



The Sizewell C Project

9.124 Comments on Responses to SZC Co.'s Responses to the ExA's Second Written Questions (ExQ2)

Revision: 1.0
Applicable Regulation: Regulation 5(2)(q)
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Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009



1 INTRODUCTION

1.1.1 This report provides SZC Co.'s comments on the responses submitted by Interested Parties (IP) at Deadline 8 (24 September 2021) and at Deadline 9 (30 September 2021) to the Examining Authority's Second Written Questions [PD-031 to PD-037].

1.1.2 SZC Co.'s response to the ExQ2s was submitted to the Examining Authority at Deadline 7 [REP7-049 to REP7-057], with further comments provided at Deadline 8 [[REP8-115](#)].

1.1.3 This document only provides SZC Co.'s comments on ExQ2s where a response has been provided by an IP at Deadline 8 or Deadline 9. For the ease of reading, SZC Co.'s response at Deadline 7 and 8 is provided (where applicable), as well as the response submitted by IP so that the comment may be seen in context.

1.1.4 It follows the same structure as the SZC Co.'s Responses to the Second Written Questions issued at Deadline 7 [[REP7-056](#)], and is arranged as follows:

- Part 1:
 - General and cross-topic questions;
 - Agriculture and Soils;
 - Air Quality;
 - Alternatives;
 - Amenity and Recreation;
- Part 2:
 - Biodiversity and Ecology;
 - Habitats Regulations Assessment;
- Part 3:
 - Climate Change;
 - Compulsory Acquisition;

- Cumulative and Transboundary;
- Coastal Geomorphology; and
- Community Issues.
- Part 4:
 - Draft Development Consent Order (DCO);
 - Flood Risk, Ground Water and Surface Water;
 - Health and Wellbeing;
 - Historic Environment;
 - Landscape Impact, Visual Effects and Design.
- Part 5:
 - Noise and Vibration
- Part 6:
 - Radiological Consideration;
 - Section 106;
 - Socio-economics; and
 - Transport

1.1.5 This report contains Examination Library References in square brackets (e.g. [APP-001]).

Navigation guide to the Examining Authority's Second Written Questions:

ExQ2 Part 1 Link to Part 1	ExQ2 Part 2 Link to Part 2	ExQ2 Part 3 Link to Part 3	ExQ2 Part 4 Link to Part 4	ExQ2 Part 5 Link to Part 5	ExQ2 Part 6 Link to Part 6
<ul style="list-style-type: none"> • General and Cross topic Questions • Agriculture and soils • Air Quality • Alternatives • Amenity and recreation 	<ul style="list-style-type: none"> • Biodiversity and ecology, terrestrial and marine • Habitats Regulations Assessment 	<ul style="list-style-type: none"> • Climate change and resilience • Compulsory Acquisition • Cumulative impact • Coastal Geomorphology • Community Issues 	<ul style="list-style-type: none"> • Draft Development Consent Order (DCO) • Flood risk, ground water, surface water • Health and wellbeing • Historic environment (terrestrial and marine) • Landscape impact, visual effects and design 	<ul style="list-style-type: none"> • Noise and Vibration 	<ul style="list-style-type: none"> • Radiological considerations • Section 106 • Socio-economic • Traffic and Transport

ExQ2 - Part 1

ExQ2	Question to:	Question:
G.2 General and Cross-topic Questions		
G.2.14	The Applicant, SCC, ESC	Policy and Need
		<p>The ExA's ExQ1 G.1.12 questioned whether the Planning Statement [APP-590], paragraph 3.9.2, was correct to state that it was appropriate to treat EN-1 and EN-6 as providing the primary policies relevant to the determination of the application. The responses to that ExQ1 from the Applicant, ESC and SCC together with the Applicant's comments on the responses received from ESC and SCC are noted [REP3-046]. In the decision dated 19 February 2021 relating to the application for the Wheelabrator Kemsley K3 Generating Station and Wheelabrator Kemsley North Waste-To-Energy Facility Order the Secretary of State for Business, Energy and Industrial Strategy, at paragraph 6.3, states: <i>"As set out above, sections 104 and 105 of the Planning Act 2008 set out the procedures to be followed by the Secretary of State in determining applications for development consent where National Policy Statements have and do not have effect. In both cases, the Secretary of State has to have regard to a range of policy considerations including the relevant National Policy Statements and development plans and local impact reports prepared by local planning authorities in coming to a decision. However, for applications determined under section 104, the primary consideration is the policy set out in the National Policy Statements, while for applications that fall to be determined under section 105, it is local policies which are specifically referenced although the National Policy Statements can be taken into account as 'important and relevant considerations'."</i> It is recognised that there are obvious differences on the facts between that particular case and the Sizewell C Project application. Nevertheless, further comments are sought on the principle of the approach to the primacy of policy in a s105 case, as expressed by the Secretary of State in that decision.</p>
	SZC Co. Response at Deadline 7	<p>SZC Co. has considered the Secretary of State's decision letter ("DL") and the related Examining Authority Report ("EXR") in the Wheelabrator case, neither of which affect the position as set out in its answer to EXQ1 G.1.12 or its comments on the answers to that question provided by ESC and SCC.</p> <p>In order to understand the comment made in paragraph 6.3 of the Wheelabrator DL, and its relevance (if any) to this Examination it is necessary briefly to consider the specific circumstances in that case.</p>

ExQ2	Question to:	Question:
		<p>The Wheelabrator application was for two related developments, one of which (known as 'Project K3') was a NSIP as defined in the PA 2008, the other (known as 'Project WKN') was not. Project WKN was below the threshold for national significance set by the PA 2008 and would therefore have fallen to be determined by the local planning authority under the TCPA 1990 if it had not been 'directed in' pursuant to s.35 PA 2008. That is essential context, because it means that the key considerations to which reference was made in SZC Co's response to EXQ1 G.1.12 would not have applied to Project WKN in the way that they plainly do to the proposed Sizewell C new nuclear power station here.</p> <p>There is no explanation in the DL of what is meant by the statement in paragraph 6.3 that for applications that fall to be determined under section 105 "<i>it is local policies which are specifically referenced</i>" (emphasis added). Given that there is no 'specific reference' to local policies in section 105 itself, or in any relevant policy document, it is not possible to discern to what this is referring.</p> <p>The EXR concluded that development plan policies should take precedence for Project WKN (EXR paragraphs 4.6.4 and 4.7.4). The reason for the approach taken in the EXR can be seen in EXR paragraphs 6.2.1 to 6.2.5 and in particular paragraph 6.2.4 which stated: "<i>Indeed, whatever the reason behind the lack of definitive statutory or judicial clarity over the issue [of which policies should take precedence], it would be sensible in my view to apply the statutorily adopted development plan as the primary consideration to <u>a project that, but for the s35 Direction, would have fallen to be considered on that basis</u></i>" (emphasis added).</p> <p>So far as SZC Co. is aware, that is the only substantive explanation to be found in the Wheelabrator decision-making documents for the approach to policy precedence adopted to the determination of the WKN Project in that case. Whilst the Examining Authority's stated rationale for the approach taken to the WKN Project is understandable on the specific facts of that case, it plainly has no application to the proposed development of the Sizewell C new nuclear power station which is and always has been nationally significant. Moreover, for the same reason it does not affect any of the points made on behalf of SZC Co. in response to ExQ1 G.1.12.</p>

ExQ2	Question to:	Question:
		<p>In the Energy White Paper the Government has plain made its position on the continued suitability of the NPSs in providing "a proper basis on which the Planning Inspectorate can examine, and the Secretary of State can make decisions on, applications for development consent" pending review of the NPS (page 55). It has done so in the full knowledge and understanding of its stated position that any such decision would fall to be made under section 105. Had the Government thought that local plan policies and/or the NPPF should instead have primacy in such decisions, it would surely have said so. The position that it has in fact adopted is entirely consistent with the position of the Applicant in this case, and is entirely unsurprising having regard to the factors identified in response to ExQ1 G.1.12. Finally, it should be noted that the Wheelabrator decision is the subject of an application for judicial review which was heard by Dove J in mid-July. The grounds of challenge are not understood to relate to this specific point. Judgment is awaited.</p>
	<p>East Suffolk Council Response at Deadline 7</p>	<p>It is common ground that s105 of the Planning Act 2008 applies to decision-making for this project as Sizewell C will not be developed before the end of 2025.</p> <p>Section 105 requires the following to be taken into account:</p> <ul style="list-style-type: none"> - any local impact report - any prescribed matters - anything else that is considered important and relevant <p>Matters are duly prescribed by the Infrastructure Planning (Decisions) Regulations 2010, as amended, and are (paraphrased):</p> <ul style="list-style-type: none"> - the effect on listed buildings, conservation areas and scheduled ancient monument - the effect on navigation, the marine environment and legitimate uses of the sea - the effect on biological diversity <p>Thus, five areas are specifically mentioned, together with any other matters that are considered to be important and relevant. Local policies are not specifically mentioned in s105 albeit ESC considers them to be important and relevant matters for the decision-maker to take into account. East Suffolk Council and Suffolk County Council have submitted an extensive joint local impact report [REP1-044]- [REP1-101] Main LIR doc: [REP1-045]. The summary of the report (pages 475-528 of [REP1-045]) focuses almost exclusively on impacts and mitigation, with some discussion of Local Plan policies to assist the ExA and Secretary of State. ESC has not identified any conflict between relevant</p>

ExQ2

ExQ2	Question to:	Question:
		<p>policies in EN-1 / EN-6 and the Local Plan. However, in the event of any conflict, ESC accepts that the policies in the NPSs should prevail.</p>
	<p>Suffolk County Council Response at Deadline 7</p>	<p>SCC observes that the Wheelabrator decision cited in the question provides an example of the Secretary of State exercising his reasonable discretion in balancing the weight to be attached to local policy and the relevant NPSs in the way described in our response to G.1.12. Whilst s.105 PA 2008 does not in terms refer to local policies, it does refer directly to local impact reports, which would be expected to address local policies. SCC therefore believes that its comments made in response to G.1.12 remain a correct reading of the position.</p> <p>Noting the Applicant’s reference to language within NPS EN-1 in their comments on responses to G.1.12 for Deadline 2 [REP3-046], SCC maintains that there is no automatic primacy to be given to NPS policies in a case under s.105 PA 2008 where (by definition) those NPS policies do not ‘have effect’ in relation to the particular proposal. SCC submits that it is a matter of planning judgment for the decision maker, having regard to the content and relevance of the particular policy statements in question, whether more weight should be given to a local policy or to an NPS policy in the event that they contain divergent guidance. This issue is also further addressed in SCC’s Post Hearing Submission at Deadline 7 for ISH9 in relation to Agenda Item 5.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>SZC Co’s answer given at Deadline 7 is unaffected by the further responses from the local authorities.</p> <p>ESC’s position as to the need for the policies in the NPS to prevail in the event of conflict has, rightly, not been altered by consideration of the Wheelabrator decision.</p> <p>SCC’s response contains no assessment or analysis of the very different factual position in the Wheelabrator decision, and its clear implications for the relevance (or otherwise) of the comment referred to in the Examining Authority’s Second Written Questions (ExQ2) G.2.14 to decision-making in this case. For the reasons set out in the SZC Co.’s response to this question at Deadline 7, the Wheelabrator Examining Authority’s stated rationale for the approach taken to the WKN Project plainly has no application to the proposed development of the Sizewell C new nuclear power station which is and always has been nationally significant. Moreover, for the same reason it does not affect any of the points made on behalf of SZC Co. in response to the Examining Authority’s First Written Questions (ExQ1) G.1.12 [REP2-100].</p>

ExQ2

ExQ2	Question to:	Question:
		<p>SCC has continually failed to engage with or respond to the detailed submissions made on behalf of SZC Co. in response to ExQ1 G.1.12 as to the reasons why in the event of conflict the NPS policies should prevail.</p> <p>The Government’s position on these issues is clearly set out in the Energy White Paper and is consistent with the way in which SZC Co. has put its case.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>Judgment on <i>EFW Group Ltd. v. Secretary of State for Business, Energy and Industrial Strategy</i> [2021] EWHC 2697 (Admin)) was handed down on Friday 8 October 2021. The grounds of challenge did not directly engage with the issue that had been raised by the ExA as being potentially relevant to the decision in the Sizewell C case. The Judgment does not therefore have any implications for decision-making in respect of this application. The position is briefly explained in Appendix 1A of this document, for the sake of completeness.</p>
<p>Ag.2 Agriculture and soils</p>		
<p>No additional comments received at Deadline 8</p>		
<p>AQ.2 Air Quality</p>		
<p>AQ.2.0</p>	<p>The Applicant</p>	<p>Electric Charging Points</p> <p>(i) With the Government set to ban the sale of new petrol and diesel cars and vans from 2030, should the proportion of parking spaces within both the permanent and temporary car parks with electric charging points be increased to facilitate and support a cleaner fleet of vehicles through both the constructional and operational phases of the development.</p> <p>Please explain the current rationale for the proportion of electric charging points proposed, both for the temporary and permanent car parks.</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>SZC Co. is committed to provide electric vehicle charging bays. For the main development site permanent car park, at least 20% of car parking spaces will have active electric vehicle charging, with a further 20% capacity for passive provision. The demand for the permanent development site electric vehicle charging shall be reviewed in line with the Operational Travel Plan.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>During the construction phase, temporary car parking on the main development site, the northern park and ride and the southern park and ride sites will have capacity for up to 40% to be provided, with an initial 5% active electric vehicle charging provided on first occupation. The CWTP is being updated to provide for monitoring of the use of the electric charging points by the transport co-ordinator, which would be reported to the Transport Review Group (TRG) in the quarterly transport monitoring reports. Based on the monitoring the TRG can then direct SZC Co. to convert passive to active spaces. Based on discussions with SCC since ISH8 a trigger of 80% utilisation of the active vehicle charging spaces is proposed for the conversion of further passive spaces to active, which will be incorporated into the updated CWTP.</p> <p>The Associated Development Design Principles have been updated at Deadline 7 to reflect the commitments for electric vehicle charging points.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC sets out our position on Electric Vehicle charging in our response to AQ.2.1 at [REP7-163] and that subject to approval of details in writing this level of provision is acceptable for the main development site. SCC is content on the proposed provision at temporary car parking sites and review of occupancy subject to an understanding of the length of time it would take to install new infrastructure and an understanding of the frequency of data collection that triggers action. It is important that delays in installing additional charging points does not create a lack of provision leading to disincentivising the uptake of electric vehicles.</p> <p>SCC is awaiting submission of the updated CWTP before commenting further on the proposals for managing electric vehicle car parking.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>The wording has been included in the CWTP (Annex L of the Deed of Obligation (Doc Ref. 10.4)) and is agreed with the Councils and this is confirmed through the SoCG (Doc Ref. 9.10.12(B)).</p>
<p>AQ.2.4</p>	<p>Applicant, ESC, SCC</p>	<p>CoCP</p> <p>As currently drafted, there is an exemption for 'community/local suppliers' in the standard of vehicle that may be allowed.</p> <p>(i) How is the community/local supplier defined?</p> <p>(ii) Do the mechanisms for monitoring ensure that these operators can be clearly identified?</p>

ExQ2

ExQ2	Question to:	Question:
		(iii) In seeking to support local suppliers in this way can the air quality standards that need to be achieved still be met?
	SZC Co. Response at Deadline 7	<p>(ii) The definition will be agreed with ESC and the Environmental Review Group, along with justification and how the impact of emissions from this vehicle will be mitigated (secured via the CoCP (Doc Ref. 8.11 (D)) and the CTMP [REP2-054] to be used for vehicles delivering to site. The CoCP (Doc Ref. 8.11 (D)) states that the totality of the exemptions will account for no more than 8% of individual vehicles on an annual basis. A registration scheme will be established requiring HDVs to be registered prior to being allowed access to the project sites, with reporting of the registration scheme performance to the Transport Working Group on an annual basis.</p> <p>(ii) Yes, the mechanism to be used is a registration scheme requiring vehicles to be registered prior to being allowed access to the project sites, with reporting of the registration scheme performance to the Transport Working Group.</p> <p>(iii) Yes. The ongoing achievement of air quality standards is not dependent upon the proposed limit on the number of HGVs which do not meet the highest emissions standards (Euro VI), since the assessment undertaken as part of the ES did not rely on these standards being achieved. The assessment presented in the ES utilised an HGV fleet mix for development vehicles that was based on the current composition of the baseline fleet mix in the UK and is conservative, and even using this assumption no significant air quality effects were identified.</p>
	East Suffolk Council Response at Deadline 7	<p>Questions i) and ii) are for the Applicant/SCC to respond.</p> <p>iii) ESC understands that there is an aspiration that local suppliers will seek to comply with the requirement to use Euro VI HDV. If this is not possible the vehicles would fall into the 8% non-Euro VI allowance and as such will not affect the predicted impacts on air quality.</p>
	Suffolk County Council Response at Deadline 7	<p>i) The Council consider that this should be defined within the CoCP and the Deed of Obligation.</p> <p>ii) No. SCC has requested that the Applicant defines local supplier, specifically in terms of HGV and LGVs. The Council is concerned that the controls and monitoring applied to</p>

ExQ2

ExQ2	Question to:	Question:
		<p>movements to the main site and associated development sites may not be applied to local deliveries.</p> <p>iii) EURO V emissions date from 2008. Data from https://www.statista.com/statistics/1203363/uk-licensed-hgvs-by-age/ suggests that 20% of HGVs are likely to predate this date. As newer vehicles complying with EURO V and VI are likely to be concentrated adjacent to low emission zones there is a risk that local suppliers in Suffolk are operating elderly HGVs. SCC is willing to work with the applicant to support and incentivise local suppliers to invest in newer vehicles compliant with EURO VI.</p>
	SZC Co. Response at Deadline 8	<p>i) The inclusion of the exemption for local suppliers was made at the request of the Councils and SZC Co. is happy to support this position to allow local contractors to support the project. Table 4.1 of the CoCP (Part B) (Doc Ref. 8.11(E)), secured by Requirement 2, defines the circumstances that may allow an HDV to be exempt from the Euro VI emissions standard. This commitment has been updated to clarify that any such exemptions must be agreed with ESC and the TRG, along with the justification as to why Euro VI is not possible, and the measures that would be put in place to mitigate the impact from emissions. This clarification has been included in the Deadline 8 version of the CoCP Part B (Table 4.1) (Doc Ref. 8.11(E)).</p> <p>ii) The vehicle registration scheme would allow the local suppliers to be identified, and therefore monitored.</p> <p>iii) The Applicant, ESC and SCC are in agreement that, in seeking to support local suppliers in this way, the air quality standards will still be met.</p>
	ESC Response at Deadline 8	<p>(i) It is acknowledged that the Applicant will work with ESC and SCC to define what a "community/local supplier" is.</p> <p>(iii) ESC does not agree that ongoing achievement of air quality objectives (AQOs) is not dependent on the number of HDVs which meet the highest emission standards. There is considered to be a risk that NO2 contribution will cause an exceedance if no vehicles meet the Euro VI standard or there is a very low uptake. However, the 8% cap on non-Euro VI compliant HDVs is considered a sufficient control to ensure no significant risk of AQO exceedances.</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 10	(iii) The Applicant and ESC are in agreement that the 8% cap on non-Euro VI compliant HDVs is sufficient control to ensure no significant risk of AQO exceedances; No further response is required.
AQ.2.5	Applicant, ESC	<p>CoCP Non Road Mobile Machinery (NRMM)</p> <p>(i) Does an annual basis for calculating the 15% of NRMM which could be non Stage IV plant achieve a suitable degree of control? Will this for example be a rolling twelve month period or annually by a specific date?</p> <p>(ii) If a high proportion of non-stage IV plant was used during a particular period how would this knock on to construction for the rest of the reporting period if limited amounts of Stage IV plant were available?</p> <p>(iii) In the event the 15% could not be reached what would be the consequence?</p>
	SZC Co. Response at Deadline 7	<p>(i) The calculation would be undertaken on an annual basis to align with the output of the Environmental Review Group, who would have oversight of the process. An updated Statement of Common Ground between the Applicant, ESC and SCC is to be submitted at Deadline 8 (Doc Ref. 9.10.12(A)) reflecting progress of discussions between the parties on this matter. However, the use of an annual basis for the calculation is considered to be robust and appropriate and has been successfully applied on other infrastructure schemes.</p> <p>(ii) The availability of stage V compliant plant in the market place has improved greatly in the last 5 years and for widely used items supply is unlikely to be a constraint. Stage V compliant plant are already entering the marketplace for many items of new NRMM as regulatory deadlines for the sale of Stage V NRMM will feed in during the construction period for the proposed development. The exemptions process is aimed primarily at the occasional use of small numbers of specialised plant or the temporary use of replacement plant due to a breakdown. In the unlikely event of the limited number of exempted plant being used early in a reporting period, an approach to managing NRMM use, based on the risk of significant effects at sensitive receptors, would be proposed to the Environmental Review Group in a timely manner.</p> <p>(iii) The conclusion that construction phase effects on amenity or local air quality will be not significant is not dependent upon the achievement of the proposed exemptions limit for NRMM. They represent the application of good practice to managing emissions, rather than mitigation for a specific identified impact. The assessment presented in the ES was</p>

ExQ2

ExQ2	Question to:	Question:
		<p>conservative and did not assume a set performance level of achieving Stage IV compliant plant. Use of predominantly Stage IV compliant plant will therefore further reduce the predicted air quality effects from NRMM from those presented in the ES and no significant effects were identified within the ES assessment.</p>
	<p>East Suffolk Council Response at Deadline 7</p>	<p>Answer to question (i) ESC considers that the 15% cap on annual NRMM with a less stringent standard than stage IV is satisfactory. The Applicant should confirm whether this is annual or rolling, although ESC considers that either would be acceptable.</p> <p>There are concerns regarding the placement of NRMM relative to human health and ecological receptors, and the placement of NO2 monitoring locations to capture NRMM air quality impacts. However, it is expected that this risk can be managed, provided suitable detail is provided in the dust monitoring and management plan (DMMP) that the Applicant has committed to, which will require agreement and sign-off by ESC.</p> <p>Answer to question (ii) This question is to be addressed by the Applicant.</p> <p>Answer to question (iii) In this event, there would be a risk of potentially significant adverse impacts at human health and/or ecological receptors. Such risks could potentially be managed, for example by increasing the separation between non-compliant NRMM and receptors. Baseline or operational phase air quality monitoring data may also be useful to inform the assessment of these risks. Any departure from the 15% commitment would need to be fully assessed to ensure that significant impacts would not arise, and this would need to be agreed by ESC and potentially other stakeholders (e.g. Natural England). If significant impacts due to NRMM emissions cannot be avoided, there would ultimately be a risk that construction activities using this plant would need to be temporarily halted.</p> <p>ESC anticipates that any such non-compliance and further assessment would be reported to and managed by the Environment Review Group</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>(i) SZC Co. and ESC are in agreement that this proposed approach provides suitable control.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) See SZC Co.'s response at Deadline 7 above.</p> <p>(iii) SZC Co. and ESC are in agreement on the likely consequences being as per the conservative assessment presented in the ES. Non-compliance with the proposed threshold would not worsen the effects from those presented in the assessment submitted with the DCO application, as updated by subsequent ES Addenda.</p>
	ESC Response at Deadline 8	<p>iii – ESC is not in agreement with the Applicant that lack of control on emission standards will not change impact significance conclusions. There is a large amount of uncertainty around the location of NRMM and consequently the distance to sensitive receptors. However, the inclusion of a design principle in the CoCP to achieve a minimum NRMM stage IV emission standard and placement away from sensitive receptors provides guidelines to avoid circumstances that could cause significant air quality impacts.</p>
	SZC Co. Response at Deadline 10	<p>SZC Co. and ESC are in agreement that the CoCP design principles on NRMM provide guidelines to avoid circumstances that could cause significant air quality impacts. SZC Co and ESC are in agreement that the Environment Review Group will be used to manage non-compliance and further assessment of NRMM air quality impacts as necessary.</p>

AI.2 Alternatives

	The Applicant, SCC	<p>Strategic alternatives for the movement of freight</p> <p>The Applicant, in comments on the response by SCC to ExQ1 AI.1.10 [REP3-046] states that the constraints at Sizewell compared to the situation at Wylfa do not make the scale of marine intervention proposed at Wylfa practical. The Applicant has also provided its comments on the LIR [REP3-044] in relation to the Councils' position that SZC Co. has not fully explored the maximisation of delivery of materials by modes other than road and is not matching the aspirations of other nuclear projects.</p> <p>(i) Does SCC now accept that the increased proportion of sea-borne transport set out in the change to the application represents the upper limit that could reasonably be achieved?</p> <p>(ii) Should and, if so, how would the increase proportion of sea-borne transport set out in the change to the application be secured by the DCO?</p> <p>(iii) Please clarify and update the position in relation to the deliverability and timing of the additional train movements and the timing of the construction of the second BLF.</p>
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ExQ2	Question to:	Question:
		<p>(iv) Please specify how the mitigation of adverse impacts of the transport strategy would be monitored and controlled by the DCO requirements.</p> <p>(v) The Applicant's LIR comments indicate that for the permanent BLF weather conditions would impact the ability to use such a facility to the extent that during the winter months the deck of the facility is demobilised thereby removing the ability to use it for circa 5 months of the year. What would be the percentage material transported by road for this five month period?</p> <p>(vi) The Applicant also indicates that in relation to the temporary marine bulk import facility (MBIF) for the delivery of bulk materials during the construction phase, weather conditions have the potential to impact the ability to use such a facility all year around. Taking account of weather conditions what percentage of materials can reliably be transported using the marine option facilities?</p>
	SZC Co. Response at Deadline 7	<p>Part (i) is for SCC. SZC Co. has no further comment.</p> <p>Part ii) – the securing mechanism is the limit on HGV numbers enforceable through the CTMP. That limit cannot be met without the anticipated contribution from both rail and marine transport. This is explained further in Appendix A to Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021) [REP5-114] (Material Imports and Modal Split), which demonstrates that rail and road capacity cannot meet the materials requirements. That approach is considered appropriate to meet the requirement in NPS EN-1 to prefer sustainable transport modes whilst retaining some limited flexibility between those modes to respond to opportunities in the procurement of materials.</p> <p>SCC has suggested [REP6-049] at electronic page 8 that <i>"SCC accepts that there are practical reasons why greater use of marine could not be made into a 'hard control' but sees no reason why the FMS should not commit to maximising the use of marine where practicable."</i> SZC Co. would be pleased to explore that issue further with SCC and through the examination more generally. There are, however, some points to be made at this stage, including:</p>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> - none of the freight transport options are without impact. The ExA for example, has rightly examined the impact of vessel movements. Night time trains have effects, as do HGV movements; - with the SLR and two village bypass in place, it is not necessarily obvious that maximising marine movements would always be the right solution; - as SZC co. explained at ISH1, it is important to retain some practical and competitive tension between procurement options in order to optimise the efficient project delivery and maintain options for instance over the quality, guaranteed availability and price of materials. <p>Were it to be agreed that an objective to maximise marine transport was appropriate, it would then be necessary to understand how that objective would operate and whether SCC or others wished to have control over how it was exercised.</p> <p>Part (iii) – the up to date position on delivering train capacity is set out in the second Statement of Common Ground with Network Rail [REP5-095]. The parties are working to a programme to deliver 2 trains per day by October 2023 and 4 trains per day from March 2024. The Material Imports and Modal Split paper submitted at Deadline 5 (Appendix A to Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021) [REP5-114]) explains that the Marine Bulk Importation Facility is planned to be operational from Q2 2025.</p> <p>Part (iv) - multiple measures are proposed to monitor and control the mitigation of adverse effects arising from the transport strategy. These include:</p> <ul style="list-style-type: none"> - The Coastal Processes Monitoring and Mitigation Plan (CPMMP) submitted in draft at [REP5-059] - Monitoring of dust impacts through the provisions of the CoCP (Doc Ref. 8.11 (D));

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> - Monitoring of rail and road noise through the Noise Monitoring and Mitigation Scheme secured by the CoCP (Doc Ref. 8.11 (D)), along with the Noise Mitigation Scheme (Doc Ref. 6.3 11H(C)); - Monitoring of transport effects through the CTMP (Doc Ref. 8.7(B)) and CWTP (Doc Ref. 8.8(B)) enforced through the provisions of Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)) <p>Part (v) With reference to LIR [REP3-044] item 15.7.15, there are no plans to import materials via the Permanent BLF, this is solely used for the import of AIL. There is no need to import AILs during the winter period as the AIL schedule allows for AILs to be imported to site in the season prior to their requirement and stored on site until required. There is, therefore, not change to the model split during this period. The</p> <p>The MBIF's main period of utilisation is during the Phase 2 Bulk earthworks for the import of backfill, the required quantity of backfill is split between marine import during the summer and year-round rail imports. The proportions of marine and rail import of fill is shown in Figure 5 – Rail and Marine import of permanent works backfill, of the Material Imports and Modal Split paper, Appendix A [REP5-114]. The import profiles and onsite stockpiling of material has been developed so that no additional road import of fill materials is required in the winter period when the MBIF in not in operation.</p> <p>Notwithstanding the above and referring only to latter part of the question, for year 5, in which deliveries are typical of all the construction phase years, 1,9473 deliveries are made by road in 5 winter months out of an annual total of 46,807 deliveries, which is 42%.</p> <p>Part (vi) For the temporary marine bulk import facility (MBIF) there is a reliable annual capability to receive 765,000 tons of material annually (assuming an appropriately graded and semi dry material). This reliable annual capacity is 60% of the facility's theoretical maximum annual capacity and has been adopted following allowance being made based on operational experience at HPC, the exposed North Sea location and the efficiency of end-to-end logistics operations.</p>

ExQ2

ExQ2	Question to:	Question:
	Suffolk County Council Response at Deadline 7	<p>The MBIF is available for imports from 2025 and its utilisation in the first two years is 87% of this reliable maximum capacity.</p> <p>i) SCC considers that there may be opportunities to further increase the proportion of seaborne transport, particularly in the later phases of construction. SCC accepts that it would be at this point unreasonable to have a requirement for a higher proportion of seaborne transport, but would expect an aspiration in the CTMP for the Applicant to fully investigate and implement a maximisation of sea borne transport wherever possible. For example, if during the winter months sea conditions are milder than typically experienced, this could create opportunities for increased use of the beach landing facilities. SCC seeks for the Applicant to regularly report on this matter to the Transport Review Group.</p> <p>ii) Throughout the construction phase there would be a forecast of the modal split, this could be monitored by the TRG. The forecast should include a profile of materials by mode, with aspirations that the proportion of materials transported by sustainable modes remains above the forecast or potential corrective actions are identified where practicable. The Council’s preference is that delivery of the supporting infrastructure ie beach landing facility is secured against commencement of phase 2 of the construction program to ensure that these are available at the relevant time.</p> <p>iii) The Council is awaiting further information from the Applicant to demonstrate that this is achievable.</p> <p>iv) The transport impacts are controlled and monitored through the measures set out within the CTMP, CWTP and TAMP, which are in turn secured by the Deed of Obligation. However, the details of some of these measures are under discussion.</p> <p>v) The Council considers that this is for the Applicant to answer.</p> <p>vi) The Council considers that this is for the Applicant to answer.</p>
	SZC Co. Response at Deadline 8	<p>There is no significant disagreement with SCC on these issues. At Deadline 7 SZC. Co provided comments on submissions from earlier deadlines and subsequent written submissions to ISH1/ISH6 – appendices [REP7-062] and, in particular, Appendix H.</p> <p>In Table 2.1 of that document SZC. Co set out its intention to update the Construction Traffic Management Plan [REP2-054] to incorporate the following:</p>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • add monitoring of freight modal split – monitoring of materials delivery mode split between marine, rail and road to demonstrate the mode shares achieved. The 60% by rail and marine is over the whole construction phase but monitoring data will be provided to the TRG on an annual basis (electronic page 7). • Daily HGV average target: update section 4 to provide an HGV quarterly average target of 500 daily 2-way HGV movements to/from the MDS during the peak construction averaged over a quarter. It would be a target rather than a cap and not meeting the target would trigger a review by the TRG and a decision if any action is to be taken. It would allow a decision to be made by the TRG based on marine/rail/road split. A cap may be instigated by TRG if practical and if exceedance occurs regularly. <p>These two measures in combination would meet SCC’s requests to have mode share constantly monitored and reported to TRG and provide the opportunity for TRG to influence the mode share. For example, the ability to tighten peak construction HGV traffic caps if the quarterly average is regularly exceeded would drive a greater share of transport by rail or sea.</p> <p>SZC. Co considers it important to retain some flexibility, particularly over choices between marine and rail transport for the reasons explained in its Response to ExA commentary on the draft DCO and other documents [REP7-058] at electronic page 17 but is happy to work with other TRG members to optimise sustainable transport.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC welcomes the Applicant’s commitment, and welcomes further discussion. SCC considers that there should be an aspiration to maximise transporting materials by sea and rail, whilst taking into consideration the wider issues that the Applicant has identified including environmental, and feasibility.</p> <p>As set out in our Response [REP7-163] to EXQ2 AL.2.0, SCC accepts that it would be unreasonable to have a requirement for a higher proportion of sea-borne transport, but would expect an aspiration in the CTMP for the Applicant to fully investigate and implement a maximisation of sea borne transport where possible paying due regard to relevant considerations and impacts.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>SCC welcomes the Applicant's commitment to monitor and report the modal split of construction materials. SCC does not seek to control the process. We consider that regular reporting of the modal split, and any opportunities that were identified or investigated, to the TRG would be a reasonable approach which would not unduly constrain the delivery of the project. This would allow the TRG to monitor and consider whether opportunities should be further pursued.</p> <p>SCC agrees that all transport modes have impacts but the key to the success of the project in terms of a sustainable freight strategy is to minimise the overall impact. Consistent with NPS EN-1, SCC considers this is achieved by maximising marine and then rail transport.</p> <p>While it is accepted that SZC Co has made great efforts to propose mitigation on the highway network including two significant bypasses and other substantial works, it remains a fact that the mitigation does not resolve all impacts at all locations. It is acknowledged that, subject to completion of the ES workstream, the mitigation does address those locations where significant impacts were identified.</p> <p>Many of SCC's concerns are regarding the timely delivery of the mitigation particularly those not secured within the DCO (i.e. ESL level crossing improvements and ESL rail noise mitigation) and the appropriateness of 'reasonable endeavours' to secure delivery of those measures within the DCO.</p> <p>(vi) In appendix A of Written Submissions Responding to Actions Arising from ISH2: Traffic and Transport Part 1 (7 July 2021) [REP5-114]) the theoretical capacity of the MBIF between April and October is stated as 1,400,000 tonnes with a minimum requirement of 700,000 tonnes i.e. 50%.</p> <p>In the D7 response 765,000 tonnes is quoted as the 'reliable annual capacity' being 60% of the theoretical capacity (but is in fact 55%). If as stated 87% of this reliable annual capacity (665,550 tonnes) is available in the first two years of operation this would equate to 67.5% of the theoretical capacity. While we consider that SCC does not have access to the details of the data available to SZC Co. and does not dispute its figures it does appear that there may be spare capacity within the marine deliveries if it were practical, and consider that reporting process on the identification and use of this capacity is a reasonable approach.</p>

ExQ2	Question to:	Question:
	<p>SZC Co. Response at Deadline 10</p>	<p>The parties are very closely aligned and SZC Co. is grateful to SCC for its recognition of the need for some flexibility and for the recognition that this is a shared issue that can be considered through the operation of the TRG with the benefit of monitored mode share data.</p> <p>At Deadline 8, SZC Co. amended the CTMP (Annex K to the draft Deed of Obligation [REP8-088] at electronic pages 226, 229 and 259) to commit to monitoring and reporting freight mode split and to quarterly HGV targets which, if not met on a quarterly basis would trigger a review by the TRG. That review can include a consideration of freight mode share, including whether any action can practically and reasonably be taken to in relation to marine/rail/road split.</p> <p>In further discussions, SCC, has asked and SZC Co. has agreed, that an addition be made to Section 8 of the CTMP, as follows:</p> <p><i>“ SZC Co. must monitor the mode of delivery of construction materials in terms of rail, marine or road with the use of the delivery management system, which is detailed later in this section.</i></p> <p><i>The freight strategy is intended to result in 60% of the construction materials being delivered to site by rail or sea, with the remaining 40% of material being delivered by road over the course of the construction period. Where cost effective and practicable, SZC Co. will aspire to achieve a greater than 60% mode share of construction materials delivered by rail or sea. Monitoring of the freight mode share will be provided to the TRG on an annual basis as set out in Section 8 of the CTMP.”</i></p> <p>That amendment has been made at Deadline 10 (Doc Ref. 10.4).</p> <p>In relation to the timely delivery of infrastructure, discussions have continued and a series of Grampian type triggers have been discussed and agreed with both SCC and ESC. The target timescales for the Sizewell link road, two village bypass and rail works that are set out in the Phasing Schedule (Plate 2.1 of the Construction Method Statement (Doc Ref. 10.3)) and Schedule 9 of the Deed of Obligation (Doc Ref. 10.4) commit SZC Co. to use reasonable endeavours to implement the works according to the defined milestone dates.</p>

ExQ2

ExQ2	Question to:	Question:
		The additional Grampian triggers provide 'long stop' dates that provide further guarantees. SCC, ESC and SZC Co. have reached agreement of these triggers.
Al.2.5	The Applicant, English Heritage Trust (EHT)	<p>Site specific assessment – Sizewell Link Road</p> <p>The Applicant in its comments on the EHT response to ExQ1 Al.1.28 and Al.1.34 [REP3-046] in relation to the potential effect of increased traffic on the B1122 close to Leiston Abbey on the significance of the Leiston Abbey Group indicates that detailed discussions with EHT regarding measures to be included in the Draft Deed of Obligation are ongoing. Please state whether that particular matter has now been resolved and any necessary mitigation secured?</p>
	SZC Co. Response at Deadline 7	<p>Detailed discussions on mitigation which will address the effects on the setting of Leiston Abbey are progressing very well and SZC Co. and EHT are close to agreeing the specific amounts and measures to be included in the Draft Deed of Obligation. The Draft Deed of Obligation submitted at Deadline 7 (Doc Ref. 8.17(F)) has been updated to reflect the progress that has been made since the response to the Examining Authority's First Written Questions.</p> <p>SZC Co. has provided clarification to EHT and Historic England on how their existing legal right of access to Leiston Abbey from the B1122 will be maintained. The need to provide improvements to the junction of this access with the B1122 to ensure safe access to Leiston Abbey (second site) will be considered at the detailed design stage: Requirement 6A [REP6-006] requires SZC Co. to submit a right of way implementation plan to Suffolk County Council for their approval in their capacity as Highway Authority. This must be in general accordance with the Public Rights of Way Strategy [REP3-013] which includes the need "to minimise road crossing points and, where unavoidable, to carry out relevant road safety audits and implement recommendations to ensure user safety". Therefore safety of both motorised and non-motorised users will need to be considered and any appropriate safety measures incorporated in order to discharge the requirement.</p>
	English Heritage Trust Response at Deadline 7	EHT considers that the package of mitigation which is nearing agreement will include sufficient measures to ease its concerns regarding the impacts of increased traffic on the B1122. The mitigation will be secured as part of the financial contribution included in the Deed of Obligation, which is, in principle, agreed between the parties with final details to be discussed on 13 September 2021.

ExQ2

ExQ2	Question to:	Question:
		<p>EHT has requested further detail from SCZ Co. regarding any changes to the junction and access arrangements at the access to Leiston Abbey second site and the B1122. The land parcel MDS/02/14 is the subject of the CPO process – part of this DCO – and EHT requests that its rights across the land (through English Heritage’s rights under the 1964 Guardianship Agreement) are retained.</p> <p>If changes are made to the access point, and junction with the B1122 to allow for a new bridal way, then the opportunity should also be taken to ensure that the access is safe for all road users including pedestrians, and that visibility splays are secured that are as clear and safe as possible. Moreover, consideration should be given to extending the 30 mph speed limit from the new roundabout up to and past the Leiston Abbey entrance to avoid vehicles accelerating away from the roundabout, potentially into waiting or turning traffic.</p>
	SZC Co. Response at Deadline 8	SZC Co. is pleased to confirm that, following discussions on the 13 September 2021, the package of mitigation measures has now been agreed. These are set out in the Deed of Obligation (Doc Ref. 8.17(G)) at Schedule 8. It is understood that, following the provision of further information setting out the approach to road safety and maintenance of access rights, that these matters have also been resolved.
	SCC Response at Deadline 8	SCC notes these comments regarding the protection of the existing right of access to Leiston Abbey. Any changes to the access will be subject to road safety audits and the authority would not accept any reduction in key design and safety criteria such as visibility.
	SZC Co. Response at Deadline 10	SZC Co. welcomes SCC's clarification on road safety and the access to the Second Leiston Abbey Site.
<p>AR.2 Amenity and recreation</p>		
AR2.0	The Applicant, SCC (point ii and v)	<p>PROW</p> <p>(i) [REP3-013] The Rights of Way Access Strategy provides plans at a very large scale of the existing and proposed coastal path routes, however, the Access and Rights of Way Plans [REP2-007] at a scale of 1:2,500 show greater clarity is it correct to assume the plans shown in [REP2-007] take precedence?</p> <p>(ii) Do SCC seek more detailed plans than those shown in [REP2-007] for the alignment of the coastal path, if so, what scale would you anticipate being appropriate?</p>

ExQ2	Question to:	Question:
		<p>(iii) In light of the ongoing concerns raised by SCC and supported by ESC in the LIR [REP1-044] and in answer to FWQ AR1.7 what is the current situation with regard to the proposed route of the coastal path and the consequential future maintenance of this important route?</p> <p>(iv) It would appear a further iteration of the Rights of Way and Access Strategy is to be provided to address the concerns raised in the responses to FWQ AR1.7, while a revised version has been received [REP3-013] this does not appear to respond to the points referred to by SCC and responded to in the WR response from the Applicant. When is this proposed to be submitted to the Examination?</p> <p>(v) Has clarification been provided from SCC regarding "<i>the changes proposed for the management of access to the coast</i>" in their response to AR1.7?</p>
	SZC Co. Response at Deadline 7	<p>(i) The Access and Rights of Way Plans submitted at Deadline 2 [REP2-007] have been superseded by the Access and Rights of Way Plans Revision 6 [REP5-008] submitted at Deadline 5. The Access and Rights of Way Plans Revision 6 [REP5-008] are submitted 'For Approval' and therefore take precedence over the plans in the Rights of Way Access Strategy [REP3-013]. The Access and Rights of Way Plans Revision 6 [REP5-008] only show definitive Public Rights of Way and Highways. The plans in the Rights of Way Access Strategy [REP3-013] show definitive Public Rights of Way, and also show other recreational routes such as long distance walking routes, cycle routes and permissive footpaths, and accessible landscapes such as Open Access land and Common Land, but do not show Highways.</p> <p>(ii) This is a matter for SCC.</p> <p>(iii) The coastal path is a natural feature intended to replicate the existing. It is also adjacent to the soft coast defence feature and will be maintained as a part of this. The numerical modelling indicates that the soft coast defence would not be eroded back to the path under even extreme storm conditions. Maintenance of the soft coast defence feature will include regrading of the design profile to the lines and levels shown within the application, and this will include the coastal path, if required.</p> <p>(iv) The Rights of Way and Access Strategy submitted at Deadline 3 [REP3-013] is the same as the revised Rights of Way and Access Strategy submitted at Deadline 2 [REP2-035], but with plans (Figures) included which were inadvertently omitted from the</p>

ExQ2

ExQ2	Question to:	Question:
		<p>document submitted at Deadline 2. SCC has made further comments on the Rights of Way and Access Strategy in their Written Response at Deadline 3 [REP3-079] (paragraphs 44 to 49) and Deadline 5 [REP5-172] (paragraphs 49 to 59). The Rights of Way and Access Strategy has been reviewed in light of SCC's comments submitted at Deadlines 3 and 5, and an updated revision is submitted at Deadline 7 (Doc Ref. 6.3 15I(C)).</p> <p>(v) SCC to provide further clarification.</p>
	<p>Suffolk County Council Response at Deadline 7</p>	<p>ii) SCC is satisfied the Access and Rights of Way Plans Rev 6.0, which are at a scale of 1/2500, will be able to show the alignment of the coast path</p> <p>v) AR.1.7 Response (i) 3 reads: "The Strategy needs to be updated to reflect the changes proposed for the management of access on the coast by SCC". SCC's Rights of Way & Access SZC case officer has been away from work for some weeks, but the changes proposed are assumed to relate to a) the establishment of the England Coast Path, where the defined trail and extent of spreading room is still at the determination stage with the Secretary of State and b) SCC's contention FP21 should be aligned on top of the coastal defence, rather than on the seaward side.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>(v)</p> <p>a) SCC is correct that the establishment of the England Coast Path and the accessible coastal margin is in the determination stage with the Secretary of State. The Rights of Way and Access Strategy refers to this at paragraph 1.2.3 [REP7-023].</p> <p>b) Further clarity on the location of Footpath 21 (PRoW E-363/021/0), the Suffolk Coast Path, the future England Coast Path and Sandlings Walk (which are proposed to follow the same route along the coast within the main development site and, hereafter, referred to as the Coast Path) in relation to the sea defences was provided by SZC Co. at ISH12, and is included in the Written Summary of SZC Co.'s Written Summaries of Oral Submissions made at ISH12: Community submitted at Deadline 8 (Doc. Ref. 9.101). In summary:</p> <ul style="list-style-type: none"> • SZC Co.'s proposed route east of the hard sea defence is proposed so that the landscaped hard sea defence will screen lower level buildings and structures within the power station, allowing people to enjoy the coastal landscape and minimise intrusion by the power station. This is similar to the existing Coast Path and coastal defence alongside Sizewell B. This design approach is described at paragraph

ExQ2

ExQ2	Question to:	Question:
		<p>6.12.7 and illustrated on Figures 6.14 and 6.15 of the Design and Access Statement submitted at Deadline 5 [REP5-070].</p> <ul style="list-style-type: none"> • SZC Co. has undertaken work recently which has identified that, through the Coastal Process Management and Mitigation Plan (CPMMP [REP5-059]), the Coast Path will not be eroded during the lifetime of Sizewell C, and SCC's concerns can now be alleviated. SZC Co. has updated the CPMMP to confirm a commitment to retain the Coast Path at Deadline 8 (Doc. Ref. 6.14 2.15.A(B)). There is therefore no reason, based on SCC's concerns, that the Coast Path should not be on the alignment proposed by SZC Co.
	<p>SCC Response at Deadline 8</p>	<p>(ii) SCC notes these comments but emphasises that the Access and Rights of Way Plans must accord to the schedules in the dDCO.</p> <p>(iii) SCC seeks the alignment of the FP21 (the coast path) on top of the hard coastal defence feature, being in its opinion, as the responsible highway authority, the most resilient route, and the one offering the best all round views and user experience, especially in the operational phase. The enjoyment of a PRoW is a consideration for proposed diversions when made under the Highways Act 1980.</p> <p>In effect, SCC seeks the switch of FP21 from the seaward side of the coastal defence (as proposed by the Applicant) to the top, and the informal route from the defence top to the lower seaward route, The informal route at the lower level would provide an alternative to users not wanting to see the Sizewell A, B and C sites.</p> <p>No cogent explanation why FP21 and the coast path cannot be aligned on top of the defence has been put forward by the Applicant, including in its oral submissions at ISH12. SCC will work with the Applicant at the detailed design stage, with the primary objective of engineering a path on top of the hard coastal defence feature which meets the County Council's requirements for surface and width, and ties in with onward PRoW. SCC expects SZC Co. to use its best endeavours to work with the County Council on designing a route on top of the defence.</p> <p>(iv) SCC has made further comments on the ROW & Access Strategy at 2.12 above.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>(iii) SZC Co.'s position on switching the location of FP21 (PRoW E-363/021/0) (the Coast Path) from the lower location on the seaward side of the hard coastal defence to the top, is set out at our Deadline 8 response to item AR2.0 (v) b) above.</p>

ExQ2	Question to:	Question:
		<p>SZC Co. has worked hard in development of the proposals for shoreline management to identify that the Coast Path along the lower route proposed by SZC Co. during operation will not be eroded, alleviating SCC's long-standing reason for requesting that the coast path is aligned on top of the hard coastal defence. SZC Co. notes that SCC has introduced a new reason for FP21 to be on top of the hard coastal defence feature at Deadline 8: <i>"the one offering the best all round views and user experience, especially during the operational phase"</i>. SZC Co. considers that the coast path aligned on the lower ground east of the hard sea defence will provide the best views and coastal experience, for reasons explained in our Deadline 8 response to item AR2.0 (v) b) second bullet above. This has been SZC Co.'s long-standing position and clearly set out in the original application documents (e.g. the Design and Access Statement paragraphs 6.12.7, 6.12.8 and Figures 6.14 and 6.15 (pdf pages 92 and 93) [APP-585], and Volume 2 Chapter 13 (Landscape and Visual) of the Environment Statement (ES) paragraph 13.5.12 fifth bullet (pdf page 75) [APP-216]). SZC Co. disagree with SCC's new secondary reason for locating the coast path on top of the hard sea defence (the best all round views).</p> <p>The hard sea defence and the route of the Coast Path will be designed in detail post-DCO consent. At that stage it will be possible to design the optimal Coast Path route as an integrated part of the sea defences. Requirement 6A of the draft DCO requires a Public Rights of Way Implementation Plan be submitted and approved by SCC before any new or diverted public right of way listed in Schedule 11 may be commenced. The route of FP21 in relation to the coastal defences will be fixed at that stage, and it is unnecessary to fix it now. A number of design and technical issues will need to be addressed if the Coast Path is located on top of the hard sea defence including a considerable length of 'ramp' to raise it from approximately 5.2mAOD (the level of the Coast Path at the base of the hard sea defence) to up to 14.6mAOD (the level stated in paragraph 2.2.184 of Volume 1, Chapter 2 (Main Development Site) of the First ES Addendum [AS-181]). The Applicant intends to landscape the defence top including undulating levels, which would be lower than 14.6mAOD for sections of the defence. To reach a level of say 13.2mAOD from 5.2mAOD would require accessible 'ramps' no steeper than 1:21 gradient of at least 168m length at both the northern and the southern ends. Consideration will also need to be given to the need for rest areas and the alignment of the route to fit with the naturalistic design of the sea defences. This would be best resolved at the detailed design stage.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(iv) SZC Co.'s response to SCC's comments on the Rights of Way and Access Strategy are given in Comments on Earlier Deadlines and Subsequent Written Submissions to ISH1-14 (Doc. Ref. 9.120) submitted at Deadline 10. A revised Rights of Way and Access Strategy which addresses SCC's comments is submitted at Deadline 10 (Doc. Ref. 10.26).</p>
AR.2.1	Applicant, SCC	<p>Footpath Implementation Plan (FIP)</p> <p>(i) SCC suggest in response to AR1.7 that the current FIP process is not appropriate. Has progress been made in resolving the differences in how and through what mechanism the FIP should be secured? Please advise of the latest position.</p> <p>(ii) If SCC remain of the view this should be a revised requirement, has a proposed wording been prepared, please provide this to the Examination.</p>
	SZC Co. Response at Deadline 7	<p>Schedule 2, Requirement 6A has now been included in the Draft DCO, the latest draft of which is submitted at Deadline 7 (Doc Ref. 3.1(G)), which requires a Public Rights of Way implementation plan to be submitted and approved by SCC before any new or diverted public right of way listed in Schedule 11 may be commenced. This provides SCC with appropriate control over the timing, details and delivery of the PRoW diversions within the main development site. It is understood that SCC are content with this approach.</p>
	Suffolk County Council Response at Deadline 7	<p>i) At AR.1.7, SCC stated its concern the FIP will be produced post consent and will not be a robust enough document to ensure that the routes being provided as embedded mitigation will be acceptable. SCC further noted the FIP is not secured by a requirement and therefore not bound by Schedule 23 leaving any disagreement to be determined by arbitration. Little has changed since, but SCC will continue to work with SZC Co to develop the FIP, as it will for the Rights of Way and Access Strategy (also not concluded).</p> <p>ii) SCC is not aware of any proposed wording having been prepared.</p>
	SZC Co. Response at Deadline 8	<p>SZC Co. reiterates that Requirement 6A has been added to the draft DCO requiring a Public Rights of Way Implementation Plan be submitted and approved by SCC before any new or diverted public right of way listed in Schedule 11 may be commenced. The PRoW implementation plans must be in general accordance with the Rights of Way Strategy. SZC Co. has been working closely with SCC on the drafting of the Rights of Way and Access Strategy and submitted an updated version at Deadline 7 responding to SCC's</p>

ExQ2

ExQ2	Question to:	Question:
		comments [REP7-023]. A further updated version is submitted at Deadline 8 (Doc Ref. 6.3 15I(D))
	SCC Response at Deadline 8	The FIP has been renamed the Public Rights of Way Improvement Plan and SCC is satisfied in inclusion in Schedule 2 6A of the Draft DCO resolves earlier concerns. SCC is content that this resolves the matters raised in previous submissions including AR1.7 and provides an acceptable level of control for the authority.
	SZC Co. Response at Deadline 10	SZC Co. has no further comments.

ExQ2 - Part 2

ExQ2	Question to:	Question:
Bio.2	Biodiversity and ecology, terrestrial and marine	
Part 1 – Matters to be dealt with in writing following ISH7 – wet woodland		
Part 2 – Matters to be dealt with in writing following ISH7 – protected species		
Bio.2.4	Applicant	Please will the Applicant summarise the outcome of the bat stakeholder workshop held on 3 June?
	SZC Co. Response at Deadline 7	<p>The bat workshop held on the 3 June 2021 was attended by SZC Co. and its consultants, Suffolk Wildlife Trust (SWT), East Suffolk Council (ESC), Suffolk County Council, Royal Society for the Protection of Birds (RSPB) and Natural England. The focus of the workshop was to address a series of points raised by SWT, ESC and RSPN in advance of the workshop, which included:</p> <ul style="list-style-type: none"> • Data adequacy • Data analysis • Future Monitoring • Noise effects • Lighting effects • Mitigation Measures • In-combination effects <p>Additional meetings were held on the 4 and 24 August 2021 between SZC Co., ESC and SCC. The purpose of the meetings was to review outstanding issues and matters raised by the Councils in their Deadline 5 response [REP5-138]. Comments have been included within the subsection below as relevant.</p> <p><u>Data Adequacy</u></p> <p>SZC Co. clarified the methodology proposed for static monitoring and discussed the proposed 2021 survey locations. Stakeholders were in agreement that the locations and methodology were suitable. SZC Co. also confirmed that surveys of the SSSI triangle and Goose Hill area were being undertaken in August 2021, but previous efforts had been</p>

ExQ2	Question to:	Question:
		<p>unsuccessful due to unsafe conditions and ground tree inspections surveys are planned for late August 2021. It was explained by SZC Co. that many of the trees around the Leiston Drain are now to be retained, as confirmed in the revised Main Development Site Landscape Plans for Approval (Doc Ref. 2.5(B)) submitted to the Examination and summarised in writing in the Written Response to matters arising at ISH7 [REP6-002].</p> <p>SZC Co. confirmed that further research would be undertake into the likely location of pregnant females in relation to Goose Hill as part of the proposed radio-tracking surveys. Radio-tracking surveys of barbastelles are now committed and secured in the TEMMP [REP5-088].</p> <p><u>Data Analysis</u></p> <p>SZC Co. confirmed that the updated bat impact assessment [AS-208] replaces the assessment presented within Volume 2, Chapter 14 of the Environmental Statement (Section 14.13 only) [AS-033].</p> <p>A discussion was held on the methodology used for data analysis (percentage as a metric) and SWT were understood to be happy with the clarification provided.</p> <p><u>Future Monitoring</u></p> <p>SZC Co. confirmed that the Terrestrial Ecology Monitoring and Mitigation Plan (TEMMP) [REP5-088] includes all proposed monitoring and has been updated to reflect previous commentary (see also above). In addition, in response to SWT, SZC Co. explained that the compensation and adequacy of mitigation proposals for impacts on Barbastelle are appropriate and are reflective of the scale of the potential impacts. The position in relation to future monitoring is thought to be an agreed matter between SZC Co., ESC and SCC.</p> <p><u>Noise</u></p>

ExQ2	Question to:	Question:
		<p>SZC Co. provided clarity on the proposed approach to noise monitoring during construction as defined in the TEMMP [REP5-088] and stakeholders were understood to be happy with the clarification provided.</p> <p>The discussion also included reference to the use of noise frequencies and thresholds used within the ES [AS-033] and updated bat impact assessment within the First ES Addendum (Appendix 2.9.B) [AS-208]. SZC Co. reiterated the position set out within the Examining Authority's First Written Questions (ExQ1) responses provided to Bio.1.115 and Bio.1.116 [REP5-128] starting on e-page 71. SZC Co. explained on 3 June that there is a typographical error in the Updated Bat Impact Assessment where 8khz is stated as opposed to 22 khz (paragraph 8.2.60) and stakeholders were understood to be happy with the clarification provided.</p> <p>ESC raised concerns over predicted noise levels within the retained dark corridors. The noise model outputs are not deigned to define '<i>intra-site</i>' noise levels and did not consider the locations of the dark corridors or what will be effectively '<i>low noise areas</i>', such as the water management zones. SZC Co. explained that the noise contours therefore represent a very pessimistic outlook for noise, particularly '<i>within</i>' the site and do not represent a day-to-day reality as the noise emitters in the construction area are mobile plant, and the contours show the maximum noise at each location. It is believed that these points were understood by the stakeholders, whilst they may still have remained concerned over noise impacts. However, a management approach is agreed in principle to be the most effective method to manage/avoid noise impacts on sensitive bat areas. The approach will be outlined in a future update to the Code of Construction Practice (CoCP) (Doc Ref. 8.11(D)). SZC Co. noted an action to consider the requirement for additional localised noise mitigation, where this might be required, in proximity to the retained dark corridors and include this in the final version of Part B of the CoCP (Doc Ref. 8.11(D)).</p> <p><u>Lighting</u></p> <p>A discussion was held on dark corridors which included a discussion on lighting contour plots which were being undertaken at that time to demonstrate that dark corridors for</p>

ExQ2	Question to:	Question:
		<p>bats could be retained. SZC Co. agreed to provide the plots for comment after the meeting and these were then submitted into examination in the Technical Note on Indicative Lighting Modelling [REP3-057]. Comments have subsequently been provided by stakeholders in various Deadline 5 submissions (ESC [REP5-138] and RSPB/SWT in Section 6 of [REP5-165]). SZC Co.'s current position which was subsequently discussed again with ESC and SCC on the 4 August, where SZC Co. explained that the lighting modelling, for example at Ash Wood, did not account for the 5m hoarded fencing and was therefore was pessimistic. This is believed to have been accepted by ESC. It was also agreed at the meeting on 4th August that SZC Co. would prepare and submit a 'dark corridors plan' to examination at Deadline 7 which will be secured through the Lighting Management Plan (Doc Ref. 6.3 2B(A)).</p> <p><u>Mitigation</u></p> <p>The provision of mobile task lighting was discussed. SZC Co. explained that mobile task lighting cannot be accounted for in the lighting plots [REP3-057] but, to ensure that such lighting does adversely impact on dark corridors or low light areas, that some form of supervisory control over such lighting could be included in the role of the Ecological Clerk of Works (ECoW) and included in Part B of the CoCP (Doc Ref. 8.11(D)).</p> <p>A discussion was held on hibernation and the proposals for the bat barn. SZC Co. explained that the bat barn proposals included to date follow the specifications sent through by Natural England. Stakeholders considered that brick facias should be included from the floor to ground level and SZC Co. took an action to consider the potential to include these within the proposals with Natural England as the proposals are taken forward. The final details of the bat barn will be included within the Draft Bat Licence application.</p> <p><u>In-combination effects</u></p> <p>SZC Co. agreed to prepare two notes to provide clarity on the following potential in-combination effects on bats:</p>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • The combined effect of lighting and noise. This note was then submitted to examination at Deadline 6 (see Appendix B of SZC Co.'s Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 [REP6-024] on e-page 34). • The potential combined impacts of the main development site and Sizewell link road on the bat population. This note was then submitted at Deadline 5 (see Appendix Q of SZC Co.'s Comments on Submission from Earlier Deadlines (Deadlines 2-4) [REP5-120] on e-page 1392). This was subsequently discussed on the 4 August with ESC/SCC where SZC Co. provided further justification to clarify that a further assessment of this potential impact is not required.
	RSPB/SWT Response at Deadline 8	<p>Our concerns are clearly stated in our Written Representations. We reiterated concerns the Applicant does not appear to have addressed in our deadline 7 submissions². Whilst we welcome the bat workshop and the progress made we wish to make clear that where we did not provide an immediate response that does not mean we agree with the Applicant.</p> <p><i>Data Adequacy</i></p> <p>We did not agree the static locations and methodology were suitable.</p> <p>We welcome the Applicant agreed to add back in some of the static locations that had been removed from 2020 and wait to see the results.</p> <p>We requested monitoring at Goose Hill and Kenton Hills because the 2020 back-tracking surveys suggested pregnant female and juvenile barbastelle were using those areas. The Applicant agreed to consider that, but we have not seen a response to that request.</p> <p>Our concerns over data adequacy are clearly stated in our Written Representations and there are still spatial gaps in the dataset, such as the link between Bridleway 19 and Kenton Hills and areas to cover breeding and juvenile barbastelle as outlined in our Deadline 7 submissions.</p> <p>Also, we have been clear there needs to be more quantitative data to inform a better analysis that can focus on barbastelle and Natterer's bats. This includes using actual</p>

ExQ2

ExQ2	Question to:	Question:
		<p>counts and not relying on percentages which mean common species mask actual (rather than relative) importance of a location for rare species.</p> <p>We welcome the inclusion of radio-tracking surveys of barbastelle to enable the comparison of levels of bat activity.</p> <p><i>Data Analysis</i></p> <p>We understood the Applicant's clarification but are still not happy with the approach to data analysis (the analysis should use actual abundance and not percentages) and did make clear at the workshop we still consider data analysis should focus on barbastelle and Natterer's bat. We noted the Applicant agreed to review the approach to data analysis for barbastelle but have not seen a response.</p> <p>Our concerns over data analysis detailed in our Written Representations remain as outlined in our deadline 7 submissions.</p> <p>There is huge uncertainty over the impacts on barbastelle and the use of percentages as a metric is deeply flawed. As we have repeatedly said, actual counts of barbastelle and Natterer's bats should be used instead.</p> <p><i>Future Monitoring</i></p> <p>Please refer to our comments on the TEMMP in our deadline 7 submission .</p> <p>We do not agree the compensation and adequacy of mitigation proposals for impacts on barbastelle are appropriate and are reflective of the scale of the potential impacts. As detailed in our written submissions our main concerns are lack of buffers in key areas, lack of roost resource provision, uncertainty over task specific lighting and noise. We now have further concerns having seen the Bat Method Statement, given the Applicant does not plan to replace approximately half the lost roosts until the late operational stage of the power station (70+ years), as they are waiting for trees to mature. It is critical that the Applicant does more in the early stages. Not necessarily just more bat boxes but use some of the other techniques such as early veteranisation of trees and reusing felled roosts.</p> <p><i>Noise</i></p>

ExQ2

ExQ2	Question to:	Question:
		<p>We understood the Applicant’s clarification, but we still have concerns over impacts from noise and the approach to noise monitoring as outlined in our deadline 7 submissions .</p> <p><i>Lighting</i></p> <p>Please refer to our comments on REP3-057 in our deadline 5 submission and the concerns in our deadline 7 submissions.</p> <p><i>Mitigation</i></p> <p>Please refer to the concerns detailed in our deadline 7 submissions</p> <p>The Applicant notes the final details of the bat barn will be included within the draft bat licence application. The details are not included in the draft bat method statement (REP7-080 to REP7- 85) and query when they will be submitted to the Examination.</p> <p><i>In combination Effects</i></p> <p>Please refer to our comments on REP6-024 in our deadline 7 submission.</p> <p>As stated in our deadline 6 submission, the Applicant presented no new information on the potential combined impacts of the MDS and SLR in REP5-120 Appendix Q. The concerns detailed in our Written Representations submitted at Deadline 2 remain.</p> <p>Whilst we welcome the progress made, we are disappointed and very concerned the Applicant has still not addressed many of our concerns at this late stage of the Examination</p> <p>See REP8-173.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>SZC Co. provided responses to concerns raised by the RSPB and SWT in Section 2.9 of SZC Co.’s Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 submitted at Deadline 8 [REP8-120]. These cover the majority of the points raised above. As such the applicant directs the examining authority to the responses provided therein.</p> <p>An additional meeting was held on the 6th October 2021 to discuss outstanding concerns in relation to bats and was attended by ESC, RSPB and SWT. The discussion was focussed on the following:</p>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • The mitigation buffer, where SZC Co. provided details of the buffer widths around Ash Wood. Discussions were also held on areas around Kenton Hills and Bridleway 19 and plans detailing the buffers in these locations shared following the meeting. • Roost resource compensation, where SZC Co. confirmed that all roost reprovion (bat boxes) would be front loaded and would be provided ahead of the roost features for which they are mitigating. • The SSSI triangle, where SZC Co. provided a draft of the Bat Tree Inspections 2021: SSSI Triangle (Doc Ref. 6.13 (D)) which clarified the confirmed and estimate roost resource of the SSSI triangle. SZC Co. also confirmed that the potential roost features were in addition to those already identified. • Pregnant female and juvenile barbastelle, where discussions were held on the likely location of pregnant female and juvenile barbastelle and the proposed habitat creation works in these areas.
Part 3 - Matters to be dealt with in writing following ISH7 – Designated sites		
Part 4 - Matters to be dealt with in writing following ISH7 – Sabellaria Spinulosa		
Part 5 – matters arising from the Applicant’s replies to ExQs1 [REP2-100]		
Bio.2.19	Applicant, ESC	<p>Bio.1.78. (a) The Applicant states that the mitigation or enhancements for associated development on sites on third party land are to be secured in the Deed of Obligation. Why are they not in the DCO?</p> <p>(b) For measures on the main development site the measures “would remain within EDF Energy ownership and control”. “EDF Energy”, an undefined entity in the response, is neither the proposed undertaker nor the Applicant. However, if all the measures are secured pursuant to requirements, which the ExA understands from the preceding parts of the Applicant’s response is the case, it will be for the undertaker to ensure that it has the necessary rights to carry out the mitigation on the land of “EDF Energy”, or any other landowner. Please will the Applicant and ESC confirm that this is also their understanding and will ESC please state whether or not it considers the arrangements to be acceptable and enforceable.</p>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	<p>(c) There are many references in the ES to the use of the EDF Energy Estate to deliver mitigation. Given that the Applicant (and would-be undertaker) has clarified that it owns very little land for the development, how does it propose to deliver the mitigation on the EDF Energy Estate?</p> <p>a) Bio.1.78 refers to para 14.7.274, para 14.7.280 of Chapter 14, Volume 2 of the ES [APP-244]. Para 14.7.274 relates to monitoring and mitigation of recreational displacement. Since the DCO Application was submitted, SZC Co. has produced and submitted to the examination the Monitoring and Mitigation Plan for Sandlings (Central) and Alde-Ore Estuary [REP5-122] and the Monitoring and Mitigation Plan for Walberswick and Sandlings (North) [REP5-121] set out SZC Co's commitments in relation to monitoring and mitigation of recreational displacement and are secured through the Deed of Obligation (Doc Ref. 8.17(F)). Where the obligations relate to land outwith SZC Co's ownership, the delivery of the commitments will be pursuant to private agreement with the relevant landowner.</p> <p>Para 14.7.280 refers to habitat creation areas which includes Aldhurst Farm. Not all of these areas of land are in the control of SZC Co. and the Estate Wide Management Plan (Doc Ref. 9.88) submitted at this Deadline 7 and secured by Requirement 5C explains this and commits SZC Co. to the creation and maintenance of these habitat creation areas. Where the obligations relate to land outwith SZC Co's ownership, the delivery of the commitments will be pursuant to private agreement with the relevant landowner.</p> <p>There are no further mitigation or enhancement measures for the associated developments related to the two paragraphs referenced in Bio.1.78.</p> <p>(b) EDF Nuclear Generation Limited (ENGL) and SZC Co. are currently both part of the EDF Group. The "EDF Estate" has referred to their landholding collectively. Measures on the main development site (MDS) would remain within SZC Co's ownership; however, for measures that are to implemented on land beyond the MDS but within the land owned by EDF Nuclear Generation Limited (ENGL), the implementation and maintenance of such measures will be secured as part of the private agreement to be reached with ENGL, with the principle having already been agreed between the parties.</p>

ExQ2	Question to:	Question:
		<p>(c) SZC Co. refers to the response provided at deadline 2 in the Responses to the Examining Authority's First Written Questions (ExQ1) - Volume 1 - SZC Co. Responses [REP2-100], question Bio.1.43 the delivery of the mitigation would be secured as part of the private agreement to be reached with EDF Energy Nuclear Generation Limited (ENGL) ENGL, with the principle having already been agreed between the parties.</p>
	<p>East Suffolk Council Response at Deadline 7</p>	<p>ESC notes the limited land that is currently owned by the Applicant (although we understand the group of companies of which the Applicant is part owns the main site). The Applicant is yet to provide ESC with any title to the order land or any details for the proposed structure of land acquisition for the order land.</p> <p>ESC's general position in relation to the mitigation for associated development on sites on third party land is that, where possible, this should be secured in the DCO and it is the undertaker's responsibility to ensure that it has the necessary rights to carry out the mitigation on the land, regardless of who owns it.</p> <p>ESC is open to consideration of binding the undertaker rather than the landowner/prospective landowner in respect of the commitments proposed to be included in the Deed of Obligation, so long as such a vehicle is no less effective and has no fewer remedies than the conventional vehicle provided under section 106. We have set out at [REP3-061] and [REP5-139] what ESC would require (as a minimum) for the dDCO and/or Deed of Obligation (as appropriate) to provide, for such arrangement to be acceptable and enforceable.</p>
	<p>TASC Response at Deadline 7</p>	<p>TASC have concerns arising from the lack of knowledge as to land ownership and where responsibilities lie in relation to mitigation plans. Sufficient resources will be required to ensure the overseeing of mitigation projects, and, if mitigation is carried out inappropriately or unsuccessfully, there must be a well-resourced and suitably qualified enforcement team to monitor attaining the required objectives. If it is suspected that agreed mitigation plans are not being carried out or are unsuccessful, TASC require assurance that the Applicant/undertaker will be held responsible and appropriate enforcement action taken.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>SZC Co. has reviewed ESC's previous representations and has updated the dDCO and DoO to reflect discussions which have been had with ESC subsequently.</p>

ExQ2	Question to:	Question:
		<p>SZC Co. is the “undertaker” as defined in Article 8 of the dDCO and is therefore responsible for compliance with all obligations in the dDCO. SZC Co. is also a party to the DoO with the local authorities and is named in relation to the obligations which it must comply with. Appendix C of the Written Submissions Responding to Actions Arising from ISH1 [REP5-113] sets out how these obligations may be enforced against SZC Co. in the event of a breach. SZC Co. has also created a governance structure through the DoO to provide transparency and accountability throughout the construction period.</p>
	RSPB/SWT Response at Deadline 8	<p>At epage 23 and 24, in the Applicant’s response to Bio.2.19 in relation to (a) the Applicant securing mitigation or enhancements on third party land, through the Deed of Obligation. Why are they not in the DCO? The Applicant states:</p> <p style="padding-left: 40px;">“Where the obligations relate to land outwith SZC Co's ownership, the delivery of the commitments will be pursuant to private agreement with the relevant landowner.”</p> <p>And in answer to (b) (relating to EDF Nuclear Generation Limited, currently not the undertaker nor the Applicant) the Applicant states for areas within EDF Nuclear Generation Limited (ENGL) ownership but not within the main development site (MDS):</p> <p style="padding-left: 40px;">“the implementation and maintenance of such measures will be secured as part of the private agreement to be reached with ENGL, with the principle having already been agreed between the parties.”</p> <p>Our concern, as has been repeated on many occasions is not only the ecological viability of mitigation and enhancement measures proposed but also the legal (and financial) certainty of them being provided. For the ExA and Secretary of State to be able to take such measures into account in their consideration they must be able to have confidence with regard to all three aspects.</p> <p>Therefore, whilst principles are already agreed with ENGL, the fact that these are not in place for relevant third party landowners (noting in addition how late in the application process we are). We therefore continue to have concerns and at present do believe that full confidence can be placed in such measures being possible and deliverable.</p>
	SZC Co. Response at Deadline 10	<p>The Applicant’s position remains that the mitigation and enhancements are ecologically viable and that through the EWMP (Doc Ref. 10.15) secured by Requirement 5C of the</p>

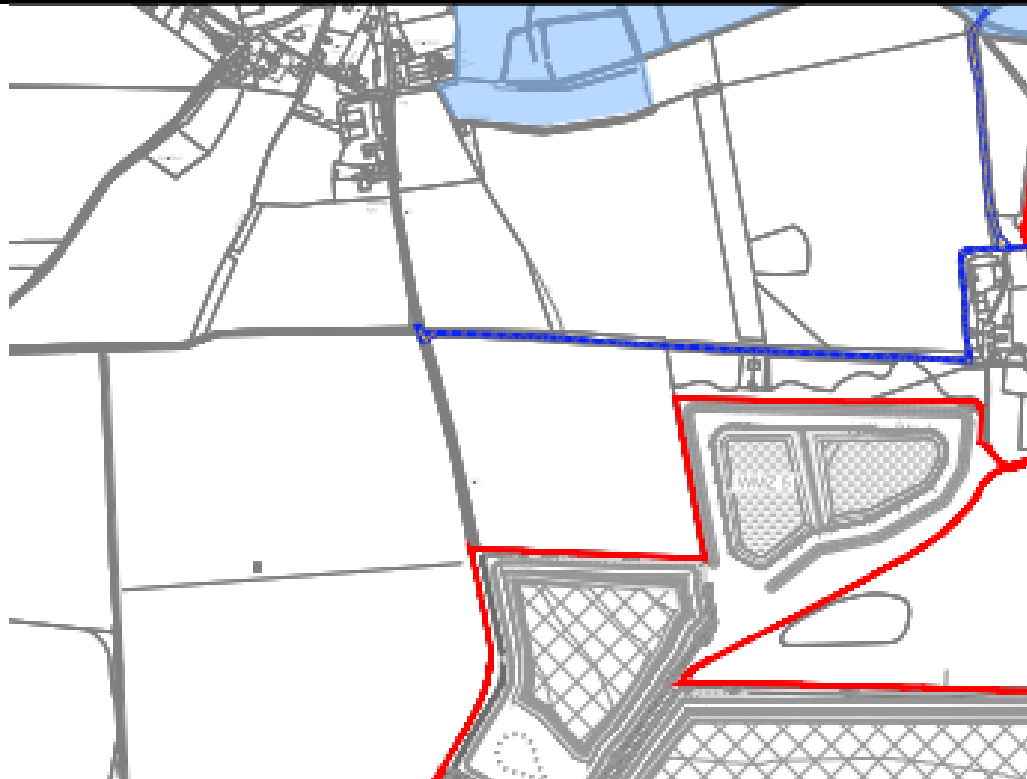
ExQ2

ExQ2	Question to:	Question:
		<p>dDCO, it is legally bound to provide the mitigation and enhancements within that plan beyond its own land ownership.</p>
<p>HRA.2 Habitats Regulations Assessment</p>		
HRA.2.2	Applicant	<p>Impediment to management</p> <p>Could the Applicant confirm whether a written commitment, including plan, showing access routes to maintain access for the RSPB to continue management to the southern side of the Minsmere reserve is to be provided to the Examination. If so, please provide this information and confirm whether such an access commitment has been agreed with the RSPB and NE.</p>
	SZC Co. Response at Deadline 7	<p>As has previously been confirmed by SZC Co., RSPB’s access to the south side of the Minsmere reserve is outwith the order limits and will not be impeded. Notwithstanding this SZC Co. will commit in writing not to impede the access. The position remains as set out in section 1.8 of SZC Co.’s Written Submissions arising from Issue Specific Hearing 7 [REP6-002]. This states:</p> <p><i>‘SZC Co confirms that the RSPB will be able to access the southern side of the RSPB Reserve, along the existing access route, via Lower Abbey farm and which is defined as the blue line and shown in Plate 2 below.</i></p> <p>Plate 2: Retained access route to Minsmere RSPB (south)</p>

ExQ2

Question to:

Question:



As shown on the plate above, the existing access runs east to Lower Abbey farm from the lane just south of Eastbridge and then runs north to access the southern edge of the Minsmere reserve. This access is entirely outwith the proposed order limits and so access will be unimpeded by the temporary construction area of Sizewell C which occurs to the south.

The access commitment has not yet been formalised with the RSPB and NE. SZC Co. will commit, via an appropriate mechanism, not to carry out works which impede RSPB's existing access route to the southern edge of the Minsmere reserve via Lower Abbey Farm.

ExQ2

ExQ2	Question to:	Question:
	RSPB/SWT Response at Deadline 8	We note on epage 99 of the response to HRA.2.2 the proposed commitment in writing not to impede the RSPB’s access to Minsmere reserve and look forward to receiving this in due course.
	SZC Co. Response at Deadline 10	SZC Co. is grateful to the RSPB for its positive engagement on this matter and will continue discussions to formalise that agreement outside of the examination in order to secure the appropriate level of detail and assurance for both parties.
HRA.2.3	Applicant	<p>Disturbance to shoveler and gadwall (breeding and non-breeding) using functionally linked land</p> <p>In [REP5-112] the Applicant confirmed that points of difference relating to survey data and precaution will be responded to in writing. However, no specific deadline for such a response was stated. Could the Applicant respond to NE and RSPB’s concerns in respect to both species (breeding and non-breeding).</p>
	SZC Co. Response at Deadline 7	<p>In relation to the potential effects of disturbance on the Minsmere-Walberswick SPA breeding and non-breeding shoveler and gadwall, details of Natural England’s concerns are set out under Issue 27 (pp 65 – 68) of their Written Representations [REP2-153] whilst RSPB and SWTs’ concerns are in paragraphs 3.314 – 3.328 (breeding) and 3.335 – 3.341 (non-breeding) of their Written Representations [REP2-506]. The Applicant’s responses to these comments are provided in [REP3-042] at:</p> <ul style="list-style-type: none"> • Paragraphs 11.21.4 – 11.21.12 (breeding) and 11.21.13 – 11.21.18 (non-breeding) in relation to Natural England’s comments. • Paragraphs 14.5.38 – 14.5.45 (breeding) and 14.5.51 – 14.5.57 (non-breeding) in relation to RSPB/SWTs’ comments. <p>SZC Co.’s detailed responses to the Natural England and RSPB/SWT comments (as provided in [REP3-042]) set out the following key points:</p> <ul style="list-style-type: none"> • Potential effects on gadwall and shoveler are limited to those birds using the functionally linked land (FLL) on the Minsmere South Levels and Sizewell Marshes.

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • The breeding populations of these two species within the designated site are not dependent on this FLL for the provision of resources which cannot be obtained within the designated site itself. Rather the functional linkage in this case is concerned with the occurrence of additional breeding birds. This contrasts with the situation for the SPA marsh harrier, which nest within the designated land but depend upon the FLL as a foraging resource. • The potential for effects on the non-breeding populations of these two species is limited to birds using the FLL on the Sizewell Marshes. Based upon the baseline survey data and the fact that it is highly likely there will be inter-change of birds between the Sizewell Marshes and other suitable sites within the wider area (as well as between the Sizewell Marshes and the SPA), it is clear that only a small percentage of the SPA population will use (and potentially depend upon) the Sizewell Marshes. • For the non-breeding populations, other sites outside the SPA have the potential to provide more extensive areas of supporting habitat than the Sizewell Marshes. • The assessments for the breeding populations rely on seven years of survey data (providing abundance estimates) for the FLL. The distributional data on breeding birds within the FLL (collected during the 2020 surveys) usefully highlight that the assessment in the shadow HRA [APP-145] probably overestimates disturbance effects to those birds using on the Minsmere South Levels but, critically, the assessment conclusions do not depend upon these further data. • The interpretation of the survey data relating to the non-breeding populations in Natural England's Written Representations [REP2-153] is erroneous. It fails to recognise; (i) the reliance of the assessment on over five (recent) winters of Wetland Bird Survey (WeBS) count data relating to the SPA and each of the relevant areas of FLL; and (ii) the between-winter consistency in distributional patterns on the Minsmere South Levels (as determined from three winters of project-specific survey data, of which two encompass the full winter period). • The assessments are highly precautionary and undertaken in relation to the worst-case scenario (i.e. Phase 1) for construction noise impacts. • The assessments undertaken in the shadow HRA [APP-145] and shadow HRA Addendum [AS-173] give careful consideration to determining how critical the FLL

ExQ2	Question to:	Question:
		<p>is to the designated populations, and whether it is necessary for the maintenance or restoration of favourable conservation status of the qualifying features (for both the breeding and non-breeding situations). As such, the assessments align fully with the guidance on FLL produced for Natural England (Chapmen and Tyldesley 2016).</p> <p>At ISH7, discussion on the breeding and non-breeding SPA populations of these species highlighted that both Natural England (Dr Saunders) and RSPB (Miss Miller):</p> <ol style="list-style-type: none"> 1. Continue to have concerns over the fact that for the breeding populations there is only a single year of survey data detailing distributions on the FLL. 2. Were concerned that between-year movements of breeding birds between the SPA and the FLL might affect the conclusions of the assessment (because the FLL may be more important in some years than others). 3. Continue to consider that the predicted levels of displacement are of concern. <p>The Applicant's response to each of these points is as follows:</p> <p><i>Distributional data for breeding populations on FLL</i></p> <p>As stated above, the assessment conclusions for the breeding populations do not depend upon the distributional data from the 2020 surveys. Rather the shadow HRA [APP-145] adopts a precautionary approach of assuming a uniform distribution of birds across the Minsmere South Levels, which at ISH7 RSPB (Miss Miller) stated "<i>is actually a reasonable assumption to make in the absence of that distributional data.</i>"</p> <p><i>Between-year movements of breeding birds</i></p> <p>On the issue of between-year movements of breeding birds between the SPA and the FLL, as stated above, the assessment in the shadow HRA [APP-145] relies on seven years of data (from between 2010 and 2017) on the abundance of these birds within the FLL to reach its conclusions. The Applicant considers that it is unreasonable to suggest that this is not sufficient to adequately capture the potential for such between-year movements and to enable the issue to be accounted for within the assessment.</p>

ExQ2	Question to:	Question:
		<p><i>Predicted levels of displacement</i></p> <p>In relation to the levels of the predicted displacement, the Applicant considers that the crux of the matter is whether this displacement from FLL would affect the status of the populations of the qualifying features within the designated site and, hence, the associated conservation objectives of the site. In this respect, the Applicant once again draws attention to the guidance on FLL produced for Natural England by Chapmen and Tyldesley (2016). This is clear in identifying the need to take account of FLL in HRA assessments (which is certainly not disputed by the Applicant) but also recognises that such assessments have to determine how critical the FLL is to the designated population and whether it is necessary to maintain or restore favourable conservation status of the qualifying feature. The guidance clearly states that effects which would not be acceptable within the boundary of the protected site <i>may or may not</i> be acceptable on the FLL.</p> <p>For the reasons set out above (and which are elaborated on in the shadow HRA report [APP-145], shadow HRA Addendum [AS-173] and SZC Co.'s Comments on Written Representations [REP3-042]), the Applicant considers that when the nature of the functional linkage at issue here is taken into account, it is almost inconceivable that the predicted levels of displacement would prevent the maintenance of the favourable conservation status of these qualifying features (the population sizes of which are all currently well above their citation levels). The Applicant considers that this critical point has not been given sufficient attention by either Natural England or RSPB and, contrary to the comment of Mr Woodfield at ISH7 that it seems quite extraordinary that "<i>contiguous land impacts that are in excess of 1% can be disregarded so easily</i>", the conclusion reached in the shadow HRA [APP-145] is considered to be the correct one on the basis of the careful and detailed 'analysis' that has been undertaken.</p>
	RSPB/SWT Response at Deadline 8	The Applicant refers to their response at Deadline 3 (REP3-042) to the RSPB and SWT's Written Representations ⁴¹ and summarises the points made in that submission. We also note our response at Deadline 5, which responded in detail to the Applicant's points in REP3-042 and is therefore also relevant to the summary points listed by the Applicant.

ExQ2	Question to:	Question:
		<p>The following points are in response to the issues noted arising from ISH7.</p> <p><u>Distributional data for breeding populations on Functionally Linked Land (FLL)</u></p> <p>We do agree that the assumption of an even distribution of waterbirds is a reasonable assumption. The Applicant has noted that their surveys (covering a single year) showed a more clustered distribution of birds around the north-eastern pools on the South Levels, however, we consider that breeding waterbirds are likely to use ditches and long vegetation in parts of the South Levels that were not covered during the Applicant's surveys, including areas likely to be affected by noise and visual disturbance. The assumption of an even distribution is therefore a reasonable (rather than highly precautionary) approach in our view.</p> <p><u>Between-year movements of breeding birds</u></p> <p>We are unclear regarding the source of the statement that the data are "not sufficient to adequately capture the potential for such between-year movements and to enable the issue to be accounted for within the assessment". Our comments at ISH7 on the movements of birds between sites such as the Minsmere-Walberswick SPA, the South Levels and Sizewell Marshes were made to support the assumption (made by the Applicant and agreed by the RSPB and SWT) that the South Levels and Sizewell Marshes are functionally linked to the SPA.</p> <p><u>Predicted levels of displacement</u></p> <p>We consider that the levels of displacement predicted are significant for breeding birds (11% of the total SPA and functionally linked land population for breeding gadwall and 7% for breeding shoveler) and for wintering birds (around 4% displacement predicted). Minsmere South Levels and Sizewell Marshes provide important breeding and wintering habitat for birds from the SPA and the effective reduction in the area of this functionally-linked habitat available has the potential to result in declines in overall species populations of the SPA. Given the magnitude of the predicted displacement to the total SPA populations, we consider that such population changes are possible and therefore do not agree that adverse effects on integrity can be excluded without reasonable scientific doubt.</p>

ExQ2	Question to:	Question:
		<p>We are extremely concerned that to date, the Applicant has not proposed sufficient measures to address this potential impact. Whilst we appreciate the TEMMP43 confirms that monitoring will be undertaken and should it:</p> <p style="padding-left: 40px;">“Determine any changes in usage of the Minsmere South levels by breeding waterbirds as a result of construction of Sizewell C” then “Further boundary screening and or other approaches to noise reduction and visual disturbance to lessen any apparent impacts and to maintain populations.”</p> <p>However, as we have previously commented, it is our view that initial and additional measures proposed will not mitigate potential effects. We believe the Applicant will be amending the TEMMP to include more details and therefore we will not comment further here but reserve the right to comment further in light of changes (or not) made to the TEMMP at Deadline 8.</p>
	SZC Co. Response at Deadline 10	<p>In their Deadline 8 Response (paragraphs 7.23 – 7.29 in [REP8-173], as set out above), RSPB/SWT make a number of further points pertaining to the issues that have been discussed during the course of the examination on the potential for disturbance to cause displacement of breeding and non-breeding gadwall and shoveler on FLL close to the Minsmere-Walberswick SPA, and on the implications of such potential displacement for the designated populations. The Applicant’s response to these points is set out below:</p> <ul style="list-style-type: none"> • <u>Distributional data for breeding populations on Functionally Linked Land (FLL):</u> The Applicant is pleased that RSPB/SWT acknowledge that the assumption of a uniform distribution of breeding waterbirds on the Minsmere South Levels (used for purposes of estimating the numbers of birds potentially displaced) is reasonable. However, in contrast to the RSPB/SWT view, the Applicant considers that there is a strong case to make for this being a highly precautionary assumption. The Applicant would highlight that the only data on breeding waterbird distribution on the Minsmere South Levels presented to the ExA (i.e. from the 2020 surveys) show a marked concentration of both gadwall and shoveler around the north-eastern pools. This coincides with the likely preferred habitats of these species on the Minsmere South Levels. The Applicant does not dispute the RSPB/SWT’s statement that these breeding waterbirds will also use ditches in other parts of the Minsmere South Levels but it is undoubtedly the case

ExQ2	Question to:	Question:
		<p>that the available evidence (from both the available survey data and known habitat preferences) suggests that the densities of these birds will be higher around the pool systems in the northeast of the area. Hence, in the absence of any evidence to the contrary, it is reasonable to propose that the assumption of a uniform distribution is precautionary.</p> <ul style="list-style-type: none"> • <u>Between-year movements of breeding birds:</u> The RSPB/SWT question the source of the statement made by the Applicant in [REP7-051] (see epage 39) that in relation to the reliance on seven years of waterbird abundance data that “The Applicant considers that it is unreasonable to suggest that this is not sufficient to adequately capture the potential for such between-year movements and to enable the issue to be accounted for within the assessment.” This statement is made by the Applicant in direct response to comments by both NE and RSPB/SWT during ISH7. Both of these parties stated that, in relation to breeding waterbirds, there could be frequent between-year variation in the relative numbers of birds nesting within the SPA and on the nearby FLL (i.e. see statements by Dr Saunders of NE on epage 3 of [EV-136]¹ and by Miss Miller of RSPB on epage 4 of [EV-136]²). These statements appear to imply that the importance of the FLL relative to the actual designated site has been underestimated and, hence, that the potential displacement of birds from the FLL may have greater implications for the designated populations than as determined in the shadow HRA Report [APP-145]. The point made by the Applicant in [REP7-051] is that this aspect of the assessment relies upon seven years of data on the abundance of these breeding waterbirds within the FLL, and this should be deemed sufficient to capture the potential for between-year variation in abundance on the FLL (so that it is accounted for in the assessment potential displacement from the FLL). • <u>Predicted levels of displacement:</u> RSPB/SWT reiterate their view that the predicted levels of displacement of the waterbirds are significant and that the potential reduction in the area of the FLL has the potential to cause declines in the relevant SPA populations. However, no specific reasons or justifications are provided as to why this should be the case, and there is a lack of evidence for dependence of the designated

ExQ2	Question to:	Question:
		<p>populations of the relevant qualifying features on the FLL on which the potential effects of disturbance would manifest.</p> <p>In relation to the monitoring measures which are proposed for breeding and non-breeding waterbirds in the most recent version of the TEMMP (Doc Ref. 10.28), the Applicant has updated the methodology further at Deadline 10 to provide greater clarity on the spatial and temporal extent of survey and also to ensure comparisons are made with other monitoring understand by the RSPB and WeBS date to determine if any displacement occurs from the Sizewell C construction works. SZC Co will seek further discussion and input from RSPB/SWT and is open to suggestions on how the proposed approaches can be developed further.</p> <p><i>¹also with these breeding birds, depending on the water level, so you can have birds that will, in some years probably nest within the site boundary and another year's nest slightly beyond it."</i></p> <p><i>²Birds might breed in the SPA one year and just outside the next. The South levels in particular are directly contiguous with SPA and they are managed as part of the RSPB Minsmere reserve."</i></p>
HRA.2.8	Applicant	<p>Marsh harrier – HRA Compensatory Measures</p> <p>Could the Applicant respond to the points raised by Natural England with regards to the proposed HRA compensatory measures, including:</p> <ul style="list-style-type: none"> • expand on the feasibility of the wetland habitat element for the proposed HRA compensatory measures for marsh harrier at Upper Abbey Farm <p>confirm whether the wetland habitat element of the HRA compensatory measures will be in place prior to construction. If this is not proposed, could the Applicant expand on why they consider this to be acceptable with reference to the Defra HRA guidance and the point at which negative effects are considered likely to occur</p>
	SZC Co. Response at Deadline 7	SZC Co. understands Natural England's point on feasibility to relate to a historic position which was that SZC Co. had previously considered that creating any new wetlands in the north of the EDF Energy estate was unlikely to be possible, give the topography in this area. However, and has been discussed with Natural England in workshops held in 2020

ExQ2	Question to:	Question:
		<p>and subsequently, the twin drivers of flood compensation mitigation and the need to optimise the marsh harrier habitat compensation area, SZC Co. looked again at the feasibility of new wetlands. It was concluded that by excavating approximately 120,000m³ of material from the lowest lying parts of the north and eastern edges of the proposed area, it would be possible to provide flood compensation and a wetland for marsh harriers. The wetland area will essentially be achieved by excavating to intercept near surface groundwater levels, in the same manner than was used for the successful Aldhurst Farm wetland creation. The topography of the area, which rises to the west, is such that any greater sized wetland would require dramatically greater excavation of material and a much extended construction programme which would then compromise the function of the wider area for marsh harriers.</p> <p>In REP6-042, at para 4.3, Natural England states '<i>We welcome the inclusion of the wetland element within proposals. Having reviewed the report we believe that the design is sufficient to compensate for habitat losses within the main development site which will be impacted by noise and visual disturbance during construction</i>'.</p> <p>The wetland habitat area of the HRA compensatory measures will be built in the first winter following the granting of any order and the excavation is considered to be reliant on the powers in the order. The works will not be undertaken in February-October to avoid impacts on breeding birds, including marsh harriers and this will be secured in a future update the CoCP. On current programmes and assuming no delays, construction of the wetland would be undertaken in winter 2022-23 as part of the ecological enabling works for the project.</p> <p>In the first summer of construction of Sizewell C, here assumed to be summer 2023, when the marsh harrier habitat compensation area is required, to support marsh harriers, which breed in the summer, the marsh harrier habitat compensation area will comprise the dry habitat components, with a shallow open water body. It is likely to take until the second summer following the construction of the wetland for the reedbeds to become fully established. However, the open water habitats and their margins will themselves provide valuable habitats for foraging marsh harriers, as explained at paragraph 2.1.5 of Appendix</p>

ExQ2

ExQ2	Question to:	Question:
		<p>B of SZC Co.'s Written Submissions arising from Issue Specific Hearing 7 [REP6-002].</p> <p>There will be no point during the important summer period during which the marsh harrier habitat compensation area will be unavailable to marsh harriers, as no construction of the wetlands will be undertaken in this period. The optimal condition is likely to be reached in the second summer, as explained above.</p>
	RSPB/SWT Response at Deadline 8	Please refer to paragraphs 7.30 – 7.42 of [REP8-173] for detailed response.
	SZC Co. Response at Deadline 10	<p>In their Deadline 8 Response (paragraphs 7.30 – 7.42 of [REP8-173] as identified above), RSPB/SWT raise a number of points related to the marsh harrier HRA compensatory habitat measures and the response provided by the Applicant in [REP7-051] to ExAQ HRA. 2.8 (which is also set out above). The Applicant's response to these further concerns from RSPB/SWT is provided below:</p> <ul style="list-style-type: none"> • <u>Functioning of the early wet habitats (prior to reedbed establishment):</u> See para 7.31 of REP8-173. The excavation of the new wetland will be undertaken in the first winter (any excavation shortfall to be completed in the second winter) and this is now secured via way of the CoCP (Doc Ref. 10.2). The winter excavation is to ensure that there is no disturbance to breeding birds in the summer, including marsh harriers. As has been explained to the examination, even though the reedbed component is unlikely to be fully established until the second summer following excavation, the open water areas and their margins will still provide habitat for prey species for marsh harriers. • <u>TEMMP – requirement to reference DCO, Schedule 2, Requirement 14C and associated plans:</u> See paras 7.32-7.34 of REP8-173.

ExQ2	Question to:	Question:
		<p>The TEMMP (Doc Ref. 10.28) only identifies the requirement by which the monitoring it describes is secured. Therefore there is no need to reference Requirement 14C.</p> <ul style="list-style-type: none"> <p><u>TEMMP – requirement to include targets for ensuring that the extent, distribution and availability of suitable supporting habitats is maintained and that there is no significant disturbance to marsh harrier using the provisioned compensatory foraging habitats:</u> See paras 7.35 – 7.36 of REP8-173.</p> <p>There is no need to expand the target in the TEMMP as suggested by the RSPB/SWT, given that foraging activity is the matter being addressed by the compensatory habitats and the link between foraging activity and both this and the productivity of breeding marsh harriers of the SPA are captured in the target. Widening the target would distract from its central purpose, particularly given that the sHRA Report does not identify any further impacts on marsh harriers which might lead to an adverse effect on integrity.</p> <p><u>TEMMP – focus on the Potential Interventions on levels of usage of the Sizewell Marshes SSSI by foraging marsh harrier:</u> See paras 7.37 – 7.38 of REP8-173.</p> <p>SZC Co accepts that monitoring marsh harrier foraging activity over the Minsmere South Levels, in addition to that of the Sizewell marshes SSSI and the habitat compensation is appropriate and the monitoring is now specified in the TEMMP, resubmitted at Deadline 10.</p> <p><u>Implementation Plan – commitment to include reference to monitoring and management measures as set out in the TEMMP Table 2.1:</u> See paras 7.39 – 7.41 of REP8-173.</p> <p>The requirement states that no vegetation clearance at the SSSI crossing can be carried out before a marsh harrier implementation plan is in place. It is therefore a document which must be approved prior to construction and the approval process includes Natural England and ESC. This should give all stakeholders confidence in (i)</p>

ExQ2

ExQ2	Question to:	Question:
		<p>the timeliness of delivery, (ii) the effectiveness of the measures/functionality of habitats and (iii) any required adaptive management of the proposed marsh harrier compensatory habitats.</p> <p>However, it is important to note that these measures are already additionally secured as follows:</p> <ul style="list-style-type: none">a. The timeliness of habitat delivery is already covered via way of (i) existing habitats for marsh harriers which are already being delivered and enhanced on the estate and are secured via the Estate Wide Management Plan (Doc Ref. 10.15) and (ii) the early delivery of the wetlands which is secured in the CoCP (Doc Ref. 10.2)b. Monitoring of the effectiveness of measures, including the functionality of the habitats and any required adaptive management of the proposed marsh harrier compensatory habitats are already secured in the TEMMP (Doc Ref. 10.28) which includes a governance process with EWG approval.

ExQ2 - Part 3

ExQ2	Question to:	Question:
CC.2 Climate change and resilience		
No additional comments received at Deadline 8		
CA.2 Compulsory acquisition		
CA.2.10	The Applicant	<p>Whether the purposes of the proposed Compulsory Acquisition justify interfering with the human rights of those with an interest in the land affected</p> <p>The Applicants response to ExQ1 CA.1.38 [REP2-100] states that where land is required permanently (outside of the main development site) it is intended that there will be permanent legacy benefits where possible. However, the legacy benefit of the Sizewell Link Road (SLR) remains controversial. The DL5 submission of SCC [REP5-173] stating that <i>"the net legacy benefit of the Sizewell Link Road is very low"</i>, and that <i>"that once traffic levels move to that for the operational phase, then the harm clearly outweighs the benefits"</i>. The legacy benefit of the SLR is also raised on behalf of LJ & EL Dowley [REP5-260]. Notwithstanding the information provided in response to CA.1.70:</p> <p>(i) Please provide further and clear justification for the permanent acquisition of this land as opposed to its temporary occupation during the construction period for that purpose.</p> <p>(ii) Detail the frequency and "significance" of the levels of traffic that would be generated during the construction period due to outages.</p> <p>(iii) Please provide further details to support the claim of "significant positive legacy benefits" in relation to the B1122.</p>
	SZC Co. Response at Deadline 7	<p>(i) SZC Co. proposes to retain the Sizewell link road for the reasons set out in SZC Co.'s response to ExQ1 AI.1.32 and ExQ1 AI.1.33 [REP2-100] (electronic pages 196 – 201) and at electronic pages 240 – 243 of the Sizewell link road Response Paper [REP2-108].</p> <p>Retaining the Sizewell link road would result in benefits, including:</p> <ul style="list-style-type: none"> • Permanent reduction in traffic for communities along the B1122. SCC commissioned a report in December 2014 (referred to as the 'Sizewell C, Route D2 and B1122 Study'¹) to provide a high level assessment of options for providing relief to communities along the B1122. Page 254 of the study stressed the need for a

¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/141211-Sizewell-Study-REXH-final.pdf>

ExQ2	Question to:	Question:
		<p>bypass, both in the construction and in the operational phase by stating "If the bypasses were not constructed, the number of HGVs on the existing B1122 both during and after the Sizewell C construction period would be unacceptable." (paragraph 2.1.20 of Appendix 5D [REP2-108]).</p> <ul style="list-style-type: none"> • The B1122 is substandard for the traffic that it currently carries – particularly in relation to forward visibility, carriageway width and its lack of amenity for cyclists and pedestrians. That analysis, together with the amenity effects of its operation on the communities that front the road is set out in Section 2.1 of Appendix 5D, the 'Sizewell Link Road – Principle and Route Selection Response Paper' [REP2-108]. • Table 8.9 of the consolidated TA [REP4-005] provides information on the traffic levels during the operational phase of Sizewell C. This shows that there would be a 94% reduction in traffic on the B1122 Theberton during operation should the Sizewell link road be in place (there would be 7,000 daily AAWT traffic flows in 2034 without the Sizewell link road but 400 with the Sizewell link road in place) • Sustained improvements in noise and air quality would be achieved, particularly in Theberton from the permanent reduction in traffic along the B1122 (Table 2.2 of Appendix 5D in REP2-108 confirms the effects on the B1122 and local communities with and without a Sizewell link road. Paragraph 2.1.100 of Appendix 5D in REP2-108 states that "by 2034, when construction traffic is no longer present, there would be either a negligible effect or beneficial [noise] effects as a result of the Sizewell link road for the majority of receptors, with only one receptor recording significant major adverse noise effects on a typical day". Paragraph 2.1.128 of Appendix 5D [REP2-108] states "Retaining the Sizewell link road offers permanent benefits, particularly in relation to the Theberton element of the bypass, including sustained improvements in noise and air quality in the village. The Councils summarised these benefits in their joint response to the Stage 4 consultation. Paragraph 246 of the Councils' response states: "The Councils consider the Theberton Bypass as a legacy benefit of the development, by removing through traffic from the village, with likely associated benefits on noise and air quality and greater network resilience, and strongly believe it should be retained following construction." • The opening and retention of the Sizewell link road would enable the existing B1122 to be re-purposed in response to dramatically reduced traffic levels. Lower traffic volumes on the B1122 would result in the route becoming more popular among

ExQ2	Question to:	Question:
		<p>cyclists and would contribute substantially to enhanced cyclist connectivity in the area (para 5.4.42 of Consolidated TA [REP2-045]). This would be directly consistent with the East Suffolk Council Quiet Lanes initiative. This initiative seeks to maintain the existing tranquillity of a suitable rural road and encourage the use of it through active and sustainable means such as walking, cycling, and horse riding. SZC Co. is working with the local authorities to contribute funds to achieve the repurposing of the road and to develop a cycle network that would maximise the use of the quieter roads, creating recreational routes that link up with local destinations.</p> <ul style="list-style-type: none"> • ESC rightly identify this opportunity as “<i>hugely significant</i>” [REP3-060] at paragraph 2.11 onwards. • The proposed Sizewell link road offers long term benefit to Yoxford. As the design of the Sizewell link road includes a link off the A12 south of Yoxford and the Middleton Moor link, it allows traffic from both the north and south travelling to Sizewell to avoid needing to pass through Yoxford. • The environmental harm that would be caused by removing the road would be avoided (further details about his harm are provided below). <p>SZC Co. consulted on the option of a temporary Sizewell link road at Stage 4 pre-application consultation. 161 responses were received to the question on its removal, of which, 41 responses gave a view on whether the Sizewell link road should be removed and land restored. 68% opposed the removal of the Sizewell link road. This is set out in SZC Co.’s response to ExQ1 AI.1.32 [REP2-100] (electronic pages 197).</p> <p>Middleton- cum-Fordley Parish Council conducted a survey of their own in May 2021 and survey results were obtained from 138 individuals [REP5-242]. The survey found that, should the Sizewell link road be delivered on its proposed route, 61% considered it should be permanent (Question 4, 80% response rate).</p> <p>Removing the Sizewell link road would result in a significant amount of construction work and environmental damage. The impacts of the removal of the Sizewell link road are set out in SZC Co.’s response to ExQ1 AI.1.32 and ExQ1 AI.1.33 [REP2-100] (electronic page 192); at electronic pages 240 – 243 of Appendix 5D of the Sizewell link road Response Paper [REP2-108] (submitted at Deadline 2); and at electronic page 149 of SZC Co.’s Comments on the Councils’ LIR [REP3-044].</p>

ExQ2	Question to:	Question:
		<p>The Sizewell link road would need to be built to a high standard and this was recognised and accepted by SCC at the Issue Specific Hearing. With a 10-12 year overall construction period, and given the scale and nature of traffic involved, it is misconceived to think the Sizewell link road could be built as some form of temporary haul road.</p> <p>If the Sizewell link road was made temporary, the removal works would include:</p> <ul style="list-style-type: none"> • Removal of the Sizewell link road itself, pavements, road drainage networks, utilities (e.g. cables, overhead lines) and the Pretty Road Overbridge. • Reinstating parts of the A12 and B1122, including: removal of A12 Western Roundabout and reinstating the existing A12 alignment; removal of Middleton Moor roundabout; and reinstatement of the existing B1122 alignment. • Removal of the Sizewell link road tie-in to the B1122 at the eastern end of the Sizewell link road and reinstatement of the existing B1122 alignment. <p>The preliminary environmental information provided as part of the Stage 4 Consultation Document [APP-082] stated that "During the breaking of surfaced areas and removal of the road and associated infrastructure, there is the potential for significant adverse noise and vibration effects on nearby residential properties, as well as on the amenity of users of PRoWs and the setting of Theberton Hall".</p> <p>These activities would result in a significant amount of construction traffic. To construct the Sizewell link road, a large amount of material is proposed to be moved to the main development site. If the Sizewell link road was temporary, this material would have to be transported back to the Sizewell link road site to reinstate the land.</p> <p>It is estimated that to move just this material from the main development site to the Sizewell link road site to reinstate the land would require 10,556 one way truck movements alone. This would be in addition to other construction traffic movements that would be needed for other works, including drainage and landscaping.</p> <p>At the Stage 4 consultation, ESC raised concerns about the potential environmental impact of the removal of the road. In particular, the removal of the SuDS that serve the Sizewell link road could have a negative impact on the biodiversity that would have established in the SuDS from the time they were constructed.</p> <p>Given the benefits of retaining the Sizewell link road and the drawbacks of removing it following construction of Sizewell C, there are clear and compelling benefits in its retention and justification for the permanent acquisition of this land.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) Based on the existing numbers for Sizewell B outage traffic, it is expected that an outage at Sizewell C, would result in approximately 700 vehicles per day (630 cars, 63 LGVs, 3 HGVs). A planned outage occurs approximately every 18 months and lasts approximately 6 weeks. With Sizewell C the number of planned outages would triple.</p> <p>The Sizewell link road would act as a dedicated promoted route from the A12 to the site to facilitate movement of workers (and their cars) to the main development site with less disruption to residents of the B1122 and through Leiston. The road would also serve Sizewell A and B, the Sizewell community (including the beach) and provide convenient access to parts of Leiston. HGVs and AILs would be required to route via the Sizewell link road, even during operation, which would ensure that any HGVs and AILs would not travel through the villages of Yoxford, Theberton and Middleton Moor. SZC Co. would ensure that HGVs and AILS route onto the Sizewell link road in the operation phase through the Operational Travel Plan, which is to be secured via the Deed of Obligation [REP5-082]. This is set out in SZC Co.'s response to ExQ1 AI.1.33 [REP2-100] (electronic page 199) and at electronic pages 240 – 243 of the Sizewell link road Response Paper [REP2-108]. With the benefit of the Sizewell link road, it is anticipated that signage would ensure that all but immediately local traffic would use the link road.</p> <p>The significant legacy benefits of the Sizewell Link Road are set out within the response to part <i>i</i> of CA.2.10 above.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC continues to consider that, for the reasons set out in its Written Representations [REP2-189], the environmental and cost implications of the retention of the SLR outweigh the benefits once the construction phase of SZC is completed. It is noted that there will be short term impacts while the road is removed, but this would need to be weighed against the continuation of the disbenefits in perpetuity if the road was retained. These short-term impacts can be minimised by the necessary truck movements referred to in SZC Co's Response to CA2.10 (REP7-052) being routed along the route of the SLR, either on the existing road bed, or for those places where it has already been removed, using a haul route mirroring the process used during construction. It is anticipated that it would be a similar process to that already proposed by the Applicant for the removal of the linear infrastructure of the Green Rail Route.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>The issue raised about the removal of the SUDS and the impact on biodiversity can be resolved by not relying on these features for ecological mitigation, using measures such as district licencing to seek mitigation elsewhere and to ensure that through approaches including "newt fencing", not encouraging the establishment of significant populations at these locations.</p>
	<p>SZC Response at Deadline 10</p>	<p>SZC Co. has already responded to SCC's comments on this matter at [REP8-120] (electronic pages 52 - 62) and at SZC Co.'s Comments on Earlier Deadlines and Subsequent Written Submissions to ISH10-14 (Doc Ref. 9.120) submitted at Deadline 10.</p> <p>SZC Co.'s justification for the retention of the Sizewell link road is also set out in ExQ1 AI.1.32 and ExQ1 AI.1.33 [REP2-100] (electronic pages 196 – 201), at electronic pages 240 – 243 of the Sizewell link road Response Paper [REP2- 108] and SZC Co.'s response to ExQ2 CA.2.10 [REP7-056] (electronic page 139) and at SZC Co.'s Written Summaries of Oral Submissions made at Compulsory Acquisition Hearing 1 Part 1 [REP7-064] (electronic pages 3-6).</p> <p>In summary, SZC Co. maintains the view that the long term benefits of providing the Sizewell link road far outweigh any long term impacts. These long term benefits include a permanent reduction in traffic for communities along the B1122 and sustained improvements in amenity, noise and air quality would be achieved, particularly in Theberton and Leiston.</p> <p>The opening and retention of the Sizewell link road would also enable the existing B1122 to be re-purposed in response to reduced traffic levels. SZC Co. is working with local authorities to develop the B1122 Corridor Repurposing Scheme. The principle of the scheme is secured in the Deed of Obligation (Doc Ref 10.4) and it seeks to provide enhanced facilities and connectivity for non-motorised users and local communities along the B1122. Following the opening of the Sizewell link road to the public, SZC Co shall agree the B1122 Corridor Repurposing Scheme with Suffolk County Council and shall implement the agreed B1122 Corridor Repurposing Scheme. The Deed of Obligation explains that improvements may include highway improvements, maintenance of existing</p>

ExQ2	Question to:	Question:
		<p>cycle paths, upgrades of footways, enhancement of roadways designated as 'Quiet Lanes', measures to reduce traffic speed, pavement markings and a package of behaviour change measures such as provision of cycle maps, provision of cycle parking and guided cycle rides. It is unclear why SCC would want to deny these substantial long term benefits to affected communities along the B1122.</p> <p>The existing B1122 is a substandard road as it comprises of sections of narrow roads through villages, with tight corners, resulting in poor visibility as SZC Co. has set out in Sizewell link road Response Paper [REP2-108 (electronic pages 199-222)]. There are also no continuous footways or cycleways along the B1122 apart from where it passes through the village of Theberton, where there are footways of approximately 1.2m in width. The retention of the Sizewell link road, combined with the B1122 Corridor Repurposing Scheme, will completely transform the B1122 and address these long standing concerns of the B1122.</p> <p>The Sizewell link road would need to be in operation for approximately 12 years. By this point, the road will have become assimilated into the landscape, particularly with the successful implementation of the landscape and ecological objectives set out in the Sizewell link road Landscape and Ecology Management Plan (Doc Ref 10.27). To deliberately plan the opposite, i.e. to not assimilate the road into the landscape and to not minimise ecological impacts for a temporary road during the construction period would not be responsible.</p> <p>As set out in SZC Co.'s response to this question (ExQ2 CA.2.10) at Deadline 7, the Sizewell link road will result in a significant and permanent reduction in traffic on the B1122 during operation. This permanent reduction includes traffic that currently travels along the B1122 i.e. not SZC Co. traffic. If the Sizewell link road was temporary, it would result in all traffic having to revert back to the B1122. In this scenario, communities along the B1122 would face an increase in HGV and other traffic after having a 12 year period of significantly reduced traffic flows. This scenario would be completely unfair and unreasonable for the B1122 communities.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>The change which SCC is proposing cannot be achieved this late into the examination and it is not a change which SZC Co. is willing to work up, assess and consult on, unless directed to do so by the Secretary of State, as it is not necessary, appropriate or consistent with the expressed wishes of the affected communities. SZC Co. has explained this in further detail at SZC Co.'s response in Comments on Earlier Deadlines and Subsequent Written Submissions to CAH1 and ISH8-ISH10 [REP8-120] (electronic pages 52 - 62) at Deadline 8 and SZC Co.'s Comments on Earlier Deadlines and Subsequent Written Submissions to ISH10-14 (Doc Ref. 9.120) submitted at Deadline 10.</p>
CA.2.14	<p>The Applicant, SCC</p> <p>SZC Co. Response at Deadline 7</p>	<p>Adequacy of the protective provisions set out in the draft DCO and the need for any other protective provisions to protect relevant interests</p> <p>The Applicant's response to ExQ1 CA.1.67 [REP2-100], and its response to the comments on those question responses [REP5-129], records that the parties are working to ensure that the draft DCO provisions as a whole adequately secure the highway works.</p> <p>(i) Please provide an update on progress and indicate whether this will take the form of a set of Protective Provisions to be inserted as a schedule to the DCO.</p> <p>(ii) Please also clarify the position in relation to the Protective Provisions additionally sought by SCC for other topic areas.</p> <p>(i) SZC Co. are not negotiating protective provisions in relation to highways with SCC. Our position, as we have always made clear to SCC, is that protective provisions for highways are unnecessary. Most DCOs (and other 'Works Orders' such as TWA Orders or hybrid Acts) require works to highways, and yet very few have sought to include 'protective provisions' for existing highways. We are not aware that absence of such provisions has caused any difficulties, and certainly has not at Hinkley Point C. The Highway Act 1980 protects existing highways from interference without 'lawful excuse' by persons other than the highway authority. Ordinarily, such interference is therefore authorised by a s278 agreement entered into by a developer wishing to carry out works to an existing highway or to create a new highway which will connect into an existing highway. The dedication of the new</p>

ExQ2

ExQ2	Question to:	Question:
		<p>highway would ordinarily be dealt with via a s38 agreement, again made under the Highways Act 1980. The position is slightly different with a DCO, in that a DCO provides the undertaker with statutory authority to carry out the authorised works (including works which interfere with an existing highway), and therefore the DCO itself in principle authorises the entry onto the highway without the need for a lawful excuse in the form of a s278 agreement. For this reason, however, DCOs generally provide an express power for the local highway authority and undertaker to enter into an agreement to s278/38 agreements (under art 21 in the case of the SZC dDCO). We have added a new sub-paragraph to article 21 (art 21(3)) which prevents SZC Co from carrying out any highway works without completing such an agreement with SCC. This therefore places SCC in exactly the same position with regard to their ability to control the terms on which a highway may be interfered with as they would have but for the statutory authority afforded by the DCO. SZC Co. consider this to be the simplest and most appropriate means of ensuring SCC has the necessary level of control over works affecting existing highways. For additional clarity, Rev 8 dDCO provides expressly that art 21 agreements may include such matters as might otherwise be included in a s278 or s38 agreement. We have invited SCC to offer further drafting to enhance article 21 should they wish to.</p> <p>(ii) SZC Co. are not currently discussing and are not aware of any Protective Provisions sought by SCC in addition to those referenced above.</p>
	Suffolk County Council Response at Deadline 7	<p>(i) SCC submitted draft protective provisions for the highway authority at D6 [REP6-050]. The Applicant is currently not minded to include those provisions in the dDCO. Discussions are ongoing between SCC and Applicant to see whether amendments to articles 20 (construction and maintenance of new and altered streets) and 21 (agreements with street authorities) could give SCC sufficient comfort so that SCC considers protective provisions are not necessary. In the meantime, SCC maintains its position that protective provisions are required.</p> <p>(ii) SCC is not seeking protective provisions for other topic areas.</p>
	SZC Co. Response at Deadline 8	<p>SCC has indicated in recent discussions that in principle they are close to being content with relying on article 21. SZC Co. believes that provided they can agree with SZC Co the</p>

ExQ2

ExQ2	Question to:	Question:
		level of fees payable under the Deed of obligation for highway design and supervision fees, they will be content to drop their request for protective provisions in the DCO.
	SCC Response at Deadline 8	(i) SCC accepts the alterations made by the applicant to article 21. Subject to this and satisfactory resolution of some minor issues relating to highway maintenance contained within the Deed of Obligation SCC is prepared to withdraw its proposal for protective powers as the highway authority.
	SZC Response at Deadline 10	No further response required by SZC Co.

ExQ2

ExQ2	Question to:	Question:
Cu.2 Cumulative impact		
Cu.2.0	The Applicant, SCC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The DL5 response by SCC to additional submissions from the Applicant comments on the response provided to ExQ1 TT.1.133 [REP5-172] states, in relation to the assessment of cumulative transport impacts, that the Applicant has been working with SCC to address its concerns on the environmental assessment of road traffic. Please indicate whether this work has been completed and whether the position in relation to cumulative traffic impact and any additional mitigation that would be required is now agreed?</p>
	SZC Co. Response at Deadline 7	<p>The updated cumulative transport environmental assessment has been provided within the Fourth ES Addendum (Doc Ref. 6.18) submitted at Deadline 7. The revised assessment addresses all of SCC's comments. The updated transport effects tables have been shared with SCC prior to Deadline 7 to inform the discussions on transport mitigation, which has now been agreed with SCC and is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)).</p>
	Suffolk County Council Response at Deadline 7	<p>The workstream is ongoing; the Applicant has worked with SCC to address our concerns; however, a revised version of the ES is under preparation by the Applicant, and we understand that this work is imminent, but will require review by SCC. For ease of reference, SCC will set out any areas of disagreement once we have a final submission of the ES; however we do not currently expect any areas of disagreement.</p>
	SZC Co. Response at Deadline 8	<p>Please see SZC Co.'s Deadline 8 response to ExQ2 TT.2.28 for a summary of the position.</p>
	SCC Response at Deadline 8	<p>The Environmental Statement workstream has been responded to separately in our response to [REP7-030].</p>
	SZC Response at Deadline 10	<p>Please see SZC Co.'s Deadline 10 response to ExQ2 TT.2.28.</p>
Cu.2.1	The Applicant, ESC	<p>Cumulative effects with other plans, projects and programmes</p> <p>The Applicant's comments on response to EXQ1 Cu.1.3 [REP3-046], indicates that discussions are ongoing with SCC, ESC and parish councils with a view to agreeing the proposed scheme of local improvements. Please indicate whether any agreement has been</p>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	<p>reached and set out the consideration given to the timeline of any works to avoid disruption on a haul route for both the Sizewell C Project and the EA1N and EA2 projects.</p> <p>The package of proposed transport improvements to be delivered by SZC Co. in addition to the works included in the DCO has now been agreed with ESC and SCC and is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)). It has been agreed that the following schemes are to be delivered by SZC Co.:</p> <ol style="list-style-type: none"> 1. Marlesford and Little Glemham – Pedestrian enhancements, formal pedestrian crossings, village gateways and speed limits 2. Yoxford – pedestrian crossing 3. B1125 Westleton and Walberswick – village gateways and pedestrian enhancements. 4. B1078 corridor – road safety improvements 5. B1122 early years - Village gateways at Theberton and Middleton Moor, pedestrian enhancements and formal pedestrian crossing in Theberton, road safety improvements. 6. B1122 corridor repurposing – Change in use of B1122 to local access road and cycle / pedestrian route as well as integration and promotion of Quiet Lane scheme. 7. Leiston town centre improvement scheme – environmental and safety mitigation 8. Wickham Market improvement scheme – environmental and safety mitigation <p>The delivery and timing of these schemes has been agreed with SCC and are proposed to be phased to minimise disruption to the highway network and local communities (refer to the draft Deed of Obligation (Doc Ref. 8.17(F) for details of phasing).</p> <p>In addition, a series of transport related contributions have been agreed with SCC and ESC and are set out in the draft Deed of Obligation (Doc Ref. 8.17(F)</p> <p>SZC Co. will continue the close engagement with both the EA1N and EA2 projects to ensure that there is close coordination for the delivery of works in particular where there are proposals for all projects in the same locations, such as at Theberton.</p>
	East Suffolk Council Response at Deadline 7	Discussions are ongoing with Marlesford and Little Glemham with SCC and the Applicant. SCC as local highway authority and the Applicant are best placed to advise on a likely timetable for agreement and whether any works may disrupt the haul route for both

ExQ2

ExQ2	Question to:	Question:
		<p>Sizewell C and East Anglia One North and East Anglia Two. As proposals are likely to include pedestrian crossings on the A12 (which will need assessment from a noise and air quality perspective) and the potential for traffic calming measures or wider footways could all result in disruption to the highway necessitating possible road closures, diversions or contraflows during construction. Impact on the main transport route for these nationally significant projects will need to be considered in scheduling the highway works.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>Further engagement has been undertaken with the relevant Parish Councils, SCC and ESC in order to confirm the agreed the proposed scheme of local improvements. The updated Deed of Obligation (Doc ref. 8.17(G)) provides the detail of the proposed schemes to be delivered.</p>
	<p>SCC Response at Deadline 8</p>	<p>The list of mitigation schemes has been agreed in principle. A number still require the submission of details to provide comfort to SCC that the proposed mitigation scheme is acceptable. These are the following:</p> <ol style="list-style-type: none"> 1 Marlesford and Little Glemham, 2 Yoxford Mitigation Schemes and 4. B1078 Road Safety Improvements: While plans are available they have yet to be appended to the Deed of Obligation. 3 B1125 Corridor, 5 B1122 Early Years and B1122 Repurposing. While principles have been discussed, the LHA has not seen any detailed proposals. 7. Leiston Town Centre Improvement and 8. Wickham Market Improvement Schemes. It is understood that the indicative scheme will be based on the details forming part of the ongoing consultations. <p>Although the method of delivery of these schemes has been agreed the timing has not. Not included within this list but forming part of the mitigation is the SZC Signage Strategy and associated implementation plans. The principles and approval process have been agreed with the Applicant but not the timing of the strategy or the implementation. The Applicant and SCC are in regular correspondence, and it is anticipated that agreement will be reached before the end of the examination.</p>
	<p>SZC Response at Deadline 10</p>	<p>The proposed mitigation schemes are listed in the Deed of Obligation (Doc Ref. 10.4) along with the design drawings that have been developed to date. The Deed of Obligation also sets out the process of engagement that will be ongoing between SZC</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Co. and representatives of the relevant Parish Councils, Suffolk County Council and East Suffolk Council. Formal Workings Groups will take forward the development of all schemes through to detailed design and implementation.</p> <p>The mitigation schemes set out in the Deed of Obligation will be delivered as early as possible within the Early Years of construction. The detailed implementation programme will be agreed with Suffolk County Council.</p>
<p>CG.2 Coastal Geomorphology</p>		
CG.2.0	The Applicant	<p>Impacts on coastal processes</p> <p>The submission of Bill Parker 'Tsunami geohazard – Lack of transparency on the precautions and mitigating actions for the proposed Sizewell C development' [REP2-228] submits that there is a quantifiable risk of a tsunami that the Applicant has not taken into account in the DCO application, and the level of risk is such that it makes the Sizewell C site too vulnerable to be built. The Applicant's response to ExQ1 Al.1.4 [REP2-100] indicates that it has considered Tsunami risk to help inform the design of the Sizewell C sea defences.</p> <p>(i) Please provide further details and explanation as to how the design of the sea defences would provide adequate safeguard against this risk?</p> <p>(ii) In relation to "Storrega-type" Tsunami events, the Applicant indicates that they have an estimated return period of 1 in 10,000 years. Please explain how the design of the sea defences would respond to this risk or has provision been omitted due to the anticipated infrequent occurrence?</p> <p>(iii) Has the potential for climate change to impact upon the frequency and severity of tsunamis been taken into account in the sea defence design?</p>
	SZC Co. Response at Deadline 7	<p>i) All external hazards, including those associated with coastal flooding (e.g. tsunami), are being treated as part of the Nuclear Safety Case (required under UK law) in line with the appropriate regulation, standards and relevant good practice including the Nuclear Site Licence Conditions (notably Licence Condition 14). The sea defences form part of the protection against coastal flooding. Their design includes consideration of the associated hazards such that they can be demonstrated as being able to provide the required level of protection in line with the ALARP (as low as reasonably practicable) principle.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>ii) In regard to the risk of tsunamis, a bespoke analysis carried out for the Sizewell site in order to characterise the hazard based using reports issued by DEFRA. A "Storegga²-type" event has been considered within this assessment. As per the response to i), the design of the sea defences includes consideration of all the appropriate hazards such that their design can be demonstrated to provide the required protection in line with the ALARP principle. As with all hazards, tsunami is considered within the safety demonstration and Nuclear Site Licence application.</p> <p>iii) The implications of the latest climate change science and understanding (UKCP18) is being considered on all hazards in line with regulator expectations (see ONR UKCP Position Statement).</p>
	Bill Parker Response at Deadline 8	<p>i) No useful explanation is provided by EDF / Cefas to your question and this response is inadequate.</p> <p>ii) No evidence is provided by EDF / Cefas to your question and this response is inadequate.</p> <p>iii) No evidence is provided by EDF / Cefas to your question and this response is inadequate. I note that within the ONR position statement Tsunami isn't mentioned and therefore whether reliance on this statement is relevant or sound.</p>
	SZC Co. Response at Deadline 10	No further response from Sizewell C. As detailed at Deadline 7, tsunami hazards are considered within the safety case assessment for the Nuclear Site Licence.
CG.2.6	ESC, MMO, EA, NE, RSPB, National Trust, Alde and Ore Association, Mr Bill Parker	<p>Impacts on coastal processes</p> <p>At DL5 the Applicant submitted a revised version of the CPMMP [REP5-059]. Please indicate whether there are any further concerns:</p> <p>(i) as regards the wording of that draft plan including in relation to the geographical extent of the proposed monitoring, the means of monitoring and future mitigation to maintain the shingle transport corridor and mitigation triggers? (ii) in relation to the funding of the monitoring and mitigation process by the Applicant and the duration for that to process and funding to be in place?</p>

² Storegga is located at the edge of Norway's continental shelf in the Norwegian Sea. In around 6200 BCE, structural failures of the shelf caused three underwater landslides, which triggered very large tsunamis in the North Atlantic Ocean.

ExQ2	Question to:	Question:
		<p>(iii) the means of securing and enforcing the CPMMP provisions?</p> <p>(iv) whether this now satisfactorily addresses the details sought of the proposed secondary mitigation in the event that the SCDF-supported sediment pathway across the site frontage is interrupted?</p> <p>(vi) whether any further changes/provisions are required to safeguard the Coralline Crag from avoidable unnatural deterioration?</p>
	SZC Co. Response at Deadline 7	<p>(i) – (iv) for named IPs SZC Co. has no comment.</p> <p>(vi) As shown in the assessments detailed in Volume 2, Appendix 20A of the ES [APP-312] and Section 2.15 of the ES Addendum [AS-181], the impacts on coastal geomorphology are localised and do not reach the Coralline Crag ridges at Thorpeness – that is, there is no pathway to impact. Section 1.3 of the Written Submissions Responding to Actions Arising from ISH6 [REP5-118] highlights that anthropogenic ocean acidification would not affect the integrity of the Coralline Crag across the life of the station.</p>
	East Suffolk Council Response at Deadline 7	<p>(i) ESC has provided detailed comments on the latest CPMMP to the Applicant at Deadline 6 [REP6-032]. The following items A) to C) are important issues taken from that feedback.</p> <p>A. The one-dimensional modelling of soft coastal defence feature report (TR544) [REP2-115] and the operational modelling of SCDF report (TR545) [REP3- 048] explore and advise the application of SCDF materials which are more erosion resistant than the natural beach sediment. This would logically lead to the SCDF retreating at a slower rate than the adjacent natural beaches, as well as reducing its sediment yield. Retreat of the natural beach would at some point overtake that of the more resilient SCDF. The resulting misalignment in the shoreline could have a similar impact as that of the HCDF, i.e. presenting a blockage to longshore sediment transport.</p> <p>We request that the rationale regarding the interference with longshore transport be amended to include the potential impacts of a misaligned shoreline; for example, to: Maintain a continuous shingle beach to avoid or minimise the impacts of an exposed HCDF and/or misalignment between the SCDF and the natural shoreline (blockage potentials) to longshore shingle transport and downdrift erosion.</p>

ExQ2	Question to:	Question:
		<p>Both the scope of monitoring and the setting of mitigation triggers will need to be reviewed and extended as necessary to meet any additional demands arising from the prospect of misaligned shorelines. Outside of the formal process, ESC has asked the Applicant to provide more substantiated details of the impacts of a misaligned shoreline (also known as recessed shores) on the natural longshore transport, being a precursor to the establishment of Triggers and appropriate mitigations.</p> <p>B. The CPMMP describes several data gathering/monitoring techniques, saying that the advantages of each of these methods and recommendations for their applications under the CPMMP remain under review, but will be finalised for approval prior to the commencement of construction of the HCDF/SCDF by ESC and the MMO following consultation with the MTF.</p> <p>ESC's concern is with timing; i.e. the methods should be in place and operating sufficiently in advance of construction in order to capture baseline conditions ahead of the coast being affected by the construction works.</p> <p>C. The CPMMP states: The mitigation is warranted because, if no intervention is undertaken, shoreline recession is likely to expose the HCDF within the timeframe of 2053 – 2087 (i.e., within the Sizewell C operational phase). Avoiding an exposed HCDF prevents dividing the otherwise continuous shingle beach in two and partially or fully blocking the longshore shingle transport corridor.</p> <p>ESC's concern is that the Applicant confines its scope of mitigation to a singular impact, that being exposure of the HCDF; whereas, and as alluded to elsewhere, there are other conditions that could jeopardise the continuity of longshore shingle transport.</p> <p>Confirmation from the Applicant is sought, that mitigation will be provided for all with-scheme related impacts on the natural sediment transport regime, be they due to adverse misalignment of the shoreline, exposure of the HCDF, or any other negative conditions thus arising (e.g. shore disturbance, should it be necessary to deepen the HCDF toe, at some point, or for adaptive design).</p> <p>(ii) It is understood that under the terms of the DCO the costs of administering and delivering all aspects of the monitoring and mitigation process will be paid for entirely by the Applicant. Also, that the monitoring and mitigation process will continue while the development has potential to cause significant negative effects on coastal processes, unless and until amended by a future Cessation study. Any recommendations to reduce the scope of or cease monitoring and mitigation will</p>

ExQ2	Question to:	Question:
		<p>require agreement of the Approval authorities. The only possible exception to this is in regards to the Thorpeness Village frontage where ESC has challenged the Applicant to include it in the baseline monitoring area. There may be a cost sharing agreement (ESC, the Applicant) created to deliver monitoring over this area. This is presently being explored by ESC for further discussion with the Applicant.</p> <p>(i) ESC is the joint Approving and Enforcing Authority for implementation of the CPMMP, along with the MMO. ESC's area of jurisdiction is to landward of the MHWS contour, which may move landward over time. ESC has powers to enforce provisions within the CPMMP that are required to protect ESC's interests. ESC is broadly satisfied with this arrangement.</p> <p>(ii) Secondary mitigation methods are described in principle in the CPMMP. A likely mitigation method would be beach recharge for instance. ESC fully appreciates that it is not possible to predict just when any of the given secondary mitigation methods may have to be deployed. However, ESC consider that further analysis needs to be carried out by the Applicant to better gauge the likely future demands, and broad-scale timing as to when secondary mitigation might come into play (Triggers). This concern is heightened by the recent one-dimensional modelling of soft coastal defence feature report (TR544) [REP2-115] and the operational modelling of SCDF report (TR545) [REP3- 048] which describe and advocate the application of erosion resistant properties to the SCDF; whilst providing longevity and economy to the SCDF, some measures have the potential to cause recessed shorelines within the natural beaches north and south. See also (i) a. and c. above.</p> <p>(v) n/a</p> <p>(vi) Section 2 of the CPMMP v2 (page 28 of 77) states: 'because of its important roles in defining the edge of the coastal sediment cell and bank stability SZC Co. proposes to extend the proposed five-yearly background environmental monitoring of Sizewell – Dunwich Bank (see Section 2.3) to include the Thorpeness Coralline Crag outcrops and ensure that any unexpected natural changes which may affect impact detection are identified.'</p> <p>Section 2.3 adds: 'A full sandbank and nearshore bathymetry survey would be conducted once every five years as part of the background monitoring.'</p>

ExQ2

ExQ2	Question to:	Question:
	<p>SZC Co. Response to ESC at Deadline 8</p>	<p>There is no mention of proposed mitigation if the Coralline Crag is found to be deteriorating, but ESC welcomes the inclusion of this important receptor in the monitoring schedule.</p> <p>(i) Response to ESC comment A.</p> <p>At Issue Specific Hearing 11 (Agenda Item 8: Coastal Processes Update (SZC Co.'s Written Summary of Oral Submissions at Issue Specific Hearing 11 (Doc Ref 9.100))), Dr Dolphin clarified that SZC Co. are comfortable with using the native particle size distribution and not to coarsen the SCDF. This is because modelling in BEEMS Technical Report TR545 [REP7-045] has shown the SCDF is viable for these sizes. This is now the default position of SZC Co. for the SCDF (such details to be approved pursuant to Requirement 12B of the draft DCO), however, Dr Dolphin also noted that there are trade-offs in using the native particle size distribution. Specifically, the advantages of coarsening particle size are that it decreases beach maintenance and mitigation activity and reduces disturbance. Also, by using coarser material (within the native size range), the (already low) risk of HCDF exposure is also decreased as larger particles are more difficult to erode.</p> <p>With respect to the suggestion that coarsening the SCDF sediment would result in misalignment, this concern is considered would be addressed anyway by recharge of the SCDF which would (within the limits that the sacrificial layer is permitted to erode) maintain the Sizewell C shoreline adjacent to the likely (future) naturally receding shorelines to the north and south. That is, the resulting difference in shoreline positions would primarily be the result of differences between maintained and naturally retreating shorelines.</p> <p>As this comment stems from concerns around SCDF particle size (that are now resolved by retaining the native size distribution), no further action is considered necessary. It should also be noted that differences in shoreline position due to SCDF maintenance and adjacent natural recession has been considered in BEEMS Technical Report TR545 [REP7-045], which shows that the SCDF would release sediment into the coastal system at a faster rate, but that the SCDF is still comfortably viable under these conditions.</p>

ExQ2	Question to:	Question:
		<p>Although not the focus of BEEMS Technical Report TR545 [REP7-045], the model results do demonstrate that gross (storm scale) longshore transport from SCDF erosion only results in small-scale deposition over a short distance (100 - 200 m to the north, in the case of a SE storm, for example), which is consistent with the evidence already provided on shingle transport (Section 2.3.4.2 of Volume 2, Appendix 20A of the ES [APP-312]). Nonetheless, SZC Co. has explained to ESC how the SCDF performance would be monitored, including assessment methods to check it is not disrupting longshore transport and, if it is, that the mitigation methods outlined in Section 7 of Volume 2, Appendix 20A of the ES [APP-312] would be utilised to avoid a net loss of sediment to downdrift shorelines (with such monitoring and mitigation described on Section 7 of the CPMMP [REP5-059] as secured through Requirement 7A of the draft DCO and Condition 17 of the DML).</p> <p>Response to ESC comment B.</p> <p>Baseline data continue to be collected each year and will do be each year until the CPMMP is implemented and that standard of data collection will be specified by way of target accuracies (which is in agreement with recent MMO requests). Method changes would only be deployed where emerging technologies improve monitoring data and following demonstration that they are reliable. These will not compromise standards and will be set out in the CPMMP submitted for approval pursuant to Requirement 7A of the draft DCO and Condition 17 of the DML as appropriate. For example, the use of Autonomous Survey Vessels (ASVs) has been considered because their shallow draft allows subtidal bathymetry to reach closer to the shoreline. However, such novel technologies would not be used if they were not practical (i.e., could not be reliably and safely deployed) and did not meet the required hydrographic survey standards. Given the length of the project, it is expected that proposals to change monitoring methods will occasionally arise as a result of technological advancements, and that these would be discussed with the MTF and require approval from the discharging authorities as part of the CPMMP before they could be implemented.</p> <p>Response to ESC comment C.</p>

ExQ2	Question to:	Question:
		<p>The concerns raised that avoidance of HCDF exposure is the only factor considered for disruption to longshore transport are incorrect. The modelling in BEEMS Technical Reports TR544 and TR545 [REP7-101 and REP7-045] also considers the potential for changes in shoreline angle due to SCDF maintenance and adjacent natural shoreline recession (i.e., a slight foreland and 'adverse misalignment' as termed by ESC), which could (assuming there were no commensurate changes in bar positions) affect the rate of longshore transport across the Sizewell C frontage. However, it is also important to note that the SCDF would erode more quickly and supply more sediment in the very situation where its presence might locally reduce longshore transport. As a result, the SCDF will counter-balance any effect it has on future longshore transport. The CPMMP [REP5-059] will monitor and detect if there is a deficit (i.e., the SCDF trapping more sediment than it releases). Should mitigation be deemed necessary from such monitoring then SZC Co is committed to deploying beach recycling, bypassing or recharge mitigation, as set out in Section 7 of Volume 2, Appendix 20A of the ES [APP-312].[APP-312] and described in Section 7.5 of the CPMMP [REP5-059]. The same mitigation methods would be used for any other disruptions to longshore transport caused by Sizewell C, such as any works required on the HCDF as suggested by ESC. As above, such monitoring and mitigation is secured by the CPMMP through Requirement 7A of the draft DCO and Condition 17 of the DML.</p> <p>(iii) Any amendments to the CPMMP would require approval by ESC and MMO as the discharging authorities under DCO Requirement 7A and DML Condition 17.</p> <p>SZC Co. has thoroughly examined the evidence and have been unable to identify any pathway to impact at Thorpeness. ESC has not supplied any evidence-based argument to counter this position, and therefore it is concluded that the proposed monitoring extent is appropriate and does not require modification. Furthermore, were impacts to manifest they would start close to the Sizewell C site and radiate outwards and the adaptive approach to monitoring set out in the CPMMP [REP5-059] (secured by Requirement 7A of the draft DCO and Condition 17 of the DML) provides for alteration of the monitoring extent should monitoring indicate that be required.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(iii) No further comment from SZC Co. required.</p> <p>(iv) BEEMS Technical Report TR544 [REP7-101] already sets out the broad scale timing for SCDF recharge. The triggers for mitigation will be set in the Deadline 10 submission of the CPMMP based on TR544, but these are likely to be revised in consultation with the Marine Technical Forum prior to construction and throughout the life of the station based on improvements in methods, the actual rate of sea level rise and the performance of the SCDF itself.</p> <p>The issue raised around particle-size as an erosion resistant property are now largely resolved as SZC Co. is comfortable with using the native size distribution and not coarsening the SCDF.</p> <p>(vi) The Coralline Crag at Thorpeness is intentionally not mentioned because SZC Co. has demonstrated there is no pathway to impact. Any deterioration to the Crag would not be as a result of SZC Co.'s activities, and therefore there is no requirement for monitoring and mitigation there. The Crag and the Bank, both of which change very slowly, are included in the proposed monitoring in the CPMMP [REP5-059] as they may alter natural coastal processes and therefore may lead to natural change. Therefore, monitoring the Crag and the Bank as part of the background monitoring may also aid in the distinction of natural change from SZC Co. impacts.</p>
	<p>Alde and Ore Association Response at Deadline 7</p>	<p>The revisions to the CPMMP have addressed only matters within the 3km vicinity of SZC. There is nothing to deal with the impact of the project on the longshore drift or other coastal changes which may impact on the adjacent Suffolk coastline despite the proven geomorphological history and ongoing sedimentation processes. Having a baseline relating to all potentially affected areas, notably in relation to longshore drift, and climate change factors impacting in the coast for the very minimum of the physical life of the construction, is necessary. The legal and funding framework is not clearly set out or obvious.</p>

ExQ2	Question to:	Question:
		<p>Detailed comments on CG.2.6 Impacts on coastal processes. Text in italics is ExQ's questions</p> <p>ExQ asks for indications whether there are any further concerns in relation to the revised CPMMP, REP5-059,</p> <ol style="list-style-type: none"> i. As regards the wording of that draft plan including in relation to the geographical extent of the proposed monitoring, the means of monitoring and future mitigation to maintain the shingle transport corridor and mitigation triggers? <p>Geographical extent: The Association remains concerned about the geographical extent of the proposed monitoring: it objects to the minimalist SCZ centred, isolationist approach. Table 1 states the maximum extent of monitoring will be 3km centred on SZC, that is Thorpe Ness headland to Minsmere Outfall- this is inadequate as the limitation does not recognise the Suffolk coastal sediment flow system and the interconnected nature of the evolution of the Suffolk coastline, on which much evidence has been submitted (including REP2-204, REP2-510 and several more). No response has been seen from the Applicant in relation to the knock-on effects along the coast.</p> <p>Means of monitoring and future mitigation to maintain the shingle transport corridor</p> <ol style="list-style-type: none"> a) Terms used in the CPMMP are not defined and need to be to ensure that the matters to be surveyed and on which data is to be collected are clearly understood and adequate baselines established. For example, in Table 1 Section 7 there needs to be a clear definition of 'beach survey', (does it just mean beach profile or include aspects such as pebble size and longshore drift), equally in Para 1.1.2 the broad term 'geomorphology receptors'/ 'geomorphic receptors' is used but there is nothing to indicate what is to be covered. At the least the CPMMP needs to state that the items to be monitored will be agreed jointly by the Applicant and the Marine Technical Forum. b) Para 1.1.2 on monitoring states that statutory authorities should only provide feedback "relevant to the project". The CPMMP has set a firm limit of a 3km area and so appears to exclude considering any other area however much it might be impacted by the project. On the basis of the current draft the Applicant would be able to argue that such data is not within the compass of the CPMMP and so is not relevant, so that mitigatory action would not be considered. There need to be provisions for the Applicant to make and to consider at regular intervals observations related to the wider stretch of the related coastline.

ExQ2	Question to:	Question:
		<p>c) The statutory authorities should have an equal role in deciding when data collection on any aspect can be run down or ceased, or needs to be increased, given their extensive expertise and awareness of the characteristics of the coast which they manage in various ways.</p> <p>d) Para 1.1.4 states that "... monitoring the separate elements of the geomorphology receptor for impacts will capture both the potentially significant and the anticipated insignificant impacts". How can this be correct for the Suffolk coast that might be affected by the project if the monitoring and mitigation only extend to a 3km stretch? Further, Chapter 9 states that 'mitigation for coastal geomorphology is only proposed with respect to two potential interruptions to continuous longshore transport' for the HCDF and BLF. This indicates there is no intention to take account of wider coastal impacts of the proposed construction.</p> <p>e) The plan should be based on scenarios/modelling, including sea level rise and climate change features including more violent storms and surges, going beyond 2110 (see Table 3 in para 7.1 sets that limit). Such calculations are needed until at least 2190 when the plant may be taken away and that is only provided that means of removing the nuclear waste off the site have been found.</p> <p>f) The plan for mitigation is by using shingle using recycling, bypassing or recharging. This recognises that shingle moves, albeit much more slowly than sand, but recycling and bypassing would keep the shingle within the Bay and prevent it from continuing its normal role of the long term drift southwards and so would impact on the adjoining coastline. Thus, the monitoring and mitigation to maintain the shingle corridor is too narrowly construed being applied only to a 3km length despite the fact that the shingle corridor runs all along the Suffolk coast.</p> <p>Mitigation triggers</p> <p>a) The second aim stated in the CPMMP Executive Summary is to 'maintain the longshore shingle transport corridor, thereby minimising or avoiding impacts of an exposed hard coastal defence feature (HCDF). Para 7.5 also states that "The aim of the proposed mitigation is to maintain the longshore shingle transport corridor." Since the monitoring is proposed to centre on SZC and is for a 3 km zone only, the CPMMP, as designed, cannot achieve that aim of maintaining the longshore transport corridor of the coastline within which SZC would sit.</p>

ExQ2	Question to:	Question:
		<p>b) As currently proposed, the CPMMP contains no monitoring to trigger mitigation along affected adjacent coasts. This is not acceptable.</p> <p>ii. <i>In relation to the funding of the monitoring and mitigation process by the Applicant and the duration for that to process and funding to be in place?</i> There is very little said about funding in this document but by implication in wording on costs it appears that the Applicant would carry the cost of monitoring. There is little here on the provision of a full legal and funding framework which means that the document is still work in progress and not complete.</p> <p>iii. <i>The means of securing and enforcing the CPMMP provisions?</i> REP5- 059 states that the Sizewell Marine Technical Forum is to facilitate open and transparent dialogue with the statutory environment authorities (these are not actually listed but should be). It is only about dialogue to inform SZC action. Whilst the role of discharging authorities is recognised, this appears to be a passive one and it would appear to give no authority to the statutory authorities should they consider action is required (para 1.1.1)</p> <p>iv. <i>Whether this now satisfactorily addresses the details sought of the proposed secondary mitigation in the event that the SCDF-supported sediment pathway across the site frontage is interrupted?</i> Para 7.1 clearly shows that it is known that the HCDF will disrupt longshore shingle transport as it could become exposed after 2053) quote." Avoiding an exposed HCDF prevents dividing the otherwise continuous shingle beach in two and partially or fully blocking the longshore shingle transport corridor. Were such a condition to persist, shingle starvation and erosion on either side of the exposed HCDF would be expected" but the mitigation proposed relate only to the frontage formed by the SCDF. There is nothing in the CPMMP which addresses impacts of changes in the sediment pathway caused by the SCDF or HCDF other than within the 3km Greater Sizewell Bay area. Further, in Chapter 10 it is made clear that any mitigation will only address the Greater Sizewell Bay, its geomorphic elements, coastal processes and transport rates and pathways. This does nothing for other parts of the coast which are likely to be affected by disruptions in the natural sediment pathway along the entire Suffolk coast whether Thorpeness village to the unique Orfordness further south. The changes do not begin to address the need to consider mitigation for coastal areas which could be affected by the massive intrusion in sediment pathways by the</p>

ExQ2	Question to:	Question:
		<p>protruding HCDF. This should be preferably as far south as Shingle Street to safeguard the unique shingle shoreline and composition of Orford Ness.</p> <p>v. <i>No question printed</i></p> <p>vi. <i>Whether any further changes/provisions are required to safeguard the Coralline Crag from avoidable unnatural deterioration?</i></p> <p>Any drilling into the Coralline Crag is likely to increase its vulnerability to erosion. The latest plans for the desalination plant simply add to the amount that needs to be done already.</p>
	<p>SZC Co. Response to the Alde & Ore Association at Deadline 8</p>	<p>(i)</p> <p>(a) - (f). The Alde and Ore Association suggest that matters affecting longshore transport and coastal change have not been taken account by the CPMMP [REP5-059]. This is not correct. The CPMMP does explicitly consider all Sizewell C impacts, including those acting on longshore transport and coastal change. Sizewell C's impacts are predicted to be very localised, well-monitored, and mitigated in the case of HCDF potential to disrupt longshore transport. The approach set out in the CPMMP is adaptive and the monitoring extents are able to expand if impacts extend beyond their predicted footprint. The evidence for impacts does not support the need for wider regional monitoring by SZC Co. - it is worth noting that the East Anglian Monitoring Programme does already collect such data.</p> <p>Regarding monitoring/survey methods - SZC Co. uses the best methods available to monitor the coastal environment. The extents are well defined in the CPMMP [REP5-059] and these require final approval by the discharging authorities (the Marine Management Organisation and East Suffolk Council), in discussion with the MTF.</p> <p>Regular reporting set out in Section 9 of the CPMMP will be examined by the MTF and will include assessment of impacts and the ongoing suitability of monitoring extents.</p> <p>The monitoring proposed in the CPMMP [REP5-059] will run until the end of the Decommissioning Phase (2140) unless otherwise agreed as a result of changes set out in the SZC Monitoring and Mitigation Cessation Plan, which itself must first be approved by the discharging authorities.</p>

ExQ2	Question to:	Question:
		<p>The sediment transport studies (modelling and measurements) show that the pebble-sized material (the non-sand component of shingle) is confined to above low tide (approximately) and the sub-bay between Minsmere Sluice and the Thorpeness headland. It does not move further south as implied (although limited volumes of sand do). Furthermore, any sediment moved using beach recycling or bypassing would be sediment that has been trapped and prevented from following its natural transport. That is, it would restore, not disrupt, natural transport.</p> <p>Mitigation triggers</p> <p>SZC Co. is required to avoid or minimise the impacts resulting from the Sizewell C Project, which is why it is appropriate the monitoring and mitigation activities are centred on Sizewell C with a suitable extent to ensure they do not extend beyond the monitored area – this is what the proposed monitoring in the CPMMP [REP5-059] does. SZC Co. is not responsible for monitoring or mitigating natural changes along the Suffolk Coast.</p> <p>ii. The CPMMP is secured by DCO Requirement 7A and DML Condition 17. Pursuant to these provisions, SZC Co. is obliged to implement the CPMMP as approved, which places an absolute obligation on SZC Co. to carry out such monitoring and mitigation as is required by the CPMMP and so, by consequence, to ensure it has sufficient funds to do so. This would be necessary to ensure compliance with the DCO and so avoid the criminal sanction that would exist were it unable to meet its obligations. SZC Co. does not consider any provision in relation to funding is necessary on this basis.</p> <p>iii. As stated, the MTF is established to facilitate open and transparent dialogue with the statutory environment authorities, particularly in relation to consultation on information required pursuant to Requirements of the DCO or Conditions of the DML and discussion of monitoring reports. Should the statutory authorities have any concerns from those discussions they can be raised and discussed at the MTF and should those concerns remain make representations to the relevant discharging and enforcing authority for the CPMMP (i.e. ESC and/or MMO).</p>

ExQ2	Question to:	Question:
		<p>iv. It is incorrect to say that only the Sizewell C frontage is monitored. Terrestrial remote sensing methods will cover 3 km of coast and field surveys will include the sub-bay from Minsmere Sluice to the Thorpeness Headland (see Table 1 of the CPMMP [REP5-059]). As stated above in this reply, the impacts do not extend to the areas listed, which are south of Thorpeness.</p> <p>vi. There is no pathway to impact for the Coralline Crag at Thorpeness, nor is there any drilling planned. The aspects of the desalination plant that affect coastal processes are two small outfall heads, which would not affect beach shingle in any way and would not affect the supply of subtidal sand to the south. As Sizewell C does not impact the Coralline Crag, which an important feature for headland stability and local beach behaviour, it would not affect the vulnerability to erosion at Thorpeness.</p>
	National Trust Response at Deadline 7	<p>We remain concerned about uncertainty contained in assessments and so do not believe the assertion within the Executive Summary of the CPMMP that the scope of the plan covers 'any potential significant effects on coastal geomorphic features (receptors)'. We believe it is necessary to extend the geographical extent of monitoring to address uncertainty and that means monitoring from the start of the development through to the end of decommissioning of the site. We are of the opinion that both monitoring of the bathymetry and beach should extend to the National Trust shoreline and adjacent sub tidal area (incorporating sedimentary bars).</p> <p>The reference in the CPMMP to the maintenance of the shingle transport corridor along the SZC frontage appears to remain a limited definition related to the intertidal beach processes only. It does not appear to reflect the potential impacts to bar system from dredging, interaction to structures, or interaction to vessel movements or indeed (in addition) linkage to sediment transport directions which might be altered by changes to the morphology of the upper beach and foreshore particularly as this develops over time and in the longer term. We consider this could be adequately mitigated by extending the monitoring to include the National Trust frontage and this would address our concerns regarding the uncertainty of assessments and a low relations ips to changes to geomorphology identified above to be considered both in the wider context of the Greater Sizewell Bay. It would also be helpful to maintain records that can assist in determining (if such uncertain outcomes arise), how they behave and influence the long-term coastal geomorphology. The NT feel this could be achieved by the applicant agreeing to carry out a bathymetric</p>

ExQ2

ExQ2	Question to:	Question:
		<p>survey and drone survey of the beach and cliff along the frontage of our land ownership every 5 years, with this commitment being set out in the Coastal Processes Monitoring and Mitigation Plan. This would provide an ongoing set of information showing the reality of any change and allay our concerns about uncertainty.</p> <p>We remain concerned about assessments made of long-term changes to coastal geomorphology and many of those matters have been deferred again until deadline 7, when yet further information will be issued out in a piece-meal fashion. We note that several of the sub-questions under this item are dependent upon knowledge of information to be included in these future submissions by the applicant and/or are more relevant to other interested parties. As such we will provide our views on these matters at future deadlines if appropriate.</p>
	<p>SZC Co. Response to the National Trust at Deadline 8</p>	<p>The monitoring proposed in the CPMMP [REP5-059] already applies to the life of the station (i.e., until the end of the Decommissioning Phase (2140)). Regarding monitoring extents, the CPMMP envelopes the predicted extents of marine and coastal activities and structures and adds a large buffer to account for uncertainty. The monitoring extents are appropriate to the impact footprints and the effects to coastal geomorphic receptors, and do not extend north of the Minsmere Sluice. The regulatory stakeholders of the Marine Technical Forum agree with the CPMMP extents (ESC Statement of Common Ground (Doc. Ref. 9.10.12(A) and MMO Statement of Common Ground (to be submitted at Deadline 9). See also, for example, the comments from the Environment Agency on point (i) of ExQ2 CG.2.6 (below). As the monitoring and approach proposed in the CPMMP is adaptive, it would be expanded in the unlikely event that any monitoring extents prove insufficient to capture the observed impacts.</p> <p>It is not correct that "potential impacts to bar system from dredging, interaction to structures, or interaction to vessel movements " or linkages between the subtidal and subaerial (above low tide) beach have not been considered in the CPMMP - these activities/structures and areas are all considered in the CPMMP.</p>
	<p>Environment Agency Response at Deadline 7</p>	<p>(i) The sediment sub-cell for this area stretches from the Blyth Estuary harbour training arm through to the Thorpeness sedimentary feature. A further sub-cell can be considered to occur between Minsmere sluice and outfall and the Thorpeness sedimentary feature. For the purposes of the HCDF/SCDF coastal monitoring the Minsmere sluice to Thorpeness spatial extent seems appropriate.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) No comment</p> <p>(iii) The Marine Management Organisation and East Suffolk Council need to be satisfied with any enforcement provisions, and we support both organisations in this matter.</p> <p>(iv) We are satisfied.</p> <p>(vi) The EA supports the intention outlined in Section 2 of the CPMMP v.2 to extend monitoring of the Sizewell – Dunwich Bank and nearshore bathymetry to include the Coralline Crag outcrop at Thorpeness so that any changes (whether natural or artificial) may be identified and mitigation discussed with the MTF as required.</p>
	SZC Co. Response to the Environment Agency at Deadline 8	No further response from SZC Co. required.
	Natural England Response at Deadline 7	<p>Natural England are unable to answer this question at this deadline due to specialist resource constraints.</p> <p>We request that the ExA defer our input to Part 3 of Examiner’s questions, when we will aim to provide a response by Deadline 8.</p>
	SZC Co. Response to Natural England at Deadline 8	No further response from SZC Co. required.
	Royal Society for the Protection of Birds (RSPB) and Suffolk Wildlife Trust Response at Deadline 7	<p>As per our Written Representation, Deadline 3 submission and our transcript of our oral contributions to ISH6, submitted at Deadline 5, the RSPB/SWT’s key concern remains that the vegetated shingle that is currently present along that southern Minsmere frontage, which is an internationally important feature, part of the Special Area of Conservation (SAC) and Ramsar site, does not appear to have been acknowledged by the CPMMP.</p> <p>We welcome the response by the Applicant [REP6-024], which confirms the Applicant understands and accepts the RSPB/SWT’s explanation of the presence of annual vegetation of drift lines and perennial vegetation of stony banks habitats along the southern Minsmere frontage. However, this recognition is not enough to overcome our concerns.</p> <p>We also note that recognition needs to be included within the CPMMP76 which continues to state</p>

ExQ2	Question to:	Question:
		<p><i>"Supra-tidal shingle was also previously recorded on the Minsmere to Walberswick Heaths and Marshes SAC frontage but was destroyed a decade or so ago (between 2010 and 2011) by natural coastal erosion."</i></p> <p>We have covered our concerns our Deadline 6 submissions and the conclusion that we do not believe sufficient detail has been presented to understand the mitigation approach in respect of the Minsmere - Walberswick designated sites. We note that the Applicant has sought to address these concerns [REP6-024], with a response that confirms that there will be an impact on natural processes but that these could be beneficial. We agree this could be the case, but believe there should be acknowledgement that the impact on natural processes has the potential to be adverse on the dynamic shingle interest feature and it is not clear how this would be addressed and managed with appropriate mitigation should it arise. Without this in place we cannot address whether the proposed mitigation strategy or the associated funding model is viable nor effective.</p>
	<p>SZC Co. Response to the RSPB & Suffolk Wildlife Trust at Deadline 8</p>	<p>The CPMMP has not been updated since SZC Co.'s review of the RSPB submissions and our REP6-024 response. SZC Co. will update Section 8 of the CPMMP accordingly as part of the Deadline 10 submission of the CPMMP.</p> <p>SZC Co. has examined the evidence regarding the SCDF and, following feedback from Interested Parties and Regulators, has agreed to the default position of retaining the native particle size distribution for the SCDF and not coarsening the sediment – see SZC Co.'s Written Summary of Oral Submissions at Issue Specific Hearing 11 (Doc Ref 9.100) regarding Agenda Item 8: Coastal Processes Update. This means that sediment released from the SCDF would be the same particle size as the native sediments. As the sediment available to be transported during storms would be the same, there would be no adverse effect to drift line vegetation – some small scale sediment deposition (patches 10-20 cm thick over 100-200 m) could over time widen the supra-tidal zone on the naturally retreating coast, which may increase in extent. As the SCDF would not affect the waves and tides acting on the Minsmere frontage, the levels of disturbance that the drift line vegetation experiences and requires would not change. Therefore, the evidence does not support an adverse impact on the already dynamic shingle interest feature. However, SZC Co. will annually monitor the presence and distribution of drift line vegetation for re-assurance in the first decade of SCDF operation.</p>

ExQ2

ExQ2	Question to:	Question:
	MMO Response at Deadline 7	The MMO are currently undertaking a technical review of this assessment and will aim to provide comments on it at Deadline 8.
	SZC Co. Response to the MMO at Deadline 8	No further response from SZC Co. required.
	Bill Parker Response at Deadline 8	vi) This question was not asked of EDF / Cefas however they responded anyway. No scientific evidence is provided by EDF / Cefas to back up the assertion that anthropogenic acidification would not impact on Crag, again the response is inadequate.
	SZC Co. Response at Deadline 10	As stated during Issue Specific Hearing 6 [REP5-111] paragraph 1.4.16, no change is expected in the resilience of the Crag to mechanical damage over the site lifetime. Furthermore, there is no pathway to impact on the Thorpeness Coralline Crag ridges from any Sizewell C activities. As noted in [REP7-060] 7.14.9 "SZC Co. addressed the resistance of the Crag to ocean acidification due to climate change (Written Submissions Responding to Actions Arising from ISH6)" [REP5-118] – evidence is presented with reference to the MCCiP Science Review in paragraphs 1.3.1 to 1.3.7.
CG.2.10	The Applicant, EA	<p>Impacts on coastal processes</p> <p>The DL5 comments of Nick Scarr on the oral submissions made at ISH6 [REP5-253,254], refers to the suggestion by the Applicant and the EA that they have modelling with 'offshore wave patterns propagated inshore'.</p> <p>(i) Please provide clarification as to whether additional modelling with the Sizewell-Dunwich banks removed for all Flood Risk Assessment epochs and shoreline change modelling is available and/or whether that reference was in fact to the latest beach erosion assessment work in TR545 which uses wave data from a buoy offshore of the SD banks?</p> <p>(ii) If that is the case, please explain why that makes TR545 suitably precautionary including in relation to fluctuations in bank crest elevation for the duration of project?</p> <p>(iii) Please also explain how the CPMMP would, in any case, provide the mechanism to pick up fluctuations in bank topography and the consequential impacts of such a change?</p>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	<p>(i) For clarification, no additional modelling has been undertaken for the Flood Risk Assessment. As discussed in Section 5.3 of Appendix A of the Coastal Modelling Report (Appendix 1 of the MDS FRA [APP-094]), the assessment concluded that the Baseline scenario, i.e. with the Sizewell - Dunwich bank in situ, resulted in more conservative (i.e. worst case) nearshore wave conditions than with their removal. As such, the scenario with the bank in place was adopted in the MDS FRA for all scenarios and epochs as a conservative approach. The latest assessment, summarised in BEEMS Technical Report TR545 [REP3-048], was undertaken to consider beach erosion and viability of the soft coastal defence feature in relation to a specific event, i.e. the Beast from the East storm, and therefore has separate objectives from the MDS FRA.</p> <p>(ii) There is no evidence or mechanism to suggest that the bank would be lost over the life of the station (or indeed over much longer time scales). The assessment of beach erosion and viability of the soft coastal defence feature is summarised in the BEEMS Technical Report TR545 [REP3-048], which focuses on the Beast from the East storm and does not account for the presence of the Sizewell – Dunwich Bank. The offshore model boundary is inshore of the Sizewell-Dunwich bank meaning any variation in bank morphology does not influence the model results, however, wave conditions recorded by the Sizewell Waverider offshore of the bank are still applied to the model boundary. As such this is considered to be a conservative approach in relation to the feasibility of the soft coastal defence feature.</p> <p>(iii) The CPMMP [REP5-059] includes proposed bathymetric surveys of the Sizewell – Dunwich Bank every 5 years. As the bank is very large and changes slowly, this interval is considered sufficient to track the long-term change of the bank. The Virtual Inshore Wave Buoy (X-band radar) and regular topographic beach surveys will also register changes to inshore storm wave climatology and beach topography/volumes.</p>
	Environment Agency Response at Deadline 7	<p>(i) We were referring to the work reported in BEEMS TR545.</p> <p>(ii) The modelling in TR545 uses wave data from the Sizewell waverider buoy which is located offshore of the Sizewell Dunwich banks, and applies this directly into the model domain inshore of the banks. It therefore discounts the influence of the banks in reducing wave height, resulting in a precautionary assessment (since wave height, period, energy etc. in the model is therefore likely to be greater than it would in reality given the controlling influence of the banks on the inshore zone across the Greater Sizewell Bay).</p>

ExQ2

ExQ2	Question to:	Question:
		(iii) CPMMP proposes bathymetric surveys of Dunwich- Sizewell bank every 5 years, this appears to be an appropriate frequency. Additionally, the monitoring of various other parameters are in our view sufficient to capture the indirect impacts of changes in bank morphology such as wave height and beach erosion trends, and it would then be the role of the MTF to consider this data and any implications in conjunction with the applicant.
	SZC Co. Response at Deadline 8	No further response from SZC Co. required.
	Nick Scarr Response at Deadline 8	See REP8-248 .
	SZC Co. Response at Deadline 10	<p>1. In response to Item 1.1 set out in Mr Scarr’s Deadline 8 submission [REP8-248], SZC Co.’s position remains as previously stated in CG.2.10 at Deadline 7 (above) – “As discussed in Section 5.3 of Appendix A of the Coastal Modelling Report (Appendix 1 of the MDS FRA [APP-094]), the assessment concluded that the Baseline scenario, i.e. with the Sizewell - Dunwich bank in situ, resulted in more conservative (i.e. worst case) nearshore wave conditions than with their removal.” SZC Co. notes that the assessment undertaken for the MDS FRA does not assume that the Sizewell – Dunwich bank will remain in place over the life-time of the development. Instead SZC Co. has tested a number of scenarios with regard to whether the bank is in place (fully or partially) or no longer <i>in situ</i>, for both the present day and future scenarios (i.e. beyond operational life-time) to determine which would result in the worst-case impact in terms of flood risk to the Project. Based on the outcomes of this wave modelling exercise it was determined that the scenario, i.e. with the Sizewell - Dunwich bank in situ, resulted in more conservative (i.e. worst case) nearshore wave conditions than with their removal and therefore would pose the greatest flood risk to the Project. As the Environment Agency noted above at D7, the approach taken by SZC Co. <i>‘therefore discounts the influence of the banks in reducing wave height, resulting in a precautionary assessment (since wave height, period, energy etc. in the model is therefore likely to be greater than it would in reality given the controlling influence of the banks on the inshore zone across the Greater Sizewell Bay)’</i>.</p> <p>As also previously stated, this finding was based on comprehensive coastal modelling (coastal geomorphology and wave transformation etc.), rather than the intuitive expectation expressed in REP8-248. Furthermore, the modelling</p>

ExQ2	Question to:	Question:
		<p>undertaken to inform the MDS FRA has been underpinned by an evidence based assessment. SZC Co. has engaged with the Environment Agency, as the Regulator, via an iterative approach throughout. During this process, the Environment Agency has consistently undertaken a rigorous peer review of the MDS FRA and its supporting modelling.</p> <p>In response to Item 1.2 set out in Mr Scarr’s Deadline 8 submission [REP8-248], SZC Co.’s position remain as previously stated in CG.2.10 at Deadline 7 (above) – “The latest assessment, summarised in BEEMS Technical Report TR545 [REP3-048], was undertaken to consider beach erosion and viability of the soft coastal defence feature in relation to a specific event, i.e. the Beast from the East storm, and therefore has separate objectives from the MDS FRA.” SZC Co. would like to reiterate that the modelling undertaken for these two assessments (i.e. FRA and TR545) are not, as Mr Scarr notes “...<i>mutually incompatible in their claims</i>.” The modelling undertaken by SZC Co. for each of these assessments has separate purposes, requiring the application of different modelling approaches and therefore they are not directly comparable.</p> <ol style="list-style-type: none"> 2. SZC Co. response remains as previously stated – “There is no evidence or mechanism to suggest that the bank would be lost over the life of the station (or indeed over much longer time scales)”, but nevertheless the assessment of beach erosion and viability of the soft coastal defence feature (as summarised in the BEEMS Technical Report TR545 [REP9-020]) is modelled applying offshore wave conditions inshore of the bank and so effectively removes any influence of the bank from the results. 3. Bank bathymetry is discussed in Volume 2, Appendix 20A of the ES [APP-312], with reference to three detailed BEEMS reports compiled over a decade. These reports have sought to continually update the assessment of bank bathymetry data. 4. SZC Co.’s response remains as previously outlined: “The remit of the EGA was to review the potential for future shoreline change that would lead to exposure of the HCDF without secondary mitigation (beach maintenance)”. It was determined that exposure would occur without significant change within a medium-term window – there was, therefore, no need to speculate on any more extreme conditions or the longer term. Subsequent work (BEEMS Technical Reports TR544 and TR545 [REP7-

ExQ2

ExQ2	Question to:	Question:
		<p>101 and REP9-020) have addressed the performance of the proposed mitigation measures under these more extreme conditions.</p> <ol style="list-style-type: none"> 5. No further response is required – see replies to 1 and 2 above. 6. Consideration of the banks and bank degradation has been addressed in Comments at Deadline 7 on Submissions from Earlier Deadlines and Subsequent Written Submissions to ISH1-ISH6 – Appendix B [REP7-060] – paragraph 7.1.7 is of particular relevance. 7. SZC Co.’s position with respect to FRA modelling is covered in response (1) above. The suitability of the modelling conducted in BEEMS Technical Report TR545 is supported by the submissions of Regulators (the Environment Agency, East Suffolk Council) [REP8-156, REP8-159]. <p>Part 2 of REP8-248 considers the erosion period 1736-1836. The IP restates again their concern over the potential for complete disappearance from the coastal system of the sediment comprising the bank system, stating that the loss of Dunwich Bank would cause accelerated erosion of the Sizewell-Minsmere foreshore, not Dunwich cliffs. SZC Co. maintains its position that the very different geomorphic context of the coastline in 1736-1836 makes it less relevant to evolution from the present day than its behaviour in more recent periods and that there is presently no evidence that the sediments of the bank system are disappearing – indeed, evidence suggests that the Dunwich Bank material is moving landward, toward rather than away from the coastal system [APP-312].</p>
CG.2.11	The Applicant	<p>Impacts on coastal processes</p> <p>The DL5 comments of Nick Scarr on the oral submissions made at ISH6 [REP5-253,254], raises a number of issues including in relation to the Expert Geomorphological Assessment (EGA).</p> <ol style="list-style-type: none"> (i) Please indicate whether a new EGA should be conducted in respect of the latest data and modelling and, if not, why not? (ii) Please indicate how (giving paragraph references) the submitted FRA and EGA have considered any change or degradation of the Sizewell-Dunwich banks over the lifetime of the Sizewell C project?

ExQ2	Question to:	Question:
		<p>(iii) Please explain the variation in the assessment of the importance of the Sizewell-Dunwich banks to Sizewell shoreline stability pre DCO, in the DCO application and post DCO?</p> <p>(iv) Please respond to the criticism that changes or degradation of the Sizewell-Dunwich banks would have the consequence of placing the exposed landward side of the main nuclear platform at increase flood risk and the northern defences could be vulnerable.</p>
	SZC Co. Response at Deadline 7	<p>(i) The remit of the EGA was to review the potential for future shoreline change that would lead to exposure of the HCDF without secondary mitigation (beach maintenance). BEEMS Technical Report TR403 (summarised in Volume 2 Appendix 20A of the ES [APP-312]) reports the EGA exercise and identified a window (2053-2087) when it was most likely that the initially terrestrial HCDF would be exposed to marine conditions <u>without mitigation</u> (to prevent such an outcome). The EGA identified that HCDF exposure without mitigation was likely to occur under conditions similar to those currently experienced at the site. BEEMS Technical Report TR403 also identified that uncertainty in the projection of future environmental parameters affecting geomorphic change becomes too great at around this same time for any attempt to project shoreline change any further into the future to be plausible i.e., present conditions are unlikely to hold beyond this window. Having determined that mitigation was required, this work was completed and does not need to be repeated, as the latest modelling and data (BEEMS Technical Reports TR544 and TR545 [REP3-032 and REP3-048]) addresses the performance of the mitigation measures.</p> <p>(ii) FRA: As noted in the response to CG.2.10, SZC Co. has undertaken an assessment of the impact of the removal of the Sizewell-Dunwich banks on nearshore wave conditions and subsequently the risk of overtopping of the coastal defences. This is discussed in Section 5.3 of Appendix A of the Coastal Modelling Report (Appendix 1 of the MDS FRA [APP-094]). This assessment concluded that the Baseline scenario with the Sizewell – Dunwich bank in place resulted in more conservative (worst case) nearshore wave conditions than with its removal. As such, the scenario with the bank in place was adopted in the MDS FRA for the assessment of overtopping risk to the coastal defences throughout the development lifetime.</p> <p>EGA: The potential nearshore effects of bank change was considered by the EGA and in BEEMS Technical Report TR403 (and synthesized into Volume 2, Appendix 20A of the</p>

ExQ2	Question to:	Question:
		<p>ES [APP-312]. The EGA did not consider the degradation of the banks over the project lifetime because the scope of the work was limited to defining only the period prior to mitigation being required (and degradation of the banks could not occur within that timeframe).</p> <p>(iii) SZC Co. has always considered that the Sizewell – Dunwich Bank plays a role in reducing the inshore wave energy. This was demonstrated in various BEEMS reports (also synthesized in Volume 2, Appendix 20A of the ES [APP-312]) on the historical bank variability and in wave modelling. They show that wave energy dissipation is important for larger storms. However, SZC Co.’s view of the linkage between the bank and shoreline response has become more nuanced as data collection and modelling has increased for several reasons:</p> <ul style="list-style-type: none"> • The banks crest varies in elevation by over 4 m, which means that some sections will have little effect on waves, even during severe storms. • As the bank is far from shore (around one kilometre) wave refraction and diffraction processes even-out the wave energy, spreading it more evening along the shore • Closer to the DCO application, and in particular during the EGA, it became clear that the shoreline behaviour is incoherent and shows no clear linkage to the form of the bank. <p>Despite these complexities, the uncertainty around the bank and its role in shoreline change is accounted for by excluding it from the BEEMS Technical Report TR545 ‘Beast from the East’ storm modelling [REP3-048] (by virtue of the model boundary being inshore of the bank but with wave conditions offshore of the bank applied to the boundary), to obtain worst-case storm erosion rates.</p> <p>(iv) Degradation of the Sizewell-Dunwich banks would not have an impact on extreme still water levels and therefore would not increase the risk of inundation to the landward side of the main development platform. Wave overtopping of the existing coastal defences and further wave propagation behind the existing Sizewell A and Sizewell B stations would result in wave energy dissipation, and the wave action at the landward side of the main development platform would therefore not be significant. As discussed in point (ii), the impact of the degradation of the offshore sand banks on the nearshore wave conditions and overtopping of coastal defences has been considered as part of the Coastal Modelling</p>

ExQ2	Question to:	Question:
		<p>Report (Appendix 1 of the MDS FRA [APP-094]) showing that degradation of the banks would not increase the wave height nearshore, south of the Sizewell C frontage.</p> <p>On that basis, SZC Co. concludes that degradation of the Sizewell-Dunwich banks would not increase flood risk to the proposed development.</p>
	<p>Nick Scarr Response at Deadline 8</p>	<ul style="list-style-type: none"> i) The Applicant's shoreline change exercise ends in 2070, the plant's lifetime to spent fuel removal being 2160 or beyond. The EGA assumes the permanence and protection of the offshore wave relief geomorphology and therefore, in my view represents a low erosive, non-conservative, non-precautionary modelling exercise over less than half the plant's considered lifetime. For TR545 discussion see my paper REP7-220. ii) See point 1 on pages 1 and 2 above. The suggestion that 'degradation of the banks could not occur within the stated timeframe' is speculation. The Sizewell Dunwich banks can change year-on-year with major change possible in decadal timescales. The Applicant states in BEEMS TR311 (page 155) that "Dunwich Bank has been highly variable in its elevation and extent over decadal time periods". Also see point 2 on pages 2-3 above. iii) The Applicant states that during the DCO application it 'became clear' that the shoreline behaviour shows no 'clear linkage to the form of the bank'. This represents a somewhat precipitate change in assessment that, in my view, lacks credible consideration. Were we, however, to accept the Applicant's recent change in assessment that the shoreline behaviour is 'incoherent' then would this not represent an untenable risk scenario? The Applicant's claim that TR545 modelling satisfies the 'uncertainty around the bank and its role in shoreline change' by 'by virtue of the model boundary being inshore of the bank but with wave conditions offshore of the bank applied to the boundary' is not valid in my opinion, for the following reasons: TR545 is confined by its defining parameters which also make it unsuitable for wider consideration: <ul style="list-style-type: none"> 1) The choice of storms modelled (moderate to low wave heights and water levels). 2) The use of mid-range climate change sea level rise. 3) No regard for storm surge in the BofE modelling (and only a very limited consideration in other modelling).

ExQ2	Question to:	Question:
		<p>4) Limited scope in not considering the impacts of northern coastline breaches.</p> <p>5) An unsupportable reliance, in my view, on treating offshore wave attenuating geomorphology such as at least the inner and outer longshore bars as 'immutable'— i.e., permanently resilient. The alongshore bars will have a marked effect in preventing erosion from more modest storms such as the BofE and, could change or be lost in event of an absent Dunwich bank.</p> <p>The limited and 'particular' nature of TR545 modelling, in and of itself, could be acceptable. However, the meaning of TR545 needs careful consideration; TR545's claims to conservative (precautionary) modelling are, in my opinion, mainly misplaced as shown in my document REP7-220 and particularly so if such claims are contextualised to be representative of overall flood and erosion risk modelling of the proposed Sizewell C. This is more fully covered in my document REP7-220.</p> <p>iv) That the banks would not have an effect on extreme still water levels is agreed; that wave action on the landward side of the nuclear platform would not be significant assumes a reliance and control of shoreline erosion for the lifetime of the installation. This is not a given.</p> <p>The more immediate difficulty is erosion of the shoreline north of the proposed Sizewell C in and around the Minsmere levels. The partial loss of Dunwich bank and/or the inner and outer longshore bars could result in increasing water volumes caused by wave action inundating these marshlands that are contiguous with the Sizewell levels on the landward side of the main nuclear platform. This is not accounted for in the FRA that I am aware of. This is covered in my main document REP2-393.</p> <p>The Applicant concludes with the statement that the 'degradation of the Sizewell-Dunwich banks would not increase flood risk to the proposed development.' I do not regard this as a supportable premise for reasons given above and, in my papers REP2-393, REP5-253.</p>
	SZC Co. Response at Deadline 10	The points raised by the IP at Deadline 8 are extracts of [REP8-249] posted in its entirety by the IP in response to Examiner's Question CG.2.10. The position of SZC Co. on each matter is as stated and contained in SZC Co.'s Deadline 10 responses to CG.2.10 points 4-7 (above).
CG.2.14	The Applicant	Impacts on coastal processes

ExQ2	Question to:	Question:
		<p>The Alde and Ore Association Written Submission for DL5 providing commentary on ISH 6 [REP5-187], submits that the CPMMP should have a wide geographical coverage going at least as far south as Shingle Street with appropriate time intervals for monitoring. That proposition is supported by other IPs including Mr Bill Parker.</p> <p>(i) If an extension to the monitoring area is not agreed, please explain further why the monitoring is only considered to be necessary within the area proposed;</p> <p>(ii) Without baseline monitoring for the wider neighbouring coastline how would any unusual changes and/or adverse effects resulting from the proposed development in such wider locations be recognised and mitigated?</p> <p>(iii) In any event, should funding be provided and secured in order to mitigate against such an eventuality?</p>
	SZC Co. Response at Deadline 7	<p>(i) The rationale for the monitoring extent is covered in CG.2.8 above as well as in the Written Summaries of Oral Submissions made at ISH6: Coastal Geomorphology (14 July 2021) [REP5-111], SZC Co's responses to the National Trust [REP6-024, Appendix G] and Local Impact Report LIR Ref. 11.48 (iv) [REP3-044]. The key points behind this rationale and why it should not be extended to Shingle Street (or indeed Thorpeness, as discussed in CG.2.8) are:</p> <ul style="list-style-type: none"> • the predicted impacts of Sizewell C fall well within the Greater Sizewell Bay and do not extend to, or near, Thorpeness. Therefore, there is no rationale for Sizewell C to monitor there. The extents set out in the CPMMP [REP5-059] are always larger than the predicted impacts, to allow for any uncertainty; • the Coastal Processes Monitoring Plan (CPMMP; [REP5-059]) is adaptive and monitoring extents would be extended were impacts demonstrated to move beyond their anticipated extents; • impacts would start to develop at Sizewell C and radiate outwards so that impacts closer to the site would effectively provide an "early warning" of impacts further afield (no wider regional or systemic impacts could develop without significant local scale impacts being detected first); • the Sizewell C development does not remove sediment from the coastal system; on the contrary, it adds sediment (via episodic erosion of the maintained SCDF over the life of the station). <p>(ii) As impacts radiate outward from Sizewell C, the adaptive monitoring proposed in the CPMMP [REP5-059] would extend the monitoring extents if impacts moved beyond</p>

ExQ2	Question to:	Question:
		<p>their predicted envelope. The baseline East Anglian Monitoring Programme provides a long (30 years), high-quality record that could be drawn upon were this to occur i.e., if the impacts and monitoring extents were exceeded. Further commentary on this matter can be found in the paragraphs 1.4.24 and 1.6.9 of the Written Summaries of Oral Submissions made at ISH6: Coastal Geomorphology (14 July 2021) [REP5-111].</p> <p>(iii) As there is no evidence to support the widening of the monitoring area, it is not considered appropriate or necessary to provide and secure funding for this eventuality. As the CPMMP is adaptive, to the extent that its area does require to be extended in the future, this will be agreed pursuant to Requirement 7A of the DCO/Condition 17 of the DML and SZC Co. are then obliged to implement the CPMMP in accordance with its approved details (Requirement 7A(2) and Condition 17(2)). This is an absolute obligation on SZC Co. to carry out the actions required by the CPMMP and in order to discharge that obligation, it would need to ensure that it has sufficient funds to do so. This would be necessary to ensure compliance with the DCO and so avoid the criminal sanction that would exist were it unable to meet its obligations.</p>
	Bill Parker Response at Deadline 8	<ul style="list-style-type: none"> i) This is a response deigned to limit the possible liability of EDF and Cefas not in the interests of having a good understanding of what the impact is or potentially could be on adjacent coastlines. It is a very tightly drawn assessment and ignores the potential impact on Sizewell C from other changes along the coast or any asymmetric impacts that Sizewell C could generate that are not immediately obvious in the short term. It is too narrow in its focus for the length of time of the proposed development. ii) There is an assumption here that others will take responsibility for identifying potential SZC impacts this is not acceptable. iii) It is positive to have clarification that it is 'an absolute obligation on SZC Co. to carry out the actions required by the CPMMP'. However the key question must be, is the scope of the CPMMP wide enough and does EDF (or subsequent owner / responsible party) have any veto in the decisions as to what is included or not included and what the mitigating actions should be? This needs to be resolved and made crystal clear in the drafting of the CPMMP.
	SZC Co. Response at Deadline 10	<ul style="list-style-type: none"> (i) The requirement of monitoring is to confirm the impacts of SZC (in this case on the Coastal Geomorphology receptor), not to detect natural changes across the region.

ExQ2	Question to:	Question:
		<p>The proposed scope of monitoring is considered adequate by the Environment Agency (response to CG.2.6 at Deadline 7, above and [REP7-129]) to detect impacts. There is also a requirement to extend this monitoring should it be demonstrated that impacts are expanding in scope over time.</p> <p>(ii) SZC Co. has made no such assumption.</p> <p>(iii) Monitoring and mitigation obligations must be agreed with and enforced by the discharging authorities (East Suffolk Council and the Marine Management Organisation). For marine activities this is a standard process which SZC Co. and all marine developers are subject to. Therefore, monitoring that is specified in the CPMMP will be required (as part of the DML licence conditions and DCO Requirement 7A) and the associated reporting will determine whether the licence conditions are being properly implemented and to improve the basis on which future monitoring is undertaken as part of an Adaptive Monitoring Programme (by improving knowledge of the effects).</p>
CG.2.15	<p>The Applicant</p> <p>SZC Co. Response at Deadline 7</p>	<p>Impacts on coastal processes</p> <p>The DL5 submission of Mr Bill Parker in relation to ISH6 [REP5-191], highlights some areas which he submits have been overlooked in the modelling provided to date and is critical of the assumptions underlying the EGA including the use of 'reasonably foreseeable' conditions.</p> <p>(i) Please respond to those criticisms and summarise why the approach to monitoring utilised by Cefas can be regarded as robust.</p> <p>(ii) Please provide clarification on the methodology on ground strengthening and the foundations for the HCDF as highlighted by Cllr Robin Sanders at ISH6 [REP5-180].</p> <p>(i) The following response is provided as two sections to match the question – (a) Mr Parker's concerns that some areas have been overlooked in the modelling and (b) assumptions regarding the EGA for determining whether SCDF mitigation is needed to avoid disruption to longshore transport by an exposed HCDF.</p> <p>(a) Modelling (as outlined in Mr Parker's point 2 (a) d) All of Mr Parker's concerns are addressed in SZC Co.'s DL7 topic-based response (Doc. Ref. 9.73) to DL2 Written Representations on Coastal Geomorphology (specifically Nick Scarr [REP2-393], Bill Parker [REP2-230], Natural England [REP2-152], SCAR [REP2-509],</p>

ExQ2	Question to:	Question:
		<p>Stop Sizewell C [REP2-449r], Minsmere Levels Stakeholders Group [REP2-377], The National Trust [REP2-150] and The Alde and Ore Association [REP2-204]) and SZC Co.'s separate DL7 response (Doc. Ref. 9.73) to the unaffiliated review of BEEMS Technical Report TR311, written by Derek Jackson and Andrew Cooper and submitted by Stop Sizewell C [REP2-449]. Key responses to Mr Parker's points are summarised here using his numbering.</p> <ul style="list-style-type: none"> i. Multiple storm scenarios. The modelling conducted is primarily for predicting impacts, and therefore follows the standard EIA worst-case approach. This approach, including model types and conditions, were developed in consultation with the Marine Technical Forum since 2015. BEEMS Technical Report TR545 [REP3-048] also includes multiple design storm scenarios and an extreme storm sequence. ii. UKCP18 sea level rise and the lifetime of the station. SZC Co.'s assessment has considered the station lifetime scale (to 2140) – see for example the modelling in the DL5 version of BEEMS Technical Report TR545. iii. Shore-face connected ridges. These morphologies have been identified on eastern North Sea Dutch and German shorelines but are not present at Sizewell. iv. Sea level rise assumption for EGA. The EGA observed that sea level has been rising throughout the period for which shoreline change data at Sizewell has been collected. The fact that shoreline change in response has not been regionally coherent highlights that the response to SLR is not a linear, predictable outcome and that the system has absorbed this rate of rise. SZC Co. therefore does not consider it unreasonable to project that this manner of response would continue. The EGA nevertheless projected an additional, linear estimate of change (as a worst case, despite there being no evidence that this is how the system will respond) alongside the assumption of an ongoing, non-linear system response. The EGA noted that rates of SLR are projected to increase more quickly beyond 2070 and did not attempt to apply this method to periods for which more rapid rise is expected. Using this method, the EGA determined that unmitigated shoreline change would expose the HCDF between 2053 and 2087 – the earlier dates in the range represent the possibility of faster rates of sea level rise (amongst other factors) contributing to faster shoreline retreat. v. Wave climate and sand banks. The UKCP18 climate change predictions for the Sizewell coast shows a decreasing wave climatology (in terms of mean annual and maximum wave height (up to 12% subject to which RCP climate change scenario is

ExQ2	Question to:	Question:
		<p>considered). Please refer to our response to CG.2.11 regarding the Sizewell – Dunwich Bank and its role for inshore waves. Mr Parker’s comparison with adjacent sandbanks neglects the fact that the two do not share similar behavioural properties – there is no evidence of cyclic behaviour in Sizewell – Dunwich Bank, whereas there is evidence of cycles in the Great Yarmouth Banks (a sequence of several interconnected banks extending north from Kessingland).</p> <p>vi. Mr Parker (and Derek Jackson and Andrew Cooper in their review submitted as the Written Representation of Stop Sizewell C [REP2-449r]) has incorrectly interpreted the cited papers (Bonaduce et al., 2019 and Grabemann and Weisse, 2018). SZC Co. considers that both submissions refer to Grabemann and Weisse (2008) and that 2018 is an error. This means that the Grabemann and Weisse paper was produced 13 years ago and not with the latest UKCP18 predictions, which SZC Co. is required to use and has used. Nevertheless, these papers are, in fact, in agreement with the UKCP18 assessment for the Sizewell area that climate change will lead to a reduction, not an increase, in mean annual and maximum wave height. SZC Co. accepts that historically a hypothesized increase in the dominance of NE waves, importantly combined with virtually no Dunwich Bank, could have driven the observed severe erosion at Dunwich (and accretion in the southern half of the GSB including Sizewell). This case is accepted but was not considered in detail with respect to coastal geomorphology as it does not present a worst case for impacts of Sizewell C nor hazards to the station.</p> <p>vii. Longshore transport. The assumptions to which Mr Parker refers are unclear to the Applicant. The development of the evidence base presented in Volume 2, Appendix 20A of the ES [APP-312] included examining the scientific literature on longshore transport in the area and the use of longshore transport models to quantify rates of movement and how they vary under changing conditions. The likely increase in transport rates with SLR is recognised. However, whether this leads to erosion or accretion at specific locations is dependent on multiple other factors, including sediment supply. The worst-case assumption that net erosion on, and adjacent to, the development site (at greater or lesser rates) remains valid in any case.</p> <p>(b) EGA: The EGA was an exercise in determining what was reasonably foreseeable with respect to whether (and when) the HCDF without mitigation would be exposed, and at what point</p>

ExQ2

ExQ2	Question to:	Question:
		<p>change becomes too uncertain to project. The EGA projected change only as far as this 'upper limit to reasonable projection of change' and determined that the HCDF was likely to be exposed within this timeframe. There was no suggestion that change was 'reasonably foreseeable' for the project lifetime and no such assumption has been applied.</p> <p>(ii) In the written summaries of Oral Submissions at ISH6 9.46 [REP5-111], it is stated that the ground treatment would most likely comprise rigid inclusions. We note that the purpose of the ground treatment would be to transfer the load from the sea defence into competent strata below the soft material. In civil engineering these techniques are used widely and have established design codes and guidelines that are applied. The sea defence design report [REP2-116] will be updated to expand on the ground treatment proposals.</p>
	<p>Bill Parker Response at Deadline 8</p>	<ul style="list-style-type: none"> i. I disagree the scope of TR545 does not include extreme storm sequences, I assume that will be released for Deadline 10 and therefore this statement appears to be incorrect. ii. The assessment till 2140 is a) too short, it must be till 2190 as required by ONR / EA coast management assessment and b) it has not taken into account potential future increases in sea level rise. Each series of predictions made through research has consistently been an increase in sea level on previous assessments and the research on glacier melt (e.g. Western Antarctic ice sheet) has indicated that it is faster than previously thought. Therefore, there is a failure to take a more precautionary approach on this issue. iii. The North sea is a single connected entity and therefore to ignore these issues is not compatible with a precautionary approach to the coastline. iv. The limited time horizon of the EGA makes little sense in viewing the long term vulnerability of Sizewell C. I also note that the EGA was a) not independent and b) had constraints / conditions placed upon it within which to make its comments. It is therefore of restricted value in responding to this point. v. The behavioural properties of these banks will be within the current conditions. When there is increased water depth through sea level rise, changes to storminess and other impacts of climate change this may not continue to demonstrate the same properties. The examination of past behaviour is not always a predictor of future.

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> vi. The challenge to Prof. Andrew Cooper and Prof. Derek Jackson (both distinguished academics in the field of coastal geomorphology) assessment is concerning. I defer to the senior academic expertise and this issue should be resolved through academic consensus rather than taking just the Cefas interpretation of the science. vii. I agree that there could become an increased vulnerability to SZC if the longshore drift has less sediment supply to the erosion rates at Sizewell and this is a factor that is difficult to predict into the future, but must be regarded as a risk to the site. c. The EGA indeed did identify a period of time when the HCDF would be exposed, which I don't dispute. However, the real benefit from having an independent (unlike the EGA) would be to estimate how the coastline may develop esp. as modelling becomes increasingly unreliable through time. <ul style="list-style-type: none"> ii) I await the further information, however this is now very late in the process and will need to be examined in detail once released.
	SZC Co. Response at Deadline 10	<ul style="list-style-type: none"> i. Please note that Storm Erosion Modelling of the Sizewell C Soft Coastal Defence Feature using XBeach-2D and XBeach-G report [REP9-020] and the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature report (Doc. Ref 9.12(C)) have been updated and completed at Deadlines 9 & 10 respectively. The modelling includes two design storms in which the instantaneous 1:20 year wave conditions are held constant for 13 hours and the Beast from the East 1:107 year return interval with recessed shorelines (which increase erosion pressure) and 2140 SLR (RCP4.5 for the HCDF and RCP8.5 for the Adapted HCDF). ii. Assessment to 2140 covers the design life of the HCDF of 110 years to accommodate change in spent fuel storage strategy (as defined in [REP8-096] Section 2.3.1) and has applied climate risk appropriately based on UKCP18 climate change predictions for assessment of sea level rise and decreased wave conditions, as required. iii. The scales of assessment and monitoring are appropriate. Numerical modelling has demonstrated the impacts of SZC will be felt in only those aspects of coastal geomorphology that occur locally. With respect to the predictions of wave climate, these are from UKCP18 and are based on models of the UK seas including the whole North Sea.

ExQ2	Question to:	Question:
		<p>iv. The scope of the EGA has been explained in SZC Co. responses at Deadline 7 [REP7-060, Appendix B, Section 3]. The EGA was not concerned with the long-term vulnerability of SZC, which is a matter for the ONR. The expert panel was not constrained and included highly qualified, experienced scientists with a deep knowledge of the Suffolk coast.</p> <p>v. The potential for any major bank changes is bracketed by assessments which remove bank influence on the inshore wave climate in Storm Erosion Modelling of the Sizewell C Soft Coastal Defence Feature using XBeach-2D and XBeach-G report [REP9-020] and the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature report (Doc. Ref. 9.12(C)), which have been updated and issued at Deadlines 9 and 10 respectively.</p> <p>vi. SZC Co. has no further response – please refer to our assessment of the Jackson and Cooper review [REP7-060, Appendix C] and its relevance to the Sizewell C EIA and examination.</p> <p>vii. This risk has been recognised in the Storm Erosion Modelling of the Sizewell C Soft Coastal Defence Feature using XBeach-2D and XBeach-G report [REP9-020] and the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature report (Doc. Ref. 9.12(C)), updated and issued at Deadlines 9 and 10 respectively.</p> <p>c. The EGA previously assessed the long-term shoreline change. SZC Co consider that there is no benefit in repeating this exercise. Vulnerability of the SCDF under future conditions is assessed in the Storm Erosion Modelling of the Sizewell C Soft Coastal Defence Feature using XBeach-2D and XBeach-G report [REP9-020] and the Preliminary Design and Maintenance Requirements for the Sizewell C Coastal Defence Feature report (Doc. Ref. 9.12(C)), updated and issued at Deadlines 9 and 10 respectively. The independence of the EGA has been addressed in Issue Specific Hearing 6 [REP5-111], paragraphs 1.4.6 and 1.5.12.</p>
CG.2.16	The Applicant, ESC	<p>Impacts on coastal processes</p> <p>The DL5 submission of Mr Bill Parker in relation to ISH6 [REP5-191], suggests that certain aspects should be built into the structure of the Marine Technical Forum including having meaningful local community membership and being open to public scrutiny. Please indicate whether it is agreed that such inclusion and external scrutiny would be beneficial and should be accommodated?</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	<p>Local community membership of the Marine Technical Forum would be inappropriate. The MTF is a regulatory forum for regulators and their technical experts only. The MTF's Terms of Reference make it clear that its purpose is to facilitate dialogue between SZC Co. and the regulators to ensure that all monitoring obligations are properly satisfied, stating '<i>The MTF is primarily focussed on... the successful specification, planning, implementation and reporting of all forms of marine and coastal monitoring associated with SZC that are needed for the proper protection of the environment and compliance with UK law</i>'. External scrutiny is already provided by the four regulatory stakeholders and their expert advisors. Once approved, the Annual and Substantive (ten-year review) reports of the CPMMP will be made publicly available. As such, expanding the membership as suggested would not be beneficial, is not necessary and would disrupt important regulatory processes.</p>
	Bill Parker Response at Deadline 8	<p>The assumption that 'the successful specification, planning, implementation and reporting of all forms of marine and coastal monitoring associated with SZC that are needed for the proper protection of the environment and compliance with UK law' would exclude local expert input would be a mistake. Indeed, it would provide an essential additional component to the 4 key regulators, namely the local community input. The failure to effectively engage with the local community and bring them onboard with the entire Sizewell C project demonstrates how the disregard of local views have hampered this project development. It would be unfortunate if EDF assumed that there not suitable responsible representative locally who a) couldn't understand the complexity of the research or results or b) wouldn't add value to the MTF to ensure it was a more effective body. This response should be reconsidered.</p>
	SZC Co. Response at Deadline 10	<p>The purpose of the Marine Technical Forum (MTF) is to facilitate open and transparent dialogue between SZC Co. and the statutory environmental bodies (and their advisors) relating to marine monitoring of the SZC Project. The MTF will help facilitate good environmental regulation of the Sizewell C Project by providing the members of the MTF with a high level of confidence that the environment is being properly protected in accordance with the DCO and DML. The Terms of Reference (ToR) for the MTF will be subject to review on or before commencement of the Sizewell C Project, as secured in Schedule 11 of the Deed of Obligation (Doc Ref. 10.4). In undertaking the ToR review, the MTF will consider the mechanism for reviewing monitoring undertaken in accordance with the Deemed Marine Licence and any other matters the MTF, in its reasonable opinion,</p>

ExQ2

ExQ2	Question to:	Question:
		<p>consider should be included in any update of the ToRs. ESC has already raised with the applicant a desire by which outputs from monitoring reports can be disseminated to, and feedback returned from the wider community and this will be explored when the ToRs are reviewed. However, is expected that ESC would collate any such feedback for representation at the MTF.</p>
<p>CI.2 Community Issues</p>		
<p>CI.2.1</p>	<p>ESC, SCC</p>	<p>Accommodation Strategy</p> <p>The Applicant in response to the LIR and the concerns raised at ISH4 in respect of the delivery of the accommodation campus and the caravan site at the LEEIE consider that it would not be appropriate to limit worker numbers as a mechanism to ensure timely delivery of the accommodation campus. In [REP3-044] the Applicant sets out their detailed arguments as to why this is considered inappropriate (paras31.2.5 onwards).</p> <p>(i) Do you agree that the assessment of the gap between the availability of project accommodation and the total amount of accommodation required would not exceed the amount of spare capacity available in the 60-minute area?</p> <p>(ii) Are there particular concerns for a smaller geographical area, reflective of the likely greater pressure on accommodation the nearer to the site you are?</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>SZC Co. notes that this question is addressed to ESC and SCC but would like to clarify that:</p> <p>(i) The demand for accommodation in the period before the LEEIE caravan site is on-line is less than a normal Sizewell B outage, which is accommodated by the existing area. The main source of accommodation in this period would be in the tourist sector (primarily caravans) – the Housing Fund’s Tourist Accommodation Market Supply element would be in place to mitigate the effects of e.g. unlicensed sites and support new and re-configured stock. The market will also respond with flexibility to meet demand, and for much of the time there would be substantially more available accommodation than assessed (outside the peak tourist season). The demand for accommodation in the period before the campus is on-line is less than the peak and never exceeds that level. The build-up will be phased, and there will be substantial capacity provided by the Housing Fund in the interim period.</p> <p>(ii) Demand will be for local accommodation both in the early years and at the peak – as above, demand in the early years will not exceed demand at the peak. In any case, a</p>

ExQ2

ExQ2	Question to:	Question:
		<p>responsive and flexible Housing Fund will be in place to mitigate for effects and target activities locally.</p> <p>Furthermore, as set out in Appendix 3B to these ExQ2 responses, ESC and SZC Co have agreed a programme for the release of Housing Fund contingency payments in the event that phased delivery of the Project Accommodation is not opened relative to the monitored number of NHB workers during the Construction Period, in order to be used for additional Private Housing Market Supply and Tourist Accommodation Market Supply measures deemed appropriate by the Accommodation Working Group and the measures would be set out in Private Housing Supply Plan and Tourist Accommodation Plans in place at that time.</p> <p>Given the need to provide bedspaces rapidly with this part of the contingent fund, the Private Housing Market Supply measures most likely to be effective are <i>Support rent / deposit guarantee</i> and <i>Loans / Grants / Guaranteed lets</i> – these can be deployed quickly and effectively to increase capacity in the market.</p> <p>For Tourist Accommodation Market Supply Measures, 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 amend licenses, reconfigure sites, or develop infrastructure, or for enforcement action for illegal sites, for example.</p> <p>SZC Co’s response to CI.2.3 sets out in detail how the Housing Fund will be both pro-active and reactive.</p>
	<p>East Suffolk Council Response at Deadline 7</p>	<p>(i) ESC notes that in 31.2.9 the Applicant claims that the total amount of accommodation required is never greater than the number of bedspaces which SZC Co. assessed to be the minimum amount of spare capacity available in the 60- minute area. However, we know from the experience at Hinkley Point C in Somerset that works have honey-potted to residential accommodation as close to the construction site as they can. In East Suffolk there is limited private rented accommodation available close to the site. It is therefore likely that any undue delay to provision of the accommodation campus would result in enormous pressure on the private rented sector which is already stretched and only available to working households given the discrepancy in Local Housing Allowance rates and rental value in the area, in closer proximity than 60-minutes to the construction site. ESC do not consider a cap on workers at 7000 (only 900 under the peak workforce) would have a significant impact on the Applicant’s ability to deliver the project should the campus be delayed. The campus would have to be significantly delayed beyond its</p>

ExQ2

ExQ2	Question to:	Question:
		<p>suggested provision by the end of Year 3 of construction for the project to be impacted by this suggested cap.</p> <p>(ii) In ESC there is limited private rented or tourist accommodation available in the towns and villages closest to the site which workers would gravitate in accordance with the Applicant's Gravity Model. Our concern is that landlords may perceive workers as being able to pay more and ESC may find people being displaced by workers in these areas to the large town centres where the demand is already very high. The Housing Fund (details in the Deed of Obligation at this deadline) is designed to build resilience in the locality but is predicated on the campus being in place by the end of Year 3 to absorb a large number of the non-home-based workers to support and mitigate any impact on the more vulnerable cohort seeking housing in the area affected.</p>
	Suffolk County Council Response at Deadline 7	SCC defers to ESC on matters relating to accommodation.
	SZC Co. Response at Deadline 8	<p>ESC is correct to note that the NHB construction workforce at Hinkley Point C has located close to the site than had been anticipated. This has been accounted for within SZC Co's approach to assumptions about the spatial distribution of the workforce via the Gravity Model (see Appendix 9C of the ES (Workforce Spatial Distribution) [APP-196] for detail) which has a stronger gravity function than that used for Hinkley Point C.</p> <p>As set out in Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130] the area in which workers have concentrated at Hinkley Point C is broadly similar in terms of the scale and characteristics of accommodation.</p> <p>As set out in Chapter 31 of SZC Co's Response to the Councils' Local Impact Report [REP3-044] the assessment of effects on accommodation undertaken for the Socio-economic Chapter of the ES (Volume 2, Chapter 9) [APP-195] takes a very precautionous, conservative approach to demand, supply and delivery (via the Housing Fund) of accommodation.</p>

ExQ2	Question to:	Question:
		<p>There is no evidence of rental prices substantially increasing, or housing market stress occurring, as a result of Hinkley Point C (Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021 [REP2-130]) and the provision of bedspaces in the area using a Housing Fund should limit displacement. At Sizewell C – unlike Hinkley Point C – this is also supported by funding for resilience measures which are responsive to any indicated stress, and which will be used to limit vulnerability to housing need and homelessness (e.g. as a result of end of Assured Shorthold Tenancy).</p> <p>SZC Co. and East Suffolk Council have worked closely to agree and deliver a detailed set of measures, led by strong governance and informed by regular monitoring, that will ensure the appropriate delivery of bedspaces in the private rented sector, resilience to service provision, and support for tourist accommodation to mitigate the identified significant effects – particularly on the rental sector, and particularly the lower 30th percentile of the rental sector where there may most likely be competition between workers seeking accommodation and those in receipt of LHA and in housing need. This is agreed, and is set out in Schedule 3 of the Draft Deed of Obligation (Doc Ref. 8.17(G)).</p> <p>As such, ESC’s concerns relate only to security on delivery of the Project Accommodation. SZC Co. has provided a response to this at Deadline 7 in SZC Co’s Response to ExQ2 (ExQ2 CI.2.2) [REP7-056] and Appendix 3B to SZC Co’s Response to ExQ2 [REP7-057].</p> <p>Please refer to SZC Co’s Response to ExQ3 CI.3.0 (Doc Ref. 9.97) for further detail on the Applicant’s position relating to the delivery of accommodation via the Housing Fund and Housing Fund contingency payments.</p>
	ESC Response at Deadline 8	<p>Appendix 3B – Agreed Housing Fund Approach:</p> <p>Appendix 3B was discussed at ISH12 and ESC’s written summary of oral case summarises our position. ESC can confirm that we agree with the approach towards contingent and non-contingent payments from the Housing Fund and the sums to be appended to each of those elements is agreed. We welcome that Applicant confirming at 1.1.15 that providing for a Housing Contingency Fund ‘does not in any way diminish the Project’s commitment</p>

ExQ2

ExQ2	Question to:	Question:
		<p>to providing the Project Accommodation'. ESC consider the Housing Contingency Fund to be a last resort, our preference is for the Project Accommodation (caravan park at the LEEIE and accommodation campus) to be provided in a timely manner as proposed in the Implementation Plan.</p> <p>In addition to the reasonable endeavours and contingency fund, the Applicant has committed to a requirement in the Deed of Obligation to have completed the caravan park within 3 months of the Workforce Survey reporting more than 850 non-home based workers [REP7-057 at paragraph 1.5.18]. That requirement should be included in the Deed or Obligation or the DCO. An equivalent requirement should be included in the Deed or the DCO, obliging the undertaker to deliver the accommodation campus by certain trigger points.</p> <p>In the event that the caravan park and/or campus are not completed by the specified triggers, the undertaker will be obliged to make the agreed financial contributions through the contingency fund, but it should be clear that the payment of that fund will not release the undertaker from the continuing obligation to deliver the caravan site and accommodation campus.</p> <p>ESC has noted the ExA's concern that there may be a time-lag in reporting of non-home-based workers and being able to implement the Housing Contingency Fund. In reality, ESC expects to be in regular contact with the Applicant during the construction process particular with regards to whether the Implementation Plan is progressing as expected. The Deed should include an appropriate mechanism and strategy for dealing with any likely delay in the delivery of the accommodation to allow for advance planning for temporary alternative measures, until such time as the accommodation is provided by the undertaker.</p> <p>Expenditure of the Housing Fund Contingent and non-contingent elements are expected to be monitored and agreed through the Accommodation Working Group.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>The Deed of Obligation (Schedule 3) (Doc Ref. 10.4) includes drafting at paragraphs 4.1.1 and 4.2.1 that obliges SZC Co. to complete the Project Accommodation, unless otherwise agreed with the Accommodation Working Group, within three months of specified dates that will be determined by the Workforce Survey exceeding certain thresholds of NHB workers.</p>

ExQ2	Question to:	Question:
		<p>The 'reasonable endeavours' clause now refers to the delivery of Project Accommodation in accordance with the Implementation Plan.</p> <p>As such, SZC Co. there is now a requirement to deliver the Project Accommodation, and this is required regardless of the release of any related contingency funding. Contingency payments will provide for the period of any delay (if there is one) and do not release the undertaker from the continuing obligation to deliver the LEEIE Caravan Park and Accommodation Campus.</p> <p>SZC Co. has submitted further information regarding its position on the delivery of Project Accommodation and the purpose, function and governance of Housing Fund and Housing Fund Contingency payments within the submission at Deadline 8 in SZC Co. Response to Request for Further Information at Deadline 8, Appendix B, Section 2 [REP8-130].</p> <p>This sets out, with specific reference to points raised by ESC above, at Sub-Section 2.5 (Front-loading and dealing with the potential 'lag') that although there is a delay in release of money from the Housing Contingency Fund – this is not a delay in completing the Project Accommodation, which will continue in the meantime.</p> <p>The Housing Contingency Fund payment acts as an additional incentive to deliver on-time and to provide additional mitigation. 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 assumed/assessed delivery dates of the Accommodation Campus set out in the Implementation Plan [REP2-044], and Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] and the Accommodation Strategy [APP-613].</p> <p>The governance and monitoring set out at paragraph 7.1 and paragraph 8.1 of Schedule 3 of the Deed of Obligation (Doc Ref. 10.4) provide a positive framework for dealing with any delay in the delivery of the accommodation to allow for advance planning for temporary alternative measures until such time as the accommodation is provided.</p> <p>As suggested by ESC, the Sizewell C Project will 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.</p> <p>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</p>

ExQ2

ExQ2	Question to:	Question:
		<p>information and notice as possible of delays relative to the Implementation Plan. This has now been included formally within the Deed of Obligation.</p> <p>New drafting has been added to Schedule 3 (paragraph 7.2.4) which specifies that SZC Co. shall report to the Accommodation Working Group every 6 months (or more regularly as necessary) on information that may be relevant to East Suffolk Council in planning its delivery of bedspaces through the Private Housing Supply Plan, including information relating to Sizewell C Construction Workforce on-boarding and recruitment and progress in delivery of the Key Environmental Mitigation, including Project Accommodation.</p> <p>Expenditure of the Housing Fund Contingent and non-contingent elements would be delivered through the same mechanism as the non-contingent element of the Housing Fund – via the Private Housing Supply Plan – which is monitored and agreed through the Accommodation Working Group.</p>

ExQ2 - Part 4

ExQ2	Question to:	Question:
DCO.2 Draft Development Consent Order (DCO) – comments on the Applicants’ responses to ExQs1 (all para numbers are prefixed DCO.)		
No additional comments received at Deadline 8		
FR.2 Flood risk, ground water, surface water		
No additional comments received at Deadline 8		
HW.2 Health and wellbeing		
HW.2.0	The Applicant, SCC	<p>Severance Fear and Intimidation</p> <p>In light of the concern expressed at the ISH for Transport regarding the approach taken to the assessment on severance and Fear and Intimidation and the Question raised at TT.2.27.</p> <p>(i) Please advise whether it is regarded that the guidance has been properly used in understanding the implications for severance and the potential for fear and intimidation.</p> <p>(ii) If the ExA concludes that the Guidance has not been properly followed what the implications could be for the assessment and the weight the ExA should apply to the evidence presented to date.</p>
	SZC Co. Response at Deadline 7	Please refer to the response to TT.2.27. In addition, the methodology used by SZC Co. for fear and intimidation has been agreed with SCC; this will be set out in the updated version of the Statement of Common Ground with SCC and ESC to be submitted at Deadline 8.
	Suffolk County Council Response at Deadline 7	i) SCC is content that the guidance, following the updated assessment, has been applied appropriately, subject to final review of that assessment. In relation to the fear and intimidation methodology, the table shown within the IEMA guidelines has been interpreted as the change in traffic / HGV / speed between the without and with development scenarios. If it is not based on the change in magnitude then the majority of links would experience ‘extreme’ magnitude, if including speed. It is unlikely that SZC is expected to result in a change in average speed over an 18-hour day at the levels set out within the IEMA guidance, therefore speed has been scoped out.

ExQ2

ExQ2	Question to:	Question:
		<p>The methodology used aligns to that used for other projects. However, the latest analysis needs to be reviewed by SCC following submission by the Applicant.</p> <p>ii) Whilst SCC is content with the methodology used following review by our consultants, if the ExA were to conclude that the Guidance had not been properly followed, perhaps the most proactive course would be for the Applicant to contact IEMA and for them to comment on the assessment method, if they believe that the Applicant has applied the method incorrectly, then the Applicant would need to determine whether any material effect would be likely by altering the assessment method and potentially submit a updated assessment, and propose any relevant mitigation, as a result.</p>
	SZC Co. Response at Deadline 8	<p>(i) No further response from SZC Co. is required.</p> <p>(ii) See SZC Co.'s Deadline 7 response to ExQ2 TT.2.27 which provides a comprehensive response on this matter. In addition, SCC agrees with SZC Co.'s approach to the assessment of fear and intimidation as set out in their response to HW 2.0 at Deadline 7. It is therefore not considered necessary to engage with IEMA but SZC Co. will endeavour to do so to seek to provide additional comfort to ExA on this matter.</p>
	SCC Response at Deadline 8	SCC can confirm the methodology has been agreed.
	SZC Co. Response at Deadline 10	SZC Co. welcomes SCC's confirmation that the methodology has been agreed.
HW.2.1	The Applicant, SCC	<p>Severance</p> <p>(i) In light of the concerns expressed by a number of Parish Councils please advise of the progress of the work that has developed on the schemes at Wickham Market, Little Glemham and Marlesford and elsewhere along the proposed transport corridor.</p> <p>(ii) Are any of the schemes likely to be presented to the Examination setting out the details of proposed mitigation?</p> <p>(iii) It is noted that a number are referred to in the draft obligation, but this does not include precise detail of what mitigation might be forthcoming,</p>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	<p>(i) Please refer to the response to CU.2.1 for details on the agreed local transport schemes that is reflected in the latest draft Deed of Obligation (Doc Ref. 8.17(F)) submitted at Deadline 7.</p> <p>(ii) Refer to (i) that the agreed position on the local schemes is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)) in terms of the scope of the works. It has been agreed that the local schemes will be delivered by SZC Co. and therefore SZC Co. will need to progress the detailed design of the schemes and gain technical approval by SCC as well as enter into a S278 agreement with SCC for SZC Co. to deliver the schemes on the public highway.</p> <p>(iii) Agreement has now been reached with SCC with regards to the schemes that will be delivered by SZC Co. and the proposed phasing of these schemes as well as an agreed package of transport contributions that will be made by SZC Co. The agreed position is set out in the draft Deed of Obligation (Doc Ref. 8.17(F)).</p>
	Suffolk County Council Response at Deadline 7	<p>i) Progress has been made on the schemes as follows:</p> <ul style="list-style-type: none"> • Wickham Market: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation expected in September / October 2021 • Little Glemham and Marlesford: Preliminary scheme details shared with Parish Council, ESC and SCC. Generally acceptable to SCC subject to minor revisions. • A12 Yoxford: Preliminary discussions held between Parish Council, SCC and SZC CO on highway mitigation. • B1122 Corridor (Early Years): Meeting between Theberton and Eastbridge Parish Council, SCC and SZC in September 2021. Preliminary design drawings shared. • B1125 Westleton: Discussion commenced between SCC and SZC Co on potential mitigation measures. • Leiston Town Centre: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation underway. <p>ii) SCC is working with the Applicant to develop feasible mitigation schemes, but it is incumbent upon the Applicant to submit these to PINS.</p>

ExQ2

ExQ2	Question to:	Question:
	Marlesford Parish Council Response at Deadline 7	<p>We would advise the ExA that we are working with both the Applicant and SCC to secure a package of mitigation measures for the A12 through both Marlesford and Little Glemham. The Applicant has addressed some of (but not all) the concerns that the two parishes have, but further progress needs to be made on a number of aspects relating to noise, air quality and vibration and a major issue for Marlesford - the provision of a pedestrian and cycle route from the village to the Fiveways roundabout in order to link with a similar facility from the roundabout into Wickham Market. Both objectives are supported by SCC and in the case of Marlesford, a properly specified pedestrian and cycleway would contribute to a significant reduction in the fear and intimidation currently experienced by cyclists and pedestrians who use the existing path to get to and from Wickham Market. Elderly pedestrians and parents with prams and pushchairs are particularly vulnerable at the moment, and the risks will increase with further HGV traffic. We believe that delivery of such a connection from Marlesford to Wickham Market will contribute to a modal shift towards more sustainable travel.</p> <p>Subject to SCC, Little Glemham and Marlesford Parish Councils being satisfied with the Applicant's mitigation proposals we will be urging the Applicant to present its mitigation plans to the ExA before the end of the Examination.</p>
	SZC Co. Response at Deadline 8	<p>Engagement is ongoing with the relevant Parish Councils, SCC and ESC and progress is being made on the schemes as follows:</p> <ul style="list-style-type: none"> • Wickham Market: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation due to be undertaken in September/October 2021. • Little Glemham and Marlesford: Proposals have been shared to include enhanced pedestrian amenity, controlled pedestrian crossing points, village gateways and quiet road surfacing. • A12 Yoxford: Location of proposed pedestrian crossing on the A12 agreed in principal. Designs being prepared. • B1122 Corridor (Early Years): Meeting held with Theberton and Eastbridge Parish Council, SCC to discuss proposals including a controlled pedestrian crossing, enhanced pavements, village gateways in Theberton and Middleton Moor.

ExQ2

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • B1125 Westleton: Meeting held to discuss potential proposals with Parish Council and SCC. Further design work being undertaken. • B1125 Blythburgh: Meeting held with Parish Council. • B1125 Walberswick: Meeting held with Parish Council. • Leiston Town Centre: Preliminary scheme details agreed by Working Group (Parish Council, ESC, SCC and SZC Co). Local consultation has been undertaken. <p>In response to the request by Marlesford Parish Council for an off road cycle route from Marlesford to Wickham Market, this was discussed previously in a meeting with the Parish Council and SCC. It is not considered possible to deliver such a scheme within the extent of the public highway due to the existing width of the highway itself on the A12. The topography of the highway verge also limits the extent to which the verge could be incorporated into a cycle lane.</p>
	SCC Response at Deadline 8	(i), (ii) and (iii) SCC understand that details of the agreed local highway schemes will be included as annexes to the Deed of Obligation. Details on the progress to date are in our response to Cu.2.1. The implementation in terms of timing of these schemes is under discussion.
	SZC Co. Response at Deadline 10	<p>The assessment included in the Fourth ES Addendum demonstrated that there will not be a significant adverse impact on fear and intimidation in Marlesford or Little Glemham. Notwithstanding this, a package of improvements is proposed and secured in the Deed of Obligation.</p> <p>The agreed Local Transport Schemes are secured in the Deed of Obligation (Doc Ref 10.4) and plans showing the indicative/outline design are included as annexes to the Deed of Obligation.</p>
HW.2.3	Applicant, Ipswich and East Suffolk CCG, West Suffolk CCG	<p>Health and Wellbeing Working Group</p> <p>Please advise on the progress in respect of</p> <p>(iii) Availability and calculation of a contingency fund to support mitigation and monitoring of affects which materialise above the levels identified as referred to by the CCG in [REP5-214] further response to HW.1.1</p>

ExQ2	Question to:	Question:
		<p>(iv) Whether a method has been agreed to monitor journey times and if this were to identify increases a contingency fund has been agreed?</p> <p>(v) The latest in respect of governance arrangements for the Health and Wellbeing Working Group</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>(i) Volume 2, Chapter 28 (Health and Wellbeing) of the ES [APP-346], does not identify significant impacts on local healthcare services despite taking a conservative approach, assuming no offsetting of demand on local healthcare services due to home-based workers using the "Sizewell Health" occupational health facility. Therefore, the residual healthcare contribution is voluntary, rather than being required to address a significant impact.</p> <p>The chapter concluded (paragraphs 28.6.101-28.6.103 [APP-346]), that following the implementation of the occupational health service, the change in healthcare demand directly attributable to the non-home-based workers would be negligible and the potential change in healthcare demand attributable to any dependants or family members of non-home-based workers would be minor. It is anticipated that workers who bring families are most likely to be on long-term contracts and would buy properties or take private rented sector accommodation during this time. As such, they would not represent a net addition to the existing number of council tax paying households/population, and there would be little to no material change in net healthcare demand. Overall, the magnitude of impact on health and wellbeing would be low. In the context of a uniformly high sensitivity receptor and highly valued asset, the resultant effect is considered minor adverse, which is not significant. However, similarly to Hinkley Point C, a voluntary contribution is to be provided to address the minor residual impact from the non-home-based workforce and support local health care capacity and resilience with a contribution for non-home-based staff dependents until the NHS Budget Allocation accounts for the indirect net population gain.</p> <p>SZC Co. and the CCG have made significant progress in terms of the residual healthcare fund and SZC Co.'s proposed contribution is set out in the Draft Deed of Obligation (Doc Ref. 8.17(F)). This is not yet fully agreed with the CCG but which will be discussed further in a meeting on 9 September 2021. Rather than include a contingency element, this includes an amount of resilience, representing around a 20% uplift to address uncertainty, enabling a proactive rather than</p>

ExQ2	Question to:	Question:
		<p>reactive approach. SZC Co. has also agreed to the CCGs request to fund staffing and proposes supporting one full time role up to peak construction and 50% of a full time role for the remainder of the construction phase.</p> <p>(ii) SZC Co.'s transport modelling does not predict significant journey time delays. Extensive transport mitigation is proposed to avoid journey time delays, including new roads and highway improvements, use of rail and sea transport, support for Suffolk Constabulary for AIL escorting and road safety, transport management plans and the various funds set out in Schedule 16 of the Draft Deed of Obligation (Doc Ref. 8.17(F)). The latter includes a contingent fund which the Transport Review Group will be able to draw down on to address any effects arising during the construction period. This is directed to ensuring that the construction of Sizewell C does not generate effects greater than those forecast in the Transport Assessment (i.e. to ensure the efficient and effective operation of the highway network). A fund (contingent or otherwise) for journey time delays is not justified and not proposed.</p> <p>(vi) Discussions to finalise the detail of the governance arrangements for the Health and Wellbeing Working Group are ongoing and will be progressed further on the 9th September 2021. Changes already made to the Draft Deed of Obligation (Doc Ref. 8.17(F)) in response to the CCGs comments include increasing the number of CCG members of the group from two to four; adding in the option to invite other</p> <p>(vii) parties which may include but not be limited to representatives from Primary Care, Ipswich & East Suffolk Alliance, Healthwatch Suffolk, East of England Ambulance Service and NHS England; and changing the chair of the group to a CCG representative rather than the Director of Public Health as previously proposed.</p>
	East of England Ambulance NHS Trust and Ipswich and East Clinical Commissioning Group Response at Deadline 7	(i) Clear progress has been made with regards to provision of a contingency fund to support mitigation. The Applicant will be able to provide further detail in their submission. EEAST has used a clear evidence base for its submission and will work with EDF towards an agreement to be made in due course.

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) Whilst a method is yet to be agreed, discussions regarding governance and monitoring of evidence to support the draw down of any agreed contingency fund continue to be progressed, and EEAST will work with EDF towards an agreement.</p> <p>(iii) EEAST has shared a revised version of the Terms of Reference for the Community Services Working Group to the Applicant and awaits further comment.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>(i) SZC Co. has agreed that a contingency payment should be provided to EEAST totalling £122,000. This could be utilised for a response post allowing ambulance(s) to be located closer to the main development site and enabling a quicker response to both the site and the local community.</p> <p>(ii) If a response post is not required, for example because SZC Co. is able to accommodate ambulances on one of the associated development sites or because EEAST do not consider it necessary at the time, SZC Co. proposes that this money could be applied towards other resilience measures. For example, provision and support for skills and education initiatives such as the Community First Responders and public education initiatives (as suggested in REP5-136). It is therefore proposed to provide this payment upfront so a methodology for draw down is not required. EEAST would however report into the CSWG on measures implemented and how these contribute towards community safety.</p> <p>(iii) SZC Co. welcomes the proposed terms of reference and has incorporated these into the Deed of Obligation (Doc. Ref 8.17(G)) where agreed following discussion with EEAST. These discussions have also taken into account EEAST's comments on the draft Deed of Obligation REP-136 and Strategic Relationship Protocol [REP5-135] at Deadline 5.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC welcomes that the Applicant appears to have reached broad agreement with the CCG and Public Health about appropriate levels of healthcare contribution, although we understand that there is still disagreement with regard to a contribution from the Applicant on dentistry services to mitigate impacts from non-home based workers.</p> <p>So whilst we maintain the view as set out in the Local Impact Report [REP1-45] para 27.24, that, notwithstanding the provision of comprehensive on-site occupational health facilities, the Council anticipates the proposal will still have an</p>

ExQ2

ExQ2	Question to:	Question:
		<p>impact on primary healthcare facilities in and around the area of the development, we will support the CCG's view as to the suitability of levels of mitigation.</p> <p>(ii) SCC set out its position with regard to delays in paragraph 20 and 21 of REP6-049. This has been a matter of much debate with the Applicant and SCC is of the view that provision by the applicant of funding for improvements on the A12 and a contingency fund to mitigate other impacts identified through the TRG is acceptable.</p> <p>In terms of monitoring delays there will be a significant amount of data available to the TRG, for example journey time data from the DMS. As the highway authority SCC also collects data which can inform the TRG on this matter.</p>
	SZC Co. Response at Deadline 10	SZC Co. is pleased to confirm that it has reached agreement with the East of England Ambulance Service NHS Trust on the Deed of Obligation contribution and with the CCG on the Residual Healthcare Contribution, with the exception of dentistry. Further detail on dentistry is set out in SZC Co.'s Deadline 8 response to HW.3.3 [REP8-116] and Deadline 10 response to HW.3.0 (Doc Ref. 9.125).
HW.2.4	Applicant ((i) only), Ipswich and East Suffolk CCG, West Suffolk CCG	<p>Onsite Occupational Health facility</p> <p>(i) Has agreement been reached regarding the specification and procurement of the Occupational Health Facility?</p> <p>(ii) Are you content with the mechanisms to secure the provision and timing of delivery of the onsite OH facility?</p>
	SZC Co. Response at Deadline 7	(i) As set out in Schedule 5 of the Draft Deed of Obligation (Doc Ref. 8.17(F)), the occupational health service specification will be in accordance with Volume 2, Appendix 28A – Health Technical Note 1 – Occupational Health Service Description [APP-347]. The specification builds upon the proven provision at Hinkley Point C, and constitutes an adaptive occupational health provision, which the Health Working Group will be updated on over the course of the construction phase. Such engagement will be applied to monitor the effectiveness of the provision, contrasted against routinely collected public health and health care data. Where appropriate SZC Co. will refine, align and support wider public health initiatives and priorities as they become apparent.

ExQ2	Question to:	Question:
		<p>The Draft Deed of Obligation (Doc Ref. 8.17(F)) sets out that the occupational health facility will be provided for the "<i>Construction Period</i>" which is defined as "<i>the period between (i) the Commencement Date; and (ii) date of receipt of fuel for Unit 2</i>". SZC Co. has recently clarified to the CCG that the occupational health service would not sit within the campus (and therefore not be available until the campus is built); the facility will sit on the main development site to provide convenient access to workers during their working day and will open upon on or by the Commencement Date.</p> <p>Procurement of the facility will be a commercial matter for SZC Co., but as set out in row HWd of the Statement of Common Ground [REP5-097] with the CCG '<i>The Parties have agreed that SZC Co. will work collaboratively with the CCG to inform the design and procurement of service</i>' and this matter is '<i>Agreed as far as it can be for the purposes of the Examination</i>'.</p> <p>SZC Co. has agreed with SCC both parties would prefer HWHW services to be contracted out from Sizewell Health to SCC, as this presents greater synergy with local public health and health care. This is reflected in the updated Draft Deed of Obligation (Doc Ref. 8.17(F)) definition of the occupational health service with a footnote noting that wording needs to be refined at D8 to allow for a scenario where this is not practicable e.g. because SCC do not have the capacity to provide this service, or it is not at a reasonable market rate when compared to other providers offering the same level of service provision.</p>
	Ipswich and East Clinical Commissioning Group Response at Deadline 7	<p>(i) Whilst a formal agreement is yet to be sought with the applicant positive discussions continue to take place.</p> <p>(ii) The CCG has been informed by the applicant that a OH service won't be online for the commencement of the construction period, however mitigation has been offered as part of the most recent DOO to support the impact on Health Services during years 1 – 3 for NHB workers and dependants for which the CCG is comfortable with</p>
	SZC Co. Response at Deadline 8	(i) SZC Co.'s position is as set out in the response at Deadline 7. Please note there is a typo in the last paragraph, first line - "HWHW services" should read "sexual health services".

ExQ2

ExQ2	Question to:	Question:
		(ii) SZC Co. notes that the CCG has clarified its understanding in [REP7-194] as follows: <i>"Following on from my submission earlier today I made an error under HW2.4. The applicant has confirmed that the DOO secures the opening of the occupational health service at commencement - please note that this is on the main development site and not on the campus. We are discussing mitigation to support the dependants during this early stage of construction. Apologies for my error."</i>
	SCC Response at Deadline 8	SCC can confirm that we have reached in-principle agreement with regard to sexual health services, as set out in the Applicant's quoted answer, and we expect that requested amendments will be included in the next D8 draft Deed of Obligation that reflect our requirements.
	SZC Co. Response at Deadline 10	SZC Co. is pleased to confirm that the Deed of Obligation (Doc Ref 10.4) sets out the agreed position on sexual health services with SCC.
HE.2 Historic environment (terrestrial and marine)		
HE.2.7	The Applicant	Two Village Bypass: Farnham Manor Please expand on the statement that the primary architectural interest is inherent in the standing building and does not relate to the wider landscape (paragraph 9.4.59 of [APP-432]).
	SZC Co. Response at Deadline 7	Farnham Manor comprises a standalone historic farmhouse and estate centre. The architecturally significant element of this structure comprises the surviving elements of the 17 th or 18 th century timber-framed house, which presently forms the east elevation of the house. The extensive west and south wings on the house are later, and are of limited architectural value, concealing the overall form and structure of the older parts of the house in views from outside. The special architectural interest of the house in terms of its overall form and external appearance is experienced almost solely from the garden of the house to the east, although structural detail can be experienced in close views from the south and north elevations and presumably from inside the building. This ability to appreciate and experience the architectural value of the building does not relate or depend on any perceptual links to the area outwith the immediate surroundings of the house.

ExQ2

ExQ2	Question to:	Question:
		<p>The perceptual links to the wider farmstead, however, contribute to historical value, allowing the functional and tenurial links between these structures to be read, although as noted in previous responses, this contribution is limited because of the extent of modern change of use and ownership, with consequent alteration, reconstruction, and extension of not only Farnham Manor but also the associated structures.</p>
	<p>ESC Response at Deadline 8</p>	<p>Two Village Bypass: Farnham Manor. ESC's only comment here in response to the Applicant's answer to the ExQ2 question is that it is ESC's view that the immediate surroundings of the Hall referred to at the end of the first paragraph self-evidently include the area of the proposed bypass route. The ability to appreciate some of the architectural interest of the Hall and its associated group of buildings is available from the existing public footpath to the east of the Hall. It is difficult to fully understand the architectural value of any building without also understanding its context, particularly where that building originated as a farmhouse in a farmed landscape. The response here that attempts to disassociate architectural value and context is not one with which ESC agrees.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>By way of clarification, architectural interest is defined by NPPG as '<i>...an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures...</i>'. In this context, the architectural interest of Farnham Hall is provided by the survival of the 17th century house which is largely enveloped within modern extensions of very limited, architectural value and which discernibly detract from the architectural value of the 17th century house; similarly, the architectural relationship of the former outbuildings with the Manor is diminished by their conversion to residential use and the subdivision of the farmyard by modern fences, walls and hedges. These changes mean that there is no designed or fortuitous architectural composition that can be said to contribute to the significance of Farnham Manor.</p> <p>SZC Co. notes that the assessment of effects on Farnham Manor is not a matter of disagreement between ESC and SZC Co. as evidenced by the Statement of Common Ground - East Suffolk Council and Suffolk County Council (Doc Ref. 9.10.12(B)).</p>

ExQ2	Question to:	Question:
HE.2.10	The Applicant, SCC, ESC, Historic England	<p>Enhancement to Proposed Mitigation Schemes</p> <p>Please provide an update on discussions regarding potential enhancement of mitigation schemes for the below assets:</p> <ul style="list-style-type: none"> (i) Theberton Hall (ii) Abbey Cottage (iii) Farnham Hall (iv) Hill Farmhouse (v) Barrow Cemetery Group (FMF site)
	SZC Co. Response at Deadline 7	<p>Landscape mitigation has been designed in line with the Design Principles set out in Chapter 5 and 8 of the Main Development Site Design and Access Statement [REP5-070] and the Associated Development Design Principles [REP3-023]. These design principles explicitly consider historic landscape character and have been consulted upon with East Suffolk Council. The compliance of the proposed mitigation with these design principles is secured by Requirements 14 and 22A of the draft DCO (Doc Ref. 3.1(G)), which explicitly require approval of detailed landscape proposals for the Main Development Site, Two Village Bypass and Sizewell Link Road by ESC.</p> <p>Mitigation measures currently under discussion with ESC and Historic England for the specific heritage assets noted by the Examining Authority comprise:</p> <ul style="list-style-type: none"> (i) As set out in the Landscape and Ecology Management Plan for the Sizewell Link Road [REP5-076], broadleaf planting would be used to screen the line of the Sizewell Link Road through the arable field that was formerly part of the parkland around Theberton Hall. (ii) The design response to the site entrance is set out at sections 8.8.2-8.8.7 of Part 2 of the Main Development Site Design and Access Statement [REP5-073]. This response stresses the reduction in width of the access road at the completion of the construction period, the use of a form and planting scheme/verge treatments that better reflects the rural surroundings of the scheme and also that the access route would not be lit during the operational period. (iii) Amendments have been made to planting schemes in the Two Village Bypass Landscape and Ecology Management Plan to better respond to local historic landscape context and reinforce connectivity with Foxburrow Wood.

ExQ2	Question to:	Question:
		<p>Following a meeting with Farnham Environment Residents and Neighbours association (FERN) on 21st July 2021, SZC Co. is reviewing landscaping proposals along the western side of the two village, bypass within the current order limits, to provide additional screening and potential noise reduction. SZC Co. is preparing a more detailed landscaping scheme to present and discuss with FERN.</p> <p>(iv) Mitigation planting for Hill Farmhouse, Middleton Moor (LB 103064) comprises the reinstatement and planting up of the hedgerow to the east of the Title Road junction to the south-west of the asset and the provision of new hedgerow to the northern side of the Sizewell Link Road. These are illustrated at page 14 of the Landscape and Ecology Management Plan for the Sizewell Link Road [REP5-076]. Seen through the existing hedgerows, this will present a screen that is entirely in accord with the existing historic landscape character.</p> <p>(v) Provision of interpretation and outreach works to enhance understanding of and virtual access to these assets as part of the outreach strategy set out in Section 8 of the Overarching WSI [REP3-022].</p>
	East Suffolk Council Response at Deadline 7	<p>ESC can confirm that officers have participated in one meeting with the Applicant that included District and County Council colleagues (landscape, ecology and environmental protection) in respect of a general discussion on mitigation proposals that consist of landscaping in relation to: Theberton Hall, Farnham Hall and Hill Farmhouse (Middleton, not Farnham). There have been no discussions in respect of Abbey Cottage. The Barrow Cemetery Group (Freight Management Facility) is under the consideration of County Archaeology colleagues and not ESC. Historic England was not a party to the meeting.</p> <p>The meeting was an initial scoping meeting only, with the potential for further meetings in the future to address specific technical issues arising from land ownership, future management, associated costs, maintenance liabilities in the long term, and the provision of technical drawings and information. The actual design of the mitigation was not discussed.</p>
	Suffolk County Council Response at Deadline 7	SCC defers to ESC and HE on this issue.
	Historic England Response at Deadline 7	We would need to defer to the LPA with regards to matters (i iv), however with regards to (v) Barrow Cemetery Group (FMF site), we can confirm we have had

ExQ2

ExQ2	Question to:	Question:
		<p>further discussion with regards to the enhanced mitigation. We recognise the applicant has limited opportunities for improving the physical management of the surviving monuments. What is proposed is essentially improved research, publication and dissemination. We would welcome further details from the applicant as to how the enhanced mitigation might manifest itself and what are the likely outcomes and confirmation of the mechanism for securing this mitigation.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>Response to ESC: In respect of points (i) to (iv), SZC Co notes that the Landscape and Ecology Management Plans for Sizewell Link Road [REP5-076] and the Two Village Bypass [REP5-077] contain proposals for agreeing and monitoring the effect of landscape mitigation that conforms to the principles and outline scope set out above and further engagement will be carried out through the detail design process.</p> <p>Response to Historic England: SZC Co. has discussed this matter further with Historic England and the approach set out in SZC Co.'s response at Deadline 7 has been agreed. To ensure this is secured, additional wording - agreed with Historic England - has been added to the outreach section of the Overarching Archaeological Written Scheme of Investigation (Doc Ref. 6.14 2.11.A(B)) This reads:</p> <p>The Outreach strategy will set out specific proposals for further engagement focused on the Seven Hills barrow cemetery (which includes SM 1011339, SM 1011340, SM 1011341, 1011342, SM 1011343, SM 1011344). This will include proposals for academic and popular publication of the results of the freight management site excavations in the context of the wider group of barrows in addition to other forms of engagement as noted above. Proposals for this further engagement will be agreed with Historic England before approval by SCCAS.</p>
	<p>ESC Response at Deadline 8</p>	<p>Enhancement to Proposed Mitigation Schemes. These mitigation schemes are landscape-led, although they are also designed as mitigation for heritage asset impacts arising from the development of road and road infrastructure within their setting. With specific respect to Abbey Cottage (item (ii)), ESC notes the points made here in confirmation that the access road to the MDS will be reduced at the</p>

ExQ2

ExQ2	Question to:	Question:
		<p>completion of the construction period; the planting scheme and verge treatments will be designed to reflect the rural surroundings of the scheme; and that the access route will not be lit during the operational period. ESC considers that these points acknowledge some of the sensitivities around the new access road and roundabout in close proximity to the Grade II listed Abbey Cottage and are welcomed.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>SZC Co. notes that these are not matters of disagreement between ESC and SZC Co. as evidenced by the Statement of Common Ground - East Suffolk Council and Suffolk County Council (Doc Ref. 9.10.12(B)) .</p>
<p>Landscape impact, visual effects and design</p>		
<p>LI.2.2</p>	<p>The Applicant</p>	<p>Design Council – Additional Design Review</p> <p>The importance of the nationally designated landscape is fully acknowledged by the ExA. As such, it is not unreasonable to expect thorough and detailed reviews of the proposed design to have occurred during both pre-application and examination phases. If further reviews are to be undertaken consideration should be given to whether a wider review, rather than just the accommodation campus, would be beneficial.</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>SZC Co. considers the design review undertaken by the Design Council (as recorded in Appendix B of the Main Development Site Design and Access Statement – [REP5-075]) is of sufficient scope, thoroughness and quality to provide assurance to the Examining Authority that the project represents good design and has been subject to a proper independent review. The proposed approach to design governance including matters explored in the hearing (ISH 5) has evolved to provide a robust ongoing approach to design review which is outlined in LI.2.3.</p> <p>SZC Co notes that the Local Impact Report (LIR) [REP1-045] prepared by SCC/ESC outlines a sound understanding/appreciation of the proposed design and its contextual response and while not all matters relating to design are agreed, does not suggest that a further review is required at this stage. Responses of consultees to the Examining Authority’s First Written Questions (ExQ1) LI. 1.1 do not identify a need for a wider review but do identify the benefits of design review</p>

ExQ2

ExQ2	Question to:	Question:
		<p>as part of the ongoing process, to which SZC Co. has responded positively. Further information can be found in SZC Co.'s response to ExQ2 LI.2.3.</p> <p>SZC Co. has reached agreement with ESC and SCC over the scope, scale and governance arrangements for the Natural Environment Fund, which provides an appropriate response to the residual impacts on the landscape.</p> <p>It is also worth noting that SZC Co. has agreed the scale of the Environment Trust, which will be secured separately to the Deed of Obligation. SZC Co. continues to work with the Councils and other stakeholders to finalise the detail (which will be secured through a separate legal agreement) including matters relating to governance. The Trust will have available to it £1.5 million per year of construction and the first 20 years of operation, and £0.75 million per year of the remaining operational phase. Further details will be provided to the community in the coming few months.</p>
	ESC Response at Deadline 8	<p>Design Council - Additional Design Review. It is correct of the Applicant to state here that ESC has not called for a further project-wide design review, given that the most recent review undertaken by the Design Council was completed less than two years ago (28.11.19). It is interesting to note here the views of the Applicant that ESC and SCC's joint LIR [REP1-045] outlined a sound understanding/appreciation of the proposed design and its contextual response.</p>
	SCC Response at Deadline 8	<p>SCC strongly welcomes the commitment of the Applicant for the setup and scale of funding proposed for the Environment Trust; we also support the proposal for the "front-loading" of the funding for this trust, so that more money is available during construction and the first 20 years of operation. SCC has received and is reviewing a draft of the separate legal agreement to secure the trust and its funding, and continues discussion with the Applicant on the governance of the trust, but is optimistic that a workable approach can be agreed.</p> <p>To clarify, SCC is content that the combination of the Natural Environment Fund secured through the main Deed of Obligation and the funding of the Environment Trust provides an appropriate response to the residual impacts on the landscape and to the residual harm on the landscape character, the visual amenity, ecology and the special qualities of the Suffolk Coast & Heaths Area of Outstanding Natural</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Beauty (AONB) [although we note that SCC continues to consider that this residual harm could be reduced by removal of pylons and outage car park]. SCC is content about the scope and governance proposed for the Natural Environment Fund, and agrees with the combined scale of the Natural Environment Fund and the Environment Trust Funding.</p> <p>There are further discussions with and clarifications from the Applicant required, on matters of detail and the relationship between the Natural Environment Fund and operation and scope of the proposed Environmental Trust that need to be resolved.</p>
	SZC Co. Response at Deadline 10	SZC Co. is grateful for the confirmations from ESC and SCC and would point the ExA to its D9 submission Response to Request for Further Information at Deadline 9 [REP9-021] setting out how it considers the Environment Trust should be considered within the DCO decision.
LI.2.5	The Applicant	<p>Design Guardianship Role</p> <p>The proposed retention of key members of the design team in a 'design guardianship' role is noted [REP5-110]. Please confirm what consultation on this role has been and what the securing mechanism for the role would be?</p>
	SZC Co. Response at Deadline 7	SZC Co. has outlined how the design guardianship role will operate in the Design Governance Framework referred to at Question LI.2.3 , which has been drafted for ESC's consideration.
	ESC Response at Deadline 8	<p>Design Guardianship Role. ESC is uncertain what the Design Governance Framework referred to in the Applicant's response to this question. ESC has queried the Design Governance Framework with the Applicant who have clarified this term was erroneously included and it is intended to refer to the Design Review Panel. Moving forward, ESC would welcome greater clarity and precision from the Applicant in respect of terminology, i.e., the design guardianship role and design review panel, in light of the erroneous inclusion of design governance framework. ESC welcomes and supports the use of this design review process which the Applicant has now committed to in the Deed of Obligation.</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 10	SZC Co. confirms that all future references will be made to the design review panel and design guardianship role to avoid confusion and as outlined in the Deed of Obligation (Doc Ref. 10.4).
LI.2.9	The Applicant, ESC, Natural England, The AONB Partnership, Stop Sizewell C, TASC	<p>Alternative Outage Car Park Note</p> <p>Please review and comment on the content of the SCC submission [REP5-171].</p>
	SZC Co. Response at Deadline 7	<p>SZC Co. notes and welcomes Suffolk County Council’s re-confirmation at Paragraph 1 that it agrees there may be occasions where a single outage car park will be inadequate. This reflects SCC’s statement in Paragraph 4.37 of its Written Representation [REP2-189].</p> <p>Paragraph 2 is noted, although for the ExA’s benefit the reference SCC provided to their Written Representation in that note should have been [REP2-189].</p> <p>At Paragraph 3, SCC seeks an indication of the level of likelihood of two (or three) outages happening in parallel. The Sizewell complex will have three active reactors (one at Sizewell B and two at Sizewell C). Assuming that planned outages are staggered and the typical schedule for each reactor over an 18-month period is 2-months outage and 16-months no outage, then each reactor would be in a planned outage 11% of the time. Applying this to the likelihood of double or triple concurrent outages:</p> <ul style="list-style-type: none"> - <i>Double outage:</i> Two of the three reactors would be in a planned outage for 4 months out of 18, or 22% of the time. This means that there is a 22% chance in any given 18-month period that a forced outage on the other reactor would clash with a planned outage on one of the first two reactors. Forced outages happen randomly and the likelihood of a double outage clash needs to be planned for. - <i>Triple outage:</i> By contrast, the likelihood of two reactors going into a forced outage at the same time as a planned outage on the other reactor is far lower. This is because two randomly occurring events would need to happen at the same time as the 11% chance that the other reactor is already in a planned outage. The compound probability of a triple outage is significantly less likely.

ExQ2	Question to:	Question:
		<p>A response to Paragraph 4 is set out in Response to Question LI.2.10 below and is not repeated here.</p> <p>Whilst SCC is correct in Paragraph 5 that only relevant staff would be involved in forced outages, as would be the case in any repair for any work, they offer no advice as to the number of outage staff that would entail. This is because clearly it is a specialist matter that SCC cannot reliably advise on and it depends on the maintenance or repair that needs to be made. In some cases staff numbers can be very substantial (up to 1,000) in order to complete the work as soon as reasonably possible. For example, in its current unplanned outage, Sizewell B has required up to approximately 1000 outage workers on site. This number of workers were on site for approximately 3 months of the outage.</p> <p>In Paragraph 6, SCC seek details relating to the environmental assessment of a clash between outages. This is set out in Section 1.8 of the Applicant's Written Submissions Responding to Actions Arising from ISH5 [REP5-117].</p> <p>Paragraph 7 appears to contradict SCC's own assertion in Paragraph 1 that there may be occasions where a single outage car park will be inadequate. Mr Lavelle is clear at Paragraph 1.5.24 of Written Summaries of Oral Submissions made at ISH5 [REP5-110] that both an operational car park and an outage car park will generally be full to almost overflowing during a single outage.</p> <p>The Applicant agrees with SCC's view at Paragraph 8 that an off-site permanent facility is not appropriate.</p> <p>The "Sizewell C Transport Strategy Hierarchy" that SCC refers to in Paragraph 9 sets out SZC Co's process for minimising road-based traffic, followed by other measures where necessary. The scale of traffic generated by coincident outages would be significantly less than the peak construction impacts which have already been assessed and so this hierarchy is not considered relevant to double outages.</p>

ExQ2	Question to:	Question:
		<p>It has no meaningful link with how SZC Co. will respond at short notice to a randomly occurring event to safely bring the power station back online as soon as possible, which requires on-site car parking.</p> <p>Paragraph 9 also advocates car sharing and direct bus services for both operational and outage staff. The implication of this paragraph when read in the context of Paragraph 10 is that SCC assert these measures could remove the need for an outage car park altogether. In the light of that, the Applicant is unclear why SCC chose to not object to the Sizewell B outage car park on greenfield AONB land at Pillbox Field (planning application reference DC/19/1637/FUL1), if indeed it does consider the above measures are a realistic alternative. Clarification from SCC on this apparent inconsistency would be welcomed.</p> <p>SCC suggests an alternative proposal in Paragraphs 10-18 and SZC Co. responds to these points collectively below.</p> <p>As SZC Co. understands it, SCC employs farmers/contractors and their plant (i.e., tractors) to support snowploughing on a call-off basis during each winter season. Whilst on the face of it this seems to be a relatively straightforward and sensible approach for that undertaking, the same would not apply for an outage car park. The reasons for this are set out below:</p> <ul style="list-style-type: none"> • <i>Outages can last longer than 28 days:</i> Forced outages can last for longer than 28 days and the temporary car park would require planning permission in accordance with Class B of Part 4 of Schedule 2 of the General Permitted Development Order (2015, as amended). It is noted that the current extension of permitted development rights (Class BA) to a total of 56 days per calendar year, which was created in response to the pandemic, will expire at the end of 2021 and is therefore not relevant.

¹ East Suffolk Council Planning Website: <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=PQ5NVGQXJJ100>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • <i>Setting up a temporary facility takes time:</i> This point is recognised by SCC in Paragraph 18 and this time would count towards the 28-day limit, as does removing the facility, thereby reducing the remaining permitted time available for use of the space as a temporary car park. The same would apply to the bus terminus and substantial associated facilities and structures required at the power station site. • <i>Highway safety:</i> Development permitted by Class B does not require highway safety to be taken into account. The Applicant is unsure whether SCC is advocating the temporary use of local farmland for large numbers of coaches and 600 cars that will inevitably need to pass each other and other vehicles on roads that are not designed for such use? The ExA may recall the difficulties experienced when sending a single coach down a local rural road on the Accompanied Site Visit and it met a single car travelling in the opposite direction. • <i>Ecological considerations:</i> SZC Co. will need to accord with all relevant legislation and regulations. As the farmland would not be in temporary use as a car park for the majority of the time, there is a realistic prospect that protected species may inhabit the site and therefore the Applicant would need to satisfy itself through surveys that there is no risk of harm before installing temporary structures. It is an offence to proceed without a protected species licence when one is required. • <i>Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017:</i> Linked to the point above, the development would be part of Sizewell C, which is a Schedule 1 development under the EIA Regs. Permitted development rights would not apply unless the LPA has adopted a negative Screening Opinion. Whilst a Screening Opinion could be sought in advance, it is not feasible to expect the Applicant to take a judgement call at very short notice on whether there has been a material change in circumstance on that site. If there was then the Screening Opinion would be out of date, permitted development rights would be removed and the temporary use of that land without planning permission would be unlawful. • <i>Planning permission for an intermittent development of this nature could not be pre-emptively secured in advance:</i> Whilst time-limited planning

ExQ2	Question to:	Question:
		<p>permissions that require removal after a pre-defined period are commonplace, it would not satisfy the necessary tests to permit a scheme that is developed and then demolished as and when it is needed (Paragraph 56, National Planning Policy Framework 2021 and Regulation 122, Community Infrastructure Levy Regulations 2010). Clearly applying for a new planning permission each time a forced outage occurs would take too long. An application for a 600-space car park in the Countryside is considered to be unlikely to gain planning permission as it is likely to conflict with Suffolk Coastal Local Plan (September 2020)². SZC cannot be dependent on such uncertainty.</p> <p>The objective of a forced outage is to safely bring the NSIP back online as soon as possible. Relying on adequate temporary arrangements being in place off-site in a timely manner is not a realistic prospect for the reasons demonstrated above.</p> <p>SZC Co. also notes and agrees with Page 103 of ESC's Comments on any additional information/submissions received by D5 [REP6-032]. SZC Co. agrees with the reasoning put forward by ESC on Page 103, as local planning authority. SZC Co. also considers that the alternative put forward by SCC would be unlikely to be acceptable in planning terms.</p> <p>SCC's proposals are unclear. There is no reasonable alternative to the proposed on-site outage car parking and that exceptional circumstances exist in accordance with Paragraph 5.9.10 of NPS EN-1.</p> <p>The outage car parking proposed by SZC Co. falls entirely within the nominated site boundary for Sizewell C. Paragraph 2.4 of the Appraisal of Sustainability: Site Report for Sizewell (November 2009) states: "The site includes land in the Goose and Kenton Hills to provide for an access road and other facilities which</p>

² East Suffolk Council – Suffolk Coastal Local Plan (September 2020). <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

ExQ2	Question to:	Question:
		<p>may be located outside the nuclear power station boundary. The Goose and Kenton Hills are former areas of heathland although land use is now principally commercial forestry." The Government was fully aware that this area may be developed for an access road and ancillary facilities. There should not therefore be an in-principle objection to the development of an ancillary facility, such as an outage car park, in this location because the purpose of the Government's selection exercise was to rule out sites which were unacceptable in principle.</p> <p>The Applicant also refers the ExA to Mr Philpott QC's written summary of his oral submission made at ISH5, particularly Paragraphs 1.5.6 – 1.5.9 [REP5-110]. Those matters have still not been addressed by SCC.</p>
	East Suffolk Council Response at Deadline 7	<p>ESC has provided the following comment in our Deadline 6 submission [REP6-032]: SCC has responded to the ExA request at ISH5 to provide greater detail on how it considered an alternative to the proposed outage car park at Goose Hill could be achieved. ESC notes SCC's response but would like to highlight some concerns.</p> <p>At para. 13 page 3, SCC suggest that the Applicant sets up a "call-off" contract with one or more local farmers or landowners to permit temporary parking on their land should it be required in the event of an unplanned outage clashing with a planned outage. SCC does recognise that such use would require discussion with the local planning authority. As the local planning authority for the East Suffolk administrative area, ESC is concerned that any such arrangements would be unlikely to be acceptable in the countryside location (possibly within or visible from the AONB) in such an ad hoc manner. Appropriate and safe highway access would be required, and it is unlikely that such fields would be appropriate for vehicle parking without additional work including potential re-surfacing, any such temporary parking arrangement would have an unacceptable visual impact, be harmful to vehicle and pedestrian safety, lead to drainage problems in many areas, and cause community disruption and concern. Temporary facilities to facilitate park and ride from such areas would also add to the landscape and visual</p>

ExQ2

ExQ2	Question to:	Question:
		<p>impacts and are likely to be objected to by local residents in most rural locations that are well related to the road access routes.</p>
	<p>Suffolk Coast and Heaths AONB Partnership Response at Deadline 7</p>	<p>The AONB Partnership note that Suffolk County Council is a member of the AONB Partnership. Consultation responses from the AONB Partnership are always caveated by the assumption that individual members of the Partnership will make their own responses reflected their full remit.</p> <p>AONB Partnership comments on Suffolk County Council comments are made in the context that Suffolk County Council is a funding partner and host of the AONB staff team. For information, AONB Partnership consultation responses for AONB are drafted by the staff team for partner comment, correction and endorsement before submission.</p> <p>The AONB Partnership broadly agree with the conclusions the Suffolk County Council draw in their deadline 5 response to the request for additional information requested by the Examining Authority on the proposals relating to the provision of an alternative car park (REP5-171) in paragraphs 19 and 20.</p> <p>However, the AONB Partnership consider that in paragraphs:</p> <p>10: Any further parking required for simultaneous outages should be located outside the AONB.</p> <p>12: That sites outside the AONB should be identified for occasional outage car park facilities.</p> <p>13: The applicant should seek to identify locations via the proposed 'call off' contracts outside the AONB.</p> <p>15: Any sites identified for additional outage car parks should be outside the AONB.</p> <p>The AONB Partnership takes this view as large scale car parks do not contribute to the statutory purpose of the nationally designated landscapes and reasonable alternative solutions are possible.</p>
	<p>TASC Response at Deadline 7</p>	<p>TASC preface our comments on the outage car park note with our overriding opinion that the planned access road results in too great a loss of AONB. TASC remind the ExA that while Sizewell was listed within EN6 as a potentially suitable</p>

ExQ2

ExQ2	Question to:	Question:
		<p>site, we draw attention to TASC’s ISH 5 Landscape submission [REP5-296] para 15d) which says, in respect of EN6 Annex C [para C.8.69]: “The assessment expressly excluded consideration of the access road impact”, indeed it says: “there is no presumption that development will take place in the area of the access road.” It is the route of the access road that makes it possible for the car park to be located in its proposed location within the AONB. Loss of land within the AONB for a car park cannot be said to enhance the purpose of the AONB’s designation nor contribute to wildlife recovery.</p> <p>TASC refer to EN1 para 5.9.9 which states, “AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty.” This is confirmed in the NPPF at para 176.</p> <p>TASC are of the opinion that both the outage and the operational car parks should not be sited on Goose Hill. The fact that car parks are proposed for Goose Hill, demonstrates the</p> <p>Applicant’s proposed SZC development is too big for the site available.</p> <p>TASC’s comments regarding SCC’s document should not be considered as an endorsement of the SZC project to which TASC remain totally opposed. TASC consider that SCC have presented a good case for why the outage car park does not need to be, and should not be, in the AONB. Indeed, TASC consider the same alternatives should be applied to the operational car park on Goose Hill- a further alternative siting for the operational car park is to consider building the new training centre and visitor centre in Leiston, thus freeing up the land that those buildings are currently planned to occupy as part of the Sizewell B relocation of facilities.</p>
	<p>Stop Sizewell C Response at Deadline 7</p>	<p>Stop Sizewell C supports the position of SCC regarding the need for two outage car parks in the AONB for SZB and SZC and their suggestions for potential resolution with off-site facilities or reprioritisation of car park access for operational staff.</p> <p>The contention by the applicant, referred to in paragraph 4 of SCC’s submission, that once an outage clash has occurred, clashes would continue until another unforeseen outage occurred for one of the clashed reactors is a significantly risky</p>

ExQ2	Question to:	Question:
		<p>approach as an there is an accompanying increased risk of the third reactor clashing with the existing two clashed reactors.</p> <p>It also speaks to an implied abnegation of responsibility by the applicant and SZB management to actively separate the next planned outages for the clashing reactors whilst ensuring that the third reactor remains unaffected.</p> <p>It is clear that any responsible and forward thinking project management organisation would ensure that the clashes were resolved at the next planned maintenance opportunity.</p> <p>From an operational safety perspective, I would assume that the ONR would insist that the outage spacings between the three reactors are brought back into compliance at the earliest possibility by adjustments of one or more outage periods.</p> <p>Also, depending upon the severity of the issue that had caused the unforeseen clash and the period for each outage to be resolved prior to restart, there may be no long-term clash at all, as the period required for each outage may resolve the situation within the clashed outage periods respectively.</p>
	Natural England Response at Deadline 7	<p>SCC makes a very clear and compelling case for an alternative solution. We support their contention that the proposal for additional outage parking to be sited within the designated landscape of AONB is disproportionate to the anticipated or likely need. This is particularly the case given that SCC have proposed alternative approaches which appear to be both practical and deliverable.</p>
	SZC Co. Response at Deadline 8	<p>In response to TASC's comment in relation to Paragraph C.8.69 of NPS EN-6, SZC Co. notes that this paragraph goes on to state that <i>'the IPC will need to consider detailed plans using the guidance provided within EN-1 and EN-6, and the IPC should in particular seek evidence that the applicant has consulted the local authority and the AONB, on any proposals for a road'</i>.</p> <p>SZC Co's. written summary of oral submissions made in relation to development within the AONB in the light of EN-1 and EN-6 is set out in Section 1.2 of Written Summaries of Oral Submissions made at ISH5 [REP5-110].</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Further details on the site selection exercise undertaken for the access road are set out in the Site Selection Report in Section 3.6(b) (Electronic Page 74) [APP-591]. This includes details of statutory consultation, including with the local authority and the AONB.</p> <p>SZC Co. has considered other responses made by Interested Parties at Deadline 7 and has no further comments to its own response at Deadline 7.</p>
	<p>SCC Response at Deadline 8</p>	<p>We note the Applicant’s comments and clarifications in its response to LI.2.9 and LI.2.10.</p> <p>The Applicant’s response to the issue of the question of risk of a double outage occurring does not provide the answer to the level of probability that exists. There is a 22% chance that if an outage occurred, that it would be within the period when there was already an outage taking place. This does not deal with the frequency within which it is estimated that a forced outage would take place. Thus, if a forced outage only occurred once every 10 years, there would only be a 22% chance that this would coincide with an outage in another plant in that whole period. Therefore, the likelihood of there being a need for two outage car parks on a frequent basis is very low.</p> <p>SCC notes that for traffic modelling purposes the Applicant proposed during scoping that a single outage was considered for the operational year scenario and based on the rational provided accepted this.</p> <p>We stress that the approach suggested by SCC in [REP5- 171] should be seen as one of many alternative options to the outage car park at Goose Hill as proposed by the Applicant. As [REP5-171] states in para 20, “Of course, there may be other alternative approaches to deal with parallel outages to the one proposed in this paper, which still would avoid the additional development of an outage car park within the AONB.”</p> <p>Notwithstanding that, we consider that the constraints of planning permission could be overcome by seeking a permanent planning permission for the occasional use of a site as an outage car park. This could then be retained by commencing the development through constructing the accesses (our submission at REP5-171</p>

ExQ2	Question to:	Question:
		<p>stated that it would be important for these to be established at an early point in order to allow swift establishment of the rest of the facility when required) and the permission would then not lapse, though the full car park facilities would not be required to be established until the occasion required. In the meantime, the land could continue to be used for agricultural purposes.</p> <p>We can also confirm that, whilst improved alternative transport modes (direct bus services) and car sharing could considerably reduce the demand for outage car parking, we do not consider that this necessarily can remove the need for an outage car park altogether.</p> <p>A robust Operational Travel Plan that considers outage workers would be highly beneficial in managing demand, implementing mitigation measures and reducing the demand for parking. This could be considered as a reasonable alternative to providing excess parking or at least reducing the amount of excess parking.</p> <p>We also understand from the Applicant's comments in LI.2.10, that confirms that, once there is one occasion of a parallel outage, the likelihood is that the following outages would continue to be run as parallel outages (until another unplanned outage would occur). We appreciate that this would make a temporary outage car park, as proposed in [REP5-171], less feasible, though we consider that the difficulties for the recruitment of sufficient numbers of skilled staff and of then accommodating them in the area would mean that there would be strong economic and practical advantages for minimising the number of reoccurrences when such an overlap would take place.</p> <p>However, even if there can be a case made for a permanent outage car park, it does not seem that issues are insurmountable to locate the outage car park at a location outside of the AONB. It is recognised that the current DCO application does not include such an offsite provision, and given the late stage of the examination, it would not be possible within the examination period to change the DCO application to that effect. There would still be a period of at least ten years until the outage car park was required, which would allow for a TCPA application to be made. Possible alternative locations could include those of the temporary Associated Developments, such as the LEEIE or the Northern Park and Ride. It is noted that the LIR (para 16.25) considers a potential "for a legacy benefit of retaining a small proportion of parking at the southern end of the site associated</p>

ExQ2

ExQ2	Question to:	Question:
		<p>with railway station parking. This would require planning permission.” A similar approach, albeit at a larger scale, could be taken for the outage car park. There is no evidence that the difficulties suggested by ESC in its comments in [REP6-032] mean that a site could not be found that was more acceptable than one in the AONB, especially as it is anticipated that this would include very intermittent use. Furthermore, SCC considers that it would be quite possible to find a site which had acceptable road access.</p> <p>There is no inconsistency in SCC’s position that it did not object to the use of Pillbox Field as a replacement outage car park for Sizewell B. It is recognised that there will be regular occasions when one car park is required for outages. What it finds as unacceptable is the building over of part of the AONB for a purpose which may be very intermittently used.</p> <p>It is for the Applicant to evidence that there is an overriding need to locate the outage car park within the AONB, in the absence of alternatives. SCC remains unconvinced that alternative arrangements are not possible and reasonably achievable, that would not involve the additional land-take within the AONB.</p> <p>Therefore, we recommend the Examining Authority, and ultimately the Secretary of State, to examine carefully whether this aspect of the proposal is appropriate as it stands, or amendments could be sought before a final decision is taken.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>SCC re-confirms at Deadline 8 that the need for a Sizewell C outage car park cannot necessarily be removed, which SZC Co. welcomes and agrees with.</p> <p>The alternative approach to the proposed outage car park advocated by SCC is to seek ‘a permanent planning permission for occasional use’. The permission would then be implemented by ‘constructing the accesses’ to avoid the permission expiring. The rest of the car park would be built when a forced outage occurs and then it would remain in-situ. There are several problems with this inchoate concept:</p> <ul style="list-style-type: none"> • When the outage car park is needed, it is needed urgently. Waiting several months (at the least) for any necessary additional ecological surveys to be

ExQ2

ExQ2	Question to:	Question:
		<p>carried out and for the permanent surfacing on the car park to be laid is not fit for purpose.</p> <ul style="list-style-type: none"> • ESC in its role as planning authority has already confirmed at Deadline 7 that such a facility is unlikely to gain planning permission in a countryside location. The only alternative sites identified by SCC are in the countryside. • This would be a permanent off-site development. At Paragraph 8 of SCC's Deadline 5 submission [REP5-171], SCC suggest that a permanent off-site development would not be appropriate. <p>SZC Co. reiterates that there is no reasonable alternative to the proposed on-site outage car parking and exceptional circumstances exist in accordance with Paragraph 5.9.10 of NPS EN-1.</p>
<p>LI.2.10</p>	<p>The Applicant</p>	<p>Outage Car Park</p> <p>Noting the content of paragraph 4 of SCC's Alternative Outage Car Park note [REP5-171], please provide further detail as to why, if an outage clash occurs, clashes would continue until another forced or unplanned outage.</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>Where a forced outage occurs within a few months before a planned outage, the two outages for the relevant reactor may be combined for efficiency purposes where it is economically and environmentally responsible to do so. A decision to combine the outages would occur on a case-by-case basis.</p> <p>The decision to combine the outages is based on a consideration of both the reduced power-station downtime (and therefore the reduced loss of electricity generation) and the remaining operational life of the nuclear fuel. This is because a planned outage typically includes refuelling.</p> <p>Once a planned outage period is shifted, future planned outages would then resume an 18-month cycle to gain the most benefit from the nuclear fuel. The Applicant respectfully confirms that SCC is wrong in its assumption that further</p>

ExQ2

ExQ2	Question to:	Question:
		<p>outages are likely to be moved by the operator for the reasons they cite at Paragraph 4 [REP5-171]. This is because:</p> <ul style="list-style-type: none"> • Delaying a future planned outage to avoid a clash would be a major commercial risk, with a significant cost to the operator if a restart was delayed. • SZC Co. would seek to make efficient use of nuclear fuel. Bringing forward a future planned outage to avoid a clash, without the presence of another forced outage to influence that decision, is not considered to be environmentally or economically responsible.
	SCC Response at Deadline 8	See above.
	SZC Co. Response at Deadline 10	SZC Co. has no further comments to add on this matter.
LI.2.12	The Applicant	<p>Power Export Connection</p> <p>Please provide a response on the suggestion by SCC for an additional Requirement to enable the final form of the power export connection to be subject to post-consent approval [REP5-176].</p>
	SZC Co. Response at Deadline 7	<p>In the document referred to above, SCC expressed the view that <i>"the Applicant appeared to agree with a number of points made by SCC's consultants, AFRY, that there were fewer technical impediments to the use of alternatives to pylons than had been the case previously."</i></p> <p>Mr Young in fact commented that since discussions began with SCC some time ago, there is now a greater degree of common ground than there was at the outset. SZC Co confirms that there was no change in position at ISH5 from that previously submitted to the ExA in writing and discussed offline with SCC.</p> <p>On the subject of an alternative form of power export connection, SZC Co. has provided substantial information to show its consideration of alternative proposals and considers the broad proposal put forward by SCC to be neither workable nor</p>

ExQ2

ExQ2	Question to:	Question:
		<p>achievable. A full explanation of the option evaluation process for the power export connections is given in the Technical Recommendation Report Appendix 5E of SZC Co's Response to ExQ1s [REP2-108]. Responses to the questions raised specifically on the potential suitability of Gas Insulated Lines (GIL) are detailed in SZC Co's response to question ExQ1 LI.1.51 [REP2-100].</p> <p>A Requirement for post-consent approval, as suggested by SCC, is considered to be neither necessary nor reasonable.</p> <p>The Applicant refers the ExA to Mr Philpott QC's contribution to Written Summaries of Oral Submissions made at ISH5 [REP5-110], particularly Paragraphs 1.5.6 – 1.5.9. Those matters have still not been addressed by SCC.</p>
	SCC Response at Deadline 8	SCC's views are unchanged from our previous position explained in [Rep2-189], [REP5-172] page 60, and [REP5- 176] , that we remain unconvinced that technical issues are insurmountable to avoid the need for pylons and overhead lines and it considers the use of gas insulated lines to be a viable alternative.
	SZC Co. Response at Deadline 10	SZC Co. has no further comments to add on this matter.
LI.2.13	The Applicant	<p>Turbine Halls and Operational Service Centre</p> <p>The amendment to Detailed Built Development Principle 56 [REP5-070] in respect of the discussion and agreement of the colour palette with ESC is noted. However, as commented on by SCC [REP5-172], please explain on how this Principle fulfils the statement made at paragraph 6.17.9 of [REP5-070] in respect of the identification and range of colours and hues for the turbine halls. Is it intended to submit these details into Examination?</p>
	SZC Co. Response at Deadline 7	The cladding material above the base 'plinths' will use a material to be agreed (likely to be anodised aluminium). The colour of the material illustrated in the Design and Access Statement and chosen for the application is the paler end of the bronze anodising colour range (a straw colour). At this stage, there is no further material to submit to the Examining Authority but further design

ExQ2	Question to:	Question:
		<p>development will take place post granting of the DCO. This will include the cladding panels and their profiles which will be agreed with the local planning authority as part of the agreed design governance process. The precise colours of finishes within that pale bronze (straw) anodising range would also be subject to review and agreement with the local planning authority. Samples, mock-ups and prototypes would be used to demonstrate design and finishes as part of the process of agreement with the local planning authority. To further satisfy SCC's comments, we suggest some amendments to be made to Design Principle 56 in the Design and Access Statement. The proposed additional wording is shown underlined below –</p> <p><i>The turbine halls cladding (<u>material above the base plinth</u>) will provide a responsive surface treatment which changes in colour and tone, subject to surrounding lighting and climatic conditions <u>and shall be made of an agreed material and panel profile/s</u>. The colour palette <u>and panel profile</u> shall be discussed and agreed with East Suffolk Council <u>as part of pre submission discussion/ design review and align with the colour information and study outcomes recorded in the Design and Access Statement Section 7:11 and within a range of light to darker bronze</u>. The information shall include details of the manufacturer's maintenance specification for external facing cladding.</i></p> <p>Design Principle 56 indicates the preferred colour range for the turbine hall cladding being selected from light to darker bronze anodised aluminium cladding explored in section 7.11 of the Design and Access Statement. The present preference at this stage of design, is the paler end of the bronze anodised range illustrated in rendered model views Figure 7:45/7.46.</p> <p>This revised additional wording to the Design Principle will be included in the final version of the Design and Access Statement to be submitted at Deadline 10.</p>
	ESC Response at Deadline 8	<p>Turbine Halls and Operational Service Centre. ESC supports the proposed inclusion of additional wording to Design Principle 56 in the Design and Access Statement in respect of the cladding to the Turbine Halls as set out in the Applicant's response. The additional wording could be somewhat clearer: with whom will the material be agreed, as stated here? The panel profile will be agreed with ESC in the new</p>

ExQ2

ExQ2	Question to:	Question:
		<p>wording, but it should be clear that the material will be also agreed with ESC, if that is what is intended.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>Further to the updated identified at Deadline 7 above, additional wording to Design Principle 56 is provided at Deadline 10 (Doc Ref. 10.18) as shown underlined below –</p> <p><i>The turbine halls cladding (material above the base plinth) will provide a responsive surface treatment which changes in colour and tone, subject to surrounding lighting and climatic conditions and shall be made of an agreed material and panel profile/s. The colour palette, <u>material</u> and panel profile shall be discussed and agreed with East Suffolk Council as part of pre submission discussion/ design review and align with the colour information and study outcomes recorded in the Design and Access Statement Section 7:11 and within a range of light to darker bronze. The information shall include details of the manufacturer’s maintenance specification for external facing cladding.</i></p>
<p>LI.2.14</p>	<p>The Applicant</p>	<p>Interim Fuel Store</p> <p>The parameters of the Interim Fuel Store, content of Requirement 12 [REP5-029] and the response to ExQ1 LI.1.12 [REP3-046] are noted. Nonetheless, given the prominence, scale and longevity of this structure the submission of additional detail into examination, including colour and finish, would be beneficial. Please provide a response.</p> <p>Please also confirm whether the design of the Interim Fuel Store at Hinkley Point C has been finalised?</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>The Interim Spent Fuel Store (ISFS) is required at both Hinkley Point C and Sizewell C 10 years post operation. For SZC this need date is defined as 2042. The design of the ISFS has not been finalised, but design principles have been defined to provide design control and ensure an appropriate design outcome. At Hinkley Point C the design of the ISFS is at RIBA stage 1, which is the definition of the project brief and user requirements capture. Concept design of the structure including structural appearance has not yet commenced. In the case of SZC there</p>

ExQ2	Question to:	Question:
		<p>is no information available to share at this time beyond that already contained in the DCO submission and expressed in revised Design Principles as agreed at Deadline 1 with the local authorities. SZC Co. suggest that additional certainty to be provided with further enhancement of the Design Principle 57 of the Main Development Site Design and Access Statement. The proposed additions are shown below underlined:</p> <p>Interim spent fuel store 57</p> <p><i>The external treatment of the interim spent fuel store will seek to comprise a simple form with minimal external projections and a colour which responds to its setting as far as is reasonably practicable, taking into account the operational and nuclear safety requirements of the building. Reserved Matters applications shall include details of the available colour options, including an explanation of how the proposed colour choice has responded to the building's setting. <u>The design shall have regard to the AONB and its immediate landscape context, acknowledge the long design life of the building in its material selection and design response, recognising its elevated status relative to other ancillary buildings.</u></i></p> <p>This revised additional wording to the Design Principle will be included in the final version of the Design and Access Statement to be submitted at Deadline 9.</p>
	ESC Response at Deadline 8	Interim Fuel Store. ESC supports the proposed inclusion of additional wording to Design Principle 57 in the Design and Access Statement in respect of the design of the Interim Fuel Store. There is a conflict between the response here which states that the final Design and Access Statement will be submitted at Deadline 9, and the responses to LI.2.13 and LI.2.26 which state that the final DAS will be submitted at Deadline 10 – if the Applicant could confirm which please.
	SZC Co. Response at Deadline 10	Further to ESC's response above, SZC Co. confirms that the final version of the DAS is submitted at Deadline 10 (Doc Ref. 10.18). For the avoidance of doubt, where SZC Co. stated at Deadline 7 " <i>The Interim Spent Fuel Store (ISFS) is</i>

ExQ2

ExQ2	Question to:	Question:
		<i>required at both Hinkley Point C and Sizewell C 10 years post operation.”, this means “The Interim Spent Fuel Store (ISFS) is required at both Hinkley Point C and Sizewell C 10 years post commencement of the operation of Unit 1.”</i>
LI.2.18	The Applicant	<p>Dome Information</p> <p>As requested at the ISH5 on 13 July 2021, please provide photographic examples of concrete domes in-situ.</p>
	SZC Co. Response at Deadline 7	SZC Co. have provided two examples of concrete domes from EDF Saint Alban, France which was commissioned in 1989 and Seabrook Station, Gulf of Main, USA which was commissioned in 1986, these can be found in Appendix 4B.
	ESC Response at Deadline 8	<p>Appendix 4B – Concrete Dome – Example Photos</p> <p>The titling of the two example photographs here does not appear to be accurate, it is not clear which dome is the French or American example. Without any accompanying explanatory text by the Applicant, it is difficult to tell what we are meant to understand from these photographs. This does limit their usefulness.</p>
	SZC Co. Response at Deadline 10	<p>Apologies that ExQ2 LI.2.18, Appendix 4B [REP7-057], submitted at Deadline 7 was not clear, there appears to have been a slight formatting error where both photograph titles appeared on the first page. To clarify, the first photograph is of EDF Saint Alban which is an inland location on the Rhone river downstream from Lyon in France (commissioned in 1989). The second photograph is of Seabrook Station, Gulf Maine, New Hampshire, USA (North Atlantic) (completed in 1986). The request was to provide photographic examples of existing concrete domes.</p> <p>A separate note was prepared and submitted as Appendix C of the Written Submission Responding to Actions Arising from ISH5: Landscape and Visual Impact and Design [REP5-117] which sets out more information on concrete quality and maintenance.</p>
LI.2.21	Theberton and Eastbridge Parish Council	<p>Dark Skies</p> <p>Please advise when the Dark Skies report, as discussed in [REP3-138], is to be submitted into examination.</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	No response from SZC Co. is required.
	Response from Theberton and Eastbridge Parish Council at Deadline 7	<p>The existing initial report findings are present in REP5-286 Section 6. However, a final assessment will need to be done at a new moon in the autumn. We will attempt to get our autumn night sky readings between 4th and 9th September being the earliest autumn new moon of the season that will potentially be suitable, assuming clear skies.</p> <p>After that, the next available new moons are on 6th October and 4th November. We will be happy to provide the final report as soon as it is available.</p>
	SZC Co. Response at Deadline 8	SZC Co. has no comments on the initial findings provided in section 6 of REP5-286 . SZC Co. look forward to reviewing and commenting if appropriate on the Dark Skies report discussed in [REP3-138] .
	Response from Theberton and Eastbridge Parish Council at Deadline 7 Late Submission	Dark Skies report is provided within [REP7-292] .
	SZC Co. Response at Deadline 10	SZC Co. thanks the respondent for their report submission into the Examination. This report contains information on the practicalities of using the three sites identified for astronomical purposes. SZC Co. has no further comment on the findings.
LI.2.25	The Applicant	<p>Design and Access Statement – Accommodation Campus Design Principles</p> <p>Please comment on the suggested amendments to the design principles in Table A.1 of [REP5-075] made by ESC at [REP5-143].</p>
	SZC Co. Response at Deadline 7	<p>ESC’s suggested amendments to the design principles given at [REP5-143] related to those set out in Table A.1 at [APP-587] and [REP2-040] and were responded to in the design principles set out in Table A.1 of [REP5-075].</p> <p>Towards the end of [REP5-143] it is stated that <i>‘having now reviewed the submission from the Applicant, ESC can confirm that we are satisfied with the proposed amendments to the Key Design Principles for the Accommodation Campus and are pleased to note that all of our suggested additions have been</i></p>

ExQ2

ExQ2	Question to:	Question:
		<i>incorporated'</i> . It is understood that no further amendments to the Accommodation Campus design principles are necessary in relation to ESC's feedback.
	ESC Response at Deadline 8	Design and Access Statement – Accommodation Campus Design Principles. ESC can confirm that no further amendments to the Accommodation Campus Design Principles are necessary in relation to our previous comments.
	SZC Co. Response at Deadline 10	SZC Co. has no further comments on this matter.
LI.2.26	The Applicant, ESC	Design and Access Statement – Accommodation Campus Design Principles Principle 13 in Table A.1 [REP5-075] refers to the colour of buildings and the consideration to be given to the Suffolk Coast and Heaths AONB Guidance on the Selection and Use of Colour in Development document. In contrast, Detailed Built Development Principle 56 in Table 5.3 [REP5-070] includes the need for the agreement of ESC in respect of cladding colours for the turbine halls. Whilst noting the content of Requirement 17 [REP5-029], what consideration has been given to a similar level of involvement of ESC in respect of the colour finish of the accommodation campus buildings?
	SZC Co. Response at Deadline 7	Requirement 17 at [REP-029], requires a statement of compliance with the design principles set out at [REP5-075] to be submitted and agreed before work on the Accommodation Campus commences. In addition, there is a commitment from SZC Co. to enter into an agreement on a design governance framework to provide reassurance on the delivery of good design and the use of a design review panel. This framework is currently being discussed with ESC and will include reference to the use of a design review panel, the design guardianship role and the role and status of design principles (see responses at LI.2.3 and LI.2.5 for further details). The implementation of the design governance framework, along with pre-application discussions with planning officers will ensure that the design principles, including principle 13 on the use of colour within the Accommodation Campus, are actively discussed with ESC as part of a formal design review process and that an appropriate approach is agreed in advance of the statement of compliance submission.

ExQ2

ExQ2	Question to:	Question:
		<p>In addition to the above, Principle 13 in Table A.1 [REP5-075] will be amended in the Final version of the DAS to be submitted at Deadline 10 to read: <i>Building colour palette to be discussed and agreed with East Suffolk Council and to include consideration of the Suffolk Coast and Heaths AONB Guidance on the Selection and Use of Colour in Development document.</i></p>
	East Suffolk Council Response at Deadline 7	ESC consider that it is for the Applicant to advise the Examiners what consideration has been given to ensuring that there is a similar level of involvement by ESC in respect of the colour finish of the accommodation campus buildings to those on the MDS.
	SZC Co. Response at Deadline 8	No further comments to add to SZC Co. response at Deadline 7.
	ESC Response at Deadline 8	<p>The Applicant's response here states that there is a there is a 'commitment from the Applicant to enter into an agreement on a design governance framework to provide reassurance on the delivery of good design and the use of a design review panel'. As stated on answer LI.2.5 above, the Applicant has clarified the reference to the Design Governance Framework is erroneous and should instead refer to the Design Review Panel. ESC welcomes the role and use of the Design Review Panel. ESC supports the proposed amended wording to Accommodation Campus Design Principle 13 as put forward by the Applicant here in response, as it now includes for the discussion and agreement of the building colour palette with ESC – which is what the ExA is seeking via their question, in effect, and which will, thereby, mirror ESC's role in respect of similar agreement for the Turbine Halls. (Currently DP13 does not refer to ESC or ESC's agreement).</p>
	SZC Co. Response at Deadline 10	SZC Co. has no further comments on this matter.
LI.2.30	The Applicant, SCC, ESC	<p>Associated Development Sites – Requirement 22A SCC [REP5-176] considers they should be the discharging authority for Requirement 22A as the proposed landscaping is on highway land. Are discussions regarding this matter underway?</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 7	SZC Co. have been discussing this requirement with both SCC and ESC. ESC consider that they are the appropriate discharging authority for this requirement, as they are able to look at the landscape proposals in a comprehensive manner and ensure that any proposals are considered with an appropriate planning balance. SCZ Co. agrees with ESC and has therefore not made any change to the requirement to the effect SCC have requested. It should also be noted that SCC would be a consultee on the discharge of the detailed landscape proposals and ESC would be obliged to have proper regard to any representations that are made in respect of the landscape proposals. ESC would therefore be in the best position to determine the application. SCC, as the highway authority, would separately have to agree the proposed highway works, drainage and landscape buffer associated with the highway as part of the details that need to be approved as part of Article 21 of the DCO. This is considered to be a more appropriate place for SCC to define their requirements for the highway landscape works.
	East Suffolk Council Response at Deadline 7	This is under discussion. There is some concern that some of the landscaping would be outside the area the highway authority would be willing to adopt. We therefore need to decide if the landscape requirement is best dealt with holistically by ESC or in part by SCC and in part by ESC.
	Suffolk County Council Response at Deadline 7	<p>Preliminary discussions have been held between ESC, SCC and SZC Co regarding discharge of landscaping on land that is or will become highway maintainable at public expense.</p> <p>At the time this response was completed, SCC was waiting for the Applicant to provide updated plans to help it better understand the requirement.</p>
	SZC Co. Response at Deadline 8	Agreement has been reached with SCC regarding ESC's role in discharging all landscape matters in relation to highway design. SCC confirmed in its oral representations made at ISH13 that it was content for ESC to discharge landscape details, following consultation with SCC as the local highway authority.
	SCC Response at Deadline 8	Following further discussions between the Local Authorities and the Applicant we have reached agreement that, whilst ESC will lead the discharge for landscaping for this scheme both within and beyond the Highway Boundary, rather than the discharge of requirements being split, there will be an additional provision for the undertaker to consult the highway authority regarding those proposals within the

ExQ2

ExQ2	Question to:	Question:
		<p>highway boundary before submitting details to ESC for approval. In this way, SCC would have input at the formative stages of such proposals (as well as consultation in the discharge process via Schedule 23, paragraph 1(4)).</p> <p>This would be on the basis of the following being included in R22A, which we understand is acceptable to the other parties:</p> <p>"(2) Before submitting details under paragraph (1) which relate to any proposals within the proposed highway boundary, the undertaker must consult the highway authority regarding those proposals."</p>
	SZC Co. Response at Deadline 10	SZC Co. agrees that SCC should be consulted by ESC in approving the details under Requirement 22A. Under Schedule 23, paragraph 1(4), ESC must consult SCC on discharging any requirements including this one. Therefore, the additional part (2) suggested by SCC would be duplicative and is not necessary.
LI.2.37	The Applicant	<p>Sizewell Link Road – Pretty Road Bridge Design</p> <p>In the event that Change 18 [REP5-002] is accepted into examination, please provide additional visualisations of the proposed Pretty Road overbridge, ensuring that it is at a larger scale than that included at [REP5-041].</p>
	SZC Co. Response at Deadline 7	See Figure 4.3 which provides a visualisation of the proposed change that is comparable to the visualisation of the Pretty Road Bridge provided ExQ1 LI.1.93 [REP2-105] for the current design.
	ESC Response at Deadline 8	Sizewell Link Road – Pretty Road bridge design. ESC notes the submission of one new visualisation of the proposed Pretty Road bridge design. ESC notes that the ExA in their question to the Applicants, did ask for more than one such visualisation.
	SZC Co. Response at Deadline 10	SZC Co. consider that the visualisation provided is a proportionate response considering the relatively minor change proposed and in line with the level of information provided for the previous bridge design.

ExQ2	Question to:	Question:
NV.2 Noise and Vibration		
	The Applicant	<p>Construction Noise Thresholds</p> <p>(i) In light of the ongoing difference of view between you and ESC as to the appropriate standard that should be applied please explain what the justification is for having lower standards than BS 5228 Annex E5 recommends for the 19:00-23:00 time period.</p> <p>What justification do you consider there to be for the current approach and is this supported by previous precedents for projects with similar length construction programmes?</p>
	SZC Co. Response at Deadline 7	<p>(i) SZC Co. is unclear as to ESC’s current position on the appropriate threshold for the evening period.</p> <p>ESC made a point relating to evening noise thresholds in the first entry in Table 18.1 in their Deadline 5 submission ‘Comments on any additional information/submissions received by D3 and D4’ [REP5-138], where they stated:</p> <p>“The construction noise thresholds set out in the Code of Construction Practice (CoCP) [REP2-056] are more onerous than the standard BS5228-1 ABC thresholds during the day (07.00 to 19.00), aligned with the ABC thresholds at night, but less onerous in the evening period (19.00 till 23:00).”</p> <p>ESC subsequently stated at ISH8 that the minerals extraction guidance quoted in Annex E.5 of BS5228-1: 2009+A1: 2014¹ should apply to the evening period, and therefore the threshold should be no more than 10dB above the background sound level. On the basis of the measured evening background (L_{A90}) sound levels shown in Volume 2, Appendix 11A of the ES [APP-203], the construction noise thresholds could be as low as the mid-30s to mid-40s.</p>

¹ British Standard BS5228-1: 2009+A1: 2014 Code of Practice for noise and vibration control at open construction sites – Noise

ExQ2	Question to:	Question:
		<p>Accordingly, SZC Co. is not clear whether ESC is seeking to apply for the evening period:</p> <ol style="list-style-type: none"> 1. the 55dB $L_{Aeq,4hr}$ threshold from the ABC method (from Annex E.3 of BS5228-1: 2009+A1: 2014) for the quietest locations, as highlighted in their Deadline 5 submission; or 2. a much lower limit based on the minerals extraction guidance quoted in Annex E.5 of BS5228-1: 2009+A1: 2014, as stated at ISH8. <p>In respect of option 2, it is important to note that there is no guidance in Annex E.5 BS5228-1: 2009+A1: 2014 in respect of the evening period; that section of the standard recommends a threshold for construction sites that “involve large scale and long term earth moving activities”, which are “more akin to surface mineral extraction than to conventional construction activity” and suggests adoption of a 55dB $L_{Aeq,1hr}$ threshold for the daytime period. There is no recommendation for the evening or night-time periods, beyond the general advice to take account of the guidance.</p> <p>SZC Co. is proposing a construction noise threshold of 60dB $L_{Aeq,16hrs}$, (i.e. for the 16hr daytime and evening period 7am – 11pm), with the additional requirement that the contractor and SZC Co. must agree and have approved by ESC the construction methods and mitigation where the daytime construction noise levels, including the evening period, exceed 55dB $L_{Aeq,16hrs}$. In particular:</p> <ol style="list-style-type: none"> (a) The 60dB $L_{Aeq,16hrs}$ threshold is included in Table 3.2 in Part B of the Code of Construction Practice [REP5-078] and in Table 4.1 of the initial draft Noise Monitoring and Management Plan for the main development site [REP6-029] as the levels that the contractor must use best endeavours and best practicable means to achieve. (b) A revised draft of the Noise Monitoring and Management Plan for the main development site (Doc Ref 9.68(A)) includes the requirement for the contractor and SZC Co. to agree the construction methods and mitigation where the daytime construction noise levels, including the evening period, exceed 55dB $L_{Aeq,16hrs}$. This agreement will be documented in a ‘Bespoke Mitigation Plan’, and without agreement with ESC, the works cannot proceed.

ExQ2	Question to:	Question:
		<p>SZC Co. considers that the need to agree working methods and mitigation at a threshold of 55dB, which is equivalent to the lowest value for the evening period in the ABC method, represents an appropriate balance between providing ESC with the control mechanisms they seek, and balancing the need to deliver the project to programme.</p> <p>SZC Co.'s position is that applying an evening threshold based on the minerals extraction guidance (i.e. ESC's second option set out above) would effectively prevent evening working, thereby precluding the two shift working pattern required to deliver the project on-time. For this reason it is inappropriate. It is also inappropriate because it is not what Annex E.5 recommends, as set out above. Finally, it is inappropriate because Annex E.5 applies to "long-term substantial earth moving ... more akin to surface mineral extraction than to conventional construction activity". That does not represent the nature of proposed construction works, which are not akin to minerals extraction in scale.</p> <p>(ii) The thresholds for the main development site were developed in recognition of the length and complexity of the works, in consultation with ESC; although the criteria were not formally agreed, there was no material difference between parties at that time.</p> <p>As noted at NV.2.0(i), ESC suggested at ISH8 that SZC Co. adopt the minerals extraction criteria quoted in Annex E of BS5228-1: 2009+A1: 2014 for the main development site works, having previously compared the adopted 60dB $L_{Aeq,16hrs}$ threshold to the ABC method. SZC Co. is not clear on exactly what approach ESC is seeking, particularly in the evening period.</p> <p>The Bespoke Mitigation Plan process in the draft Noise Monitoring and Management Plan for the main development site [REP6-029], provides ESC with the mechanism to control, and ultimately veto, construction work at a noise level of 55dB $L_{Aeq,16hrs}$, which is equivalent to the most stringent criterion in the ABC method for any of the daytime or evening periods. It is also equivalent to the daytime threshold set out in Annex E.5 of BS5228-1: 2009+A1: 2014 that ESC say they prefer.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>SZC Co. considers that this approach provides certainty that the works will be managed and mitigated to an appropriate level, in partnership with ESC.</p> <p>There are few precedents for projects of a similar length that had construction controls as low as those proposed by SZC Co. at Sizewell. The construction thresholds for Hinkley Point C are 65dB for the daytime and 60dB for the evening (above which threshold the local authority’s agreement has to be sought)², while the recent 2019 DCO for Tilbury 2 required a Section 61 agreement³ to control construction noise levels, and limits equal to SZC Co’s SOAEL were adopted (these being 10 to 15dB higher than the thresholds sought by SZC Co., i.e. up to 75dB L_{Aeq} during the daytime).</p> <p>Therefore in response to the ExA’s question as to the existence of any relevant precedents, SZC Co. considers that these projects indicate that SZC Co.’s proposed approach at Sizewell is robust.</p>
	ESC Response at Deadline 8	<p>There remain disagreements between ESC and the Applicant over the suitability and application of the guidance in Annex E.5 of BS5228-1. However, there has been significant progress between ESC and the Applicant following ISH8 and ESC’s understanding is that the following points are now agreed by both parties:</p> <ul style="list-style-type: none"> • That there is an increased sensitivity to construction noise in the evening period (19:00 to 23:00) in comparison to conventional daytime working hours. • The adoption of lower thresholds at which the Bespoke Mitigation Plans are triggered provides an acceptable method of managing construction noise below the EIA significance thresholds set out in the ES as an alternative to lowering the thresholds within the CoCP. • In the case of the main development site, setting a construction noise criterion in relation to background noise levels would add unnecessary complexity and

² See Requirement MS9 of The Hinkley Point C (Nuclear Generating Station) Order 2013 SI 2013 No. 648 (appended to SZC Co.’s Written Submissions Arising from ISH8 (Doc Ref 9.83))

³ See Section 61 agreement for Aggregates Deliveries at Tilbury 2, included as Appendix 5A to this document.

ExQ2

ExQ2	Question to:	Question:
		<p>ambiguity to the process and would be overly onerous in comparison to the night-time thresholds.</p> <p>On this basis, ESC and the Applicant have agreed in principle that the trigger levels in Section 4.4.1 of the NMMP for the main development site should be adjusted to include a 50 dBA evening trigger level to recognise both the increased sensitivity of the evening period and extended duration of the works at the main development site. This, and ESC's other suggested amendments to the Draft NMMP, are submitted separately at Deadline 8. Should these be accepted, ESC considers that the construction noise levels around the main development site can be adequately controlled via the NMMP (and associated processes) and therefore that the thresholds in the CoCP can remain aligned to the ES significant thresholds.</p> <p>In this instance, the remaining disagreements between ESC and the Applicant over the suitability and application of BS Annex E.5 of BS5228-1 in this context become immaterial.</p>
	SZC Co. Response at Deadline 10	<p>All matters relating to the control of noise and vibration at the main development site are now agreed between SZC Co. and ESC, including the use of a lower threshold for the evening period to trigger the Bespoke Mitigation Plan process. This is reflected in the final Statement of Common Ground (Doc Ref 9.10.12(B)).</p>
NV.2.1	The Applicant	<p>Saturday Afternoon working at the Associated Development Sites</p> <p>It would appear from the assessments undertaken that there is a risk that the SOAELs could be exceeded during Saturday afternoons. The ES indicates that in most cases this could be managed and delivered through the CoCP to avoid exceedances of the SOAEL, but where this would not be the case the Noise Mitigation Scheme (NMS) would safeguard the sensitive receptors.</p> <p>This does not appear to actually be the case.</p> <p>(i) The NMS would only be triggered and be applicable under certain scenarios which may well mean that those adversely affected by construction during these times would not qualify for the NMS and therefore the mitigation would not be there. In these circumstances how could either the working pattern or the NMS be said to meet both the NPSE and NPS EN1 expectations of avoiding the SOAEL.</p>

ExQ2	Question to:	Question:
		<p>(ii) If the understanding above is correct, can the working in the Saturday afternoons be justified?</p> <p>What would the implications be for the delivery of each of the associated development sites delivery programmes if Saturday afternoon working was not accepted?</p>
	SZC Co. Response at Deadline 7	<p>(i) SZC Co. anticipates that the question relates to the wording in the earlier version of the Noise Mitigation Scheme [REP2-034], where the construction noise or vibration thresholds must be exceeded "on 10 or more days of working in any 15 consecutive days or on a total number of days exceeding 40 in any 6 consecutive months." Using this approach, it would not be possible for a property to be eligible on the basis of the noise thresholds being exceeded on Saturday afternoons only.</p> <p>That wording was taken directly and verbatim from British Standard 5228: 2009+A1: 2014⁴ and is widely used in exactly the way applied by SZC Co., not least by HS2.</p> <p>However, SZC Co. recognises that where construction works extend beyond construction weekday and Saturday morning working hours, the application of the criteria to periods that occur once a week would preclude eligibility under the Noise Mitigation Scheme [REP6-015] since the tests can never be met.</p> <p>To overcome this, the version of the Noise Mitigation Scheme [REP6-015] submitted at Deadline 6 has been amended to the following wording:</p> <p>"(2) an exceedance of (1) where:</p> <p>(a) the exceedance is predicted to occur on 10 or more days of working in any 15 consecutive days or on a total number of days exceeding 40 in any 6 consecutive months;</p> <p>or</p>

⁴ British Standard BS5228-1: 2009+A1: 2014 Code of Practice for noise and vibration control at open construction sites – Noise

ExQ2	Question to:	Question:
		<p>(b) where the exceedance occurs only on a Saturday or Sunday, it is predicted to occur on 2 weekends, or part thereof, in any 15 consecutive days or on 6 weekends, or part thereof, in any 6 consecutive months.”</p> <p>SZC Co. considers that this revised wording overcomes the issue raised in the NV.2.1(i).</p> <p>(ii) Now that the wording in the Noise Mitigation Scheme [REP6-015] has been amended, the question no longer arises. Appropriate protection has been provided for Saturday afternoon working through the Noise Mitigation Scheme.</p> <p>(iii) The programme for delivery of the Associated Development sites is based on construction works on Monday to Friday, and Saturday mornings. However, it is possible that in dry weather, primarily during the summer, Saturday afternoons will be used for earthworks to seek to accelerate the delivery of the Associated Development sites, so that their wider benefit in terms of removing SZC Co.’s freight vehicles and worker cars from the current road network are delivered earlier than might otherwise be the case.</p> <p>Further, paragraph 1.1.6 in Part C of the CoCP [REP5-078] indicates that where possible, noisy activities will be avoided on Saturday afternoons, and this means that Saturday afternoons would generally be limited to maintenance activities.</p> <p>SZC Co. considers that this is the appropriate balance to strike between minimising impacts during the Saturday afternoon period and expediting construction of the Associated Development sites which significantly mitigate the environmental impacts (including in respect of noise, air quality and traffic and transport) of the construction of Sizewell C.</p>
	ESC Response at Deadline 8	<p>ESC’s expectation is that any consideration of working on Saturday afternoons would be addressed as part of the approval process for Bespoke Mitigation Plans. Where working is proposed on Saturday afternoons (or other more sensitive periods) the Applicant will be required to demonstrate to ESC that this is strictly necessary for the timely delivery of the project or otherwise of sufficient benefit to the wider community. ESC is requesting a notification process be written into the CoCP.</p>

ExQ2

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 10	All matters relating to the control of noise and vibration at Associated Development sites, including as to Saturday afternoon working, are now agreed between SZC Co. and ESC, including the use of Bespoke Mitigation Plan process, and the need to notify residents where it is agreed to be appropriate under that process. This is reflected in the final Statement of Common Ground (Doc Ref 9.10.12(B)).
NV.2.2	Applicant, SCC, ESC	Quiet Road Surfacing (i) What additional acoustic benefit might be expected if this surface were to be used for the Sizewell Link Road and the Two Village Bypass? (ii) Would a different maintenance regime from a standard road be required in the event this surface were to be adopted to maintain the acoustic benefits it may bring? (iii) Is this now being factored into the discussions? (iv) In the event that quiet road surfacing were to be offered how would this be secured?
	SZC Co. Response at Deadline 7	<p>(i) Depending on the exact specification of the quiet road surface, a reduction of approximately 2.5dB is typically achievable, relative to a hot rolled asphalt surface (which is a standard road surface) at traffic speeds of 75km/h (approximately 46mph) or more. At slower speeds, the reduction from a quiet surface decreases since the tyre/road interface becomes less dominant and engine/exhaust noise becomes more prominent. The advice in Annex A of DMRB LA111 is to only apply the additional effect of the quiet road surface at speeds above 75km/h, however in reality there will be a tailing off of the effect of a quiet road surface at speeds below 75km/h.</p> <p>A reduction of 2.5dB may not be achievable at every receptor, since traffic noise levels at a given receptor will be due to a number of different roads, not just the road with the quiet surfacing. The overall benefit for some receptors may be less than 2.5dB.</p> <p>However, recent work undertaken in consultation with FERN, Mollett's Farm and the occupants of Oakfield House suggest that for those locations where the new roads have the potential to cause a significant increase in road traffic noise, the reduction due to a quiet road surface may be close to its theoretical maximum value of 2.5dB.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) SZC Co. is reviewing the feasibility of using a quiet road surface; the surfacing is likely to cost two to three times as much as a standard hot rolled asphalt surface, and would last 8-12 years compared with 15-18 years for a hot rolled asphalt surface.</p> <p>(iii) SCC has indicated a preference for the use of a quiet road surface, as set out in their Deadline 3 response to the Examining Authority's First Written Questions (ExQ1) Question NV.1.49 [REP3-084], and subject to the outcome of the review of the feasibility of using a quiet road surface, it will remain an option. SZC Co. anticipates being able to bring certainty to this issue as part of its detailed discussions with SCC over matters relating to transport mitigation.</p> <p>(iv) If agreed, the principles of a road surface would be secured in an update to the Associated Development Design Principles document [REP2-041].</p>
	East Suffolk Council Response at Deadline 7	SCC is the responsible authority for road noise so ESC defer to the highway authority, SCC, on this issue.
	Suffolk County Council Response at Deadline 7	<p>(i) Manual of Contract Documents for Highway Works: Volume 1: Specification for Highway Works: 900 Series: Clause 942 table 9/17 allows specification of level 3 surfacing with a 3.5dB noise reduction, lower than the 2.5dB reduction suggested by SZC Co. The authority considers that level 3 is appropriate for existing roads (A12, B1122) but level 2 may be suitable for new roads where additional mitigation is possible, for example where bunds or cuttings reduce the overall traffic noise. https://standardsforhighways.co.uk/ha/standards/mchw/vol1/pdfs/3796149%20MCHW%20Vol%201%20Series%20900_Print%20v0.2.pdf</p> <p>(ii) Lower noise surfacing are generally more porous and hence of poorer durability than 'standard materials' and this will need to be considered in the design of new and existing roads. The authority would expect SZC CO to fund maintenance of such surfaces in the construction period of SZC. Unfortunately, due to the uncertainty of future highway maintenance it is not possible for SCC to commit to do so in the longer term.</p> <p>(iii) and (iv) <u>Existing Roads</u></p>

ExQ2

ExQ2	Question to:	Question:
		<p>Low noise surfacing forms part of the proposed mitigation scheme for the A12 at Marlesford and Little Glemham and this will be secured as a specific item named within a defined scheme in the Deed of Obligation. Early discussions with the Applicant indicate that this will be acceptable for other schemes where quieter surfacing is proposed (Yoxford and Theberton).</p> <p><u>New Roads</u></p> <p>The provision of quieter surfacing will need to be included in the detailed design that will be technically approved by SCC. SCC proposes this can be done through additional plans for approval if that is acceptable to other parties.</p>
	Mollett’s Partnership Response at Deadline 7	<p>We are pleased to see the ExA’s question to the Applicant, SCC and ESC.</p> <p>This is because we are also concerned at the deterioration in effectiveness of a quiet road surface as it degrades. If the Applicant provides projections as to the noise-mitigating benefits of a quiet road surface, could we ask the ExA to ensure that these figures do not represent only the ‘best case’ scenario of when the surface is first applied, but take into account the ‘real world’ properties of a partly-worn surface and/or a surface at the end of its life.</p>
	SZC Co. Response at Deadline 8	<p>SZC Co. notes that any figures it quotes for anticipated noise reductions from quiet road surfaces are based on the values provided in the Design Manual for Roads and Bridges LA111⁵ and they represent the Government-endorsed approach to the assessment of such surfaces. The extent to which the acoustic performance of the road surface might change over time is not taken into account in any submissions on quiet road surfaces.</p>
	ESC Response at Deadline 8	<p>Quiet Roads are within the remit of the Local Highways Authority and so ESC defers to them.</p>
	SZC Co. Response at Deadline 10	<p>SZC Co. has nothing further to add to its previous responses, other than to note that the Associated Development Design Principles (Doc Ref. 10.1) require SZC Co. and SCC to engage on this matter and implement the agreed position.</p>

⁵ See Appendix A of Design Manual for Roads and Bridges (DMRB) LA 111 ‘Noise and vibration’ (May 2020)

ExQ2	Question to:	Question:
		<p>The locations for quiet road surfaces on existing roads are now agreed as Little Glemham and Marlesford to be secured under Schedule 16 of the Deed of Obligation (Doc Ref 10.4).</p> <p>Quiet road surfaces are not proposed at Yoxford and Theberton because:</p> <ul style="list-style-type: none"> • At Yoxford, the period of peak additional traffic flow is limited to the Early Years, prior to the construction of the Sizewell link road, unlike Little Glemham and Marlesford where the additional traffic is predicted for the duration of the construction works. In addition, there will be limited noise reduction from a quiet road surface at speeds of 30mph or less. • On the B1122 the period of peak additional traffic flow is limited to the Early Years through Middleton Moor and Theberton. Additionally, a temporary reduction in speed limit to 20mph has been agreed for the Early Years through Theberton, to be secured through the B1122 Early Years Scheme under the Deed of Obligation (Doc Ref 8.17(G)), subject to a Traffic Regulation Order process; a quiet road surface will offer no benefit at a speed of 20mph. <p>These agreements are reflected in the final Statement of Common Ground (Doc Ref 9.10.12(B)).</p>
NV.2.3	Applicant, Network Rail	<p>Rail Noise Mitigation Scheme</p> <p>(i) Please advise the latest position regards to the likely deliverability of this scheme in light of it being identified as primary mitigation.</p> <p>(ii) If it is not all delivered, what is the back-up position to safeguard receptors that might consequently be subject to adverse noise conditions, particularly for those receptors which would be subject to noise above SOAEL?</p> <p>(iii) Are there any elements which have not been agreed?</p> <p>It would appear that all of the noise mitigations identified in the rail noise assessment should be secured through the requirements in the DCO. If this is not agreed please explain your position.</p>
	SZC Co. Response at Deadline 7	(i) Requirement 25 prevents night time train activity unless and until a Rail Noise Mitigation Strategy (RNMS) has been submitted to and approved by ESC. The absolute nature of that draft requirement reflects SZC Co.'s confidence that a RNMS in a comparable form to that set out in draft [AS-258] can be agreed and delivered. That

ExQ2	Question to:	Question:
		<p>confidence is enhanced through the close joint working being undertaken with Network Rail. The Statements of Common Ground with Network Rail [REP2-074] and [REP5-095] confirm that neither party is aware of any reason why the various agreements, works and deliverables (which includes the RNMS) may not be delivered on time. This remains the latest position.</p> <p>Discussions are continuing with ESC who have expressed an aspiration for the RNMS to include the East Suffolk Line track enhancement and the potential for the location of acoustic barriers adjacent to the track in appropriate locations. Neither of those elements are included in the draft RNMS [AS-258] – partly because (whilst they may be desirable) neither are considered necessary to the grant of DCO consent and partly because it is not yet known whether they are deliverable. SZC Co. continues to engage Network Rail closely on these issues, although SZC Co. doubts the appropriateness of acoustic barriers in planning terms for the reasons set out in the note on acoustic fencing contained in Appendix I of SZC Co.'s Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 [REP6-024], other than at Whitearch Park.</p> <p>While Network Rail has recently stated to SZC Co., ESC and SCC in clear terms that it will not agree to noise barriers on Network Rail land, SZC Co. continues to explore options for installing noise barriers outside of Network Rail land, for example at Whitearch Park.</p> <p>SZC Co.'s response to Question NV.2.9 provides an update on the position in relation to Whitearch Park.</p> <p>(ii) SZC Co. is working on the basis that the RNMS would be delivered in its entirety – no fall back is being prepared.</p> <p>(iii) There are no elements of the draft RNMS which are unagreed between SZC Co. and Network Rail; all elements are subject to appropriate joint work in progress. It is for others to advise whether they agree the terms of the draft, although SZC Co. has not received any detailed criticism of the draft. The discussions with ESC are described above.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(iv) All of the physical and operational noise mitigation relied upon in the operational rail noise and vibration assessments is included in the draft Rail Noise Mitigation Strategy [AS-258], which is secured through the DCO (Requirement 25), or is contained in the Noise Mitigation Scheme, the latest version of which is submitted at Deadline 7 (Doc Ref. 6.3 11H(C)), which is secured by the Deed of Obligation (Schedule 12). For construction of the rail elements, Requirement 2 secures the CoCP and, through it, the Noise Monitoring and Mitigation Plans. Additionally, as explained in response to the ExQ1 Question NV.1.11 [REP2-100], a number of operating principles would also necessarily be secured contractually with Network Rail.</p>
	ESC Response at Deadline 8	<p>ESC notes that, in principle, Requirement 25 would prevent night-time train activity unless a Rail Noise Mitigation Strategy (RNMS) is submitted to and approved by ESC and that this therefore should ensure the RNMS is deliverable. Following detailed discussion with the Applicant, it has now been agreed that the time limit in Requirement 25 (3) is not required and will be removed.</p> <p>ESC has agreed with the Applicant that the possibility of using rail noise barriers is included in the draft Rail Noise Mitigation Scheme to ensure that the policy aim of 'mitigating and minimising' rail noise and vibration effects above LOAEL is achieved.</p>
	SZC Co. Response at Deadline 10	<p>The Applicant has agreed these changes with ESC and they are reflected in draft Requirement 25 (in the draft DCO [REP8-035] at electronic page 84) and in the draft Rail Noise Mitigation Plan ([REP8-071] at electronic page 6]. (refer to Doc Ref. 3.1(J)) and Doc Ref. 10.9 for the latest versions).</p>
NV.2.4	Applicant	<p>Rail Noise</p> <p>(i) Requirement 25 of the draft DCO would appear to apply to works No. 4 only. Is this understanding correct?</p> <p>If so, how is the noise mitigation being offered in respect of the main line to be secured?</p>
	SZC Co. Response at Deadline 7	<p>Please see SZC Co's response to Question NV.2.3. Requirement 25 prevents all Sizewell C trains from operating at night until a Rail Noise Mitigation Strategy is agreed with ESC. That effectively applies to trains operating on the main line as well as the Saxmundham to</p>

ExQ2

ExQ2	Question to:	Question:
		Leiston branch line, as SZC Co. has no other purpose for running trains if they cannot access the branch line.
	ESC Response at Deadline 8	ESC's position on Requirement 25 is summarised above.
	SZC Co. Response at Deadline 10	See SZC Co.'s Deadline 10 response at NV.2.3 .
NV.2.5	Applicant, ESC	<p>Operational Noise</p> <p>(i) The Main Development Site (MDS) night-time noise threshold is not yet agreed with ESC. Should the ExA consider the Council view more appropriate as a safeguard for the future noise levels, would there be implications for the operation of the station at the MDS?</p> <p>(ii) Would there be alternative or different mitigations available which may be able to be applied which could safeguard the night-time noise environment in the event the noise threshold is not agreed? Are there implications for the operation of the plant?</p>
	SZC Co. Response at Deadline 7	<p>(i) SZC Co.'s position is that a noise limit is not required for Sizewell C. The power station is designed to generate the lowest achievable noise levels and setting a limit is not necessary in this regard. A limit would serve no purpose as it is not realistically possible to significantly reduce the noise levels, as set out in more detail below. Redesign is not feasible given it is a complex and highly regulated assemblage of parts, with exacting tolerances. A requirement with no purpose cannot satisfy the tests for the imposition of requirements in NPS EN-1 paragraph 4.1.7.</p> <p>However, should a limit be required for the normal operation of the power station, SZC Co. considers that a level of 40dB L_{night} represents a threshold below which there is no prospect of an adverse effect, based on available evidence. This value is taken from the World Health Organisation's 'Night Noise Guidelines'⁶, which suggests that a free-field value of 40dB L_{night} is suitable as a LOAEL. This was set out in paragraphs 2.3.16 to 2.3.26 in Appendix 11A to the initial Statement of Common Ground with ESC/SCC [REP3-031].</p>

⁶ World Health Organisation 'Night Noise Guidelines' (2009)

ExQ2

ExQ2	Question to:	Question:
		<p>SZC Co. accepts that setting a limit based on L_{night} would, strictly speaking, require a year of monitoring to test compliance, and would be unreasonable.</p> <p>The Secretary of State imposed a Requirement⁷ on the Hinkley Point C development, requiring the power station to achieve a night-time noise limit of 45dB $L_{\text{Aeq,1hr}}$ at the façade of any dwelling.</p> <p>HPC and Sizewell C are located in similarly rural, coastal settings, close to existing power generation infrastructure, with scattered dwellings and dispersed settlements. The design incorporates elements of noise attenuation, and further wholesale attenuation is limited by, inter alia, the structural loading capacity of the building.</p> <p>The limit that HPC must achieve is considered to be a low limit, and SZC Co. considers it to be equivalent to LOAEL and the limit suggested for Sizewell C where a limit must be applied.</p> <p>It is understood that this value was derived from the recommended 45dB $L_{\text{Aeq,8hrs}}$ criterion in the World Health Organisation's 'Guidelines for Community Noise'⁸, which have not been superseded by any of the subsequent WHO guidance, including the Night Noise Guidelines, and therefore remain valid. The WHO's 'Guidelines for Community Noise' do include consideration of industrial noise, so can be considered relevant to Sizewell C.</p> <p>SZC Co. considers the free-field 40dB L_{night} and the façade 45dB $L_{\text{Aeq,8hrs}}$ values to be broadly equivalent, once they are adjusted so that both are either free-field or façade values. In both instances, they are considered to represent the LOAEL, below which there is little prospect of an adverse effect.</p>

⁷ Requirement MS12 The Hinkley Point C (Nuclear Generating Station) Order 2013. SI 2013 No. 648 (appended to SZC Co.'s Written Submissions Arising from ISH8 (Doc Ref 9.83))

⁸ World Health Organisation 'Guidelines for Community Noise' (1999)

ExQ2	Question to:	Question:
		<p>Accordingly, without prejudice to SZC Co.'s position that a noise limit is not appropriate, if a limit were imposed on the scheme, then SZC Co's position is that it should be a façade noise limit of 45dB $L_{Aeq,8hrs}$.</p> <p>ESC prefer a night-time noise threshold of 35dB as a rating level ($L_{Ar,T}$), as the Council explained at ISH8 and in written submissions.</p> <p>A threshold specified as a rating level includes a notional correction for any acoustic characteristics that are likely to attract attention at the receptor location, such as tonality, impulsiveness or intermittency. The magnitude of this correction is to be judged at the receptor, not at the source, and because the acoustic climate varies at different locations and at different times, the magnitude of the character correction may also vary.</p> <p>SZC Co. considers noise limits based on rating levels to be imprecise, and by extension unreasonable, for large, complex, and highly regulated items of nationally significant infrastructure. The magnitude of the acoustic character correction cannot be objectively quantified until after the item of plant is operational, and it may also vary at different locations according to the acoustic conditions at any given time. A rating level limit is therefore not a precise value that has consistent effect.</p> <p>For small items of plant, such as building services plant, the risk of a significant issue arising is low, and even if it does arise, there are practical options to address the issue. For example, enclosures or attenuators can be installed, or an alternative item of plant could be substituted.</p> <p>The assessment of operational noise presented Volume 2, Chapter 11 of the ES [APP-202] considered a correction of +4dB to be appropriate, as stated in paragraph 11.6.126. If a correction of +4dB were to be appropriate once the power station was complete and operational, the actual noise limit, as might be measured using a sound level meter,</p>

ExQ2	Question to:	Question:
		<p>would actually be 31dB $L_{Aeq,T}$, i.e. the 35dB $L_{Ar,T}$ limit, minus the 4dB correction. This is a 14dB reduction over the threshold that SZC Co. say is appropriate and achievable.</p> <p>The assessment set out in Volume 2, Chapter 11 of the ES [APP-202], which is based on high quality source information that has already been tested through the Hinkley Point C DCO, demonstrated that the outcomes are acceptable. Tables 11.27 and 11.28 of Volume 2, Chapter 11 of the ES [APP-202] demonstrate that a limit of 35dB $L_{Ar,T}$ cannot be achieved.</p> <p>The scope for incorporating further large-scale noise mitigation into the design of the power station is limited as a result of both the structural loading limits of the building structure, and the restrictions that flow from regulations on nuclear safety systems.</p> <p>To meet the 45dB $L_{Aeq,1hr}$ façade noise limit set out in the Hinkley Point C DCO, attenuators have been specified for exhaust fan vents on the sides of the turbine building, which brought about a small reduction in noise in one particular direction, so as to result in compliance with the noise limit of 45dB.</p> <p>Such detailed design adjustments should also be possible at Sizewell C, but at HPC these were needed to achieve compliance with the noise limit of 45dB. They do not create the potential for a significant reduction below that level, and certainly do not create the scope for a reduction in the order of 14dB which ESC's proposed limit would necessitate.</p> <p>(ii) The overall predicted noise levels for the operational power station set out in Table 11.27 (daytime) and Table 11.28 (night-time) in Volume 2, Chapter 11 of the ES [APP-202] suggest that ESC's preferred night-time noise threshold of 35dB as a rating level ($L_{Ar,T}$) cannot be achieved.</p> <p>Aspects of the power station design already include noise attenuation, such as the use of safe-change type HEPA filters in classified HVAC system exhausts; these provide some noise attenuation, which is included in the noise calculations in the submitted assessment.</p>

ExQ2	Question to:	Question:
		<p>The feasibility of incorporating further noise mitigation into the design of the power station is understood to be limited. For example, fitting attenuators to the turbine hall exhaust fans, which are likely to be one of the more prominent noise sources, will themselves add mass to the building, and could trigger the need for larger, heavier fans to overcome the additional pressure caused by the mitigation, thereby exacerbating the loading issue.</p> <p>The turbine hall exhaust fans are an example of where additional mitigation is difficult, and similar issues occur across the power station systems. The regulations that control both nuclear safety or non-nuclear safety classified systems add to the complexity.</p> <p>In summary on this question NV.2.5:</p> <ol style="list-style-type: none"> 1. SZC Co. does not consider a requirement to be justified. 2. If a requirement is imposed, it must be achievable. 3. A level that would be achievable and would be appropriate is a façade noise limit of 45dB $L_{Aeq,8hrs}$. This is comparable to the level that was imposed at Hinkley Point C, with the only difference being the time base. The limit was a 1 hour limit at Hinkley Point C. 4. Any lower level is unlikely to be achievable. It should not be imposed for that reason, and also because amenity is very well protected at this level of 45dB $L_{Aeq,8hrs}$.
	East Suffolk Council Response at Deadline 7	<p>ESC considers this question is best answered by the Applicant as we are not able to determine the implications on the operation of our proposed noise threshold. Equally we are not best placed to determine alternative or different mitigation, but would certainly welcome further engagement with the Applicant on this matter to determine what options may be available. ESC would, however, note that in ISH 8 the Applicant gave specific examples of equipment at HPC where noise reduction was and was not practicable. It is the view of ESC that statements regarding the viability or otherwise of operational power station noise reduction should be fully justified in detailed, engineering terms in a way which specifically references the individual noise sources listed in Table A2 of Appendix 11C to Volume 2 Chapter 11 of the ES [APP-205].</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Table A2 indicates that there is a difference of 30 dB between the highest and lowest sound power levels for individual items of plant serving the power station. It is unclear from the assessment what contribution these individual sources make to the predicted cumulative noise level at each receptor, but this suggests that there might be opportunities for noise reduction on an item-by-item basis which could have significant benefits in terms of controlling cumulative noise levels at individual receptors. Again, if this is not the case then ESC consider that this should be justified in both acoustic and engineering terms.</p> <p>While ESC accept that a nuclear power station has very specific requirements in terms of the mechanical plant serving it and that the Applicant is best placed to understand this, it is also the case that many types of mechanical plant noise can often be reduced at source through appropriate engineering. This can have a cost implication, but ESC consider that this should be balanced against the need to ensure the lowest practicable noise levels, which the Applicant agreed during ISH 8 should always be the aim. If it is not possible to reduce noise from individual items of plant using engineering methods as a result of the specific technical requirements of the power station, then this should be reasonably justified.</p>
	SZC Co. Response at Deadline 8	SZC Co. has nothing further to add on this point at this time, except to note that the matter remains under discussion and it is expected that it will be resolved with ESC before the end of the examination period.
	ESC Response at Deadline 8	<p>(i) ESC's position in relation to the suitability and justification of an operational noise limit has been well explained and it set out in more detail elsewhere at D8, particularly in response to the Written Summaries of Oral Submissions made at ISH 8 [REP7-068] and Written Submissions Responding to Actions Arising from ISH 8 [REP7-071]. In summary, it remains ESC's position that an operational noise limit for the power station is necessary, to ensure that the final design (and therefore the operational noise output) of the power station is controlled. ESC also maintain that the WHO Night Noise Guidelines for Europe (2009) are not an appropriate basis for a noise limit (based as they are on research into transportation noise) and also that there is no established basis for the Applicant's stated equivalence between 40 dB L_{night} and 45 dB L_{Aeq,1h}. ESC also maintains that a rating level limit would ensure that tonal components of the noise would be considered. ESC disagrees that noise limits based on rating levels are inappropriate and/or imprecise, and</p>

ExQ2

ExQ2	Question to:	Question:
		<p>the use of rating level noise limits is well established in planning terms, notwithstanding the particular and specific design requirements of a nuclear power station.</p> <p>The Applicant provided additional information at Deadline 7 in Appendix C of the Written Submissions Responding to Actions Arising from ISH 8 [REP7- 071], which details acoustic analysis of the predicted operational noise levels at a single receptor. ESC believe that any such analysis should be more robust than this, but welcomes the additional information, nonetheless. This technical report concludes that modifications to many individual items of plant would be required in order to reduce operational noise by even 1 dB. ESC acknowledges this but remains unclear as to why this is impractical, and in particular of the justification of the Applicant's statement that this is the 'quietest possible design'. In their response to ExQ2 NV.2.5, the Applicant states that "aspects of the power station design already include noise attenuation, such as the use of safe-change type HEPA filters in classified HVAC system exhausts". This is an example of the type of engineering explanation that ESC has previously requested. Were further detail provided regarding the engineering measures in place to ensure that this is indeed the quietest possible design, then ESC would expect to feel reassured enough to accept this, and by extension to accept an operational noise limit based on what could practicably and reasonably be achieved, even if this was significantly higher than preferred (e.g., 45 dB LAeq,8hrs). This discussion is expected to take place in advance of formalising our final position on this in the Statement of Common Ground at Deadline 10.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>All matters relating to operational noise are now agreed between SZC Co. and ESC, and a new requirement is included in the final DCO, limiting night-time operational noise from the power station as follows:</p> <p style="text-align: center;"><i>"Operational Noise</i> <i>When measured at the façade of any dwelling, legally in existence at the date on which this Order is made, between 23:00 and 07:00 hours, operational noise from the proposed power station shall not exceed 45dB LAeq,1hr."</i></p> <p>This agreement is reflected in the final Statement of Common Ground (Doc Ref 9.10.12(B)), with a note included at Appendix 11C of the Statement of Common</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Ground (Doc Ref 9.10.12C) summarising the meetings and discussions that led to the agreement.</p>
NV.2.8	Applicant, Network Rail	<p>Rail Noise Mitigation</p> <p>Paragraph 5.11.13 of NPS EN-1 states that improved sound insulation may be appropriate, but only “in certain situations, and only when all other forms of noise mitigation have been exhausted”.</p> <p>(i) Have all other forms of mitigation been exhausted?</p> <p>What progress has been made in the consideration of barriers as an alternative to insulation of people’s homes?</p>
	SZC Co. Response at Deadline 7	<p>(i) SZC Co. has considered a range of mitigation measures, covering the physical track infrastructure, the choice of rolling stock, the speed and operation of the trains, and improvements to the rail infrastructure at Saxmundham to avoid the need for stopping (and starting) of trains. Barriers have also been considered and remain under investigation in specific locations. SZC Co. is also working with Network Rail to seek to deliver the renewal of the track where that may be beneficial on the East Suffolk Line.</p> <p>The physical and operational measures, other than insulation at the receptors, that are considered deliverable are documented in the draft Rail Noise Mitigation Strategy [AS-258]. They comprise:</p> <ul style="list-style-type: none"> • Change arrangements at Saxmundham: a crossover north of Saxmundham station and an upgrade to the line signalling system • Upgrade to the Saxmundham to Leiston branch line track with refurbished trackbed, concrete or steel sleepers and new welded rails. • Further upgrade to the branch line track bed to include an under-ballast mat, where the branch line passes within 15 metres of a residential property • The new track of the rail-extension route comprising concrete or steel sleepers and welded rails. • Speed limits at Woodbridge / Melton, Campsea Ashe and Saxmundham. • Use of Class 66 locomotives • Night-time Leiston restrictions

ExQ2	Question to:	Question:
		<p>SZC Co. consider that all other forms of mitigation have been thoroughly explored and exhausted, as set out above. Insulation is appropriate in these circumstances, as part of the mitigation package.</p> <p>(ii) As noted in response to Questions NV.2.8(i) and NV.2.3, SZC Co. continues to engage Network Rail closely on these issues, and they have recently confirmed that they will not permit any lineside acoustic barriers on their land.</p> <p>SZC Co. doubts the appropriateness of acoustic barriers in planning terms for the reasons set out in the note on acoustic fencing contained in Appendix I of SZC Co.'s Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written Submissions to ISH1-ISH6 [REP6-024], with the possible exception of Whitearch Park. A view from ESC's Planning Department is expected shortly.</p> <p>SZC Co. remains willing to engage with Interested Parties who wish acoustic barriers to be considered on their land, or on land within SZC Co.'s control, however, there are likely to be few locations where acoustics barriers are practical or deliverable on land outside Network Rail's control because:</p> <ul style="list-style-type: none"> (a) barriers further from the track are likely to be less effective, and (b) SZC Co.'s note on acoustic fencing as referenced above shows the general unsuitability in planning terms of the barriers required.
	ESC Response at Deadline 8	<p>(i) As stated in response to NV.2.3, it remains ESC's position that both track upgrades to the East Suffolk Line and rail noise barriers (where suitable and where the benefits are evident) should be part of the RNMS, to ensure that the RNMS meets the policy aim of 'mitigating and minimising' potential adverse rail noise and vibration effects above LOAEL. It is anticipated that the draft RNMS will be revised to include this.</p> <p>(ii) ESC has maintained that all forms of mitigation should be thoroughly explored and considered, including barriers where suitable and where the benefits are evident. The Applicant continues to explore the potential for noise barriers, and we were looking</p>

ExQ2

ExQ2	Question to:	Question:
		<p>forward to continued discussion to explore sites where these would be possible with both The Applicant's and Network Rail's support. However, the latter has now apparently withdrawn that support which changes the nature of discussions. That said, ESC are hopeful that there is still time to explore the opportunity of barriers on land outside of Network Rails ownership with the Applicant and look forward to doing so as soon and as quickly as possible. ESC understand that the aim is for this process to be written into the draft RNMS. ESC's preference would be that the final RNMS (to be submitted to and approved by ESC) would include details of specific barriers in specific locations, after appropriate technical and planning consideration and in consultation with landowners and other stakeholders. However, ESC welcomes the ongoing process as a solution and the commitment to delivery of such mitigation that is found to be suitable and worthwhile, and this is currently the subject of positive discussion with the Applicant.</p> <p>There is an issue that properties subject to noise between 60dB LAmax and 70dB LAmax (LOAEL and EIA significance) would have to keep windows closed to achieve the internal 45dB LAmax and meet the WHO sleep disturbance criteria, the only way to fully avoid that happening would be to provide every property within that bracket with mechanical ventilation so they would have the option to keep their windows closed during warmer summer months to reduce the rail noise.</p> <p>On balance ESC would consider the Applicant's sleep disturbance assessment to be justified. However, ESC maintain that the preference would be that the NMS would be implemented at LOAEL or that consideration be given to a reduced NMS to provide mechanical ventilation between LOAEL and EIA significance as discussed at ISH12.</p>
	TASC Response at Deadline 8	<p>In their response, the Applicant states "...and improvements to the rail infrastructure at Saxmundham to avoid the need for stopping (and starting) of trains."</p> <p>Currently the single line from Saxmundham to Leiston is operated using a "divisible train staff". A "train staff" is a physical object that is handed by the signaller to the train driver as his authority to enter the single line. Exchanging train staffs at speed was outlawed many years ago and trains have to come to a stand to pick up/return the train staff. Can the Applicant/Network Rail say how eliminating the stopping of trains will be achieved?</p> <p>Sight of the signalling scheme plan for the Saxmundham track and signalling alterations, have been requested for many months.</p> <p>When will this be available to the Examination and therefore for public scrutiny?</p>

ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 10	<p>In response to TASC's Deadline 8 response, SZC Co.'s proposals, developed in conjunction with Network Rail, are to upgrade Saxmundham Junction. This will include:</p> <ul style="list-style-type: none"> • Removal of the existing hand points at Saxmundham Groundframe and replacement with automatic points operated from Saxmundham signal box. • Introduction of additional colour light signals, interlocked with the automatic points, which will enable a route to be set in advance of the freight trains arrival at Saxmundham Junction. • The signalling scheme plan is currently under review by Network Rail and once it is approved SZC Co. will be able to share it. <p>Currently, to enter the Saxmundham to Leiston branch line from the East Suffolk line, trains must stop several times. They must first stop at Saxmundham station to collect the signaller's token from the signal box. Only one train can be issued the token at a time, and it acts as a simple form of signalling to prevent two trains being signalled onto the same piece of track simultaneously. Once in possession of the token, the train then pulls forward to the Saxmundham manual ground frame. The train driver must stop the train a second time, with the points operated by a member of the train crew, before then pulling onto the branch line clear of the junction and stopping a third time. The points must then be reset by a member of the train crew. When leaving the branch line this process happens in reverse.</p> <p>The proposed interventions at Saxmundham Junction include the installation of colour light signals and the automation of the points, both controlled electrically from Saxmundham signalbox. The route for Sizewell trains across the junction will be set in advance of their arrival by the signaller, allowing the trains to proceed past the signalbox and across the junction onto the branch line, without stopping. Similarly, for trains leaving the branch line, a route will be set by the signaller, which allows trains to run along the branch line and onto the East Suffolk line without stopping.</p> <p>To respond to ESC's Deadline 8 response on ventilation, SZC Co. has amended the Noise Mitigation Scheme (Annex W of the Deed of Obligation (Doc Ref 10.4)) to include the provision of ventilation to properties exposed to railway noise levels of between 60 and 70dB L_{AFmax}.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>The final version of the Noise Mitigation Scheme (Annex W of the Deed of Obligation (Doc Ref 10.4)) is now agreed between SZC Co., ESC and SCC.</p>
NV.2.9	Applicant, Network Rail, ESC	<p>Rail Noise Mitigation</p> <p>Additional assessments of rail noise were undertaken in Woodbridge and Saxmundham to consider the implications of the rail strategy in respect of house boats and park homes.</p> <p>(i) Please provide an update on what the noise mitigation proposed is to be and how this would be secured.</p> <p>(ii) In the event screening in these locations would facilitate an improved noise environment for these receptors, has a similar option been considered for other receptors along the line?</p> <p>(iii) Could this be secured in the event it was considered appropriate?</p>
	SZC Co. Response at Deadline 7	<p>(i) The additional assessment of railway noise for the houseboats in Woodbridge and Melton did not identify any locations where the eligibility criteria in the Noise Mitigation Scheme [REP6-015] would be triggered. However, surveys as part of the refreshed assessments under the Noise Mitigation Scheme will identify any boats whose superstructure offers a sound reduction of less than 25dB, and mitigation may be offered on the basis of reduced criteria. The Noise Mitigation Scheme [REP6-015] submitted at Deadline 6 allows the eligibility criteria to be altered, and the updated Noise Mitigation Scheme to be submitted at Deadline 7 (Doc Ref 6.3 11H(C)) will clarify that this discretion can only be used to make the scheme more generous.</p> <p>SZC Co.'s Deadline 6 submission on the potential planning constraints relating to the installation of acoustic barriers [REP6-024] suggested that barriers in the Woodbridge or Melton areas would not be possible. SZC Co. understands that ESC's Planning Department is reviewing the position in light of its Environmental Health Department's view that more weight should be placed on the acoustic benefits than the other considerations.</p> <p>Network Rail has clarified to SZC Co, ESC and SCC that they will not permit any barriers on land within their ownership, which means that any barrier proposals will need to be located on land outside their ownership.</p>

ExQ2	Question to:	Question:
		<p>It is not SZC Co.'s intention to install railside acoustic barriers in the Woodbridge or Melton areas. They are not considered necessary to meet the planning policy tests, and the twin constraints posed by Network Rail's position and the planning impediments set out in [REP6-024] mean that their potential use for the SZC project has been exhausted.</p> <p>An update to the Whitearch Park consultation was issued to the residents and owners of Whitearch Park and submitted to the ExA at Deadline 6 [REP6-030]. The note set out a corrected set of noise contours, and revised the potential barrier location to the top of the railway embankment.</p> <p>Network Rail's subsequent clarification that they will not permit any barriers on land within their ownership precludes the installation of an effective acoustic where the railway is on an embankment, which is the case at the southern end of the Whitearch Park site.</p> <p>It remains the case that an acoustic barrier would provide some benefit at the northern part of the Whitearch Park site, from approximately the mid-point of the site northwards. Discussions are proposed to continue with the owners of Whitearch Park to explore the potential to erect an acoustic barrier on land within their ownership, which would remain subject to the necessary permissions.</p> <p>Should a barrier at Whitearch Park be taken forward, it will be secured through the Rail Noise Mitigation Strategy and the submission of a planning application to ESC.</p> <p>(ii) As noted in response to Questions NV.2.8 and NV.2.3, SZC Co. continues to engage Network Rail closely on these issues, and they have recently confirmed that they will not permit any lineside acoustic barriers on their land.</p> <p>SZC Co. doubts the appropriateness of acoustic barriers in planning terms for the reasons set out in the note on acoustic fencing contained in Appendix I of SZC Co.'s Comments at Deadline 6 on Submission from Earlier Submissions and Subsequent Written</p>

ExQ2	Question to:	Question:
		<p>Submissions to ISH1-ISH6 [REP6-024]; a view from ESC's Planning Department is expected.</p> <p>SZC Co. remains willing to engage with Interested Parties who wish acoustic barriers to be considered on their land, or on land within SZC Co.'s control, however, there are likely to be few locations where acoustics barriers are practical or deliverable on land outside Network Rail's control for the reasons set out above.</p>
	East Suffolk Council Response at Deadline 7	<p>(i) ESC considers this question best answered by the Applicant as they are proposing the mitigation for these receptors. We have been and continue to be in discussion with the Applicant and have requested that mitigation for these, and indeed all receptors, is not restricted to certain things but that all forms of mitigation are available and considered as part of a bespoke mitigation scheme for each individual property taking account of its circumstances and specific impacts.</p> <p>(ii) Acoustic Barriers along the rail track to provide mitigation for sensitive receptors has and continues to be a matter of discussion with the Applicant. Where it is a viable option to install screening, we would encourage and welcome this as part of the Rail Noise Mitigation Strategy and the Applicant's consideration of mitigating and minimising noise impacts in line with relevant policy requirements.</p> <p>(iii) ESC considers this could be secured as part of the Rail Noise Mitigation Strategy along with other mitigation schemes that form part of the requirement to mitigate and minimise noise impacts.</p>
	SZC Co. Response at Deadline 8	<p>Further discussions have taken place with ESC as a result of its Deadline 7 submission Comments on Deadline 6 Submissions from the applicants [REP7-109, electronic page 13]. There ESC provided an analysis in which it was suggested that there may be planning potential to erect acoustic barriers in defined locations to minimise noise. These matters were discussed at Issue Specific Hearing 12 at which SZC. Co advised that, whilst it doubted the suitability of barriers because of their visual and amenity impacts, it agreed to work with ESC to determine whether this was indeed the case and, if so, whether barriers could be installed in agreed locations. SZC. Co undertook to make this commitment, i.e. commitment to a process in the next draft of the Rail Noise Mitigation Plan (which is the new name for the Rail Noise Mitigation Strategy) submitted at Deadline 8 (Doc Ref 6.14 9.3.E(A)).</p>

ExQ2

ExQ2	Question to:	Question:
	ESC Response at Deadline 8	(ii) ESC consider that barriers should be included in the RNMS where suitable and where the benefits are evident. The RNMS is to be approved by ESC postconsent (if consent is granted) and would contain all deliverable mitigation proposed by the Applicant. It is envisaged that the good dialogue that has existed between us up until now would continue and that the Applicant would continue to explore and consider all areas of rail noise mitigation (including barriers) for inclusion in the final RNMS to be approved by ESC. Where it is fully justified by the Applicant that mitigation cannot be delivered ESC would accept that position. ESC would like to see a commitment to continue exploring what can be included in the RNMS beyond the examination so that the final document truly represents what can be achieved, including specific barriers in specific locations (where suitable and where the benefits are evident). Discussions during this process will be crucial to ensuring that all appropriate mitigation has been considered and subsequently secured by the RNMS. The RNMS would then be approved by ESC on this basis.
	SZC Co. Response at Deadline 10	SZC Co. is fully aligned with ESC’s approach and objectives in this respect. The parties differ in their expectations for the extent to which barriers will be genuinely appropriate but the process to which they have jointly committed in section 2.6 of the draft Rail Noise Mitigation Plan ([REP8-071] at electronic page 6] is comprehensive and robust. SZC Co. agrees that there will be benefit in continuing to explore these issues jointly post examination. (refer to Doc Ref. 10.9 for the final version)
NV.2.10	Applicant, Network Rail, ESC	<p>Noise and Vibration from Rail Freight</p> <p>ESC have sought additional clarification in respect of the uncertainties of the predictions of noise and ground borne vibration from rail activities.</p> <p>Can the ExA be updated on the current position regarding this updated information and whether the parties are agreed now as to the suitability of its forecasting, and the consequential assessments of noise and vibration and the consequential suitability of any mitigation.</p>
	SZC Co. Response at Deadline 7	SZC Co. has prepared a second set of responses to questions raised by ESC, which was issued to them in draft on 12 th August 2021, and is submitted to the ExA at Deadline 7 as Appendix 11B to the Statement of Common Ground with ESC/SCC (Doc Ref 9.10.12)

ExQ2

ExQ2	Question to:	Question:
		B). Once ESC has confirmed its position on these matters, SZC Co. will seek to update the ExA as requested.
	East Suffolk Council Response at Deadline 7	ESC's request for clarification remains outstanding and subject to requests for information as submitted to the Examination at Deadline 6.
	SZC Co. Response at Deadline 8	SZC Co. provided responses to all outstanding requests for information from ESC at Deadline 7 as Appendix 11B to the Statement of Common Ground with ESC/SCC (Doc Ref 9.10.12 B) and no further requests for information have been received from ESC. SZC Co. has nothing further to add at this time.
	ESC Response at Deadline 8	ESC has reviewed the responses supplied by the Applicant and is satisfied that this information answers the outstanding queries related to noise and vibration from rail freight.
	SZC Co. Response at Deadline 10	SZC Co. welcomes ESC's confirmation that the supplied responses were satisfactory and has nothing further to add.

ExQ2 - Part 6

ExQ2	Question to:	Question:
R.2	Radiological considerations	
R.2.0	The Applicant, ONR	<p>Nuclear Site Licence</p> <p>(i) Please advise on the latest position in respect of the application for the nuclear site licence.</p> <p>(ii) Are you aware of any impediment that may exist that would prevent or delay the granting of the licence?</p> <p>(iii) What is the current timetable that you would anticipate for the conclusions upon the license application being reached?</p>
	SZC Co. Response at Deadline 7	<p>SZC Co. submitted the Nuclear Site Licence (NSL) application in June 2020 and is actively engaged in all regulatory workstreams. Workstreams are monitored routinely via joint Level 3 and Level 2 meetings with the Office for Nuclear Regulation (ONR). The purpose of these meetings is to discuss the route and progress towards achieving a NSL in 2022 aligned to a schedule agreed with the ONR.</p> <p>The ONR's programme of regulatory interventions has been defined and is being delivered to support the licensing process and to meet the anticipated licensing timeline.</p> <p>SZC Co. is confident that the plant design is sufficiently mature and the organisation will be demonstrably capable to achieve a NSL in 2022. The ONR has not identified any issues that would prevent SZC Co. from obtaining a NSL within this time frame and SZC Co. is not aware of any impediment that may exist that would prevent or delay the granting of the NSL.</p>
	Office on Nuclear Regulation Response at Deadline 7	<p>The following general progress statement (which will be published on the ONR website in due course) addresses these points:</p> <p><i>Progress statement on ONR assessment of the application for a nuclear site licence by NNB GenCo (SZC) Ltd August 2021</i></p> <p>On 30th June 2020, NNB GenCo (SZC) Limited ('NNB GenCo') applied to ONR for a nuclear site licence to permit the construction and operation of two EPR™ reactors at the Sizewell C (SZC) site.</p>

ExQ2	Question to:	Question:
		<p>To progress its assessment of the licence application, ONR is implementing a programme of interventions and engagements aimed at gathering evidence to form a judgement on the capability of NNB GenCo and the effectiveness of its management arrangements to:</p> <ul style="list-style-type: none"> • develop a capable organisation and have adequate arrangements to provide the necessary organisational capability to safely deliver and oversee the subsequent stages of the project • develop suitable licence condition compliance arrangements • ensure adequate plans for development of a safety report that supports the SZC construction, installation, and commissioning programme • ensure that the site is suitable in terms of its location and characteristics of the population around the site, external hazards, and suitability of the site for engineering and infrastructure requirements of the facility • comply with relevant conventional safety and nuclear security legislation. <p>Our current views on the progress on each of these themes is summarised below.</p> <p><i>Organisational capability</i></p> <p>ONR has set out its expectations in Licensing Nuclear Installations that a prospective licensee should establish an organisation capable of managing matters relating to nuclear safety and security and discharging the obligations associated with holding a nuclear site licence. ONR expects this capability to be comprised in arrangements covering several key components including:</p> <ul style="list-style-type: none"> • develop and implement a clear strategy and plans that establish the nuclear baseline requirements based on the activities planned to be undertaken. These plans should include the core safety capability of the organisation and their intelligent customer arrangements to safely oversee the delivery of work. • a quality management system that ensures appropriate arrangements relating to safety and security are in-place from policies through to front line procedures. These arrangements should be fit for purpose, understood and followed by the relevant staff. • an effective competency management framework that ensures individuals within the organisation have the appropriate skills and knowledge to safely deliver their work. • the organisation has governance arrangements in-place to ensure effective leadership direction and foster the appropriate safety culture, to enable decisions made at all levels

ExQ2	Question to:	Question:
		<p>in the organisation, that have the potential to affect safety, to be informed, rational and objective.</p> <p>NNB GenCo has been progressively developing its organisational capability since nuclear site licence application. Progress is broadly in-line with expectations. NNB GenCo is intelligently adopting the arrangements from Hinkley Point C (HPC) to underpin its quality management system. NNB GenCo has established processes to ensure this adoption is considered and systematic, and where appropriate learning is identified.</p> <p>NNB GenCo is working with HPC and Nuclear Generation Limited to establish a common nuclear competency framework across EDF Energy; this framework should provide the foundation for NNB GenCo to demonstrate the competency of its organisation. NNB GenCo continues to mature its governance arrangements, informed by its stakeholders.</p> <p>Shadow working for Sizewell C is currently planned to commence in early 2022; this is a period where NNB GenCo will work to its organisational and management arrangements as if it was a nuclear site licensee, to demonstrate the adequacy of its organisation. ONR will seek confidence in the adequacy of all elements of its organisational capability throughout this shadow working period to inform our assessment.</p> <p>Licence Condition compliance</p> <p>ONR does not expect NNB GenCo to produce fully developed site management and compliance arrangements for all 36 standard licence conditions at the point of licence grant as some are only relevant to activities that will take place as the project progresses through construction and commissioning. However, fully developed arrangements must be in place for more than half of the standard licence conditions before licence grant.</p> <p>ONR and NNB GenCo have developed and agreed a programme of Licence Condition compliance targeted discussions, to ensure appropriate development is maintained to support ONR's licensing assessment. NNB GenCo has set up a targeted working group involving representatives from Sizewell C and Hinkley Point C, with the aim of transferring learning from the Hinkley Point C experience into the Sizewell C compliance arrangements.</p> <p>Safety report</p> <p>For site licencing, ONR does not expect NNB GenCo to have produced a specific safety case, however, ONR is engaging with NNB GenCo to understand how the safety case will be produced, and what processes etc will be used post licencing. ONR understands the</p>

ExQ2	Question to:	Question:
		<p>safety case will follow closely both the process and content of the HPC safety case for the areas that are to be replicated, with a key section of the future safety case justifying the replication strategy.</p> <p>Site Suitability</p> <p>A key element of ONR's site licensing assessment is the suitability of the site. In accordance with our published guidance (Licensing Nuclear Installations)¹, before a nuclear site licence is granted the prospective licensee will need to satisfy ONR that:</p> <ul style="list-style-type: none"> • the proposal conforms with Government siting policy. • the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station. • the proposed nuclear power station is capable of being designed to have robust defences against the site-specific external hazards. <p>We are satisfied that the requirements of the first two bullets are satisfactorily met. With regard to external hazards, engagement is still ongoing with NNB GenCo in order for ONR to gain confidence in the characterisation of the hazards and to ensure there is no challenge to the suitability of the site.</p> <p>Conventional health & safety</p> <p>In accordance with the requirements of the Construction (Design and Management) Regulations 2015 (CDM), ONR seeks assurance that NNB GenCo (SZC) Ltd (NNB) has established management arrangements to secure the health, safety and welfare of persons who will work on the construction site.</p> <p>NNB GenCo has been developing its organisational capability and is replicating arrangements from Hinkley Point C (HPC), in line with its strategy document "Sizewell C Project: Overarching CDM Strategy" which aims to gather and apply lessons from HPC (and elsewhere). A significant difference from HPC is that it is proposed that the principal contractor will be a Civil Works Alliance (an alliance of 5 companies including NNB GenCo). A Project Delivery Organisation sits below the Client to provide integration across the project. ONR's focus has been on ensuring that appropriate appointments are being made in line with CDM.</p> <p>NNB GenCo is engaging with other regulators including HSE. Work has been ongoing to clarify the extent of the new nuclear build site and the vires of ONR, HSE and other regulators with an interest in aspects of the proposed development.</p>

ExQ2	Question to:	Question:
		<p>As the project progresses ONR will seek assurance regarding the constructability of the two EPR units at SZC in relation to conventional health and safety issues.</p> <p>Nuclear security</p> <p>NNB GenCo SZC Security staff will continue to develop the SZC Nuclear Site Security Plan (NSSP) and the current schedule for submission of the NSSP to ONR for approval is early 2022. In addition to detailing the security standards, arrangements and procedures during the construction phase of the project, the NSSP should also demonstrate to ONR that NNB GenCo has a comprehensive understanding of what the security regime will be when the facility is operational and how the arrangements will meet regulatory expectations. It is acknowledged that specific details of the security arrangements during the later stages of the project will not yet be confirmed but these will be included in future iterations of the NSSP. In order to benefit from the operational experience gained at Hinkley Point C (HPC), it is anticipated that NNB GenCo will use the principles of 'intelligent replication' and adopt and adapt some of the security arrangements currently employed at HPC.</p> <p>Summary</p> <p>Overall, ONR is satisfied with the progress made towards the target of completing its licensing assessment by mid-2022.</p>
	SZC Co. Response at Deadline 8	No further response from SZC Co. is required.
	TASC Response at Deadline 8	<p>ExA asks ONR for the latest information regarding the application for a site licence, any impediments to the granting of such a licence and the timetable for this process.</p> <p>ONR's responses are prefaced by the statement that, 'To progress its assessment of the licence application, ONR <i>is implementing a programme of interventions and engagements</i> aimed at gathering evidence to form a judgement on the capability of NNB GenCo and the effectiveness of its management arrangements...' (emphasis added).</p> <p>The use of the present tense in this statement indicates that the work is current and therefore no conclusions can yet be drawn in respect of the Applicant's arrangements to:</p> <ul style="list-style-type: none"> • develop a capable organisation and have adequate arrangements to provide the necessary organisational capability to safely deliver and oversee the subsequent stages of the project

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • develop suitable licence condition compliance arrangements • ensure adequate plans for development of a safety report that supports the SZC construction, installation, and commissioning programme • ensure that the site is suitable in terms of its location and characteristics of the population around the site, external hazards, and suitability of the site for engineering and infrastructure requirements of the facility • comply with relevant conventional safety and nuclear security legislation. <p>The issues of organisational capability, licence condition compliance, safety and site suitability are then dealt with in a conditional manner with the use of the future tense insofar as most compliance matters are concerned. Only in respect of site suitability is the ONR apparently partially satisfied that conditions have been met in that the proposal conforms to Government siting policy and the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station. TASC challenges the ONR's conclusion that the location is suitable for the establishment and maintenance of an adequate emergency plan during 'all phases of the power station.'</p> <p>How can ONR express such confidence when the worst case accident upon which the emergency plan is based is something that is determined by the plant operators themselves and when the detailed emergency planning zone for Sizewell B was determined not by nuclear regulators but by the local authority Suffolk County Council. We wish to point out that the 1.3 kms inner DEPZ is not to IAEA standards for a Light water reactor. We believe these standards which have been recently updated by IAEA still apply to Sizewell B.</p> <p>Further to this, BEIS Emergency planning officers had several times at meetings attended by TASC, endorsed a wish for a DEPZ of 3-5 kms including Leiston IP16 post codes. SCC appear to have failed to discuss wider emergency planning zones up to 30 kms. The local planning authority East Suffolk Council also has failed to limit housing in the evacuation zones. Whilst acknowledging that the emergency planning for Sizewell B is a matter for the Sizewell Stakeholder Group, it is widely believed that the emergency plan developed for Sizewell B is inadequate to ensure the safety of those within the likely deposition area of radioactivity escaping from even a moderate accident by the evacuation of more than a small number of people. We contend that the Suffolk County Council updated evacuation</p>

ExQ2	Question to:	Question:
		<p>plan2 began with the assumption of an unrealistic 1.3 kms DEPZ. This would be compounded by alterations to highways as a consequence of Sizewell C and further disruption to travel routes, all of which terminate at the A12.</p> <p>Due to personnel changes at SCC and COVID restrictions, it has not proved possible to have a site stakeholder meeting to further discuss Emergency Planning.</p> <p>It is our opinion that the proposal to construct Sizewell C would massively complicate this already dangerous situation for the Leiston community and those living within the various identified emergency planning zones. The ONR is required to satisfy itself that the location is suitable 'for the establishment and maintenance of an adequate emergency plan during all phases of the power station' (emphasis added). TASC maintains that this is an impossible condition for the ONR to satisfy. Quite apart from the additional people occupying new houses being built in the Leiston area, during the 12 - 15 years construction period, the numbers of people potentially requiring evacuation will rise by a minimum of 4,000 workers on the SZC site. During that period of time, Sizewell B will require at least 4 or 5 outages which will add a further 2,000 workers to the pool of vulnerable people potentially in need of evacuation. During the early years of construction, since the Applicant has refused to offer Theberton and Eastbridge mitigation for traffic invasion by constructing the SLR before other site development, most HGV, LGV, bus and car traffic bound for the site will use the B1122 which will also be used by other energy-related projects in the area.</p> <p>Should Sizewell C ever become operational, there will be three operating reactors in the Sizewell area, two of which generate much hotter and more radioactive fuel carrying far more fission products than even the Sizewell B fuel of which there is around 700 tonnes already in storage on site. Sizewell C will generate over 3500 tonnes of spent nuclear fuel over its lifetime which is also likely to require long-term storage on site. The volume of lethal spent nuclear fuel stored on site at Sizewell is already a significant threat to those living in the vicinity and, in the opinion of TASC, a transgression of the human rights of those living with such a long-term de facto nuclear waste store. Sizewell C will add to the complication of the emergency plan and make it all the more improbable to implement in the event of an accident.</p> <p>We therefore disagree with the ONR when it states that it can be satisfied that the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>ONR goes on to argue that 'With regard to external hazards, engagement is still ongoing with NNB GenCo in order for ONR to gain confidence in the characterisation of the hazards and to ensure there is no challenge to the suitability of the site.' TASC believes that the ONR should conclude this engagement to satisfy itself that there is no challenge to the suitability of the site before it announces that, 'ONR is satisfied with the progress made towards the target of completing its licensing assessment by mid-2022'. Allowing negotiations to continue as if these issues are simply a matter of time and process encourages the impression that they are formalities rather than vitally important considerations. TASC believes that the ONR has an obligation to demonstrate its much-trumpeted independence from government by acknowledging that the site is anything BUT suitable, as it is too small for the proposed development, built on unstable geological foundations, on a rapidly eroding coast which is prone to storm surges and flooding, on the edge of a town of 5500 people, served by roads more suitable for farm and tourist traffic and difficult to reach or to leave in the event of an emergency. The ONR should come to the logical conclusion, no matter how much it feels constrained by the regulator's code and to its role as an enabler of government policy, that to build a twin EPR reactor power station at the Sizewell site is at best perverse and at worst irresponsible.</p> <p>TASC note that the ONR's previous submission at REP2-160 includes information regarding the ONR's prime requirements for a Justification of Site Suitability Report which includes as a necessity "adequate cooling capability can be provided for all normal and fault conditions". TASC consider that the ExA should seek the ONR's opinion about the implications of the lack of potable water available to cool SZC's primary reactor circuits, as recently identified by Northumbrian Water Ltd. TASC are concerned that the ONR do not consider lack of adequate cooling as a potential issue with regard to site licencing.</p>
	SZC Co. Response at Deadline 10	No further response from SZC Co. is required.
SA.2 Section 106		
No additional comments received at Deadline 8		
SE.2 Socio-economic		
No additional comments received at Deadline 8		

ExQ2	Question to:	Question:
TT.2 Traffic and Transport		
TT.2.0	The Applicant	<p>Transport Review Group (TRG)</p> <p>The TRG has a pivotal role in overseeing the transport control mechanisms (CTMP, CWTP and TIMP) for the Proposed Development. In response to ExQ1 TT1.1.23 the Hinkley Point C experience is referenced. Understanding that this structure may work well at Hinkley Point C, there are some outstanding concerns not addressed by the response [REP3-046].</p> <p>(i) Constitution – In what looks like a balanced voting membership there is potential for any disputes to be passed up to the Delivery Steering Group (DSG) for resolution. Consequently, further delays over any dispute resolution are likely. Why create voting members and not provide a casting vote method of resolving disputes without onward reference to another group?</p> <p>During the construction period some issues of local traffic management concern are likely to require rapid remedial response. Explain how the TRG can approve additional interventions and mitigation where a rapid response is needed.</p>
	SZC Co. Response at Deadline 7	<p>(i) In addition to the precedent of the successful similar structure of the TRG at Hinkley Point C, as set out by SZC Co. in ISH3 [REP5-108], the Applicant does not consider a casting vote appropriate because the powers of the TRG are wide, including imposing a potentially uncapped liability on the Applicant to spend significant sums of money or take any action to remedy issues or stay within the limits committed to. All normal highway functions would be carried out by SCC – for example in relation to the design and implementation of agreed works on the highway etc. but the TRG is a wider governance process which requires a collaborative approach to joint working.</p> <p>In particular, the TRG has power over the Contingent Effects Funds 1 and 2, which are capped. TRG can amend the CWTP and the CTMP and the TRG also has power to approve mitigation measures to address shortfalls or exceedances in the event that any of the targets or limits set out in the Construction Traffic Management Plan (CTMP) [REP2-054] or the</p>

ExQ2	Question to:	Question:
		<p>Construction Worker Travel Plan (CWTP) [REP2-055] have not been achieved or have been exceeded, or are not reasonably likely to be achieved or are likely to be exceeded. Any member of the TRG may propose such mitigation measures, not just SZC Co. This power enables the TRG to impose a potentially uncapped liability on SZC Co. Amendments to Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)) to be submitted at Deadline 7 have sought to make these powers of the TRG clearer.</p> <p>In light of these wide TRG powers, SZC Co. does not consider that any one TRG member should have a casting vote. Imposing a potentially uncapped liability on a developer, at the discretion of a third party such as SCC (who have sought a casting vote for themselves), is not fair or reasonable. It does not comply with national policy in NPS EN-1 paragraphs 4.1.7 – 4.1.8 that obligations should be fair and reasonable. Giving a casting vote to SCC could be akin to writing a blank cheque for wide ranging mitigation or operational changes.</p> <p>The ability to escalate matters to the DSG will enable any area where agreement cannot be reached to be re-examined by more senior representatives of the parties. It is reasonable to consider that may well lead to resolution. Escalation of disputes is a widely used and reliable method for resolving disagreements. In the unlikely event that resolution still cannot be reached, then Schedule 17 of the draft Deed of Obligation enables matters to be referred to an expert appointed in accordance with clause 8 of the draft Deed of Obligation, for independent determination which is final and binding in accordance with that clause.</p> <p>Overall, SZC Co. consider that this governance structure and process to resolve disputes will both be effective and appropriately protects the interests of all parties. It will also be sufficiently swift and responsive, for the reasons set out in the response to point (ii) below.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>(ii) The latest version of the draft Deed of Obligation, submitted at Deadline 7 (Doc Ref. 8.17(F)), includes provision for any member of the TRG to call an emergency meeting where that member considers it necessary (i.e. outside the regular quarterly meetings of the TRG). This would enable approval of additional interventions and mitigation where a rapid response is needed and enable consideration and response to be given to any other urgent matters.</p>
	SCC Response at Deadline 8	See REP8-179 at epage 87
	SZC Co. Response at Deadline 10	SZC Co. has set out its position on issues relating to the operation of the TRG above and in its Written Summaries of Oral Submissions made at Issue Specific Hearing 14 [REP8-124]. The TRG is proposed to be a consensus group with the ability to escalate any unresolved issues as set out in the agreed transport management plans. SCC has now agreed this issue and signed the Deed of Obligation (Doc. Ref.10.4).
TT.2.3	The Applicant	<p>Suffolk County Council - A12 improvements: A14 'Seven Hills' to A1152 Woods Lane</p> <p>Please clarify the position with respect to the following:</p> <p>(i) Does your modelling examine the effect of the proposed scheme if constructed?</p> <p>Do you consider that the scheme as currently proposed would provide a benefit along the A12 corridor for Sizewell C traffic?</p>
	SZC Co. Response at Deadline 7	<p>(i) See responses by SZC Co. to ExQ1 TT.1.61 [REP2-100] submitted at Deadline 2. That response confirms that the A12 improvements proposed by SCC between the A14 and A1152 have not been included or relied upon within the VISSIM modelling. These improvements are not committed and currently have no secured funding, and cannot be relied upon as a basis for assessment of the effects of Sizewell C.</p>

ExQ2	Question to:	Question:
		<p>The VISSIM modelling of the A12 between the A14 and A1152 nevertheless concluded that there would not be a material impact on driver delay and therefore no mitigation in the form of highway improvements is considered to be required by SZC Co. for the corridor.</p> <p>(ii) SCC considers that the shortest possible timescale for their proposed A12 improvements would be for them to be completed by the end of 2025 and could therefore be operational by early 2026. However, this is subject to receiving Government funding and the planning and design process. Based on the SCC optimistic programme, there would be no benefits of the proposed improvements during the early years phase or the start of the peak construction phase of the Sizewell C project. Instead there would be disbenefits to all traffic on the corridor, including Sizewell C traffic, as a result of the forecast two years of construction of the proposed SCC A12 improvements. The A12 improvements proposed by SCC identify highway capacity improvements at eight junctions on the A12 between the A14 Seven Hills and the A1152 Woods Lane, which include a range of measures such as signalling existing junctions, realigning arms of junctions, creating larger roundabouts and providing additional circulating lanes at roundabouts. It is also proposed to provide a new section of dualled road at Woodbridge. The majority of the SCC proposed A12 improvements are 'on-line' (i.e. improvements to the existing A12 corridor rather than constructing new sections of road/junctions on land outside of the existing carriageway) and would therefore require traffic management for the two year construction period which would result in some journey time delays for Sizewell C traffic and other traffic using the corridor.</p> <p>As set out in Chapter 9 of the Consolidated Transport Assessment [REP4-005], SZC Co. considers that there would not be an unacceptable impact of Sizewell C traffic on this part of the A12 corridor and no requirement for increased capacity has been identified. Notwithstanding this, it is considered</p>

ExQ2	Question to:	Question:
		<p>that once the proposed SCC A12 improvements were operational there could be some short-term benefits for Sizewell C construction traffic although the extent of any benefits is considered to be limited. For example, any journey time benefit for the SZC traffic travelling on this section of the A12 needs to be seen in the context of the overall journey of the SZC traffic. The overall benefit to SZC HGVs on this section of the A12 would be negligible in percentage terms given the distances they will be travelling to/from the main development site. In addition, the primary purpose of the proposed A12 improvements is to reduce congestion in the network peak periods. However, Sizewell C construction traffic will be spread over the course of the day and will not be limited to the network peak periods, which will further reduce any benefits to Sizewell C traffic.</p> <p>In order to provide an estimate of the duration of any short-term benefits, the Sizewell C HGV and workforce profiles have been reviewed against the SCC outline programme of the A12 improvements.</p> <p>It can be seen from the HGV profile included in the Material Imports and Modal Split Paper Appendix A [REP5-114] that the daily number of HGVs reduces considerably for the last three years of construction and would be negligible for the operational phase. Therefore, any benefit of the A12 improvements to Sizewell C HGVs would only be for the six years between the start of 2026, which is the earliest date when the improvements might be expected to be operational, and end of 2031. Any delay to the SCC optimistic programme for delivery of the A12 improvements would further narrow this period of potential benefit.</p> <p>Likewise, it can be seen from the workforce profile included in Volume 2, Appendix 9A of the ES [APP-196] that the workforce is expected to peak in year 7 (2029) and reduce after that point, with there being an average of circa 1,700 workers (construction and operation) for the last three years of</p>

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ExQ2	Question to:	Question:
		<p>construction. The workforce vehicle trips would align with the workforce profile and therefore any benefit of the A12 improvements to Sizewell C workers during the construction phase travelling on this part of the network would be predominately limited to the period of time between 2026 and 2031.</p> <p>In summary, notwithstanding that SZC Co. does not consider that there would be an unacceptable impact related to Sizewell C on this section of the A12, the SCC proposed highway improvements may result in some short-term benefits to SZC traffic on this section of the A12 but, as set out above, these are considered to be limited. In addition, any limited short-term benefits would be reduced by disbenefits (i.e. journey time delays due to on-line roadworks) during the construction of the A12 improvements.</p> <p>It is worth highlighting that SZC Co. and SCC have agreed a contribution to SCC's scheme. Please refer to the draft Deed of Obligation for details.</p>
	<p>SCC Response at Deadline 8</p>	<p>i) SCC maintains its consistent position regarding the need for mitigation on this corridor. However, following detailed technical discussions regarding the significance of the impacts along the A12 between Seven Hills and Woods Lane, and notwithstanding the views expressed by SZC Co and SCC in previous submissions, agreement has been reached regarding a proportional contribution toward improvements to mitigate delays on this corridor.</p> <p>ii) Whilst estimated completion for the scheme is currently the end of 2025, that is the scheme as a whole. The scheme would be phased from start of construction and elements are likely to be completed throughout 2024 and 2025. Due to mitigation associated with the Brightwell Lakes housing development, a number of online schemes would be likely to be occurring during the construction period with or without the SCC scheme. Whilst the Council would look to minimise disruption along the corridor, as with any highways scheme, including the Applicant's, there would be disbenefits to traffic as a result of traffic</p>

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		<p>management during delivery. However, the exact level of disbenefit is not currently known.</p> <p>Whilst SCC considers that improvements as part of the MRN scheme are needed to mitigate the traffic impacts of the proposed Sizewell C development, SCC acknowledges that the purpose of the full MRN scheme follows a long term strategy which is modelling the schemes for a future year of 2040 to:</p> <ul style="list-style-type: none"> • improve the capacity of the major road network (MRN) • reduce congestion and improve journey time reliability on the A12 • improve connectivity to the region's ports • support local economic growth and the creation of jobs • support the delivery of planned housing growth • support the visitor economy • support the Energy Coast • support and encourage walking and cycling • improve services for bus users <p>As set out in our response to TT.2.5 at Deadline 7 [REP7-163], the modelling identifies improvements for all traffic, including Sizewell C traffic. The scheme is currently returning sufficient journey time user benefit to make the scheme value for money. Although this is work in progress, we are currently demonstrating the scheme has benefit to all traffic including SZC beyond the consented mitigation agreed as part of the Brightwell Lakes development.</p>
TT.2.4	The Applicant	<p>Associated Development Sites – HGV Movements</p> <p>SCC [REP3-084] in their comments on responses to ExQ1 TT.1.15 tabulate the differences between the HGV levels set out in paragraph 3.3.6 the CTMP [REP2-054] and the levels provided in response to ExQ1. Clarify which are the correct numbers.</p>
	SZC Co. Response at Deadline 7	<p>Both sets of figures are correct. It should however be clarified that the figures stated in the CTMP [REP2-054] are correct but they are <u>peak</u> HGV movements and not an <u>average</u> over the construction period. The CTMP [REP2-054] will be updated to clarify this.</p>

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ExQ2	Question to:	Question:
		<p>The distribution of materials over the construction of a project is not even and therefore an assessment of average movement requirements over the total construction period cannot be undertaken. SCC's tabulated figures assume even distribution over 313 (Mon – Sat) or 261 (Mon – Fri) working days of the year. The early earthworks phase and latter surfacing phase of the highway schemes demand much greater HGV imports than outside of these periods.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC welcomes this clarification regarding the figures being peak movements. SCC has always recognised that there would not be a flat profile, but sought to understand the differences between the figures presented and also to highlight that the controls being proposed from Associated Development sites are far higher than the average day. Whilst SCC appreciates the purposes of assessing peak figures particularly with regards to Environmental Assessment, the Council continues to encourage the Applicant to reduce any caps where reasonable through good project management. For instance can the peak figure for the Sizewell Link Road be reduced down given the average figure is only one third of the peak, as set out in out comments on TT.1.15 at [REP3- 084] comments on responses to EXQ1.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>The CTMP (Annex K of the Deed of Obligation (Doc Ref. 10.4) has been amended to clarify the HGV movements associated with the associated development sites (para. 3.3.7). The CTMP and the caps, targets and monitoring secured within it have been agreed with the transport stakeholders and there are no residual matters of dispute between the parties with regards to the CTMP.</p> <p>SZC Co. are committed to minimising the number of construction movements by road, to/from the associated development sites. Chapter 5 of the CTMP describes some of the measures already proposed to minimise traffic volumes, and these will be further developed through detailed design and delivery planning phases. HDV caps set out in Chapter 4 of the CTMP apply to HGV movements to/from associated development sites, limiting HGV movements through Theberton and Middleton Moor. HGV movements to/from the associated development sites will be monitored via the DMS and constrained to approved HGV routes in the CTMP, with a summary of the monitoring data provided to the TRG on a weekly basis in addition to the transport monitoring reports.</p>

ExQ2

ExQ2	Question to:	Question:
TT.2.5	The Applicant, Network Rail	<p>Darsham Level Crossing – Safety Concerns</p> <p>Following ExQ1, TT.1.102 both parties were reviewing the situation with regard to the safe operation of this crossing. Provide an update on the progress of these reviews and whether any intervention is required as the result of the Proposed Development.</p>
	SZC Co. Response at Deadline 7	<p>SZC Co. has agreed to provide a contribution for the upgrade of Darsham Level Crossing to a full barrier crossing. As this is an existing safety concern for Network Rail with future funding understood to be set aside for the work, SZC Co. has proposed to provide a contribution of 50% of the cost of the full upgrade. This is still under discussion between the parties. Darsham, of course, is not affected by Sizewell C trains and the issue at Darsham arises from the location of the station car park across the A12 from the station. The current half barrier can encourage or enable unsafe behaviour from rail passengers. The Northern Park and Ride will add to traffic levels on this stretch of the A12 but the issue is understood to arise when traffic is static and the level crossing is in operation. Cars destined for the park and ride coming from it or buses coming to and from it to Sizewell C main development site in those circumstances would add to any short-term queue on the highway and should not in themselves pose a safety risk. Network Rail is believed to measure these issues on the basis that any increase in traffic in these circumstances theoretically adds to the (existing) risk. SZC Co. has agreed a Framework Agreement with Network Rail which commits the parties to work together to address the issue and is willing to contribute towards Network Rail’s planned improvement. SZC Co. does not regard this as a ‘requirement’ in the sense understood by planning policy.</p>
	TASC Response at Deadline 7	<p>TASC are very concerned about the safe operation of the Darsham crossing. Following our review of the “Statement of Common Ground-Network Rail” dated July 2021 PINS ref. REP5-095, we note it is confirmed that the level crossing at Darsham will be upgraded to a full barrier crossing. The matters TASC believe that the Applicant/Network Rail should confirm are:-</p> <ol style="list-style-type: none"> 1. That Darsham Park and Ride will not be brought into use until the safety benefits conferred by the Darsham Level Crossing upgrade have been completed. 2. The position of the fixed signal on the down East Suffolk line that will protect Darsham level crossing. 3. That the railway signal protection in the up direction will remain unchanged.

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ExQ2	Question to:	Question:
		<p>4. The estimated road closed times following the introduction of a full barrier crossing.</p> <p>5. Whether obstacle detection technology will be used on the crossing.</p>
	SZC Co. Response at Deadline 8	The matters raised by TASC are matters primarily for Network Rail as part of the design of the level crossing upgrade. The frequency of closure would be as now – determined by the frequency of trains.
	SCC Response at Deadline 8	The improvements at the Darsham Level Crossing would be a project sponsored by Network Rail with a contribution towards the cost from SZC Co. SCC would welcome any such improvements on both safety grounds and for improving pedestrian facilities. A small element of work within the public highway to improve the shared footway / cycleway is likely to be required together with modification of road signs and road markings. SCC is content that these matters can be addressed either through an arrangement with Network Rail so it is delivered as part of their scheme or separately as part of the s278 works for the Northern Park and Ride.
	TASC Response at Deadline 8	<p>In the Applicant’s response to the question of Darsham Level Crossing Safety Concerns, SZC Co. say they have agreed a Framework Agreement with Network Rail to contribute to the planned improvement. But it says SZC Co does not regard this as a "requirement" in the sense understood by planning policy (emphasis added). TASC assumes this means that SZC Co intend to use Darsham park and ride before the safety enhancements to the level crossing.</p> <p>TASC consider that safety must be a priority and that the ExA must insist that the upgrade of the level crossing is a condition of opening the "Park and Ride". After all, it is the traffic from the "park and ride" that breaks the camel's back and necessitates the crossing upgrade.</p>
	SZC Co. Response at Deadline 10	Issues of rail safety are matters for Network Rail and the ORR. SZC Co. has explained its view of the necessity for the upgrade of the Darsham level crossing and is not aware of any evidence to the contrary before the examination. The delivery of the upgrade is being appropriately managed through the contractual Framework Agreement between SZC Co. and Network Rail. That Agreement provides for the Park and Ride only to become operational <i>"if mitigation is in motion and will be delivered within 6 to 12 months."</i> In other words, Network Rail does not regard it as a prior necessity but wishes to ensure that the process for its delivery (including SZC Co.’s financial contribution) is in place and well underway.

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ExQ2	Question to:	Question:
		<p>The Examining Authority and Secretary of State can be satisfied that these issues are being controlled through the appropriate process and that the public interest is protected.</p>
TT.2.6	Suffolk County Council, Suffolk Constabulary	<p>Abnormal Indivisible Loads (AIL) Management [REP5-114] Provide comment on whether the position with respect to AIL set out by the applicant is acceptable on the following routes:</p> <ul style="list-style-type: none"> (i) A14; (ii) A12, Lowestoft to Leiston; (iii) A12, Woodbridge to Leiston; and <p>B1122.</p>
	SZC Co. Response at Deadline 7	No response required from SZC Co.
	Suffolk County Council Response at Deadline 7	<p>The AIL Management Strategy SCC understands that Suffolk Constabulary and the Applicant have been working towards an agreed matrix (the pre-mitigation Matrix) which will guide the requirements for the policing of AIL movements to and from the working areas associated with the Project (i.e. including the main worksite; the off-site associated developments; and the off-site road projects of the Sizewell Link Road (SLR), the Two Villages Bypass (TVBP) and the Yoxford Road roundabout). It is understood that the pre-mitigation Matrix will be included within an updated CTMP. A post-mitigation Matrix could be included in the CTMP, subject to agreement between the parties. The Applicant also proposes to prepare an additional post-mitigation Matrix which will reflect on the effects of the SLR, TVBP and Yoxford Road roundabout on AIL access and egress. It is understood that the Applicant will put forward that the post-mitigation Matrix will reduce the anticipated draw on the Constabulary's resource by reducing the need for police escorting. The Council understands that the post-mitigation Matrix has yet to be provided to the Constabulary by the Applicant for review. Subject to the pre-mitigation Matrix being formally presented in the CTMP in line with the detail that is being agreed between the parties, it is understood that the Constabulary will</p>

ExQ2	Question to:	Question:
		<p>be satisfied that the Applicant has the correct guidance in place to provide to its contractors and hauliers to inform the movement of AILs to and from the Project. The duty is then on those moving the AILs to comply with that guidance or to demonstrate why it is appropriate to deviate from it. SCC is content with this process.</p> <p>The pre-mitigation Matrix and post-mitigation Matrix will be used by the Applicant to predict the volume and anticipated profile of AIL movements associated with the Project – based on data from the Hinkley Point C (HPC) project. In turn that prediction will allow the Constabulary to model the resource requirement to manage the Constabulary’s involvement. It is then expected that the Applicant will fund that resource for the term of the construction period, subject to agreed reviews to reflect changes in predictions and programme. The frequency of reviews has not yet been set.</p> <p>Subject to the funding, it is understood that the Constabulary will be able to support the AIL movement strategy to the level of resource provided by the Applicant.</p> <p>It is noted that the Applicant is agreeing in principle to fund resources for a bespoke AIL unit [Paragraph 1.4.5 of document reference REP5-114]. It is understood that this will enable the Constabulary to provide the assistance required to escort loads up to the quanta and distance over which the escorts are required to reflect that which will be predicted by the Applicant and then agreed with the Constabulary as the quantum to match the resources funded. That will set the level of assistance that can be dedicated to the Project and will be the Applicant’s risk to set the resourcing correctly.</p> <p>What must not be neglected is the demand for AIL movements to and from the associated development sites during their construction and removal – which includes the construction of the SLR and TVBP. These will also have a draw on police resources and if that demand is not included within the resource allocation to be funded by the Applicant then the management of those movements will be carried out using the existing resources within the Constabulary. The excess AIL movement demands beyond those identified by the Applicant’s predictions and funding will be subject to the same procedures and programming as other hauliers experience when wishing to engage Constabulary resources to move an AIL. This operation is at the Undertaker’s own risk.</p> <p>The Constabulary has indicated to the Applicant that the AIL Unit will be able to apply any spare resource time to other roads policing tasks, which will be rostered to reflect the demands on officer time once AIL management is accounted for. It is understood that</p>

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ExQ2	Question to:	Question:
		<p>there can be no commitment to what that time and input will be and the Applicant should not rely on that input to mitigate effects of the Project.</p> <p>The pre-mitigation Matrix is predicated on assumptions, which have been agreed between the Constabulary and the Applicant, which SCC supports. Those assumptions will inform the size of the dedicated AIL Team for the project. If the assumptions are changed, or deviate from that agreed, this needs to be communicated by the Applicant as this may impact of the size of the AIL Team required.</p> <p>Two elements which are informing the definition of the AIL strategy, and the resources required, are the use of the Orwell Lorry Park as a location for the assigned Police escorting team to meet AILs; and the prospect of locations mid-route along A12 north and south of Yoxford to supplement the strategy and potentially reduce the necessary escorting distance by allowing AILs to travel part way along A12 before joining the police team for the load and vehicle to be inspected and escorted.</p> <p>Firstly, it is noted that the Orwell Lorry Park has been identified for redevelopment which will require the Applicant to identify an alternative location to meet the Police escorts and have the commencement inspections carried out safely – where a mid-route A12 meeting place is not available or appropriate.</p> <p>Furthermore, if an acceptable configuration and location cannot be achieved for the mid-route meeting point on A12 south then the resource requirement will be based on the need to meet all escorted AILs at the Orwell Lorry Park, if it is available of a similarly agreed point close to the Suffolk County boundary. Any changes to the strategy will need to be reflected in the conclusions draw on the resources and associated funding required.</p> <p>It is understood that the Constabulary has expressed to the Applicant that even with the funding of a dedicated AIL Unit, the current practices regarding the notifications of AIL movements is paramount. It is considered that through the appropriate scheduling and notification of the AILs, and good liaison between the Applicant, the TRG and the Constabulary, that the smoothest movement of AILs can be achieved.</p> <p>The Council supports the Constabulary in its position that it requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the</p>

ExQ2	Question to:	Question:
		<p>Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p>Supplementary Observations on REP5-114</p> <p><u>B1122 journey times:</u></p> <p>The Constabulary considers that the estimates of travel timings along B1122 between Yoxford and the main site [at paragraphs 1.4.6-1.4.9 of [REP5-114] are appropriate under current conditions and with no other external effects e.g. third party incidents. These times could extend if AILs (and associated escorts) come into conflict with similarly large vehicles in the opposing direction, which can quickly add travel time and disruption whilst the escorts manage the opposing flows at the most convenient passing point. The Constabulary's experience, when escorting larger AILs (e.g. over 3.5m wide), is that the average speed is much lower than 30mph.</p> <p>It is noted that the travel predictions relate only to B1122 and do not reflect on the movement of AILs on the A12 corridor.</p> <p><u>Classification of AILs:</u></p> <p>Paragraphs 1.5.1, 1.6.38 and Appendix A Figure 1 of REP5-114 sets out the vehicle type that are to be monitored during the construction of the Project. The classifications do not include HGVs over 44t and therefore excludes a number of AILs. The Applicant has to date recorded all vehicles arriving and departing the HPC works site. The Constabulary would expect all AILs movements to be recorded in the observations of HGVs access the main works. Within reason, the Constabulary does not comment on the appropriateness of the caps on HGV movements and whether this should include or exclude AIL movements [paragraph 1.6.45 REP5-114 refers]. This would be a matter for SCC and ESC as Local Highway Authority and Local Planning Authority, respectively, until the movements of HGVs and other vehicles associated with the Project became such that the volumes of traffic hindered the safe and efficient operation of the road network and the management of AILs. The Constabulary is, however, keen to have the data on the number and format of AIL movements recorded and monitored to allow for the on-going management of the AIL systems and resourcing, and would therefore propose that vehicles in excess of 44t are also recorded, reported and monitored. This will be important to assist with monitoring and auditing.</p>

ExQ2	Question to:	Question:
		<p>In view of the pivotal role the Constabulary holds when maintaining the safety of road users in Suffolk, and the need to monitor and react accordingly to potential impacts of the Project, the appropriate mechanism for reporting and monitoring the management of AIL numbers and reviewing the effects of the operations is through the TRG. The Constabulary notes that the Applicant has proposed that the Constabulary is invited to attend the TRG, however, the Constabulary must be a full member of the TRG with voting rights in order properly to represent its interests during the construction period as a key stakeholder in the management of Roads Policing. This view is one that has been repeated by the Constabulary to the Applicant, and is supported by those key strategic partners that wish to see the smooth operating of Suffolk's roads during the Project.</p> <p><u>Constitution of the Transport Review Group</u></p> <p>Paragraphs 1.6.12 and 1.6.13 of REP5-114 refer to the constitution of the TRG and its associated power and mandate on the management and control of the construction period traffic. The proposed constitution of the TRG would be for a 50/50 split between the Undertaker and local authority stakeholders. Those local authority stakeholders include Highways England (to be rebranded National Highways at the time of writing). Highways England's role in relation to the construction of the Project is related to the effects on the Trunk Road network. Its jurisdiction in Suffolk therefore ends at the junction of A14 with A12 (the Seven Hills interchange). It can be reasonably anticipated that Highways England would be minded not to use their vote on matters that do not directly affect the Trunk Road network, thus giving the casting vote on contentious matters to the Undertaker. It would therefore seem appropriate to restore that balance by providing the Constabulary full voting rights on the TRG, not least as they are a key stakeholder in the management of the road network across Suffolk, but also that decisions made at the TRG will have a direct effect on the Constabulary's operations.</p> <p><u>Off-site Mitigation Clarification</u></p> <p>The Constabulary has requested clarification relating to the design and layout of the SLR and the TVBP, regarding the configuration of the associated roundabout junctions and the need, or otherwise, for central double white lining along the corridors. These design clarifications will affect the scale of resourcing that will be required to support the construction period which the Applicant will require. The Applicant proposes that a revised AIL matrix will be sought to reflect its off-site mitigation (i.e. the SLR, TVBP and the</p>

ExQ2	Question to:	Question:
		<p>adjusted Yoxford Road roundabout). That matrix will be considered by the Constabulary once received and reflecting the design clarifications which have been sought.</p> <p>At paragraph 1.7.1 of REP5-114, the Applicant asserts that the Yoxford roundabout is sized to "accommodate the largest expected AIL movement for both Sizewell B and C". The Constabulary previously has sought from the Applicant clarification on when it anticipates it will need to utilise the dedicated through route which crosses the centre of the roundabout. The Applicant has provided sweptpath information on scenarios of AIL configuration which can negotiate the junction between A12 north and Yoxford Road, but it has not confirmed when the central route will be required and how that use will be managed. Subject to the temporary traffic management mechanisms that the Applicant proposes to put in place on those occasions, the use of the central route could require the Constabulary in attendance to direct general traffic.</p> <p>Further to the consideration of the movement of AILs associated with Sizewell B and C, the Constabulary requires clarification on the configuration of vehicles that can move through the junction between A12 north and A12 south (and vice versa) without Constabulary assistance. The A12 corridor will continue to be used for AIL movements for vehicles not associated with the Project or Sizewell B. SZC Co. needs to show that the introduction of a roundabout in this important corridor will not affect the ability of other AILs to move along the A12 without the assistance of the Constabulary, where previously assistance was not required.</p>
	Suffolk Constabulary Response at Deadline 7	<p>Summary Position</p> <p>The Parties are making progress towards an agreed position with regards to the management of AILs associated with the Project but have yet to reach a final agreement. The Parties then need to agree the amount of funding that the Applicant will provide to support the necessary additional resources.</p> <p>Matrices giving guidance as to the management of AILS are being confirmed. If they are agreed and funding for the AIL Unit is confirmed then the Constabulary will be able to accept the Applicant's position with regards to the pre-mitigation management of AIL movements along the roads used to access and leave the Project i.e. the A14; A12 (Lowestoft to Yoxford); A12 (Woodbridge to Yoxford); and 31122.</p> <p>It has been impressed upon the Applicant that the Constabulary requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available</p>

ExQ2	Question to:	Question:
		<p>for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p>The Approach to Agreeing the AIL Strategy</p> <p>The following approach is being pursued to establish an agreed strategy for the management of AI Ls associated with the Project:</p> <ol style="list-style-type: none"> 1. The Applicant provides a suitable prediction of the number, type/sizes and schedule of AILS required by the Project; 2. The Parties agree that data; 3. The Parties agree guidance on which AI Ls need escorting and across which sections of the network; 4. A matrix/matrices are prepared to confirm the escorting needs; 5. The Constabulary assesses/models the resources it needs to manage its involvement in the agreed strategy (i.e. based on the number of AI Ls to be escorted per day and over what distance); 6. The Applicant confirms its funding of the predicted resources; 7. The Constabulary receives funding and establishes the AIL Unit (allowing for recruitment and training lead in times); 8. The Parties operate the agreed schedule (number type/size and schedule); 9. Extra AIL movements are moved in accordance with standard AIL practices; and 10. The Parties monitor and review the AIL strategy on an agreed basis and reflect on that review. <p>At the time of preparing this response (i.e. Deadline 7 of the Examination), the Parties have:</p> <ul style="list-style-type: none"> • agreed the basis of the AIL predictions (points 1 and 2 above); • agreed which AILs need escorting (point 3 above); • agreed in principle the first matrix (point 4 above);

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> • made progress towards completing the resource modelling (point 5 above); and • some acknowledgement of funding has been given (point 6 above). <p>Progress on the AIL Management Strategy</p> <p>The Constabulary and the Applicant have been working towards an agreed matrix (the pre-mitigation Matrix') which will guide the requirements for the policing of AIL movements to and from the working areas associated with the Project (i.e. including the main worksite; the off-site associated developments; and the off-site road projects of the Sizewell Link Road, the Two Villages Bypass and the Yoxford Road roundabout). It has been agreed between the two parties that the pre-mitigation Matrix will be included within the control document of the Construction Traffic Management Plan CCTM P').</p> <p>The Applicant also proposes to prepare the additional 'post-mitigation Matrix' which will reflect on the effects of the Sizewell Link Road, Two Villages Bypass and Yoxford Road roundabout on AIL access and egress. It is understood that the Applicant will put forward that the post-mitigation Matrix will reduce the anticipated draw on the Constabulary's resource by reducing the need for police escorting. The post-mitigation Matrix has yet to be provided by the Applicant for review. A post-mitigation Matrix could be included in the CTMP, subject to agreement between the parties.</p> <p>Subject to the pre-mitigation Matrix being formally presented in the CTMP, in line with the detail that is being agreed between the parties, the Constabulary will then be satisfied that the Applicant has the correct guidance in place to provide to its contractors and hauliers to inform the movement of AILS to and from the Project. The duty is then on those contractors and hauliers moving the AILS to comply with that guidance or to demonstrate, to the satisfaction of the Constabulary and Highway Authority, why it is appropriate to deviate from it.</p> <p>The agreed pre-mitigation Matrix and post-mitigation Matrix will be used by the Parties to predict the requirements for escorting AIL movements associated with the Project.</p> <p>The assessment of the number, type and schedule of AIL movements associated with the Project is being based on recorded data from the Hinkley Point C ('HPC') project, as an indicative proxy in the absence of detailed predicted data specific to the Project. In turn that informed prediction for the Project will assist the Constabulary in modelling the resources</p>

ExQ2	Question to:	Question:
		<p>which will be required to manage the Constabulary's involvement. It is then expected that the Applicant will fund that resource for the term of the construction period, subject to agreed reviews to reflect changes in predictions and programme. The frequency of reviews has not yet been set.</p> <p>What must not be neglected by the Applicant, when establishing the AIL strategy, is the demand for AIL movements to and from the associated development sites during their construction and removal — which includes the construction of the Sizewell Link Road and Two Villages Bypass. These will also have a draw on police resources and if that demand is not included within the resource allocation to be funded by the Applicant, then the management of those movements will be carried out using the limited existing resources within the Constabulary.</p> <p>The pre-mitigation Matrix is predicated on assumptions, which have been agreed with the Applicant. Those assumptions will inform the size of the dedicated AIL Unit for the project and have been used to model the resource requirements needed within the Constabulary for the AIL Unit. If the assumptions are changed, or deviate from that agreed, this needs to be communicated by the Applicant as this may impact of the size of the AIL Team required.</p> <p>Assumptions that will be used by the parties to predict the resource requirements and are informing the model are:</p> <ol style="list-style-type: none"> 1) AILS are only permitted to be moved Monday — Saturday during defined periods outside network peak hours. 2) Each AIL escort requires 3 officers and associated vehicles. 3) Each team of 3 officers can escort either 2 full length AIL journeys (i.e. from Felixstowe Port, Lowestoft Port or Orwell Crossing, referred to a "full escort") OR 4 partial length AIL journeys (i.e. pick up along the A12 referred to as a "partial escort") in 1 shift. 4) AILS to be escorted on part of their journeys could be picked up along the A12 south of Yoxford, from a modified layby, subject to modifications agreed with Suffolk County Council as local highway authority and up to the width of 4.4m. AILS over 4.4m width are assumed by the Constabulary to require a full escort from the county boundary. The layby at Darsham, on A12, is not controlled by the Applicant and therefore cannot be included in the modelling.

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ExQ2	Question to:	Question:
		<p>5) With the exception of VR1 and Special Order AILS. it is assumed that all other AILS will approach SZC from the south along the A14 and north along the A12.</p> <p>6) Accidents and delays to the road network have not been factored into the model.</p> <p>7) The AIL model is predicated on Hinkley Point C transport data (2017 -2020 inclusive) as the most accurate estimate of the likely nature of AILS (size and number) for SZC.</p> <p>8) Potential delays and predictions around size of team are based on the scheduling shown in the HPC AIL data</p> <p>9) The AIL model uses baseline officer numbers and does not include abstraction rates.</p> <p>10) The AIL model does not take into account Bank Holidays</p> <p>11) Where AIL weight data is missing from the HPC data, it is assumed that the AIL will require a full escort.</p> <p>12) If width data is missing from the HPC data those loads are assumed to be included in the 3.5 - 4.399m wide category, and will require at a minimum a partial escort.</p> <p>13) All 3.5 wide AILs are included in the 3.5m - 4.399m wide category as hauliers often forget to include mirrors in width measurements</p> <p>14) All AILS in 2017 HPC AIL data that have no dimensions or category assigned are assumed to require a full police escort.</p> <p>15) The Constabulary agrees and uses the total number of HPC AILS shown in the draft CTMP table 3.1 in its analysis but not the categorisations (for the reasons set out above). It agrees that the pro rate distribution of 2017 and 2018 AILS with missing data is an appropriate approach for the CTMP but the model created by the Constabulary uses weight data not categories.</p> <p>16) Where length data is missing those loads are assumed to be below 27.3m in length.</p> <p>17) Castings provided are indicative costs based upon the current National Police Chiefs' Council (NPCC') full cost recovery rate (excluding fuel). The NPCC annual cost of a Police Constable in 2020/21 is £101,318. The NPCC annual cost of a sergeant in 2020/21 is £122,933. These costs will increase each year in accordance with inflation and cost of living rises.</p> <p>18) The model is based upon the Constabulary's risk guidance as set out in pre-mitigation Matrix. For the purposes of calculating resource requirements only red rated risks (those</p>

ExQ2	Question to:	Question:
		<p>assessed as high risk and requiring police escort) have been modelled. Loads that are assessed as amber are not included within the resource capacity prediction.</p> <p>19) The on-going availability of an AIL meeting and inspection facility at the Orwell Lorry Park, or a similar suitable facility.</p> <p>20) No AIL access at the Freight Management Facility or Park and Ride sites.</p> <p>Two elements which are informing the AIL strategy, and the resources required are the use of the Orwell Lorry Park as a location for the assigned Police escorting learn to meet AILS; and the prospect of locations mid-route along A1 2 north and south of Yoxford to supplement the strategy. This has the potential to reduce the necessary escorting distance by allowing AILS to travel part way along A12 before joining the police team for the load and vehicle to be inspected and escorted.</p> <p>Firstly, it is noted that the Orwell Lorry Park has been identified for redevelopment which will require the Applicant to identify an alternative location to meet the Police escorts and have the commencement inspections carried out safely —where a mid-route A12 meeting place is not available or appropriate.</p> <p>Furthermore, if an acceptable configuration and location cannot be achieved for the mid-route meeting point on A12 south then the resource requirement will be based on the need to meet all escorted AILS at the Orwell Lorry Park_ if it is available of a similarly agreed point close to the Suffolk County boundary. It is currently unlikely that a mid-route meeting location on A1 2 for AIL north of Yoxford will be achieved by the Applicant.</p> <p>Any changes to the strategy will need to be reflected in the pre and post mitigation Matrices</p> <p>Subject to receipt of sufficient and timely funding from the Applicant (to be secured by the Deed of Obligations). the Constabulary will be able to support the AIL movement strategy to the level of the resources provided by the Applicant's funding.</p> <p>As per Paragraph 1.4.5 of REPS-114, the Constabulary notes that the Applicant is agreeing in principle to fund resources for a bespoke AIL unit. This will set the level of assistance that can be dedicated to the Project and will be the Applicant's risk to set the resourcing correctly.</p> <p>The Constabulary has expressed to the Applicant that even with the funding of a dedicated AIL Unit, the current practices regarding the notifications of AIL movements is paramount.</p>

ExQ2	Question to:	Question:
		<p>It is through the appropriate scheduling and notification of the AILS, and good liaison between the Applicant and the Constabulary, that the smoothest movement of AILS can be achieved.</p> <p>As stated in the summary, it has also been impressed upon the Applicant that the Constabulary requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand_ will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p>Furthermore, any excess AIL movement demands beyond those identified by the Applicant's predictions and funding will be subject to the same procedures and programming as other hauliers experience when wishing to engage Constabulary resources to move an AIL. This operation is at the Undertaker's own risk.</p> <p>The Constabulary has indicated to the Applicant that the AIL Unit will be able to apply any spare resource time to other roads policing tasks, once AIL management is accounted for. Those additional policing tasks will be rostered to reflect the demands on officers' time. There can be no commitment to what that time and input will be and the Applicant cannot rely on that input to mitigate effects of the Project.</p> <p>Supplementary Observations on REPS-114</p> <p><i>B112 journey times</i></p> <p>The Constabulary considers that the estimates of travel timings along B1122 between Yoxford and the main site at Paragraphs 1.4.6-1.4.9 of REPS-114 are appropriate under current conditions and with no other external effects e.g. third party incidents. These times could extend if AILs (and associated escorts) come into conflict with similarly large vehicles in the opposing direction. which can quickly add travel time and disruption whilst the escorts manage the opposing flows at the most convenient passing point. The Constabulary's experience, v./hen escorting larger AILS (e.g. over 3.5m wide). is that the average speed is much over than 30mph.</p> <p>It is noted that the travel predictions relate only to B1122 and do not reflect on the movement of AILS on the AI 2 corridor.</p>

ExQ2	Question to:	Question:
		<p><i>Classification of AILs:</i></p> <p>Paragraphs 1.5.1, 1.6.38 and Appendix A Figure 1 of REP5-114 sets out the vehicle type that are to be monitored during the construction of the Project. The classifications do not include HGVs over 44t and therefore excludes a number of AILS. The Applicant has to date recorded all vehicles arriving and departing the HPC works site. The Constabulary would expect all AILS movements to be recorded in the observations of HGVs access the main works. Within reason. the Constabulary does not comment on the appropriateness of the caps on HGV movements and whether this should include or exclude AL movements referred to at Paragraph 1.6.45 of REP5-114. This would be a matter for Suffolk County Council and East Suffolk Council as Local Highway Authority and Local Planning Authority, respectively, until the movements of HGVs and other vehicles associated with the Project became such that the volumes of traffic hindered the safe and efficient operation of the road network and the management of AILS. The Constabulary is, however, keen to have the data on the number and format of AIL movements recorded and monitored to allow for the on-going management of the AIL systems and resourcing and would therefore propose that vehicles in excess of 44t are also recorded, reported and monitored. This will be important to assist with monitoring and auditing.</p> <p>In view of the pivotal role the Constabulary holds when maintaining the safety of road users in Suffolk, and the need to monitor and react accordingly to potential impacts of the Project, the appropriate mechanism for reporting and monitoring the management of AIL numbers and reviewing the effects of the operations is through the Transport Review Group (TRG'). The Constabulary notes that the Applicant has proposed that the Constabulary is invited to attend the TRG, however, the Constabulary must be a full member of the TRG with voting rights in order properly to represent its interests during the construction period as a key stakeholder in the management of Roads Policing. This view is one that has been repeated by the Constabulary to the Applicant and is supported by those key strategic partners that wish to see the smooth operating of Suffolk's roads during the Project.</p> <p><i>Constitution of the Transport Review Group:</i></p> <p>Paragraphs 1.6.12 and 1.6.13 of REPS-114 refer to the constitution of the TRG and its associated power and mandate on the management and control of the construction period traffic. The proposed constitution of the TRG would be for a 50/50 split between the Undertaker and local authority stakeholders. Those local authority stakeholders include</p>

ExQ2	Question to:	Question:
		<p>Highways England (to be rebranded National Highways at the time of writing). Highways England's role in relation to the construction of the Project is related to the effects on the Trunk Road network. Its jurisdiction in Suffolk therefore ends at the junction of A14 with A12 (the Seven Hills interchange). It can be reasonably anticipated that Highways England would be minded not to use their vote on matters that do not directly affect the Trunk Road network. thus giving the casting vote on contentious matters to the Undertaker. It would therefore seem appropriate to restore that balance by providing the Constabulary full voting rights on the TRG, not least as they are a key stakeholder in the management of the road network across Suffolk but also that decisions made at the TRG will have a direct effect on the Constabulary's operations.</p> <p><i>Off-site Mitigation Clarification:</i></p> <p>The Constabulary has requested clarification relating to the design and layout of the Sizewell Link Road and the Two Villages Bypass, regarding the configuration of the associated roundabout junctions and the need, or otherwise, for central double white lining along the corridors_ These design clarifications will affect the scale of resourcing that will be required to support the construction period which the Applicant will require. The Applicant proposes that a revised AIL matrix will be sought to reflect its off-site mitigation (i.e. the Sizewell Link Road, Two Villages Bypass and the adjusted "oxford Road roundabout). That matrix will be considered by the Constabulary once received and reflecting the design clarifications which have been sought</p> <p>At Paragraph 1.7.1 of REPS-114, the Applicant asserts that the Yoxford roundabout is sized to "accommodate the largest expected AIL movement for both Sizewell B and C". The Constabulary previously has sought from the Applicant clarification on when it anticipates it will need to utilise the dedicated through route which crosses the centre of the roundabout. The Applicant has provided swept-path information on scenarios of AIL configuration which can negotiate the junction between A12 north and Yoxford Road, but it has not confirmed when the central route will be required and how that use will be managed. Subject to the temporary traffic management mechanisms that the Applicant proposes to put in place on those occasions. the use of the central route could require the Constabulary in attendance to direct general traffic.</p> <p>Further to the consideration of the movement of AILS associated with Sizewell B and C. the Constabulary requires clarification on the configuration of vehicles that can move through the junction between A12 north and A12 south (and vice versa) without</p>

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ExQ2	Question to:	Question:
		<p>Constabulary assistance. The A12 corridor will continue to be used for AIL movements for vehicles not associated with the Project or Sizewell B. The Applicant needs to show that the introduction of a roundabout in this important corridor will not affect the ability of other AILS to move along the A12 without the assistance of the Constabulary, where previously assistance was not required.</p>
	<p>SZC Co. Response at Deadline 8</p>	<p>An updated CTMP (Annex K of the DoO Doc Ref. 8.17(G)) is being submitted at Deadline 8, which sets out the approach to managing AILs based on detailed discussions with Suffolk Constabulary and the highway authorities. The Deadline 7 response provided by Suffolk Constabulary set out an approach to agreeing the AIL strategy with Suffolk Constabulary. Below summarises the approach set out and the SZC Co. response:</p> <ol style="list-style-type: none"> 1) The Applicant provides a suitable prediction of the number, type/sizes and schedule of AILS required by the Project; - <i>Suffolk Constabulary confirmed at D7 that this was agreed.</i> 2) The Parties agree that data; - <i>Suffolk Constabulary confirmed at D7 that this was agreed.</i> 3) The Parties agree guidance on which AILs need escorting and across which sections of the network; <i>Suffolk Constabulary confirmed at D7 that this was agreed.</i> 4) A matrix/matrices are prepared to confirm the escorting needs; - <i>Suffolk Constabulary confirmed at D7 that this was agreed for the early years. The CTMP (Annex K of the DoO Doc Ref. 8.17(G)) submitted at D8 includes an obligation that the peak construction AIL Escort Guide must be approved by the TRG prior to the Sizewell link road and two village bypass being operational. As set out in the response to D7 by Suffolk Constabulary, the highway infrastructure has been designed to accommodate AILs but will need to go through technical approval by SCC. During this process there may be some refinements to the design (within the order limits), which may impact on the peak construction AIL Escort Guide. SZC Co. will therefore continue to liaise with Suffolk Constabulary as part of the detailed design process to develop and agree the peak construction AIL Escort Guide. It is</i>

ExQ2	Question to:	Question:
		<p><i>expected that the police escort requirement at peak construction would be less than during the early years as a result of lower demand for AIL movements and an upgraded highway network, including the Sizewell link road and two village bypass, which bypass existing constraints for AILs identified by Suffolk Constabulary including Farnham bend and the B1122.</i></p> <p>5) The Constabulary assesses/models the resources it needs to manage its involvement in the agreed strategy (i.e. based on the number of AILs to be escorted per day and over what distance); <i>Suffolk Constabulary has completed their AIL resource modelling and shared it with SZC Co.</i></p> <p>6) The Applicant confirms its funding of the predicted resources; <i>Within the CTMP (Annex K of the DoO Doc Ref. 8.17(G)) issued at D8, SZC Co. has committed to fund a dedicated AIL police escort resource throughout the construction period.</i></p> <p>7) The Constabulary receives funding and establishes the AIL Unit (allowing for recruitment and training lead in times); <i>SZC Co. is liaising with Suffolk Constabulary to ensure that funding is secured to enable the AIL Unit to be established in time.</i></p> <p>8) The Parties operate the agreed schedule (number type/size and schedule); Section 7 of the CTMP (Annex K of the DoO Doc Ref. 8.17(G)) sets out the AIL management commitments, which include close liaison between Suffolk Constabulary and SZC Co. (e.g. Suffolk Constabulary a member of TRG, daily communication on AILs, weekly meetings on AILs, forward AIL schedules being provided on a monthly and weekly basis).</p> <p>9) Extra AIL movements are moved in accordance with standard AIL practices; and <i>the CTMP (Annex K of the DoO Doc Ref. 8.17(G)) issued at Deadline 8 includes a commitment from SZC Co. to seek to smooth the profile of AIL deliveries where possible. Based on Suffolk Constabulary's Sizewell C escorting model, it is considered that the dedicated police escort resource funded by SZC Co. would have the capacity to escort the vast majority of the forecast demand and with the</i></p>

ExQ2	Question to:	Question:
		<p><i>commitment by SZC Co. to seek to smooth the AIL profile, there is likely to be limited, if any, additional requirement for police escorting beyond that which is dedicated to the Sizewell C Project.</i></p> <p>10)The Parties monitor and review the AIL strategy on an agreed basis and reflect on that review. <i>It has been agreed that Suffolk Constabulary will be a member of the TRG. The CTMP (Annex K of the DoO Doc Ref. 8.17(G)) issued at Deadline 8 requires the TRG to review the AIL strategy. Any refinements to the AIL strategy would need to be approved by the TRG and captured in the change log, which will form part of the monitoring reports.</i></p>
	<p>SCC updated position at Deadline 7 (late correction accepted at discretion of the Examining Authority)</p>	<p>The AIL Management Strategy</p> <p>SCC understands that Suffolk Constabulary and the Applicant have been working towards an agreed matrix (the pre-mitigation Matrix) which will guide the requirements for the policing of AIL movements to and from the working areas associated with the Project (i.e. including the main worksite; the off-site associated developments; and the off-site road projects of the Sizewell Link Road (SLR), the Two Villages Bypass (TVBP) and the Yoxford Road roundabout). It is understood that the pre-mitigation Matrix will be included within an updated CTMP. A post-mitigation Matrix could be included in the CTMP, subject to agreement between the parties. The Applicant also proposes to prepare an additional post-mitigation Matrix which will reflect on the effects of the SLR, TVBP and Yoxford Road roundabout on AIL access and egress. It is understood that the Applicant will put forward that the post-mitigation Matrix will reduce the anticipated draw on the Constabulary's resource by reducing the need for police escorting. The Council understands that the post-mitigation Matrix has yet to be provided to the Constabulary by the Applicant for review.</p> <p>Subject to the pre-mitigation Matrix being formally presented in the CTMP in line with the detail that is being agreed between the parties, it is understood that the Constabulary will be satisfied that the Applicant has the correct guidance in place to provide to its contractors and hauliers to inform the movement of AILs to and from the Project. The duty is then on those moving the AILs to comply with that guidance or to demonstrate why it is appropriate to deviate from it. SCC is content with this process.</p>

ExQ2	Question to:	Question:
		<p>The pre-mitigation Matrix and post-mitigation Matrix will be used by the Applicant to predict the volume and anticipated profile of AIL movements associated with the Project – based on data from the Hinkley Point C (HPC) project. In turn that prediction will allow the Constabulary to model the resource requirement to manage the Constabulary’s involvement. It is then expected that the Applicant will fund that resource for the term of the construction period, subject to agreed reviews to reflect changes in predictions and programme. The frequency of reviews has not yet been set.</p> <p>Subject to the funding, it is understood that the Constabulary will be able to support the AIL movement strategy to the level of resource provided by the Applicant.</p> <p>It is noted that the Applicant is agreeing in principle to fund resources for a bespoke AIL unit [Paragraph 1.4.5 of document reference REP5-114]. It is understood that this will enable the Constabulary to provide the assistance required to escort loads up to the quanta and distance over which the escorts are required to reflect that which will be predicted by the Applicant and then agreed with the Constabulary as the quantum to match the resources funded. That will set the level of assistance that can be dedicated to the Project and will be the Applicant’s risk to set the resourcing correctly.</p> <p>What must not be neglected is the demand for AIL movements to and from the associated development sites during their construction and removal – which includes the construction of the SLR and TVBP. These will also have a draw on police resources and if that demand is not included within the resource allocation to be funded by the Applicant then the management of those movements will be carried out using the existing resources within the Constabulary. The excess AIL movement demands beyond those identified by the Applicant’s predictions and funding will be subject to the same procedures and programming as other hauliers experience when wishing to engage Constabulary resources to move an AIL. This operation is at the Undertaker’s own risk.</p> <p>The Constabulary has indicated to the Applicant that the AIL Unit will be able to apply any spare resource time to other roads policing tasks, which will be rostered to reflect the demands on officer time once AIL management is accounted for. It is understood that there can be no commitment to what that time and input will be and the Applicant should not rely on that input to mitigate effects of the Project.</p> <p>The pre-mitigation Matrix is predicated on assumptions, which have been agreed between the Constabulary and the Applicant, which SCC supports. Those assumptions will inform the size of the dedicated AIL Team for the project. If the assumptions are changed, or</p>

ExQ2	Question to:	Question:
		<p>deviate from that agreed, this needs to be communicated by the Applicant as this may impact of the size of the AIL Team required.</p> <p>Two elements which are informing the definition of the AIL strategy, and the resources required, are the use of the Orwell Lorry Park as a location for the assigned Police escorting team to meet AILs; and the prospect of locations mid-route along A12 north and south of Yoxford to supplement the strategy and potentially reduce the necessary escorting distance by allowing AILs to travel part way along A12 before joining the police team for the load and vehicle to be inspected and escorted.</p> <p>Firstly, it is noted that the Orwell Lorry Park has been identified for redevelopment which will require the Applicant to identify an alternative location to meet the Police escorts and have the commencement inspections carried out safely – where a mid-route A12 meeting place is not available or appropriate.</p> <p>Furthermore, if an acceptable configuration and location cannot be achieved for the mid-route meeting point on A12 south then the resource requirement will be based on the need to meet all escorted AILs at the Orwell Lorry Park, if it is available of a similarly agreed point close to the Suffolk County boundary. Any changes to the strategy will need to be reflected in the conclusions draw on the resources and associated funding required.</p> <p>It is understood that the Constabulary has expressed to the Applicant that even with the funding of a dedicated AIL Unit, the current practices regarding the notifications of AIL movements is paramount. It is considered that through the appropriate scheduling and notification of the AILs, and good liaison between the Applicant, the TRG and the Constabulary, that the smoothest movement of AILs can be achieved. The Council supports the Constabulary in its position that it requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p><u>Supplementary Observations on REP5-114</u></p> <p>B1122 journey times:</p>

ExQ2	Question to:	Question:
		<p>The Constabulary considers that the estimates of travel timings along B1122 between Yoxford and the main site [at paragraphs 1.4.6-1.4.9 of [REP5-114] are appropriate under current conditions and with no other external effects e.g. third party incidents. These times could extend if AILs (and associated escorts) come into conflict with similarly large vehicles in the opposing direction, which can quickly add travel time and disruption whilst the escorts manage the opposing flows at the most convenient passing point. The Constabulary's experience, when escorting larger AILs (e.g. over 3.5m wide), is that the average speed is much lower than 30mph. It is noted that the travel predictions relate only to B1122 and do not reflect on the movement of AILs on the A12 corridor.</p> <p>Classification of AILs:</p> <p>Paragraphs 1.5.1, 1.6.38 and Appendix A Figure 1 of REP5-114 sets out the vehicle type that are to be monitored during the construction of the Project. The classifications do not include HGVs over 44t and therefore excludes a number of AILs. The Applicant has to date recorded all vehicles arriving and departing the HPC works site. The Constabulary would expect all AILs movements to be recorded in the observations of HGVs access the main works. Within reason, the Constabulary does not comment on the appropriateness of the caps on HGV movements and whether this should include or exclude AIL movements [paragraph 1.6.45 REP5-114 refers]. This would be a matter for SCC and ESC as Local Highway Authority and Local Planning Authority, respectively, until the movements of HGVs and other vehicles associated with the Project became such that the volumes of traffic hindered the safe and efficient operation of the road network and the management of AILs. The Constabulary is, however, keen to have the data on the number and format of AIL movements recorded and monitored to allow for the on-going management of the AIL systems and resourcing, and would therefore propose that vehicles in excess of 44t are also recorded, reported and monitored. This will be important to assist with monitoring and auditing.</p> <p>In view of the pivotal role the Constabulary holds when maintaining the safety of road users in Suffolk, and the need to monitor and react accordingly to potential impacts of the Project, the appropriate mechanism for reporting and monitoring the management of AIL numbers and reviewing the effects of the operations is through the TRG. The Constabulary notes that the Applicant has proposed that the Constabulary is invited to attend the TRG, however, the Constabulary must be a full member of the TRG with voting rights in order properly to represent its interests during the construction period as a key stakeholder in</p>

ExQ2	Question to:	Question:
		<p>the management of Roads Policing. This view is one that has been repeated by the Constabulary to the Applicant, and is supported by those key strategic partners that wish to see the smooth operating of Suffolk's roads during the Project.</p> <p>Constitution of the Transport Review Group</p> <p>Paragraphs 1.6.12 and 1.6.13 of REP5-114 refer to the constitution of the TRG and its associated power and mandate on the management and control of the construction period traffic. The proposed constitution of the TRG would be for a 50/50 split between the Undertaker and local authority stakeholders. Those local authority stakeholders include Highways England (to be rebranded National Highways at the time of writing). Highways England's role in relation to the construction of the Project is related to the effects on the Trunk Road network. Its jurisdiction in Suffolk therefore ends at the junction of A14 with A12 (the Seven Hills interchange). It can be reasonably anticipated that Highways England would be minded not to use their vote on matters that do not directly affect the Trunk Road network, thus giving the casting vote on contentious matters to the Undertaker. It would therefore seem appropriate to restore that balance by providing the Constabulary full voting rights on the TRG, not least as they are a key stakeholder in the management of the road network across Suffolk, but also that decisions made at the TRG will have a direct effect on the Constabulary's operations.</p> <p>Off-site Mitigation Clarification</p> <p>The Constabulary has requested clarification relating to the design and layout of the SLR and the TVBP, regarding the configuration of the associated roundabout junctions and the need, or otherwise, for central double white lining along the corridors. These design clarifications will affect the scale of resourcing that will be required to support the construction period which the Applicant will require. The Applicant proposes that a revised AIL matrix will be sought to reflect its off-site mitigation (i.e. the SLR, TVBP and the adjusted Yoxford Road roundabout). That matrix will be considered by the Constabulary once received and reflecting the design clarifications which have been sought.</p> <p>At paragraph 1.7.1 of REP5-114, the Applicant asserts that the Yoxford roundabout is sized to "accommodate the largest expected AIL movement for both Sizewell B and C". The Constabulary previously has sought from the Applicant clarification on when it anticipates it will need to utilise the dedicated through route which crosses the centre of the roundabout. The Applicant has provided sweptpath information on scenarios of AIL configuration which can negotiate the junction between A12 north and Yoxford Road, but</p>

ExQ2

ExQ2	Question to:	Question:
		<p>it has not confirmed when the central route will be required and how that use will be managed. Subject to the temporary traffic management mechanisms that the Applicant proposes to put in place on those occasions, the use of the central route could require the Constabulary in attendance to direct general traffic.</p> <p>Further to the consideration of the movement of AILs associated with Sizewell B and C, the Constabulary requires clarification on the configuration of vehicles that can move through the junction between A12 north and A12 south (and vice versa) without Constabulary assistance. The A12 corridor will continue to be used for AIL movements for vehicles not associated with the Project or Sizewell B. SZC Co. needs to show that the introduction of a roundabout in this important corridor will not affect the ability of other AILs to move along the A12 without the assistance of the Constabulary, where previously assistance was not required.</p>
	SZC Co. Response at Deadline 10	<p>The approach to managing AILs is set out in the CTMP (Annex K of the Deed of Obligation (Doc Ref 10.4)), which has been agreed with SCC, ESC, National Highways and Suffolk Constabulary. There are no outstanding areas of dispute remaining regarding the management of AILs.</p>
TT.2.8	The Applicant	<p>Early Years – Definition in DCO</p> <p>In the summary of the oral submissions for ISH3 [REP5-108] the Early Years was said to be defined as the period up to the completion of both the SLR and the TVB. In the Actions from ISH2 [REP5-114] and the proposed alteration to Requirement 8 of the DCO [REP5-028], it is said that controls would be in place until after the completion of the Park and Ride sites. The Early Years is an important period in terms of analysing and identifying the transport impacts of the Proposed Development. Clarify how this period is defined and controlled within the draft DCO.</p>
	SZC Co. Response at Deadline 7	<p>The 'early years' is defined within the Construction Traffic Management Plan [REP2-054] and Construction Worker Travel Plan [REP2-055]. The definition and rationale for the early years was discussed at ISH3, which is summarised at paragraph 1.2.1 of the Written Summaries of SZC Co.'s Oral Submissions at Issue Specific Hearings 3 [REP5-108].</p> <p>With regards to HGVs, the early years is defined in the Construction Traffic Management Plan [REP2-054] (paragraph 4.4) as the '<i>period of time prior to the</i></p>

ExQ2	Question to:	Question:
		<p><i>delivery and availability of the Sizewell Link Road (SLR) and the Two Village Bypass (TVBP). In that period, the control applies that there can be no more than 600 two-way HGV movements per day’.</i></p> <p>With regards to the construction workforce, the early years is defined in the Construction Worker Travel Plan [REP2-055] (paragraph 3.4) as the ‘<i>period prior to the delivery of the northern or southern park and ride facilities. In that period, the control is provided by the early years mode share targets’.</i></p> <p>The distinction between the Early Years period and the later construction and operational phases ensures that vehicle movements are appropriately controlled, until such time that suitable infrastructure is available to mitigate the forecast transport impacts. The separate definition for Early Years for (a) freight and (b) construction workforce is to ensure that the project is not unnecessarily constrained beyond the point at which mitigating infrastructure relevant to either (a) freight or (b) the workforce is provided. This is why it is not appropriate to have a single approach to defining the Early Years.</p> <p>The Early Years definitions and controls are set out in in the CTMP [REP2-054] and CWTP [REP2-055], which will be annexed to the Deed of Obligation (Doc Ref. 8.17(F)) and will be secured by that deed. Schedule 16 (paragraph 2.2 of the draft Deed of Obligation (Doc Ref. 8.17(F)) requires SZC Co. to implement and act in accordance with these documents. That provides the necessary control.</p>
	SCC Response at Deadline 8	<p>SCC set out our response at Table 5 of [REP6-049] our concerns regarding to having two definitions for Early Years, which are linked to the delivery of infrastructure in contrast to the remainder of the elements in the implementation plan which are delivered to calendar dates.</p> <p>In response to the concerns expressed regarding the two Early Years scenarios, and specifically construction traffic accessing the SLR construction site from the B1122, SCC accepts that the Applicant’s proposal to cap HDV (not HGV) movements on the B1122 (REP7-062) would be an acceptable measure. Although content with this cap, SCC recognises that the water tanker movements associated with the early part of the water</p>

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ExQ2	Question to:	Question:
		<p>supply strategy and movement of fill material from the TVB and SLR to the main site will present a risk for the applicant in terms of compliance. See also SCC D8 post-hearing submission on ISH14</p>
	SZC Co. Response at Deadline 10	<p>The CTMP (Annex K of the Deed of Obligation, Doc Ref. 10.4) confirms that the HDV caps defined in Chapter 4 are inclusive of water tanker movements associated with the desalination plant. Further information is provided with regards to the HDV profile in response to question 21 of the Rule 17 request for further information (Doc Ref 9.126) submitted at Deadline 10.</p>
TT.2.9	The Applicant	<p>Main Development Site - Parking Controls</p> <p>Given the reliance on mode share targets to control workforce traffic and travel it is important that consideration is being given to limiting the parking available for construction workers on site. Clarify the following:</p> <ul style="list-style-type: none"> (i) Within the DCO the provision of parking on the Main Development Site will be controlled to ensure mode share targets are not exceeded; (ii) Within the DCO how the use of the temporary park and ride site on the LEEIE is controlled, throughout the whole construction period; (iii) Does the DCO prevent the creation of additional parking areas on site during the construction period; and <p>Does the DCO prevent the use of any of the permanent parking areas being used during the construction period for construction workers?</p>
	SZC Co. Response at Deadline 7	<ul style="list-style-type: none"> (i) Schedule 2, Requirement 8 of the draft DCO submitted at Deadline 7 (Doc Ref. 8.17(F)) includes parking controls for the main development site that are two-fold: <p>First, the draft Requirement requires SZC Co. to build and use the car parking in accordance with Table 4.1 of the Construction Method Statement [REP5-048], which provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking relates to.</p>

ExQ2	Question to:	Question:
		<p>Secondly, parts 2a) and 2b) of draft Requirement 8 provide a control of the maximum limit of car parking within Work No. 1A before the northern or southern park and ride facilities are operational to 650 car parking spaces and after the northern or southern park and ride facilities are operational to 1,000 car parking spaces. Both the main development site car park and Land East of Eastlands are included in Work No. 1A.</p> <p>The early years limit of 650 car parking spaces prior to the northern or southern park and ride facilities are available has been calculated from the combined maximum accumulation at the main development site and LEEIE park and ride site (see Table 34 in Appendix 7B to the Consolidated Transport Assessment [REP2-046]), based on an 80% occupancy level. The 1,000 car parking space limit once the northern or southern park and ride facility are available is based on the total number of car parking spaces proposed at the main development site during the construction phase.</p> <p>Therefore, the combination of the car park phasing in the Construction Method Statement [REP5-048] and the absolute limits on car parking ensure that the mode share targets are met.</p> <p>(ii) Refer to the response to (i). Table 4.1 of the Construction Method Statement [REP5-048] shows that the LEEIE park and ride facility will only be available for Phase 1.</p> <p>(iii) Schedule 2, Requirement 8 of the draft DCO (Doc Ref. 3.1(G)) requires the car parking to be built and used in accordance with the Construction Method Statement. Table 4.1 of the Construction Method Statement [REP5-048] provides a breakdown of the temporary car parking at the main development site as well as the parameter zone location and the construction phase that the temporary car parking is limited to being used for. Therefore, this acts as</p>

ExQ2

ExQ2	Question to:	Question:
		<p>a control to prevent the creation of additional parking beyond that required at any point in time and beyond that set out in the Construction Method Statement.</p> <p>The absolute limit on parking spaces during the construction phase once the northern or park and ride facilities are available has been set at 1,000 spaces, as set out in part 2b) of draft Requirement 8 in Schedule 2 of the draft DCO (Doc Ref. 3.1(G)). This ensures that the total number of car parking spaces in Work No. 1A is limited to 1,000 spaces but that operational parking may be used by construction workers in the latter part of the construction phase when the temporary car parking at the main development site is being decommissioned.</p>
	<p>SCC Response at Deadline 8</p>	<p>As set out in our responses at Table 5 para 1.2. and Table 8 para 1.6.10 and 1.6.63 of REP6-049, SCC does not agree that the proposed car parking limits and modal split provide a sufficient control on worker vehicle movements. However, we consider that sufficient monitoring, reporting and governance through the TRG would allow for proactive and reactive management of any issues as they arise. During the Early Years, the car parking is not constraining vehicle movements and certainly not across the entire day, so if there is an increased workforce, even if it is achieving the modal split, the potential exists for additional movements. That being said, SCC, is close to reaching agreement with the Applicant as to the extent of monitoring and reporting required, which would alleviate these concerns.</p> <p>SCC has accepted the modal splits set out within the CWTP, both the targets based on the assessed figures and the aspirational target; however, as set out in Appendix 3B of [REP7-057]; the build out rate for the Accommodation Campus is set to begin Q4 of Year 3 and would not be completed until Q2 of Year 6. The peak construction mode shift targets require the delivery of the accommodation campus to achieve this modal split. We consider it not unreasonable to assume that the development will fail to achieve the main targets between delivery of the park and ride sites and completion of the accommodation campus, which might represent four years of the project's build out. Depending on the delivery, this could result in additional impacts. The aim of the TRG would be to identify the likelihood of these occurring and respond appropriately, such as through additional local bus services; however, even these could potentially have an impact.</p>

ExQ2

ExQ2	Question to:	Question:
		<p>Table 4.1 of [REP5-048] does set out that the LEEIE Park and Ride facility car parking would only be available for Phase 1. The Implementation Plan [REP2-044] indicates that Phase 2 would begin in Q1 2025 and that the park and rides would be complete in Q3 2024, it is assumed on this basis that if the park and ride delivery were delayed by 3-6 months then there would be no park and ride facilities at the beginning of Phase 2. This suggests that it is important that Phase 2 does not commence until the Park and Rides are delivered.</p>
TT.2.10	SZC Co. Response at Deadline 10 The Applicant	<p>SCC's response to this question at Deadline 8 state that SCC and SZC Co. are close to reaching agreement on the extent of monitoring and reporting, and with that agreed their concerns in relation to car parking constraints would be alleviated. The Construction Traffic Management Plan (Annex K of the Deed of Obligation, Doc Ref. 10.4) and Construction Worker Travel Plan (Annex L of the Deed of Obligation, Doc Ref. 10.4) are now agreed with SCC and the other transport stakeholders including the parking controls, mode share targets and monitoring of trips.</p> <p>The Phase 2- Bulk Earthworks will not see a noticeable increase in the workforce as these works do not involve a large number of operatives. As the commencement and delivery of the bulk earthworks is critical to the delivery to programme of the project, constraining the commencement of this phase to the park and ride schemes, therefore would not seem appropriate.</p> <p>The delivery programme of the Park and Ride schemes is currently based on the high-level layout and designs and therefore is conservative in its nature, it is expected that the durations will be improved on, therefore the risk of delay to the programme of these schemes is considered unlikely.</p> <p>Sizewell Link Road - Vehicle Distance Travelled Comparison</p> <p>In paragraph 1.9.18 [REP5-114] Table 6 on electronic page 498 of [REP2-108] is referred to. Please explain why in the Assessment Table in Appendix A of that document why Alignment W results in 11% more mileage than Alignment Z, which is said to give the least route mileage of all options, given Table 5 [REP5-114] of the latest submission clearly shows the contrary?</p>

ExQ2

ExQ2	Question to:	Question:																																																
	<p>SZC Co. Response at Deadline 7</p>	<p>The assessment table in Appendix A of Appendix 5A Sizewell link road: Principle and Route Selection Paper Appendix 12 in the Responses to the ExA's First Written Questions (ExQ1) [REP2-108] has been reviewed and it is considered that the vehicle km results for Route W and Z should have been transposed and that route Z would result in 11% more mileage than route W. This aligns with the assessment for HGVs and buses in Table 5 of [REP5-114], which concluded that there would be 8-10% additional mileage for buses and HGVs to use the Sizewell link road when compared with W North. The percentages are slightly different because the Peer Review within Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] was based on the integrated freight strategy, which resulted in more HGVs than forecast by the preferred freight strategy that has been described in [REP5-114].</p> <p>The results presented in the Peer Review appended to Appendix 5A Sizewell link road: Principle and Route Selection Paper [REP2-108] have been updated to correct this error as set out in the table below but the revisions would not change the conclusions of the Peer Review.</p> <table border="1" data-bbox="770 895 2085 1294"> <thead> <tr> <th></th> <th>Reported extra mileage</th> <th>Score</th> <th>Reported total score</th> <th>Corrected additional mileage</th> <th>Corrected score</th> <th>Change in score</th> <th>Corrected total score</th> </tr> </thead> <tbody> <tr> <td>On line</td> <td>15%</td> <td>1</td> <td>41</td> <td>15%</td> <td>2</td> <td>+1</td> <td>42</td> </tr> <tr> <td>W</td> <td>11%</td> <td>3</td> <td>51</td> <td>0%</td> <td>5</td> <td>+2</td> <td>53</td> </tr> <tr> <td>X</td> <td>5%</td> <td>4</td> <td>50</td> <td>5%</td> <td>4</td> <td>0</td> <td>50</td> </tr> <tr> <td>Y</td> <td>20%</td> <td>2</td> <td>54</td> <td>20%</td> <td>1</td> <td>-1</td> <td>53</td> </tr> <tr> <td>Z</td> <td>0%</td> <td>5</td> <td>62</td> <td>11%</td> <td>3</td> <td>-2</td> <td>60</td> </tr> </tbody> </table>		Reported extra mileage	Score	Reported total score	Corrected additional mileage	Corrected score	Change in score	Corrected total score	On line	15%	1	41	15%	2	+1	42	W	11%	3	51	0%	5	+2	53	X	5%	4	50	5%	4	0	50	Y	20%	2	54	20%	1	-1	53	Z	0%	5	62	11%	3	-2	60
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	<p>Suffolk County Council Response at Deadline 7</p>	<p>The AECOM Report in Appendix 12 of REP2-108 was carried out at the request of the Applicant as an independent peer review of defined information with a high-level qualitative appraisal and scoring. It is understood from discussions with AECOM that it was</p>																																																

ExQ2

ExQ2	Question to:	Question:
		<p>not intended to form the primary basis for route selection, but rather as an internal document for EDFE to help inform their decision making and further work. It was undertaken in April 2019 before any comparative route option modelling was undertaken. The report was undertaken without any knowledge of the validity of the traffic modelling undertaken by that time, and the modelling has since evolved considerably through the stakeholder review process. Given that there was no validated modelling available for the respective route options at that stage, the route mileage assessment was based solely on route distance from a particular point on the A12. This highlights the high-level nature of the report.</p> <p>The assessment in Appendix 12 of REP2-108 does not account for vehicle mileage, which is a more accurate measure of the relative sustainability, and can only be determined through modelling which was completed at a later stage after requests by Suffolk County Council and the EXA. The later data presented in Table 5 [REP5-114] was prepared two years after the document in Appendix 12 of REP2- 108 and is more representative of the relative vehicle kilometres offered by the routes. This confirms that Route W offers a more sustainable alternative in terms of vehicle kilometres.</p>
	SZC Co. Response at Deadline 8	Please refer to the answer provided to ExQ3. TT.3.0.
	SCC Response at Deadline 8	<p>The Applicant states that the mileage set out within the Detailed Assessment and Scoring of Options table for Route W is incorrect and that in fact the Sizewell Link Road results in 11% more mileage than Alignment W. This has resulted in a change to the ranking presented in the table included in the Peer Review. Despite the amendments to the ranking, the Applicant has set out that Route W still has a lower overall score than that of the Sizewell Link Road in relation to the vehicle mileage.</p> <p>The significance of the savings by Route W is potentially underplayed in the route comparison assessment due to the lack of weighting against the assessment criteria.</p>
	SZC Co. Response at Deadline 10	SZC Co. has nothing further to add to its earlier responses.
TT.2.11	The Applicant	<p>Sizewell Link Road - Route W Route – Vehicle Routeing</p> <p>Paragraph 1.9.18 [REP5-114] The first bullet point refers to additional HGV and bus traffic through Yoxford. Given the Early Years limit on the B1122 is proposed to be 600 HDV /day</p>

ExQ2

ExQ2	Question to:	Question:
		<p>two way, if both the HGV and buses from the north were to use the B1122 it would be a total of 329 HDV two way /day, why it would not be a reasonable scenario for either HGVs or buses (or both) from the north to use the B1122. Explain why this was not considered in the assessment of route choices given that it is considered acceptable during the early years?</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>Sizewell C HGVs and buses need to utilise the existing highway network during the early years prior to the delivery of the proposed new roads (i.e. Sizewell link road and two village bypass).</p> <p>Once the Sizewell link road is constructed all Sizewell C buses and HGVs from the A12 south and north will be routed on a fixed route with no route choice via the A12 and Sizewell link road, and this has been agreed with SCC. Were an alternative alignment to be selected (e.g. Route W), Sizewell C buses and HGVs from both the A12 north and south would also be assigned to Route W on a fixed route even if there were a more direct route that could be taken via the existing highway network – it would be the purpose of any new road between the A12 and the main development site to accommodate 100% of Sizewell C HGVs and buses as well as other Sizewell C related traffic.</p> <p>The question assumes that an alternative alignment (such as Route W) is constructed, but 329 HDVs two way per day from the north continue to use the B1122, rather than the new route. That such a significant proportion of Sizewell C HDV traffic would continue to use the B1122, rather than the new road, for the entire construction period, significantly defeats the purpose of and the case for the new road.</p> <p>Further, whilst SZC Co. recognises the impact on the B1122 communities in the early years (and is seeking to mitigate it as far as reasonably possible), the acceptability of HDV traffic on the B1122 for the relatively short duration of the early years does not make significant numbers of HDVs (e.g. the 329 HDV two way per day referred to in the question) acceptable over the full 12 year construction period.</p>

ExQ2

ExQ2	Question to:	Question:
	SCC Response at Deadline 8	<p>SCC response to 1.3.21 at [REP6-049] sets out our position that the impact of additional HDV movements on the B1122 may have been considered acceptable in the context of greater legacy benefits.</p> <p>The Applicant's response does not consider the greater proportion of LGVs likely to be attracted to Route W rather than the SLR (or B1119) nor the larger proportion of operational and outage traffic that uses routes to the south of Leiston.</p>
	SZC Co. Response at Deadline 10	<p>SZC Co. has nothing further to add to its earlier responses. For reasons set out previously, for example in [REP2-108] from electronic page 260, Route W is not an available or deliverable alternative – and is not put forward by SCC as such - and there is therefore only so much value in pursuing these issues.</p>
TT.2.12	The Applicant	<p>Sizewell Link Road - Vehicle Distance Travelled Comparison</p> <p>As stated in Table 6 on electronic page 498 of [REP2-108] minimising route mileage is an important sustainability factor. Table 4 [REP5-114] shows only 2 peak hours and Table 5 shows the vehicle kms savings per day. Provide a calculation of how both of these translate to the whole construction period so comparison can be made for the whole of construction for cars, LGV and HGV.</p>
	SZC Co. Response at Deadline 7	<p>The Sizewell C car and LGV peak hour Veh-KMs are provided for 8-9am and 5-6pm peak hours in Table 4 of [REP5-114], representing <u>all trips across the study area</u> (not just those using the SLR/Route W North). These can be converted to the whole peak construction period using the following process:</p> <ol style="list-style-type: none"> 1) Factor the 8-9am and 5-6pm peak hour Veh-KMs to 24hr average weekday (i.e. AAWT) levels, using the ratio of SZC traffic demand in the 8-9am and 5-6pm peak hours to 24hrs, as provided in Table 7.2 and 7.3 in the Consolidated Transport Assessment [REP4-005]. 2) Factor the average weekday (AAWT) values to average daily (i.e. AADT) levels using the approximate ratios of workforce presence as follows: <ul style="list-style-type: none"> • 100% workforce present Monday-Thursday • 85% present on Friday • 50% present on Saturday • 30% present on Sunday

ExQ2	Question to:	Question:																																
		<ul style="list-style-type: none"> • ~ 0.81 AADT/AAWT ratio. <p>3) Factor the average daily (AADT) values to the peak construction period (10 years, based on the construction workforce profile summarised in Volume 2, Appendix 9A of the ES [APP-196]) by multiplying by 365 days x 10 years. Note the two-year 'early years' construction period is excluded from this analysis since the SLR would not be in place.</p> <p>4) Since the daily SZC trip generation is based on the peak construction workforce (7,900) the values must then be factored by the average workforce level across the 10-year peak construction period (~0.59, based on the workforce profile summarised in Volume 2, Appendix 9A of the ES [APP-196]).</p> <p>The additional calculations are shown in red in the updated 'Table 4' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C cars and LGVs.</p> <p>Updated Table 4: Comparison of Total Vehicle KMs (Sizewell C cars and LGVs)</p> <table border="1"> <thead> <tr> <th data-bbox="763 858 1346 1018">Hour</th> <th data-bbox="1346 858 1536 1018">Car total veh km (SZC)</th> <th data-bbox="1536 858 1711 1018">LGV total veh km (SZC)</th> <th data-bbox="1711 858 1886 1018">Total veh km</th> </tr> </thead> <tbody> <tr> <td colspan="4" data-bbox="763 1018 1886 1070">Sizewell link road</td> </tr> <tr> <td data-bbox="763 1070 1346 1123">8-9am</td> <td data-bbox="1346 1070 1536 1123">6,172</td> <td data-bbox="1536 1070 1711 1123">2,593</td> <td data-bbox="1711 1070 1886 1123">8,765</td> </tr> <tr> <td data-bbox="763 1123 1346 1176">5-6pm</td> <td data-bbox="1346 1123 1536 1176">18,438</td> <td data-bbox="1536 1123 1711 1176">1,783</td> <td data-bbox="1711 1123 1886 1176">20,221</td> </tr> <tr> <td data-bbox="763 1176 1346 1228">Total (peak hours)</td> <td data-bbox="1346 1176 1536 1228">24,610</td> <td data-bbox="1536 1176 1711 1228">4,376</td> <td data-bbox="1711 1176 1886 1228">28,986</td> </tr> <tr> <td data-bbox="763 1228 1346 1281">Total (24hr AAWT)</td> <td data-bbox="1346 1228 1536 1281">255,935</td> <td data-bbox="1536 1228 1711 1281">27,284</td> <td data-bbox="1711 1228 1886 1281">283,219</td> </tr> <tr> <td data-bbox="763 1281 1346 1334">Total (24hr AADT)</td> <td data-bbox="1346 1281 1536 1334">206,576</td> <td data-bbox="1536 1281 1711 1334">22,022</td> <td data-bbox="1711 1281 1886 1334">228,599</td> </tr> <tr> <td data-bbox="763 1334 1346 1423">Total peak construction (10 years) *</td> <td data-bbox="1346 1334 1536 1423">422,522,224</td> <td data-bbox="1536 1334 1711 1423">45,043,362</td> <td data-bbox="1711 1334 1886 1423">467,565,586</td> </tr> </tbody> </table>	Hour	Car total veh km (SZC)	LGV total veh km (SZC)	Total veh km	Sizewell link road				8-9am	6,172	2,593	8,765	5-6pm	18,438	1,783	20,221	Total (peak hours)	24,610	4,376	28,986	Total (24hr AAWT)	255,935	27,284	283,219	Total (24hr AADT)	206,576	22,022	228,599	Total peak construction (10 years) *	422,522,224	45,043,362	467,565,586
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		<p>1) Calculate the weighted average distance between the A12 and the main development site (shown in Table 2 of Appendix 10 to Appendix 5D in [REP2-108]), based on the split of HGVs from south (85%) and north (15%).</p> <p>2) The HGV delivery profile is provided in Appendix 6A of the TT.2.25 response to ExQ2 which indicates a total of 458,139 HGV deliveries to the main development site across the whole construction period. Considering the 10-year peak construction period (year 3 to year 12) for consistency, this yields 377,339 HGVs deliveries in the 10-year peak construction period.</p> <p>3) Double the HGV deliveries to achieve 754,678 HGV movements to/from the main development site across the peak construction period.</p> <p>4) Apply the weighted average distance (in step 1) to the total HGV movements for each route alignment.</p> <p>The additional calculations are shown in red in the updated 'Table 5' below, extrapolating the peak hour Veh-KMs to the 10-year peak construction period for Sizewell C HGVs and buses.</p> <p>Updated Table 5: Comparison of Total Vehicle KMs (Sizewell C HGVs and buses)</p> <table border="1"> <thead> <tr> <th data-bbox="763 887 1346 1082">Hour</th> <th data-bbox="1346 887 1536 1082">Number of buses / HGVs per day</th> <th data-bbox="1536 887 1711 1082">SLR veh km between A12 and MDS</th> <th data-bbox="1711 887 1886 1082">W North veh km between A12 and MDS</th> <th data-bbox="1886 887 2063 1082">Difference</th> </tr> </thead> <tbody> <tr> <td colspan="5" data-bbox="763 1082 2063 1134">HGVs (typical day)</td> </tr> <tr> <td data-bbox="763 1134 1346 1187">South HGVs (85%)</td> <td data-bbox="1346 1134 1536 1187">425</td> <td data-bbox="1536 1134 1711 1187">5,436</td> <td data-bbox="1711 1134 1886 1187">3,557</td> <td data-bbox="1886 1134 2063 1187">-1,879</td> </tr> <tr> <td data-bbox="763 1187 1346 1240">North HGVs (15%)</td> <td data-bbox="1346 1187 1536 1240">75</td> <td data-bbox="1536 1187 1711 1240">567</td> <td data-bbox="1711 1187 1886 1240">1,160</td> <td data-bbox="1886 1187 2063 1240">593</td> </tr> <tr> <td data-bbox="763 1240 1346 1292">Total typical day</td> <td data-bbox="1346 1240 1536 1292">500</td> <td data-bbox="1536 1240 1711 1292">6,003</td> <td data-bbox="1711 1240 1886 1292">4,718</td> <td data-bbox="1886 1240 2063 1292">-1,285</td> </tr> <tr> <td colspan="5" data-bbox="763 1292 2063 1345">HGVs (busiest day)</td> </tr> <tr> <td data-bbox="763 1345 1346 1398">South HGVs (85%)</td> <td data-bbox="1346 1345 1536 1398">595</td> <td data-bbox="1536 1345 1711 1398">7,610</td> <td data-bbox="1711 1345 1886 1398">4,980</td> <td data-bbox="1886 1345 2063 1398">-2,630</td> </tr> <tr> <td data-bbox="763 1398 1346 1450">North HGVs (15%)</td> <td data-bbox="1346 1398 1536 1450">105</td> <td data-bbox="1536 1398 1711 1450">794</td> <td data-bbox="1711 1398 1886 1450">1,625</td> <td data-bbox="1886 1398 2063 1450">831</td> </tr> </tbody> </table>	Hour	Number of buses / HGVs per day	SLR veh km between A12 and MDS	W North veh km between A12 and MDS	Difference	HGVs (typical day)					South HGVs (85%)	425	5,436	3,557	-1,879	North HGVs (15%)	75	567	1,160	593	Total typical day	500	6,003	4,718	-1,285	HGVs (busiest day)					South HGVs (85%)	595	7,610	4,980	-2,630	North HGVs (15%)	105	794	1,625	831
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ExQ2

ExQ2	Question to:	Question:				
		Total busiest day	700	8,404	6,605	-1,799
		Total peak construction (10 years) **	754,678	9,060,512	7,120,613	-1,939,900
Buses						
		South buses	296	3,786	2,478	-1,308
		North buses	224	1,694	3,466	1,772
		Total (24hr AAWT)	520	5,480	5,943	464
		Total (24hr AADT)	420	4,423	4,797	374
		Total peak construction (10 years) *	858,466	9,046,458	9,811,681	765,223
HGVs and buses combined						
		HGVs (typical) + buses	1,020	11,483	10,661	-822
		HGVs (busiest) + buses	1,220	13,884	12,548	-1,336
		HGVs + buses (10 year peak construction period) based on workforce and HGV profiles	1,613,144	18,106,970	16,932,293	-1,174,677
		W North / SLR ratio (based on typical day HGVs)			93%	
		W North / SLR ratio (based on busiest day HGVs)			90%	
		* based on workforce profile, Yr3 to Yr12 of construction (i.e. peak)				
		** based on HGV profile, Yr3 to Yr12 of construction (i.e. peak)				

ExQ2

ExQ2	Question to:	Question:
		<p>The updated Table 5 above presents the same picture to that reported in REP5-114, in that the Route W north would result in around 7% (i.e. $18,106,970 / 16,932,293 = 7\%$) fewer Veh-KMs for HGVs and buses than the Sizewell link road alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in Veh-KMs between the two alignments would be far smaller.</p> <p>The updated Table 4, which considers the whole journey of Sizewell C cars and LGVs across the study area, shows that the difference in Veh-KMs between the two alternative route alignments is in the region of 1-2% (i.e. marginally more Veh-KMs with Sizewell link road than Route W North alignment).</p> <p>Were this revised calculation to be factored into the analysis of preferred routes, it would make no material difference, partly because the percentage difference is relatively small but more importantly for all of the reasons set out, for instance, in Appendix 5D Sizewell Link Road: Principle and Route Selection Paper to SZC Co.'s responses to ExQ1 [REP2-108] and elaborated for instance at the CA hearing on 17 August, summarised in the oral and written submissions following that hearing (Doc Ref. 9.74 and 9.76) and set out in response to Question CA.2.10. Route W exists only as a theoretical, historic line on a map; it has not been worked up or presented as an alternative; it is not deliverable and it is not preferable in environmental terms to the selected Route Z (i.e. the Sizewell link road alignment). It is not an alternative in any practical sense and it cannot now be promoted as such consistently with the policy position set out clearly in section 4 of NPS EN-1.</p>
	<p>SCC Response at Deadline 8</p>	<p>SCC have insufficient information to fully check these figures and the methodology, but the outcome which confirms that the Route W results in a saving in route mileage is considered to be a reasonable conclusion. SCC is of the opinion that the significance of the savings is underplayed in the route comparison assessment due to the lack of weighting against the assessment criteria.</p> <p>A review of the Applicant's modelling indicates that during the Operational Phase across the AM peak hour of 08:00 to 09:00 that 160 SZC light vehicles would use the link road at its eastern end and 54 at its western end, this compares with 136 using the B1119 and 84</p>

ExQ2

ExQ2	Question to:	Question:
		<p>using the B1069. Across the PM peak hour of 16:00 to 17:00 that 151 SZC light vehicles would use the link road at its eastern end and 46 at its western end, this compares with 128 using the B1119 and 161 using the B1069.</p> <p>With regards to total traffic (e.g. SZC + other traffic) although the traffic flows increase on the SLR, the flows remain light on the western sections, with a maximum twoway flow of 128 vehicles being observed between 08:00 and 09:00. Higher flows are observed in the eastern section with a maximum two-way flow of 697 vehicles during 16:00 and 17:00, which is well below the capacity of the proposed route. On the southern routes, traffic flows on the B1119 and B1069 display a maximum of 624 vehicles and 722 vehicles on the B1119 and B1069 respectively between 16:00 and 17:00.</p>
	<p>TASC Response at Deadline 8</p>	<p>TASC notes with some considerable concern that the Applicant's answer to PINS question TT.2.12 predicts that over the 10 years of peak construction activity, that there will be 467million kilometres travelled by cars/LGVs and 18million kilometres travelled by HGVs/Buses on the SLR/access road i.e. from the A12 to the site.</p> <p>The huge number of road miles which will be undertaken over such a relatively small road length and in such a contained area clearly gives rise to concerns about the impact on air quality from NOX, PM2.5s and PM10s and, consequently, on human health and the environment. We have asked our air quality expert, Dr Claire Holman, Director of the Air Pollution Services, if she can assess this impact and she advises that, to do so would require a dispersion model to be run. So, our questions are:</p> <ol style="list-style-type: none"> 1) Has EdF carried out such a dispersion model? 2) What were the results in terms of dispersal of vehicles (i.e. how many HGVs, LGVs, Buses and cars with what frequency on which roads over what periods of time)? 3) What are the impacts on human health in terms of the generation of NOX, PM10s and PM2.5s arising from the data? <p>TASC appreciate the question relates to an exercise in comparing one route to another but seeing the huge total mileage figures, prompts us to ask the following question:</p> <ol style="list-style-type: none"> 4) How many of the miles calculated are expected to actually be on the B1122 in the early years if the development is allowed to start before the SLR is completed? <p>The ExA will be aware that the World Health Organisation has just announced its recommendation that the limit for PM2.5 be cut by 50%. The guidelines state levels of particulate matter that are smaller than 2.5 microns ($\mu\text{g}/\text{m}^3$) should not exceed an annual</p>

ExQ2

ExQ2	Question to:	Question:				
		<p>level of 5 µg/m³. Similarly, the recommended limit for NOX has been reduced from 40 to 10 µg/m³.</p> <p>5) Can the Applicant confirm they will be applying the revised WHO limit to the PM2.5s and NOX that will be generated by the SZC project?</p>				
	SZC Co. Response at Deadline 10	SZC Co. has nothing further to add to its earlier responses. For reasons set out for example in [REP2-108] from electronic page 260 , Route W is not an available or deliverable alternative – and is not put forward by SCC or TASC as such - and there is only so much value in pursuing these issues.				
TT.2.13	The Applicant	<p>Sizewell Link Road - Journey Time Comparisons</p> <p>Appendix 10 [REP2-108] also states that the modelling undertaken considered journey times and some limited information is provided in the Appendix. Can the outputs of the model be used to calculate relative journey time differences for Route W and the SLR, if so provide the daily and total construction period outputs for the modelled journey times.</p>				
	SZC Co. Response at Deadline 7	<p>The model was only used to compare the assignment of traffic with the Route W North alignment in the <u>8-9am and 5-6pm</u> peak hours, so it is not possible to derive modelled journey times for other hours. Journey time comparisons are not usually extrapolated over a period (i.e. construction period) as one would not sum or average the journey times based on the different years.</p> <p>Notwithstanding this, an approximate comparison of Veh-Hours for SZC HGVs and Buses, which would be on fixed routes, can be made by multiplying the average peak hour journey time by the number of vehicles across the 10-year peak construction period (see Table 5 in response Question TT.2.12), to compare the Veh-Hours undertaken on the route section between the A12 and the main development site.</p> <p>Table 2a below provides an average journey time and distance of the two peak hours, and the percentage difference.</p> <p>Table 2a – Peak construction journey time and distance comparison (average peak hour)</p> <table border="1" data-bbox="757 1401 1928 1453"> <thead> <tr> <th data-bbox="757 1401 1480 1453">Route</th> <th data-bbox="1480 1401 1928 1453">Average peak hour</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Route	Average peak hour		
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ExQ2

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		<table border="1" data-bbox="768 245 2069 496"> <tr> <td data-bbox="768 245 1095 368">A12 / B1122 (N) to main development site</td> <td data-bbox="1095 245 1263 368">113,202</td> <td data-bbox="1263 245 1397 368">369,801</td> <td data-bbox="1397 245 1547 368">483,002</td> <td data-bbox="1547 245 1700 368">49,675</td> <td data-bbox="1700 245 1850 368">93,537</td> <td data-bbox="1850 245 1957 368">43,862</td> <td data-bbox="1957 245 2069 368">88%</td> </tr> <tr> <td data-bbox="768 368 1095 496">Total</td> <td data-bbox="1095 368 1263 496">754,678</td> <td data-bbox="1263 368 1397 496">858,466</td> <td data-bbox="1397 368 1547 496">1,613,144</td> <td data-bbox="1547 368 1700 496">225,815</td> <td data-bbox="1700 368 1850 496">214,321</td> <td data-bbox="1850 368 1957 496">-11,494</td> <td data-bbox="1957 368 2069 496">-5%</td> </tr> </table> <p data-bbox="768 552 2123 730">These tables demonstrate that there would be around 5% fewer veh-hours for Sizewell C HGVs and buses using Route W North alignment, when purely considering the difference in routes between the A12 and the main development site. Across the whole HGV journey, which would vary based on the ultimate origin, the percentage difference in veh-hours between the two alignments would be much smaller.</p> <p data-bbox="282 746 741 783">SCC Response at Deadline 8</p> <p data-bbox="768 746 2123 1075">The Applicant sets out a calculation for deriving vehicle hours for the peak construction period for the Sizewell Link Road and Route W. This identifies that there is 5% saving in vehicle hours for the Route W over that for the Sizewell Link Road, highlighting a benefit of the route.</p> <p data-bbox="768 900 2123 1075">No details on distance, factors, or models have been made available to undertake a check. It should be noted that the factoring of hours has only been undertaken for the AM and PM peaks when further hours are available which could have been utilised. The calculations appear reasonable, however, for avoidance of doubt, the end results cannot be confirmed without further detail being provided.</p> <p data-bbox="282 1091 741 1161">SZC Co. Response at Deadline 10</p> <p data-bbox="768 1091 2123 1235">SZC Co. has nothing further to add to its earlier responses. For reasons set out for example in [REP2-108] from electronic page 260, Route W is not an available or deliverable alternative – and is not put forward by SCC as such - and there is only so much value in pursuing these issues.</p>	A12 / B1122 (N) to main development site	113,202	369,801	483,002	49,675	93,537	43,862	88%	Total	754,678	858,466	1,613,144	225,815	214,321	-11,494	-5%
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Total	754,678	858,466	1,613,144	225,815	214,321	-11,494	-5%											
TT.2.14	The Applicant	<p data-bbox="768 1257 1487 1294">Sizewell Link Road – Temporary Haul Road.</p> <p data-bbox="768 1302 2123 1402">At ISH 2 there was mention of the route of the Sizewell Link Road being used as a temporary haul road to move cut and fill around the SLR site and the temporary construction areas stockpiles. If this is correct it could lead to additional HGV movements</p>																

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ExQ2	Question to:	Question:
		<p>on the section of the B1122 between the end of the SLR and the site entrance. Explain further:</p> <p>(i) How the haul road route would be used and whether such HGV movements have been assessed; and</p> <p>Any implications for HGV numbers on the B1122.</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>(i) Details of the proposed Sizewell link road construction are set out in the Material Imports and Modal Split Paper Appendix A [REP5-114], which includes the early use of the SLR alignment for the haulage of some material.</p> <p>The section of the B1122 from the eastern end of the Sizewell link road to the construction site access point will be used as the access route to the site during both the early years and after the commissioning of the Sizewell link road. This short section of the B1122 does not have any sensitive receptors and Middleton Moor and Theberton are north-west of this location.</p> <p>(ii) During the early years 600 two-way HGVs have been assessed using this section of the B1122 between the SLR and main development site. However, 700 two-way HGV movements have been assessed using this section during the peak construction and, prior to the preferred freight strategy, the integrated freight strategy assessed up to 1,000 two-way HGVs on this section of the B1122 at peak construction during the busiest day.</p> <p>The use of the SLR as a temporary haul road during its construction would result in some additional HGV movements on the short section of B1122 between the Sizewell link road and main development site to those assessed in the early years but would be within the HGV movements assessed for this section of the B1122 for the peak construction. For example, once the SLR is available to be used as a temporary haul road during its construction, there would be circa 20-30 two-way HGVs per day on this short section of the B1122 in addition to the 600 two-way HGVs per day assessed for the early years along the length of the B1122. For a short period (circa 5 months) there is expected to be 100-200 two-way HGV movements on this short</p>

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		<p>section of the B1122 in addition to the 600 two-way HGV movements assessed in the early years along the length of the B1122. The use of the SLR as a haul road during its construction acts to diverts these HGVs off the B1122 through Middleton Moor and Theberton prior to the SLR's formal commissioning. Whilst there will be additional HGVs for this short less-sensitive section of the B1122 compared to the early years assessment, the HGV movements would not exceed those assessed for the peak construction for this section of the B1122.</p>
	<p>SCC Response at Deadline 8</p>	<p>See REP8-179.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>Please see SZC Co.'s response to EXQ CA.2.10.</p>
<p>TT.2.15</p>	<p>The Applicant</p>	<p>Sizewell Link Road / B1122 – Traffic Corridor Analysis In the written summary of oral submissions at paragraph 1.3.24 [REP5-107] it was stated that a response to the ExA question on this matter would be provided in the written submissions responding to actions at ISH2. Please signpost this response or provide the response.</p>
	<p>SZC Co. Response at Deadline 7</p>	<p>Table 8.5 of the Consolidated Transport Assessment [REP4-005] shows that in the early years (2023 Reference + SZC) the number of vehicles on the B1122 through Theberton is forecast to be 7,650 two-way vehicles per day. Table 8.9 shows that in the operational year (2034 Reference + SZC) the combined number of vehicles on the B1122 through Theberton and on the Theberton bypass part of the Sizewell link road is forecast to be 7,400 two-way vehicles per day. The ExA queries whether this demonstrates that the impact of the early years on the B1122 is too great or puts doubt into the legacy benefit for the B1122.</p> <p>The retention of the Sizewell link road would reduce traffic flows on the B1122 in the operational phase to circa 400 two-way vehicles per day, which allows for the road to be repurposed through a package of walk and cycle measures, which are being progressed with SCC and ESC. Were the Sizewell link road not to be retained then the B1122 would carry over 7,000 two-way vehicles per day and the repurposing would not be possible.</p>

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		<p>The further benefits of retaining the Sizewell link road are set out in SZC Co.'s response to Examination Question CA.2.10.</p> <p>Further, SZC Co. recognises the short-term impact on the B1122 communities in the early years and is seeking to mitigate it as far as reasonably possible through a combination of demand management measures and physical improvements.</p>
	<p>SCC Response at Deadline 8</p>	<p>The ExA question on this matter neatly summarises the SCC concern about the lack of utility of the SLR in the operational phase This is particularly so when considered against the disbenefits of the scheme with environmental, community and financial costs. The Applicant sets out that in the Early Years, some 7,650 two-way daily vehicular trips would occur on B1122. Once the Sizewell Link Road is operational this would reduce to 400 two-way vehicular trips with the remainder using the Sizewell Link Road. The reduced level of vehicles is due to restricted route choice for HGVs and buses for travel to site. As no Operational Travel Plan is available at this time, it is unclear how traffic travelling to the site will be controlled to ensure use of the Sizewell Link Road, with vehicle controls in place, when vehicles travelling from the south could use the alternative route along the B1119.</p> <p>It is appreciated that the Sizewell Link Road would provide some benefit to those travelling to the site such that they do not have to travel through the communities along the B1122 during the operational phase. If vehicles are unrestricted in terms of route choice, then there is nothing stopping the use of the B1119 therefore reducing the benefit of the Sizewell Link Road and increasing traffic elsewhere.</p>
	<p>SZC Co. Response at Deadline 10</p>	<p>SZC Co. has nothing further to add to its earlier responses on the legacy benefits of the Sizewell link road.</p> <p>The Operational Travel Plan Principles document is now submitted to the ExA as Annex J of the Deed of Obligation (Doc Ref. 10.4). That document sets out the principles that will be applied when developing the Operational Travel Plan, the measures that will be considered in consultation with SCC to maximise travel by sustainable modes and procedures to monitoring and review against the objectives and targets.</p>

ExQ2

ExQ2	Question to:	Question:
TT.2.18	The Applicant, Suffolk County Council	<p>Highway / Traffic Management / Public Realm Schemes – Implementation</p> <p>Set out the expected implementation dates of the highway / traffic management / public realm schemes identified in the Deed of Obligation or the DCO that are not already shown in the Implementation Plan.</p>
	SZC Co. Response at Deadline 7	<p>The Implementation Plan [REP2-044] shows the indicative phasing, and duration of construction of the project, including the proposed environmental mitigation schemes included within the DCO order limits.</p> <p>Schedule 16 – Transport of the draft Deed of Obligation (Doc Ref. 8.17(F)) submitted at Deadline 7 has been updated to set out commitments for SZC Co. to provide funding to SCC for transport improvements as well as commitments for SZC Co. to deliver a number of additional off-site highway, traffic management and public realm schemes (e.g. Leiston Improvement Scheme, Wickham Market Improvement Scheme, B1078 Road Safety Improvements, Marlesford and Little Glemham Improvement Scheme etc).</p> <p>The timing of the delivery of the schemes to be delivered by SZC Co. set out in Schedule 16 of the draft Deed of Obligation (Doc Ref. 8.17(F)) has been discussed and agreed with SCC and is reflected in the draft Deed of Obligation (Doc Ref. 8.17(F)).</p>
	Suffolk County Council Response at Deadline 7	<p>SCC has stated its position at Table 11 of our Deadline 6 response [REP6-049] that the majority of these schemes should be delivered by the Applicant. This has been agreed by both SZC Co and SCC. It is therefore incumbent upon the applicant to provide suitable timescales that deliver these works in advance of the impacts and minimise traffic disruption.</p>
	SZC Co. Response at Deadline 8	<p>The Schedule 16 of the Deed of Obligation (Doc Ref. 8.17(G)) requires SZC Co. to prepare and submit the Local Transport Programme to Suffolk County Council for its approval, in consultation with East Suffolk Council on or before commencement, which will set out the proposed programme for the delivery of the local transport schemes.</p>
	SCC Response at Deadline 8	<p>SCC is awaiting details of when the highway schemes listed in the deed of obligation will be implemented. Discussions are ongoing on this matter.</p>
	SZC Co. Response at Deadline 10	<p>The Local Transport Schemes and Local Transport Programme are secured in the signed Deed of Obligation (Doc Ref 10.4).</p>

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ExQ2	Question to:	Question:
TT.2.28	The Applicant, Suffolk County Council	<p>Environmental Statement (ES) – Assessment of Impacts</p> <p>Paragraph 1.10.8 [REP5-115] sets out that there are ongoing discussions with respect to the assessment of transport impacts set out in the ES. Set out the areas of disagreement and also what progress has been made in resolution.</p>
	SZC Co. Response at Deadline 7	SZC Co. is to include an updated ES transport assessment within the Fourth ES Addendum to be submitted at Deadline 7 (Doc Ref. 6.18). This will address the comments raised by SCC on the ES as well as seek to address the comments raised by the ExA on the ES transport assessment.
	Suffolk County Council Response at Deadline 7	As set out in our Response at Deadline 6 [REP6-049] to 1.6.31, the Environmental Statement workstream is not quite complete. SCC is awaiting the updated assessment which will need to be reviewed; however, significant progress has been made. We are committed to all necessary engagement to complete this workstream. For ease of reference, SCC will set out any areas of disagreement once we have a final submission of the Environmental workstream; however, we do not currently expect any areas of disagreement.
	SZC Co. Response at Deadline 8	As indicated in SZC Co. and SCC responses to this question at Deadline 7, SZC Co. has now prepared an updated assessment of the ES transport effects. The updated assessment was submitted to PINS at Deadline 7 as Appendix 2.C of the Fourth Environmental Statement Addendum [REP7-032]. The updated assessment addresses comments raised by SCC, as well as comments raised previously by the ExA. SCC's response to Cu.2.0 submitted at Deadline 7 states that SCC are still to complete their review of the updated ES assessment of transport effects, but ' <i>do not currently expect any areas of disagreement</i> '. The updated transport effects tables were shared with SCC prior to Deadline 7 to inform the discussions on transport mitigation, which has now been agreed with SCC and is set out in the draft Deed of Obligation (Doc Ref. 8.17(G)) submitted at Deadline 8.
	SCC Response at Deadline 8	<p>The Council notes submission of the document and has responded separately in our Response to [REP7-030].</p> <p>SCC assumes that Schedule 22 Certified Documents will be amended so it is clear which parts of the ES and associated addendums are certified. The authority's preference would</p>

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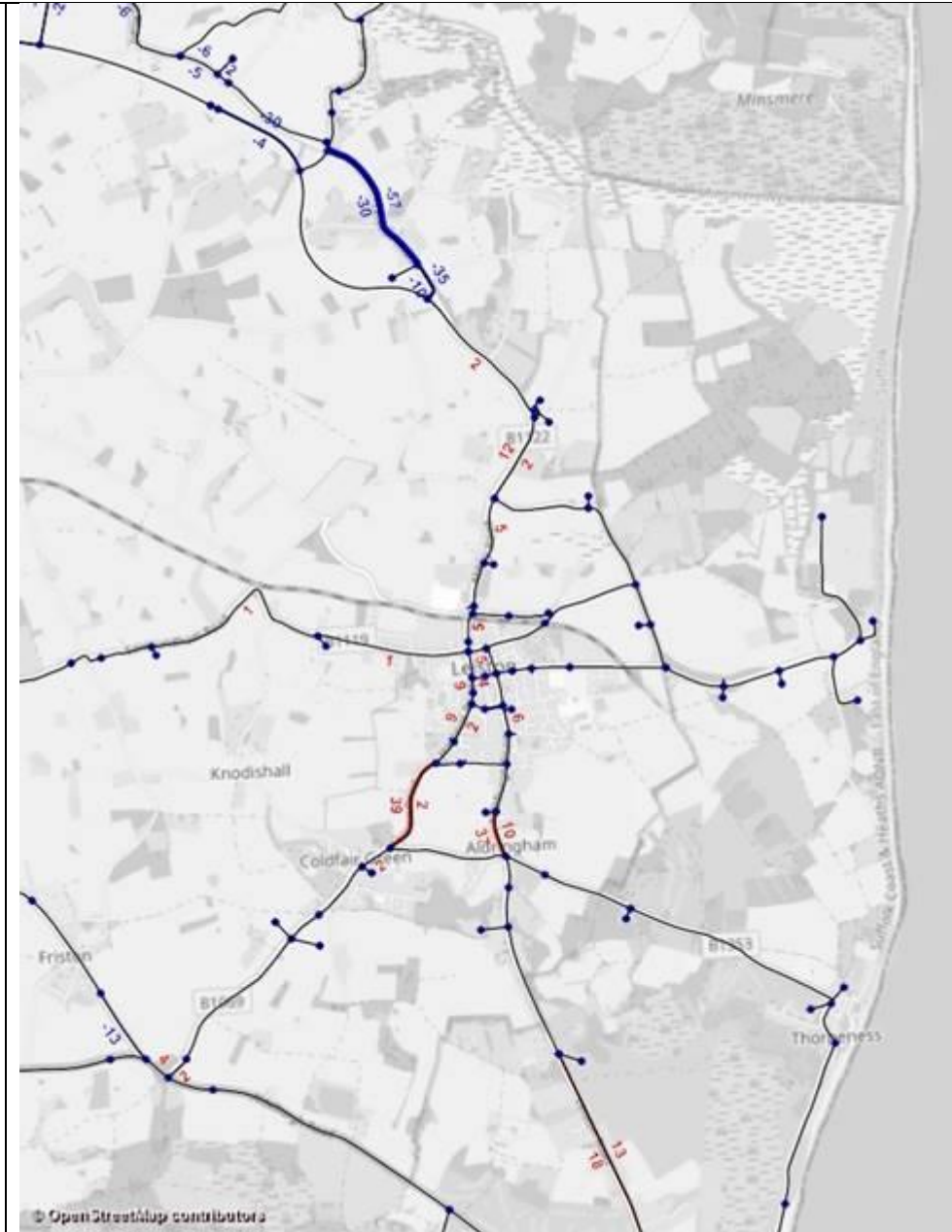
ExQ2	Question to:	Question:
	SZC Co. Response at Deadline 10	<p>be to have a single consolidated document but recognises the gargantuan task this would be.</p> <p>SZC Co. has submitted a technical note (Doc Ref. 6.20) at Deadline 10, which provides a response to the final points of clarification sought by SCC with regards to Appendix 2.C of the Fourth Environmental Statement Addendum [REP7-032]. Those matters have been discussed and now agreed with SCC. There are no changes to the transport impacts reported within Appendix 2.2C of the Fourth Environmental Statement Addendum [REP7-032].</p>
TT.2.29	The Applicant	<p>Outage Car Parking – Transport Assessment</p> <p>There was discussion at ISH5 about the permanent provision of two outage car parks, one each for Sizewell B and C. Following that discussion and taking into account comments made by Suffolk County Council [REP5-171], explain why it is considered that a double outage is considered so likely that it meets the criteria for exceptional circumstances in paragraph 5.9.10 in NPS EN-1, but it has not been assessed in the operational stage within the Transport Assessment. A double outage could have significant effect on operational traffic generation and the assessment of impacts undertaken. Should such a scenario not be considered by way of a sensitivity test of the assessments?</p> <p>The Consolidated Transport Assessment [REP4-005] seeks to assess a core scenario for the Sizewell C Project for different stages of the project. The assessment includes a reasonable level of robustness but, in accordance with WebTAG guidance, does not seek to create a 'universal worst-case scenario that takes into account all risks' (TAG Unit M1).</p> <p>The Consolidated Transport Assessment [REP4-005] was scoped with Suffolk County Council as the local highway authority and an assessment of an unplanned outage with a planned outage was not required by SCC as part of the core assessment scenario. Notwithstanding this, there is a risk that a planned outage at Sizewell B could coincide with an unplanned outage at Sizewell C or vice versa and therefore separate outage car parks are proposed for each facility. Consideration has therefore been given in this response to the scale of traffic that that scenario would generate and whether it would result in new transport effects. A summary of this sensitivity assessment is provided below.</p>
	SZC Co. Response at Deadline 7	

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		<p>A review of traffic flows across selected links close to the study area has been undertaken in the 2034 Operational phase to establish whether there would be any links with a substantially higher flow than has already been assessed in any hour, in either the 2034 Operational or the 2028 Peak Construction phase. Beyond this local study area the assessed 2028 Peak Construction traffic flows would be higher than traffic flows generated by a double outage.</p> <p>The 'Sizewell B outage' traffic flows on each link (which were already included in the Reference Case scenarios) have been manually added again to the total 2034 Operational phase traffic flows, to represent two outages occurring. A manual adjustment has been made to account for the fact that the Sizewell C outage car park would be accessed via the MDS roundabout on the B1122, rather than the Sizewell B access on Sizewell Gap.</p> <p>The assessment was undertaken for each link as follows:</p> <ul style="list-style-type: none">• The maximum flow in any of the seven modelled hours, in the 2034 Operational 'double-outage' scenario, was calculated.• This was compared against the maximum flow in any of the seven modelled hours in either the 2034 Operational or 2028 Peak Construction scenarios.• The difference between these two maximum flows on each link is presented graphically on the network diagram below (blue numbers are negative representing a decrease from what has already been assessed and red are positive representing an increase from what has already been assessed). This demonstrates where traffic flows in the 2034 Operational phase, with a double-outage, could potentially be higher than any scenario already assessed within the DCO (red numbers within the diagram).• The diagram shows that there would be reductions in traffic on the B1122 and SLR compared to what has already been assessed. The diagram shows that around the local study area in Leiston the addition of an outage at Sizewell C as well as Sizewell B would not result in significantly higher traffic flows than has been

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		<p>assessed already as part of the DCO. The diagram shows the following increase in flows in the Leiston area compared to what has already been assessed:</p> <ul style="list-style-type: none">- B1122 north of MDS roundabout +2 two-way veh/hr- Abbey Road south of MDS roundabout +14 two-way veh/hr- Abbey Road south of Lover's Lane +5 two-way veh/hr- B1122 Aldeburgh Road +6 two-way veh/hr in Leiston, +13 two-way veh/hr at Aldringham and +31 two-way veh/hr between Aldringham and Aldeburgh- B1069 in Leiston +11 two-way veh/hr, +41 two-way veh/hr north of Coldfair Green, +2 two-way veh/hr south of Coldfair Green- A1094 at the junction with B1069 +2 to +4 two-way veh/hr <p>The maximum increase in traffic generated by a double outage compared to the highest flows already assessed is +41 veh/hr north of Coldfair Green, which is less than 1 veh per minute increase.</p>

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ExQ2	Question to:	Question:
		<p>It is therefore concluded that the scale of traffic generated by coincident outages would be less than the traffic which has already been assessed for the vast majority of the links. Where there would be increases in traffic these would be less than 1 two-way vehicle per minute and for a short-term period during the length of the double outage. It is therefore considered that no further mitigation is required beyond what is already proposed by SZC Co.</p>
	SCC Response at Deadline 8	<p>Whilst the Council agrees that the assessment method appears to show limited changes, it does need to be borne in mind that the assessment applies a 'maximum flow in any of the seven modelled hours', which is assumed to mean the 'total traffic flow' (i.e. background + SZC + outages), would be occurring at different hours, and that while the total traffic flows might be comparable to what has already been assessed, the proportional impact of Sizewell C might be noticeably different. The impacts of Sizewell C are reduced by the modelling of shift patterns, these shift patterns become far more 'typical' during the Operational phase meaning that the impacts are felt more around the peak hours.</p> <p>SCC notes that the decision to agree to include a single outage in the transport assessment was a result of discussion with the Applicant during scoping regarding the likelihood of outages overlapping. At that stage the Applicant did not provide the level of detail now being presented to justify the size of the outage car park. At that time SCC accepted the applicants view that overlapping outages was likely to be a rare occurrence.</p>
	SZC Co. Response at Deadline 10	SZC Co. have nothing further to add to the Deadline 7 response.