PPSS) to ensure that owners of properties most immediately impacted by the

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Topic	Measure	Type	Details
			<p>Project (but outside of Order limits) can sell their property and relocate if they so choose to do. The PPSS boundary covers the areas where it has been considered there will be particular term impacts, including adjacent to the following sites:</p> <ul style="list-style-type: none"> <li>• Main development site;</li> <li>• Land East of Eastlands Industrial Estate;</li> <li>• Sizewell link road;</li> <li>• Two village bypass;</li> <li>• Northern park and ride;</li> <li>• Green rail route.</li> </ul> <p>The PPSS ensures that the homeowner would not suffer any financial loss in respect of the value of the property in consequence of the Sizewell C proposals on the sale of their property. Supporting property prices is not a policy requirement but is considered by SZC Co. to be socially responsible.</p> <p>Although it has been appropriate to apply a boundary for the PPSS, SZC Co. has considered particular concerns of residents outside of the scheme limits and has worked with residents to ensure that individual circumstances are considered alongside the Project</p>

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Topic	Measure	Type	Details
			<p>proposals, and has worked to identify means of addressing concerns on a case by case basis. SZC Co. will continue to work with all residents (and businesses) impacted by the Project and will make adjustments to policies and procedures where appropriate, particularly (but not exclusively) if issues arise from those stakeholders who may have protected characteristics as defined in the Equality Act 2010 and may otherwise be disproportionately disadvantaged.</p>

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## APPENDIX B: SUMMARY OF LANDOWNER ENGAGEMENT ON THE MAIN DEVELOPMENT SITE COASTAL FLOOD RISK

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## PLATES

None provided.

## FIGURES

None provided.

## 1 SUMMARY OF LANDOWNER ENGAGEMENT ON MAIN DEVELOPMENT SITE COASTAL FLOOD RISK

### 1.1 Main development site – British Energy Generation Limited & EDF Energy Nuclear Generation Limited

1.1.1 Engagement has been undertaken with those landowners who are impacted to the greatest extent by the flood risk around the Main development site. Terms have been agreed for the freehold acquisition of the significant majority of the land impacted by this increased flood risk. Engagement is ongoing in relation to land where terms for acquisition have not been agreed.

### 1.2 Main development site – Additional Landowners

1.2.1 Engagement is ongoing with all the other landowners affected by the areas of additional flooding, either directly in meetings, or via their agents who have been thoroughly briefed on the extent of the potential additional flooding. Those landowners with whom discussions are progressed directly (in meetings) are unconcerned about the impact of what they see as an imperceptible difference in flooding in extreme events.

1.2.2 The landowners who have expressed these views, appreciate that the additional areas to be flooded in extreme events are contiguous with land that would already be flooded, if a similar event were to happen without the proposed scheme having been built.

1.2.3 Agreements to flood the additional land are not proposed to be documented because the areas of additional flood land are:

- remote from the red line boundary.
- imperceptible from the existing flood events.

1.2.4 SZC Co. is awaiting feedback from agents in respect of some of the landowners, but there is regular communication between the parties and SZC Co. will seek to address any concerns. A summary table is provided below in respect of the additional third-party landowners.

### 1.3 Main development site – Natural England

1.3.1 At the request of the Environment Agency, SZC Co. has engaged with Natural England in respect to the RSPB's landholding. A report summarising the flood risk impacts was provided on 8 September 2021. A response is awaited.

**Table 1.1: Summary of landowner engagement on main development site coastal flood risk**

Landowner	Engaged	Comments	Briefed	Prior Engagement
Ann Sylvester	Yes	Awaiting feedback from agent or response to letter	Meeting with agent 27th August Plans sent agent 8th September Letter & plans sent 27th September	Yes – SLR land take
David Edward Watson, Middleton	Yes	Awaiting feedback from agent or response to letter	Meeting with agent 27th August Plans sent agent 8th September Letter & plans sent 27th September	No
Emma Louise & Laurence Justin Dowley	Yes	Informed, consider impact insignificant. Awaiting response to letter	Meeting with landowner & agent 3rd September to show plans. Letter & plans sent 27th September	Yes – SLR & MDS land take
Cripps Trust Corporation Limited	Yes	As above	As above	Yes – as above
Francis James Winter & Stuart Edward Winter	Yes	Awaiting feedback from agent or response to letter	Plans sent to agent 8th September (agent already briefed on 3rd September). Letter & plans sent 27th September	Yes – RE initial Marsh Harrier site options
John Robert Poll & Karen Poll	Yes	Awaiting feedback from agent or response to letter	Meeting with agent 27th August Plans sent to agent 8th September Letter & plans sent 27th September	Yes – SLR & MDS land take
Nathaniel John Bacon & India Bacon	Yes	Informed, consider impact insignificant. Awaiting response to letter	Meeting with landowner & agent 3rd September to show plans. Letter & plans sent 27th September	Yes – SLR land take & Marsh Harrier site
The RSPB	Yes	Informed. Additional information requested, with updated report to be provided by SZC Co. by 30 September 2021.	Meeting with landowner. Plans and report previously provided 26 August 2021.	Yes – SOCG meetings