

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 15 (05 October 2021) –
(ISH15) on the proposed temporary desalination
plant the subject of Change Request 19**

Suffolk County Council Registration ID Number: 20026012

Deadline 10

12 October 2021

Issue Specific Hearing 15 (05 October 2021) - (ISH15) on the proposed temporary desalination plant the subject of Change Request 19
Post Hearing Submissions including written summary of Suffolk County Council's Oral Case

Note: These Post Hearing Submissions include a written summary of the Oral Case presented by Suffolk County Council (SCC). They also include SCC's submissions on all relevant Agenda Items, not all of which were rehearsed orally at the ISH due to the need to keep oral presentations succinct. The structure of the Submissions follows the order of the Agenda Items but within each Agenda Item, the Submissions begin by identifying the main points of concern to SCC and then turn to more detailed matters.

Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Agenda Item 2 – Water Supply update:		
Following the discussion at ISH11, the parties to provide an update on the Water Supply Strategy with particular reference to:	No comment	
(a) Period prior to the temporary desalination plant being operational;		
(b) Period of operation of the temporary desalination plant, including the transfer of the temporary plant to the Temporary Construction Area; and	No comment	
(c) Period when Temporary Construction Area is being	No comment	

<p>reinstated and operation of the Proposed Development.</p>		
<p>Agenda Item 3 – The Environmental Assessment and the environmental implications of the proposed temporary desalination plant including matters relevant to the Habitats Regulations Assessment:</p>		
<p>(a) The additional environmental assessments and supporting documentation submitted in connection with the proposed temporary desalination plant.</p>	<p>No comment</p>	
<p>(b) Transport implications, including the Heavy Good Vehicle (HGV) deliveries and any Abnormal Invisible Loads (AILs) associated with the water tankers during the early stages of Sizewell C construction, and the construction and demolition of the temporary desalination plant.</p>	<p>SCC set out our concerns at Deadline 8 [REP8-179] regarding the water supply strategy; that we were concerned over the potential for significant numbers of HGV movements from the north to exceed those figures previously assessed, particularly along the A145 (which had historically been assessed as 5% of the total HGV movements). However, the Applicant has since indicated that the water supply would not be from the north.</p> <p>Paragraph 1.54 and 2.24 of Appendix 7B of the consolidated TA [REP2-046] sets out that 5% of HGV movements have been assessed as using the A145 and 10% the A12 to the north of the A145 (i.e., the 15% to the north).</p> <p>Following ISH15, detailed discussions have been undertaken with the Applicant to assess and consider the potential additional impacts on the transport network arising from the water strategy. This issue has now been resolved and agreed with the Applicant. Wording has been included within the signed Deed of Obligation to make clear that, if there are additional impacts arising from traffic associated with the desalination plant on the local highway network, this would be put for consideration to the</p>	<p>Final Signed Deed of Obligation (D10 submission)</p> <p>Deadline 8 Submission - Comments on any additional information/submissions received by D7 [REP8-179]</p> <p>Deadline 8 Submission - Post Hearing submissions including written submissions of oral case - Issue Specific Hearing 11 (14 September 2021) – (ISH11) Flooding, Water and Coastal Processes [REP8-182]</p>

	<p>TRG by SZC Co., and if required additional measures to be funded by SZC Co. would be delivered.</p> <p>The DoO in Schedule 16 (Transport and Public Rights of Way) includes "Contingent Effects" and "Contingent Effects Fund" which covers the potential effects of the Project set out in Annex O, considered on the basis set out in that Annex, but has now been extended to include any effects of SZC Co's water supply strategy. In paragraph 4.6.4 of Schedule 16 of the completed DoO it states, 'SZC Co shall keep the Transport Review Group regularly updated in relation to its water supply strategy in order to enable the Transport Review Group to consider the need to monitor and mitigate its potential Contingent Effects via the Contingent Effects Fund'.</p> <p>SCC has raised that consideration needs to be given as to the potential late delivery of the desalination plant. Appendix A of Planning Statement Appendix 8.4K: Site Water Supply Strategy [REP7-036] highlights the profile for water required for the project indicating that there is a steep incline in required potable water in April 2024, approximately 6 months after the programmed delivery of the Desalination Plant, and on that basis presents a risk, albeit low, that there would be a further increase in HGV movements if the plant was not delivered by this point. This would be prior to completion of the Sizewell Link Road as forecast for Q4 2024 in the Implementation Plan [REP2-044].</p>	
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	<p>SCC understands that in addition to using reasonable endeavours, SZC Co have committed in the Construction Management Strategy to a longstop, which is welcomed: <i>'Phase 2 must not commence until either the desalination plant is operational, or an alternative water supply that may otherwise be approved by ESC, is in place'</i>.</p> <p>The longstop date for the removal of the desalination plant is at Phase 5 Cold-flush testing commissioning works must not commence until operation of the temporary desalination plant has ceased.</p> <p>It is understood that the Applicant is investigating alternate sources of water which may result in tankers accessing SZC from the south (Anglian Water SoCG [REP9-014]). Whilst this would remove SCC's concerns of additional HGVs on the A145 it may result in impacts elsewhere on the local highway network. If Anglian Waters Water Treatment Works at Alton Water are considered as a source of water then the impacts of water tankers using the A137 and B1080 will need to be assessed, particularly road safety and the environmental effects on local communities along this route e.g., Tattingstone and Stutton. SCC accepts that this part of the local highway was not within the scoping of the transport assessment or Environmental Statement but the determination of the area of study predated the movements included within the Water Supply Strategy</p> <p>As the details of the water supply strategy in terms of water tanker routes have not been finalised SCC considers that review by the TRG and mitigation of the transport impacts, if any, is</p>	
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	<p>essential once these details are confirmed. This would be in addition to the latest version of the environmental statement.</p> <p>The request for additional details of traffic movements in the early years by the Examination body in their Rule 17 letter of the 6th October 2021 is welcomed by SCC. However, SCC has not had sight of this information in advance of D10.</p> <p>The applicant is requested to confirm that the import of water will be included in the monitoring of the modal split of materials.</p> <p>As set out in our Deadline 8 Response [REP8-179] SCC is also keen that the Applicant look to minimise disruption to the local highway network regarding the delivery of the water main.</p>	
<p>(c) Noise and vibration, including that associated with the additional construction plant and activities within the main development site and additional activities within the marine area and having regard to any additional impacts upon relevant internationally and nationally designated sites.</p>	<p>No comment</p>	
<p>(d) Air quality, including those associated with the introduction of additional on-site diesel generators within the main development site and any additional impacts upon relevant internationally and nationally designated sites.</p>	<p>No comment</p>	

<p>(e) Coastal Geomorphology, including any effects arising from the introduction of new infrastructure and construction activities within the marine environment, with particular regard to the effect of intake and outfall headworks on coastal processes and any additional impacts upon relevant internationally and nationally designated sites.</p>	<p>No comment</p>	
<p>(f) Landscape and visual implications, including the impact of equipment associated with the temporary desalination plant, with particular regard to any additional landscape impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) associated with the construction and siting of a containerised desalination module.</p>	<p>No comment</p>	
<p>(g) Marine historic environment implications, including the impact of horizontal directional drilling and dredging with particular regard to buried archaeological remains.</p>	<p>No comment</p>	
<p>(h) Marine water quality, sediments, and ecology, including the Water</p>	<p>No comment</p>	

Framework Directive and any effects arising from the introduction of new infrastructure and construction activities within the marine environment, and impacts of use, abstraction, discharge and hypersaline water on relevant internationally and nationally designated sites.		
(i) Terrestrial ecology and ornithology, including any additional effects upon marine birds and mammals and upon relevant internationally and nationally designated sites.	No comment	
(j) Any other relevant environmental implications, including any additional in-combination or cumulative impacts.	No comment	
Agenda Item 4 – General Habitats Regulations Assessment matters not covered under item 3 above:		
(a) Physical interaction between species and project infrastructure - effects on bird, marine mammal and fish qualifying features of relevant European sites.	No comment	
(b) Direct habitat loss and direct/indirect habitat fragmentation effects on marine mammal qualifying features of relevant European sites.	No comment	

(c) The views of Natural England, the Environment Agency, MMO, RSPB and other IPs on the third addendum to the Shadow HRA report [REP7-279] and any relevant subsequent HRA material.	No comment	
Agenda Item 5 – The DCO, DoO and other control documents		
(a) Are any changes over and above those in Revision 9 of the DCO and versions current at Deadline 7 of the DoO and other control documents needed?	Note: The DoO was completed on 08 October 2021 and will be submitted by the Applicant to the ExA at D10.	
(b) Practicalities of review and submission of any revisions.		
Agenda Item 6 – Any other matters relevant to the agenda		