



The Sizewell C Project

Non-Material Change 1: Application Report

Revision: 1.0

Applicable Regulation: Regulation 4

PINS Reference Number: EN010012

May 2026

Planning Act 2008
Infrastructure Planning (Changes to, and
Revocation of, Development Consent Orders)
Regulations 2011



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1 Introduction

1.1 Background

- 1.1.1 Sizewell C Limited¹ ("SZC Ltd") (company number 09284825) of registered office 25 Copthall Avenue, London, England, EC2R 7BP is the undertaker with the benefit of The Sizewell C (Nuclear Generating Station) Order 2022, which was granted by the Secretary of State for Business, Energy and Industrial Strategy (as they then were, now the Secretary of State for Energy Security and Net Zero) (the "Secretary of State") on 20 July 2022 (S.I. 2022 No. 853) (the "Order"). SZC Ltd is the organisation that applied for the Order and SZC Ltd owns the majority of the land within the Order limits.
- 1.1.2 The Order authorises the construction, operation, maintenance and decommissioning of the Sizewell C nuclear power station, comprising two United Kingdom European Pressurised Reactor units located adjacent to the existing Sizewell B power station on the Suffolk coast, approximately 3 kilometres north-east of Leiston. The project covers the Main Development Site ("MDS") and a number of associated onshore and offshore areas, together with all supporting infrastructure required for its delivery ("Sizewell C").
- 1.1.3 Sizewell C includes the following key elements:
- two reactor units and associated operational structures;
 - offshore cooling water intake and outfall infrastructure; and
 - temporary and permanent works including an accommodation campus, habitat compensation sites and improvement areas, temporary park and ride facilities, a permanent link road and a bypass, improvements to junctions and other highways works, a temporary freight management facility and a temporary extension of the Saxmundham-Leiston railway line together with other rail upgrades.
- 1.1.4 The Order has not been amended since it was granted, though the Deemed Marine Licence ("DML") originally granted as Schedule 21 to the Order has been varied by the Marine Management Organisation ("MMO") on 6 November 2023, 16 October 2025 and 27 March 2026.

1.2 Proposed Non-Material Change

- 1.2.1 Pursuant to section 153 and paragraph 2 of Schedule 6 of the Planning Act 2008, SZC Ltd is applying to the Secretary of State to make the non-material changes to the Order set out in this document (together, "NMC1").
- 1.2.2 There is no statutory definition of what constitutes a "material" or "non-material" change. Relevant guidance² indicates that a change is more likely to be material where it would give rise to new or materially different likely significant environmental effects when compared with a development consent order ("DCO") as made, where a new or updated Environmental Statement or Habitats Regulations Assessment would be required, where additional compulsory acquisition powers are sought and where there is a sufficiently large impact on local people and businesses.

¹ Previously named NNB Generation Company (SZC) Limited.

² Planning Act 2008: Guidance on Changes to Development Consent Orders (Department for Communities and Local Government, December 2015)

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- 1.2.3 NMC1 does not require additional compulsory acquisition of land, does not give rise to new or materially different likely significant environmental effects to those reported in the Environmental Statement relied upon by the Secretary of State in determining to make the Order (the "ES") and does not require a new or updated Environmental Statement or Habitats Regulations Assessment. The proposed changes will not have an impact on local people or businesses so as to render them material.
- 1.2.4 In overview, NMC1 comprises a focussed package of changes and corrections to:
- enable the use of part of the Land East of Eastlands Industrial Estate ("LEEIE") as an Integrated Reinforcement Yard instead of serviced caravan pitches ("Change 1");
 - enable the simultaneous use of rail facilities at the LEEIE and the Temporary Construction Area ("TCA") ("Change 2");
 - enable greater flexibility in the precise siting of the Intermediate Level Waste Store within the MDS, and make other corrections to the MDS Operational Parameter Plans ("Change 3");
 - amend public rights of way ("PRoW") associated with the Sizewell Link Road, the Two Village Bypass and the Main Development Site ("Change 4");
 - clarify that discharging authorities can exercise their existing power to approve a departure from a certified control document under certain requirements in the Order by approving an updated version of the control document ("Change 5");
 - refine the power for Traffic Regulation Orders ("Change 6");
 - ensure that variations to the DML to amend the location of works in the marine environment take effect without also needing an additional application to the Secretary of State to amend the Order ("Change 7"); and
 - correct minor drafting errors in the Order that have been identified subsequently to its grant ("Change 8").

1.3 Supporting Information

- 1.3.1 This Application Report provides an overview of the changes sought in NMC1 and their justification. The Application Report is accompanied by the following documents, which provide further justification for the changes sought and/or constitute the updated control documents referenced in the amendments to the Order:
- Overarching documents:
 - Cover letter to Secretary of State;
 - Environmental Compliance Report;
 - Draft Amendment Order (Word and PDF versions);
 - Confirmation of validation of the draft Amendment Order;
 - The Order as made by the Secretary of State, with tracked changes showing the amendments sought (for information);
 - Schedule of Proposed Changes to the Order; and
 - Copy of the notice publicising the application (published pursuant to regulation 6 of the 2011 Regulations).

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- Change 1: Use of part of the LEEIE as an Integrated Reinforcement Yard:
 - Construction Method Statement (Doc. Ref. 10.3) (May 2026) (clean and tracked changes versions);
 - Main Development Site Construction Parameter Plans (Doc. Ref. 2.5) – updated:
 - Key Plan (SZC-SZ0100-XX-000-DRW-100046) (rev. 7); and
 - Sheet 3 of 4 (SZC-SZ0100-XX-000-DRW-100094) (rev. 4).
- Change 2: Simultaneous use of rail facilities at the LEEIE and TCA
 - Rail Noise Mitigation Plan (Doc Ref. 10.9.1) (clean and tracked changes versions).
- Change 3: Greater flexibility in the precise siting of the Intermediate Level Waste Store within the MDS and other corrections to the MDS Operational Parameter Plans
 - Main Development Site Operational Parameter Plans (Doc. Ref. 2.5) – updated:
 - Key Plan (SZC-SZ0100-XX-000-DRW-100050) (rev. 5);
 - Sheet 1 of 4 (SZC-SZ0100-XX-000-DRW-100043) (rev. 5);
 - Sheet 2 of 4 (SZC-SZ0100-XX-000-DRW-100047) (rev. 5);
 - Sheet 3 of 4 (SZC-SZ0100-XX-000-DRW-100048) (rev. 4);
 - Sheet 4 of 4 (SZC-SZ0100-XX-000-DRW-100127) (rev. 3); and
 - Parameter Heights (SZC-SZ0100-XX-000-DRW-100283) (rev. 2).
 - Main Development Site Operational Siting and Height Parameters (Doc Ref. 10.19) (May 2026):
 - Please note – this is the same document as the Parameter Heights sheet of the Main Development Site Operational Parameter Plans (Doc Ref. 2.5) but is also defined separately within the Order by reference to Doc Ref. 10.19 and thus needs to be updated in both guises. The updates to this document do not amend the secured maximum heights but just correct cross-referencing errors that have been identified.
- Change 4: Changes to PRow for the Sizewell Link Road, Two Village Bypass and Main Development Site
 - Rights of Way Plans (Doc Ref. 2.4) – updated:
 - Main Development Site and Rail – Sheet 1 of 28 (SZC-SZ0204-XX-000-DRW-100342) (rev. 4);
 - Two Village Bypass – Sheet 17 of 28 (SZC-SZ0204-XX-000-DRW-100336) (rev. 7);
 - Two Village Bypass – Sheet 18 of 28 (SZC-SZ0204-XX-000-DRW-100337) (rev. 7);
 - Sizewell Link Road – Sheet 19 of 28 (SZC-SZ0204-XX-000-DRW-100338) (rev. 5);

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- Sizewell Link Road – Sheet 20 of 28 (SZC-SZ0204-XX-000-DRW-100339) (rev. 6);
- Sizewell Link Road – Sheet 21 of 28 (SZC-SZ0204-XX-000-DRW-100340) (rev. 7); and
- Sizewell Link Road – Sheet 22 of 28 (SZC-SZ0204-XX-000-DRW-100341) (rev. 7).

1.4 Structure of this Report

1.4.1 The remainder of this report is structured as follows:

- Section 2: Consultation Process
 - Describes how consultation will be undertaken in accordance with the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the "2011 Regulations").
- Section 3: Details of Proposed Non-Material Changes to the Order
 - Sets out the detail and rationale for each of the eight changes within NMC1 and the amendments required to the Order to implement those changes.
- Section 4: Environmental Considerations
 - Summarises the findings of the Environmental Compliance Report as to why the proposed changes have no new or materially different likely significant environmental effects from those reported in the ES and summarises why the proposals have no implications for the Habitats Regulations Assessment relied upon by the Secretary of State in determining to make the Order.
- Section 5: Summary and Conclusions
 - Summarises the proposal and confirms why the changes are considered to be non-material and acceptable.

2 Consultation Process

2.1 Background

- 2.1.1 On making a non-material change application, the applicant must notify and consult those persons specified in the 2011 Regulations. Regulation 7(1) and (2) of the 2011 Regulations require the applicant to consult all persons notified under section 56 of the Planning Act 2008 at the time the original DCO application was accepted, as well as any person who may be directly affected by the proposed change.
- 2.1.2 Regulation 7(3), however, provides that the Secretary of State may, on written request, consent to consultation being carried out with a reduced and targeted consultee list, where appropriate given the nature of the proposed change. On 23 April 2026 SZC Ltd wrote to the Secretary of State to request written consent to the consultation in relation to this non-material application being carried out with a reduced and targeted consultee list (the "Request").
- 2.1.3 A response from the Secretary of State is awaited. Pending receipt of that response, SZC Ltd will consult the persons it proposed to consult in its Request. If the Secretary of State considers that anyone else need be consulted, SZC Ltd will do so separately.

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2.2 Consultation and Publication Activities

- 2.2.1 Regulations 6 and 7 of the 2011 Regulations set out the requirements for publicising and consulting on a non-material change application.
- 2.2.2 The following has, or is being, undertaken by SZC Ltd to comply with regulations 6 and 7:
- A notice of NMC1 which includes the information required by regulation 6(2) will be published in a local newspaper for two successive weeks. The notice contains the information required by regulation 6 of the 2011 Regulations and a copy is enclosed with this application.
 - A notice of NMC1 which includes the information required by regulation 6(2) will be sent to each of the consultees listed on SZC Ltd's Request. If the Secretary of State considers that SZC Ltd must consult any other persons, a notice will be sent to them thereafter.
- 2.2.3 The documents comprising NMC1 will be available to view on the Sizewell C project website at: <https://www.sizewellc.com/>
- 2.2.4 and also on the Planning Inspectorate's website at: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010012>
- 2.2.5 Pursuant to regulation 7A of the 2011 Regulations, SZC Ltd will submit a separate Consultation and Publicity Statement confirming its compliance with regulations 6 and 7 of the 2011 Regulations. The Consultation and Publicity Statement will include copies of the newspaper notices published in accordance with regulation 6 and a description of the steps SZC Ltd has taken to comply with the requirements of regulations 6 and 7.

3 Details of Proposed Non-Material Changes to the Order

3.1 Overview

- 3.1.1 This application proposes a package of non-material changes to the Order, which are detailed in the remainder of this section. The changes are limited in scope and are intended to accommodate proposed refinements to the design and delivery of Sizewell C to reflect construction stage learnings to date, as well as learnings from Hinkley Point C, and to ensure clarity and efficiency in the operation of the Order.
- 3.1.2 Each proposed change has been considered individually and in combination against the ES that was relied upon by the Secretary of State in determining to make the Order. As demonstrated in the accompanying Environmental Compliance Report, none of the changes would give rise to new or materially different likely significant environmental effects to those reported in the ES, introduce new receptors or impact pathways, or undermine the effectiveness of mitigation secured through the Order.

3.2 Change 1: Use of Part of the LEEIE as an Integrated Reinforcement Yard

a) Need for Change 1

- 3.2.1 The LEEIE is an area to the south-west of the MDS and north-east of the town of Leiston. At the time of the grant of the Order, it was envisaged that part of the LEEIE would be used as a temporary caravan park during the construction period, with the remainder providing ancillary construction activities.

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- 3.2.2 Now, incorporating learning on construction efficiencies from Hinkley Point C, SZC Ltd has concluded that the LEEIE would be more effectively used as an Integrated Reinforcement Yard. Such a facility is necessary to cut, bend and assemble steel reinforcement meshes and cages for the construction of the power station. Siting this facility on the LEEIE, which is part of the approved construction area for Sizewell C and contains a temporary railhead, will reduce heavy goods vehicle (HGV) movements by avoiding long-distance transport of prefabricated steel from offsite and instead enable fabrication close to the point of use. This approach supports the safe, efficient and timely delivery of Sizewell C and provides construction programme resilience.
- 3.2.3 The LEEIE is leased to SZC Ltd for the construction phase only and will be restored and returned to the landowner following completion of construction. The proposed use of part of the LEEIE as an Integrated Reinforcement Yard will therefore be a temporary use of the land to directly support the construction of Sizewell C, in place of the previously anticipated use of this area as a temporary caravan park for construction workers. The change does not extend the Order limits.

b) Change 1 – Changes to the Order

- 3.2.4 Currently the Construction Method Statement (Doc. Ref. 10.3) ("CMS") requires that the LEEIE is used as a temporary caravan park and the Main Development Site Construction Parameter Plans (Doc. Ref. 2.5) ("CPPs") impose specified height parameters accordant with that anticipated use. Both of these documents are certified control documents listed in Schedule 23 (Certified Documents) to the Order (with the individual sheets of the CPPs listed in Schedule 6 (Parameter Plans)) and they are referenced in the requirements in Schedule 2 (Requirements), most notably requirement 13 (Main development site: Temporary construction-related development) which requires construction activity to be carried out in accordance with the CMS and CPPs.
- 3.2.5 SZC Ltd therefore needs to amend the Order to refer to updated versions of the CMS and CPPs that enable the use of the LEEIE as an Integrated Reinforcement Yard instead of a caravan park. The updated documents set parameters for the Integrated Reinforcement Yard, which includes a steel cut and bend facility, assembly area, workshops, storage areas and supporting infrastructure within Zone C13 as shown on the CPPs.
- 3.2.6 The revised CMS secures mitigation measures embedded within the design and operation of the Integrated Reinforcement Yard, including controls on hours of operation, acoustic performance standards for buildings, restrictions on night-time external activities, enhanced acoustic barriers, controls on vibration-generating activities and continued compliance with the Code of Construction Practice and other relevant certified control documents. The tracked changes version of the CMS submitted with this application shows changes against the notional version of the CMS that incorporates deviations approved by ESC to date under requirement 13 of the DCO.
- 3.2.7 As is explained in further detail in the accompanying Environmental Compliance Report, the design of the facility and the mitigations secured, together with existing other requirements in Schedule 2 (Requirements) of the Order, ensure that Change 1 gives rise to no new or materially different likely significant environmental effects compared to the previous anticipated use of the LEEIE for the purpose of the ES.
- 3.2.8 The construction and operation of the Integrated Reinforcement Yard (as a temporary construction-related facility) is already authorised as associated development under Part 2 of Schedule 1 (Authorised Development) to the Order (including paras. (c), (d), (e) and (f)) and therefore no amendment to Schedule 1 to the Order is strictly necessary to authorise

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the revised use. However, to maximise clarity on the face of the Order, SZC Ltd proposes to add express reference to the proposed facility to the description of Work No. 1A in Part 1 of Schedule 1 – adding a new sub-paragraph:

3.2.9 "(II) integrated reinforcement yard"

3.2.10 It is not proposed to delete Work No. 1A(dd), "*serviced pitches for up to 400 caravans and 400 temporary car parking spaces*", as this is cross-referenced in the Deed of Obligation entered into by SZC Ltd, East Suffolk Council and Suffolk County Council and deleting it could cause ambiguity in the operation of that document. It is a well-established principle that DCOs are permissive and that not all works specified in the definition of 'authorised development' must be constructed, absent a requirement and/or control document so requiring. SZC Ltd does not therefore see any reason why this reference must be deleted.

3.3 Change 2: Simultaneous Use of Rail Facilities at the LEEIE and TCA

a) Need for Change 2

3.3.1 At the time the Order was granted, the ES assumed that regular use of the LEEIE railhead would be limited to the early years of construction, with primary reliance subsequently transferring to the railhead at the TCA once operational.

3.3.2 Subsequent learning from Hinkley Point C, together with ongoing programme development, has demonstrated that retaining the ability to use both the LEEIE and TCA railheads concurrently would provide greater flexibility and resilience in construction logistics. Concurrent use would also maximise the use of rail-based transport for bulk materials, support more efficient construction sequencing and reduce reliance on road-based HGV movements.

b) Change 2 – Changes to the Order

3.3.3 Requirement 39 (Rail noise) requires the submission and approval of a Rail Noise Mitigation Plan in general accordance with the Draft Rail Noise Mitigation Plan (Doc. Ref. 10.9), which is a certified control document. The Draft Rail Noise Mitigation Plan currently reflects the assumption that use of the LEEIE railhead would reduce once the TCA railhead becomes operational. As a result, SZC Ltd cannot submit a Rail Noise Mitigation Plan for approval by East Suffolk Council, pursuant to requirement 39, that accommodates simultaneously use of the LEEIE and TCA railheads.

3.3.4 SZC Ltd therefore proposes to amend the Order to change the form of requirement 39 to require SZC Ltd to comply with the Rail Noise Mitigation Plan enclosed with this application unless otherwise agreed with East Suffolk Council. The Secretary of State can evaluate the proposed changes to the Rail Noise Mitigation Plan in considering this application, with the tracked changes version demonstrating differences from the version most recently approved by East Suffolk Council on 18 February 2026. The proposed changes to the Rail Noise Mitigation Plan have been discussed with East Suffolk Council. If in the future, SZC Ltd needs to further update the Rail Noise Mitigation Plan, it can seek approval from East Suffolk Council, who must only grant such approval if satisfied that the change does not give rise to any new or materially different likely significant environmental effects (para. 1(3) of Schedule 2 (Requirements) to the Order).

3.3.5 The updated Rail Noise Mitigation Plan acknowledges the continued and simultaneous operation of both railheads, while retaining the same controls on hours of operation, limits on train numbers and mitigation measures assessed previously. The control documents do

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not permit night-time rail operations through Leiston and do not increase rail movements beyond those assessed in the ES.

- 3.3.6 As is explained in further detail in the accompanying Environmental Compliance Report, the amendments to the Rail Noise Mitigation Plan ensure that Change 2 gives rise to no new or materially different likely significant environmental effects to those reported in the ES.
- 3.3.7 As the reference to the Draft Rail Noise Mitigation Plan in requirement 39 will be removed as a result of Change 2, it is also proposed to delete reference to this as a certified document in Schedule 23 (Certified Documents). The Rail Noise Mitigation Plan considered and approved by the Secretary of State through this application will be added as a new certified document to Schedule 23.

3.4 Change 3: Greater Flexibility in the Precise Siting of the Intermediate Level Waste Store within the MDS and Other Corrections to the MDS Operational Parameter Plans

a) Need for Change 3

- 3.4.1 Intermediate Level Waste ("ILW") will be generated during the routine operation of Sizewell C, primarily through the treatment of liquids and gases to reduce worker doses and discharge of radioactivity to the environment, as well as through maintenance work carried out during reactor operation and outages. Pending the establishment of a long-term Geological Disposal Facility, this waste will be safely stored on site in a building called the Intermediate Level Waste Store ("ILWS"). The construction of this facility is Work No. 1A(f) in Schedule 1 (Authorised Development) to the Order.
- 3.4.2 Further design work has identified that an ILWS of sufficient capacity to serve the operational lifetime of Sizewell C cannot be efficiently accommodated in the zone secured for the ILWS during the DCO examination.
- 3.4.3 The proposed change allows the ILWS to be repositioned within an expanded operational parameter zone, facilitating a larger footprint while maintaining the same maximum building height and operational function. This approach enables replication of the established waste management strategy, safety case and As Low As Reasonably Practicable (ALARP) principles applied at Hinkley Point C.

b) Change 3 – Changes to the Order

- 3.4.4 Requirement 17 (Main development site: Reserved matters) in Schedule 2 (Requirements) to the Order requires that Work No. 1A(f), the ILWS, must not commence until details of its layout, scale and external appearance have been submitted to and approved by East Suffolk Council following consultation with specified bodies. Submitted details must be:
- in general accordance with Chapter 7 and the detailed design principles in Chapter 5 of the Main Development Site Design and Access Statement; and
 - in accordance with two specified sheets of the MDS Operational Parameter Plans and the MDS Operational Siting and Height Parameters document.
- 3.4.5 Zone 1A-6 on the MDS Operational Parameter Plans delineates the zone within which the ILWS must be constructed and presently does not include the area to the north-east, which is also considered necessary for the ILWS. The MDS Operational Parameter Plans therefore needs to be updated to facilitate development of the ILWS in that area.

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- 3.4.6 The proposed change expands Zone 1A-6 rather than relocating it, retaining flexibility as detailed design of adjacent facilities continues to evolve. This approach ensures that the ILWS can be accommodated efficiently without increasing building height, introducing new uses or altering the scale of development assessed at DCO stage.
- 3.4.7 The MDS Operational Parameter Plans are a certified document by virtue of their inclusion in Schedule 23 (Certified Documents), with individual sheets listed in Schedule 6 (Parameter Plans). The Order is proposed to be amended to reference the updated version of the relevant sheets of the MDS Operational Parameter Plans to facilitate the revised Zone 1A-6. No other changes are proposed to the parameters secured in these plans, including no changes at all to secured parameter heights.
- 3.4.8 Detailed design of the ILWS would remain subject to approval by the local planning authority under requirement 17.
- 3.4.9 In updating the MDS Operational Parameter Plans to accommodate the revised Zone 1A-6, SZC Ltd identified a number of cross-referencing errors on other sheets of the MDS Operational Parameter Plans and the MDS Operational Siting and Height Parameters document, where they referred to superseded work numbers. SZC Ltd has therefore taken the opportunity of this NMC1 to correct those errors. These corrections are purely factual in nature, do not alter the meaning, scope or effect of the certified parameters, and are included for clarity and accuracy only.
- 3.4.10 As is further detailed in the Environmental Compliance Report, no new or materially different likely significant environmental effects to those reported in the ES will be caused by Change 3.

3.5 Change 4: Changes to PRow for the Sizewell Link Road, Two Village Bypass and Main Development Site

a) Need for Change 4

- 3.5.1 The Order authorises the stopping up, diversion and creation of PRow required to facilitate the delivery of the Sizewell Link Road ("**SLR**"), the Two Village Bypass ("**TVB**") and works at the MDS. Those arrangements were based on the level of design available at the time the Order was granted and were secured through the certified Rights of Way Plans and associated Schedules to the Order.
- 3.5.2 Since the grant of the Order, further detailed design work has been undertaken for the SLR, TVB and relevant MDS works. That design work has identified a limited number of locations where the authorised PRow arrangements require refinement so that they accurately reflect the detailed highway and access designs now being taken forward.
- 3.5.3 In particular, detailed design has confirmed that some PRow diversion points need to be adjusted, that short residual sections of PRow require formal stopping up, and that additional PRow routes should be provided based on discussions with Suffolk County Council.
- 3.5.4 The change is therefore needed to ensure that the PRow arrangements authorised by the Order are accurate, complete and reflect discussions with Suffolk County Council in relation to the detailed highway and MDS designs.

b) Change 4 – Changes to the Order

- 3.5.5 Change 4 proposes amendments to certain sheets of the certified Rights of Way Plans and consequential amendments to Schedules 10 (Streets to be permanently stopped up,

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changed in status or private means of access extinguished) and 11 (Status of public rights of way created or improved) to the Order to:

- align PRoW stopping-up and diversion extents with the detailed highway designs;
- correct omissions and inaccuracies between the certified plans and the Schedules to the Order; and
- authorise new PRoW running alongside the SLR and TVB.

- 3.5.6 Detailed design of the TVB has identified two locations where short residual sections of PRoW require formal stopping up. This requires the relocation of PRoW point references on plans E242/001/0 and E242/004/0 to reflect the correct stopping-up and diversion extents, together with corresponding amendments to Schedules 10 and 11.
- 3.5.7 In addition, new PRoW shown as part of the detailed design for TVB, which are not currently captured in the certified Rights of Way Plans or Schedule 11, are proposed to be added to the Order so that the full extent of those routes is authorised.
- 3.5.8 In relation to the SLR, five locations have been identified where PRoW point references on the certified Rights of Way Plans do not accurately reflect the stopping-up or diversion extents required by the approved detailed highway design. These point references are to be repositioned, with corresponding amendments made to Schedules 10 and 11.
- 3.5.9 The certified Rights of Way Plans also show the SLR crossing an existing PRoW, without provision for its stopping up or diversion. The Order is therefore proposed to be amended to secure formal stopping up of the affected PRoW in Schedule 10 and a permanent diversion in Schedule 11, together with corresponding updates to the certified plans.
- 3.5.10 New PRoW shown as part of the detailed design for SLR, which are not currently captured in the certified Rights of Way Plans or Schedule 11, are proposed to be added to the Order so that the full extent of those routes is authorised.
- 3.5.11 In relation to the MDS, detailed design has confirmed that the approved diversion of Bridleway 19 off Eastbridge Road requires a minor relocation of its northern end point on the certified Rights of Way Plan to avoid retention of an existing oak tree. A corresponding amendment to the certified plan and Schedule 11 is therefore required to regularise that diversion
- 3.5.12 The changes remain in accordance with the certified Rights of Way and Access Strategy (Doc. Ref. 10.26) and no change is required to that document.
- 3.5.13 As demonstrated in the Environmental Compliance Report, no new or materially different likely significant environmental effects to those reported in the ES will be caused by this change.
- 3.5.14 Further details of this change are provided in **Annex A** of this report.

3.6 Change 5: Clarification of Process for Approved Departures from Certified Control Documents

a) Need for Change 5

- 3.6.1 Currently, requirements 2 (Project wide: Code of Construction Practice), 4 (Project wide: Terrestrial Ecology Monitoring and Mitigation Plan), 8 (Project wide: Estate Wide Management Plan) and 13 (Main development site: Temporary construction-related

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development) in Schedule 2 (Requirements) of the Order are drafted as minor variants of the following form:

- 3.6.2 "[works] must be carried out in accordance with [certified control document] unless otherwise approved by [discharging authority]".
- 3.6.3 If SZC Ltd needs to carry out works other than as provided for in these documents, it can apply to the relevant discharging authority for approval to do so and that discharging authority can grant said approval if satisfied that it would not give rise to any new or materially different likely significant environmental effects to those assessed in the original environmental information (see para. 1(3) of Schedule 2 of the Order).
- 3.6.4 On a strict interpretation of the drafting of these requirements in the Order, the approval of the discharging authority is for the works that are to be carried out other than in accordance with the referenced document. It is the deviation/departure from the document that is being approved, rather than any amendment or update to the document itself. As a result, other references in the Order to that document must continue to be read as references to the original certified document, without taking account of any deviations that have been approved under a relevant requirement.
- 3.6.5 This is in contrast to requirements that expressly provide for a document to be submitted for approval by a discharging authority, in accordance with which the authorised development (or relevant part thereof) must then be carried out (e.g. public rights of way implementation plans under requirement 10 (Project wide: Public rights of way)). If those documents need to be updated, a revised version can be submitted for approval and the requirement can be re-discharged. A similar analysis arguably applies for the requirements which provide for the authorised development (or relevant part thereof) to be carried out in accordance with a specified certified control document *"save to the extent that alternative plans or details are submitted to and approved by [the discharging authority]"* (e.g. requirement 9 (Main development site: Site clearance)). There, the alternative plans/details are what are being approved.
- 3.6.6 To avoid any confusion when discharging authorities come to discharge applications for deviations under requirements 2, 4, 8 and 13, and to ensure no doubt that their approval of the manner in which works can be undertaken can be recorded in an updated version of the document in question, it is proposed to add some minor clarificatory drafting to Schedule 2 to the Order. The proposed wording makes clear that discharging authorities can provide this approval by way of approving an updated version of the control document itself which contains the necessary changes to facilitate the different mode of carrying out the relevant works. This updated version of the control document can then serve as a single point of truth for SZC Ltd, the discharging authority, interested third parties and SZC Ltd's contractors.

b) Change 5 – Changes to the Order

- 3.6.7 It is proposed to add a new paragraph 1(2)(c) in Schedule 2 to the Order as follows:
- 3.6.8 "[Where any requirement--]
- 3.6.9 (c) requires that the authorised development or any part of it is carried out in accordance with a specified document or documents "unless otherwise approved" by the discharging authority, such an approval may be given by way of approving an updated version of the specified document or documents, and references to that document or documents in this Order shall be taken to refer to the updated version."

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- 3.6.10 The drafting change does not alter the scope of power afforded to discharging authorities to approve departures from the certified control documents. Both before and after this drafting is introduced, a discharging authority can only approve departures from an original control document where the requirement permits this and where the discharging authority is satisfied that the departure would not give rise to any new or materially different likely significant environmental effects to those assessed in the original environmental information (see para. 1(3) of Schedule 2 of the Order).
- 3.6.11 The proposed drafting aligns with the mechanism included in recent energy DCOs that allows undertakers to submit amendments to any certified documents to a discharging authority for approval, provided this would not give rise to materially new or different significant environmental effects – see e.g. para. 3 of Schedule 2 to the Fenwick Solar Farm Order 2026 and para. 16 of Schedule 2 to the Stonestreet Green Solar Order 2025.
- 3.6.12 The amendment therefore does not widen the potential scope of approved activities and does not reduce regulatory oversight.

3.7 Change 6: Refinement of the Traffic Regulation Order Power

a) Need for Change 6

- 3.7.1 Traffic Regulation Orders ("TROs") are a common mechanism by which a traffic authority manages the use of the highway network on a permanent or temporary basis and they are used to impose speed limits, parking restrictions or other constraints on vehicular traffic using a highway. The Road Traffic Regulation Act 1984 ("1984 Act") provides the standard mechanism by which a traffic authority makes or amends TROs. It is common for DCOs to also provide a standalone ability for the undertaker to create their own TROs and vary TROs that are already in existence, to ensure that works on or adjacent to the highway network can be undertaken safely, and to facilitate the safe delivery of materials and workers to site.
- 3.7.2 Article 24 (Traffic regulation measures) of the Order authorises SZC Ltd, with the consent of the relevant traffic authority, to make TROs, both as regards certain speed limits on certain lengths of streets specified in Schedule 14 (Traffic regulation measures) (article 24(1)) and more generally by imposing a wider set of measures across any street in connection with the authorised development (article 24(2)).
- 3.7.3 In constructing Sizewell C, SZC Ltd requires TROs for a wide variety of purposes, ranging from setting new speed limits on roads to ensure safe construction to temporarily prohibiting vehicular access on certain routes where this mitigation is required. Given the complexity and scale of the Sizewell C project, and particularly given the large number of highway works involved, implementing a high volume of TROs swiftly is proving particularly important.
- 3.7.4 Currently, the wording of article 24(2)(a) provides that SZC Ltd can only revoke, amend or suspend an existing TRO "in so far as it is inconsistent with any prohibition, restriction or other provision made by the undertaker under this article", i.e. insofar as it is inconsistent with any TRO made under article 24(1) in relation to a speed limit specified in Schedule 14 or any TRO made under limbs (b) to (f) of article 24(2) of a type specified in those limbs. This drafting unnecessarily limits flexibility.
- 3.7.5 As SZC Ltd proceeds further with the delivery of the Sizewell C project, it is becoming clear that there are multiple instances where it would be in the best interests of the safe and efficient delivery of Sizewell C, as well as the general public, for certain existing speed limit TROs which cover stretches of road not specifically listed in Schedule 14 to be amended.

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Without the ability to make such amendments under article 24 of the Order, subject to consent from the relevant traffic authority, they must be made by the traffic authority itself under the standard 1984 Act process. The volume of TROs required via this route is proving burdensome for the traffic authority and the pace of the process is causing material delay to the project. It is therefore in the interests of both SZC Ltd and the traffic authority for article 24 to be amended to resolve this issue.

b) Change 6 – Changes to the Order

- 3.7.6 Change 6 seeks to amend article 24(2)(a) to remove the qualifier that an existing TRO can only be revoked, amended or suspended *"in so far as it is inconsistent with any prohibition, restriction or other provision made by the undertaker under this article"*. Importantly, however, SZC Ltd will still only be authorised to implement such revocations, amendments or suspensions with the consent of the relevant traffic authority and in accordance with the detailed procedure set out in the rest of article 24. The change therefore gives SZC Ltd a wider capability to propose amendments to existing TROs, but these amendments remain expressly subject to the relevant traffic authority's consent.
- 3.7.7 The change would alleviate the growing administrative burden on the local traffic authority to make amendments itself to existing TROs where this is necessary or expedient for the delivery of the authorised development, and would instead allow SZC Ltd to resource the carrying out of this function, whilst remaining subject to the existing safeguards on the exercise of the power – namely, a need for traffic authority consent.
- 3.7.8 SZC Ltd has discussed this proposed change with Suffolk County Council who are the traffic authority for the streets within the area surrounding the site. Suffolk County Council has confirmed that it is supportive of the change.
- 3.7.9 The specific form of drafting currently included in article 24(2)(a) of the Order is not replicated in recent DCOs. The proposed updated drafting is aligned with modern practice for traffic regulation articles and reflects provisions in recently granted DCOs including the Gatwick Airport (Northern Runway Project) Development Consent Order 2025, A122 (Lower Thames Crossing) Development Consent Order 2025 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

3.8 Change 7: Ensuring that Variations to the Deemed Marine Licence Have Effect without a Parallel Change to the Order

a) Need for Change 7

- 3.8.1 Sizewell C is being constructed on the Suffolk coast. As a nuclear power station and largescale piece of infrastructure, it encompasses various cooling water, drainage and outfall infrastructure that extends into the sea. Where these works are to be constructed exclusively in the marine environment, below the level of mean high water springs, they are outside the jurisdiction of the terrestrial local planning authority and are instead regulated by the MMO.
- 3.8.2 Schedule 21 of the Order granted a DML under Part 4 (Marine Licensing) of the Marine and Coastal Access Act 2009 (the "2009 Act") to provide the necessary authorisation for these works. The works are described in Part 2 of the DML and their location is controlled by paragraph 5 of the DML and the coordinate tables in Part 4 of the DML.
- 3.8.3 However, because the DML was originally granted as part of the Order, it also defines the marine works by cross-reference to Schedule 1 (Authorised Development) to the Order – see the definitions in paragraph 1 of the DML. Schedule 1 to the Order in turn defines the

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works by reference to the locations shown on the Works Plans certified pursuant to the Order, stating *"The location of the above works is shown on sheet nos 2, 4, 5 and 6 of the Works Plans"*. As a result, the location of the marine works is secured both by virtue of the coordinate tables in Part 4 of the DML and the Works Plans (via Schedule 1 to the Order).

- 3.8.4 Once granted, a DML is treated as a separate and standalone legal instrument that can be varied on application to the MMO under section 72 of the 2009 Act, without any need to change the Order. If SZC Ltd needs to revise the precise location of any of the marine works, it should be able to do so by applying to the MMO to vary the DML to update the coordinate tables in Part 4 of the DML. However, at present, it also needs to apply to the Secretary of State to update the Works Plans, as these can only be updated through a change to the Order.
- 3.8.5 SZC Ltd has applied to the MMO for three variations to the DML so far, which were granted on 6 November 2023, 16 October 2025 and 27 March 2026. The October 2025 variation amended the coordinates for certain of the marine works. Change 7 will ensure that the effectiveness of this variation is not undermined by the cross-reference to the Works Plans in Schedule 1 to the Order.

b) Change 7 – Changes to the Order

- 3.8.6 Change 7 seeks to amend Schedule 1 to the Order to remove the cross-reference to the Works Plans for the cooling water, drainage, desalination and outfall infrastructure – Work Nos. 2A – 2P. The line after the work description of Work No. 2P will be deleted:
- 3.8.7 "The location of the above works is shown on sheet nos 2, 4, 5 and 6 of the Works Plans."
- 3.8.8 The work descriptions will otherwise remain unchanged and the DML will continue to regulate the location of the marine works.
- 3.8.9 This change accords with the approach advocated in Government guidance 'Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects' (April 2024), which provides that:
- 3.8.10 "The DML must be drafted so that it is effectively an independent legal document, for example relevant definitions and project works must be within the DML."
- 3.8.11 As a result of this change, wording in article 50 (further powers as to works and extinguishment of rights) also needs to be updated so that the marine works specified in article 50(1) are not tied to the Works Plans but are instead tied to the DML. It is proposed to update this article as follows:
- 3.8.12 "... so much of the foreshore and bed of the sea as is situated within the limits of Work Nos. 2B, 2D, 2F, 2H, 2J and 2K as per the deemed marine licence (as varied) ~~shown on the Works Plans...~~"

3.9 Change 8: Drafting Corrections to the Order

a) Need for Change 8

- 3.9.1 Through the implementation of the Order post-consent, certain minor drafting errors and omissions have been identified. To ensure the clear and effective operation of the Order, these errors and omissions should be corrected through an amendment order.

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b) Change 8 – Changes to the Order

- 3.9.2 The corrections sought are described and justified in the Schedule of Proposed Changes to the Order enclosed with this Report.

4 Environmental Considerations

4.1 Environmental effects

- 4.1.1 An Environmental Compliance Report has been prepared to accompany NMC1. The purpose of the Compliance Report is to consider whether the proposed changes, considered individually and in combination, would give rise to any new or materially different likely significant environmental effects compared with those reported in the ES.
- 4.1.2 A high-level environmental screening exercise has been undertaken for all eight proposed changes. This screening confirms that Changes 4 to 8 relate solely to corrections, clarifications or refinements to the drafting and operation of the Order and do not alter any of the assumptions underpinning the ES. These changes have therefore been appropriately screened out of further environmental consideration.
- 4.1.3 Three changes (Changes 1, 2 and 3) were screened in for further consideration, as they alter the previously assessed parameters and assumptions. For each of these changes, proportionate topic-specific assessment has been undertaken to determine whether they would give rise to any new or materially different likely significant environmental effects to those reported in the ES.
- 4.1.4 When considered individually and in combination, the Compliance Report confirms that the proposed changes would not give rise to any new or materially different likely significant environmental effects to those reported in the ES. On this basis, a new or updated Environmental Statement that goes beyond the Compliance Report is not required in support of this application.

4.2 Habitats Regulations

- 4.2.1 The Environmental Compliance Report has also considered whether the proposed non-material changes have any implications for the Habitats Regulations Assessment undertaken for the Sizewell C project.
- 4.2.2 The conclusions of the original Habitats Regulations Assessment were based on the scale, nature and location of the authorised development, the identification of relevant impact pathways, and the effectiveness of the mitigation and control measures secured through the Order in relation to sites within the National Site Network (SPAs and SACs), and Ramsar sites.
- 4.2.3 When considered individually and cumulatively, the proposed changes do not affect the integrity of any European site or Ramsar site and do not alter the conclusions previously reached by the Secretary of State.
- 4.2.4 Accordingly, the Compliance Report confirms that the conclusions of the Habitats Regulations Assessment remain valid and that no new or updated Habitats Regulations Assessment is required in respect of NMC1.

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5 Conclusions and Next Steps

- 5.1.1 This Application Report has been prepared in support of an application by Sizewell C Limited for a non-material change to The Sizewell C (Nuclear Generating Station) Order 2022, pursuant to section 153 and Schedule 6 of the Planning Act 2008.
- 5.1.2 The application seeks a focused package of changes intended to support efficient delivery of the authorised development, reflect construction-stage learning, and ensure clarity and effectiveness in the operation of the Order. The changes are limited in scope and do not alter the fundamental nature of the project.
- 5.1.3 The accompanying Environmental Compliance Report demonstrates that the proposed changes:
- do not give rise to any new or materially different likely significant environmental effects to those reported in the ES;
 - do not affect the conclusions of the Habitats Regulations Assessment; and
 - do not require an updated Environmental Statement or a revised Habitats Regulations Assessment.
- 5.1.4 It is also confirmed that the proposed changes do not require any additional compulsory acquisition of land beyond that authorised by the Order.
- 5.1.5 In accordance with the relevant guidance, consideration has been given to whether the proposed changes could be material by reason of their impacts on local people and businesses. As demonstrated in the Environmental Compliance Report, the proposed changes do not give rise to any new or materially different likely significant environmental effects to those reported in the ES. Having regard to their scale, duration, context and the mitigation secured, those impacts are not considered to be of a kind that would indicate that there would be a sufficient impact on local people and businesses for the proposed changes to be treated as material.
- 5.1.6 For these reasons, the changes proposed in this application are considered to be non-material within the meaning of the 2011 Regulations and are capable of being granted by the Secretary of State by way of a non-material change to the Order.
- 5.1.7 Following submission of this application, SZC Ltd will carry out consultation and publicity in accordance with the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011, as described in Section 2 above.

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ANNEX A CHANGE 4 DETAILS

1 Change 4: Changes to PROW for the Sizewell Link Road, Two Village Bypass and main development site

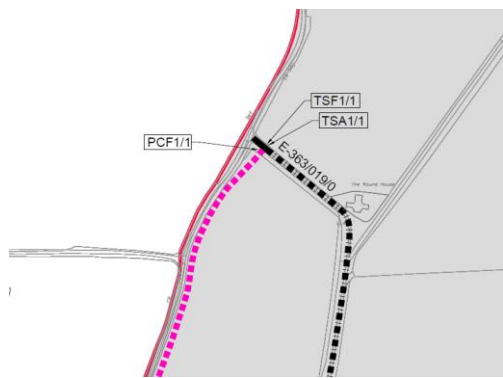
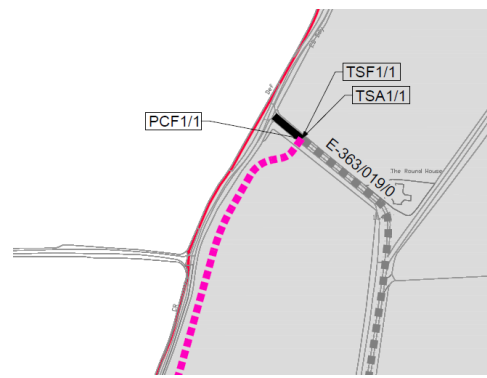
- 1.1.1 The purpose of this Annex is to explain the changes that are proposed to the Rights of Way Plans. Associated changes are also necessary to Schedules 10 (Streets to be permanently stopped up, changed in status or private means of access extinguished) and 11 (Status of public rights of way created or improved) to the Order.
- 1.1.2 The specific sheets of the Rights of Way Plans in respect of the Main Development Site, Two Village Bypass and Sizewell Link Road that are proposed to be amended are listed in the main body of the Application Report and explained below. Relevant extracts of the plans are provided below, alongside a written explanation of the proposed amendments.

2 Explanation of proposed amendments

2.1 Main Development Site

- 2.1.1 The Order approved the provision of a new bridleway close to the Main Development Site to extend from Sizewell Gap and King George's Avenue in the south, to the Accommodation Campus in the north. The bridleway will extend up to the existing northern end of public right of way E-363/019/0 (Bridleway 19).
- 2.1.2 A change to one part of the alignment is proposed, as described below.

Table 2.1 Sheet 1 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100342)

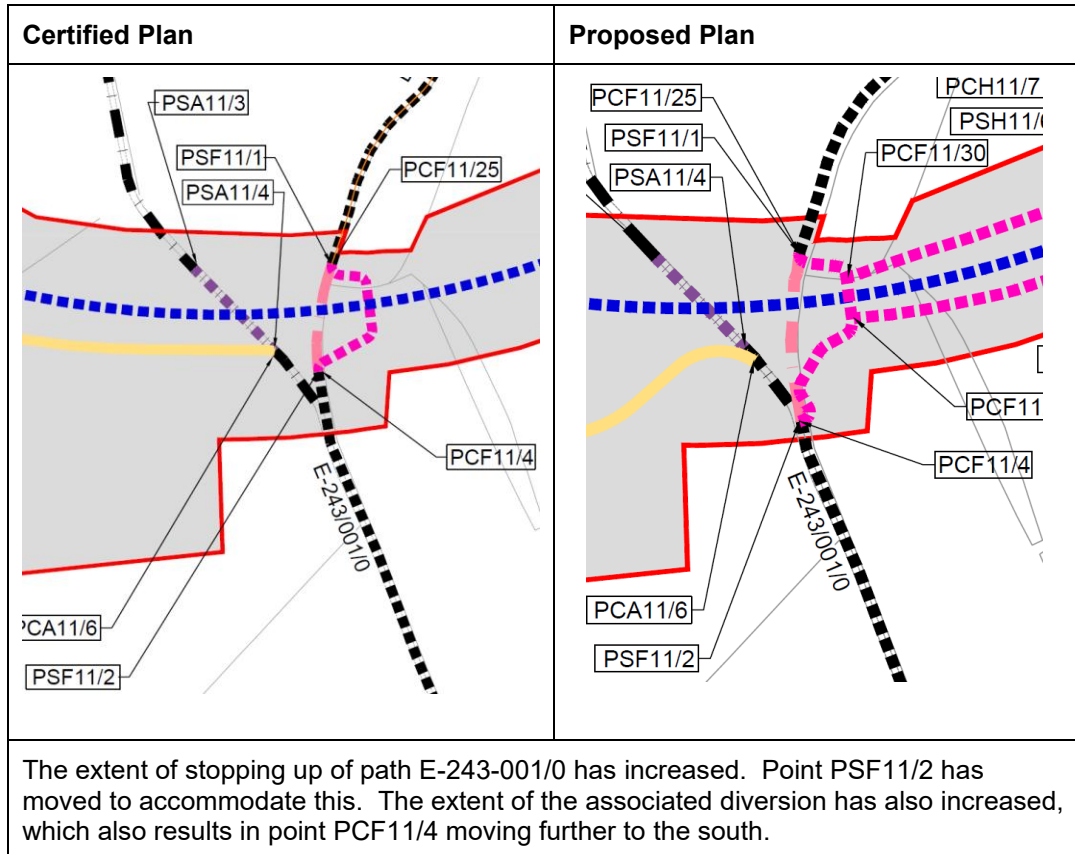
Certified Plan	Proposed Plan
	
<p>The alignment of the northern part of this PROW has changed, to accommodate a retained mature tree. Consequently, point PCF1/1 has been moved to the east.</p> <p>Consequently, the extent of temporary stopping-up of path E-363-019/0 has also been reduced to ensure the permanent new PROW would connect with the highway to the east. Point TFS1/1 has therefore also moved to accommodate this.</p>	

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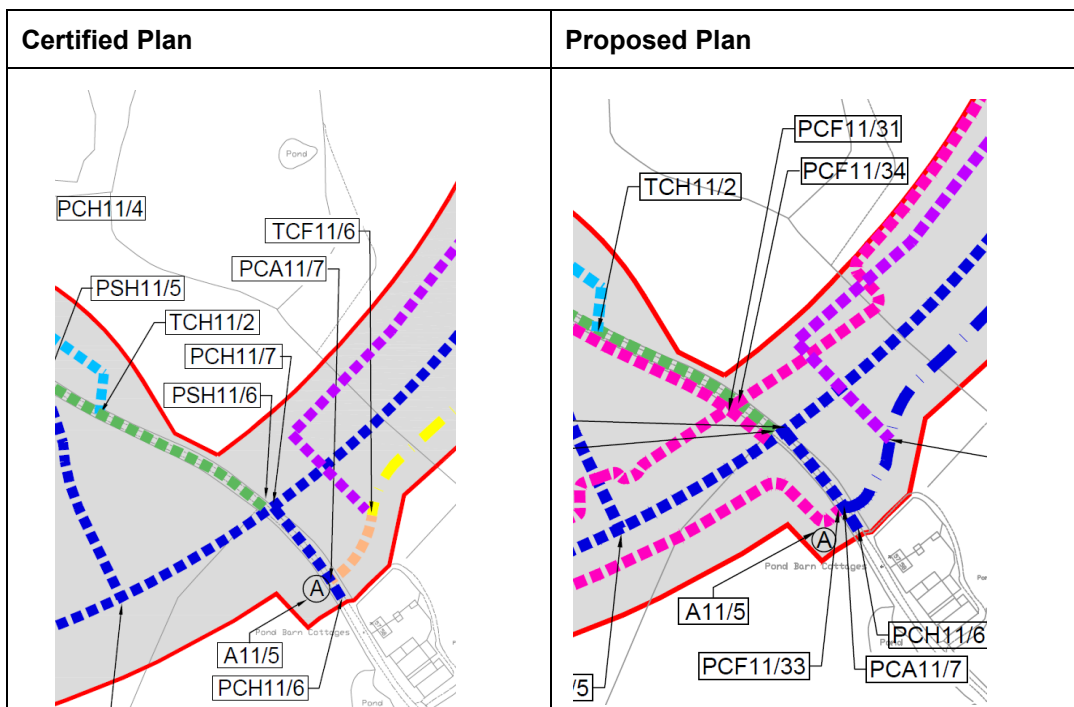
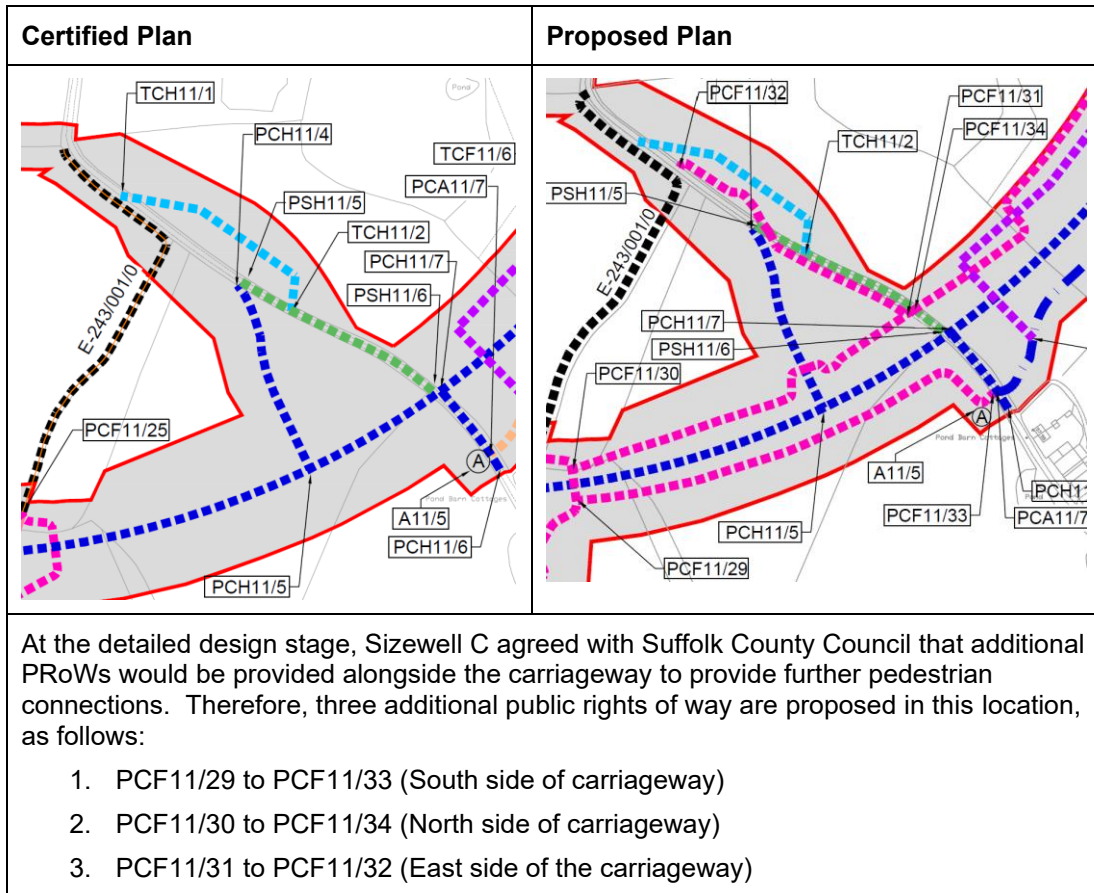
2.2 Two Village Bypass

2.2.1 The Order approved a new 1.8km road around the villages of Farnham and Stratford St Andrew. The Order approved the stopping-up and diversion of several public rights of way to accommodate this road scheme. Minor amendments to these public rights of way, plus additional public rights of way, are now proposed. These amendments are described below.

Table 2.2 Sheet 17 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100336)



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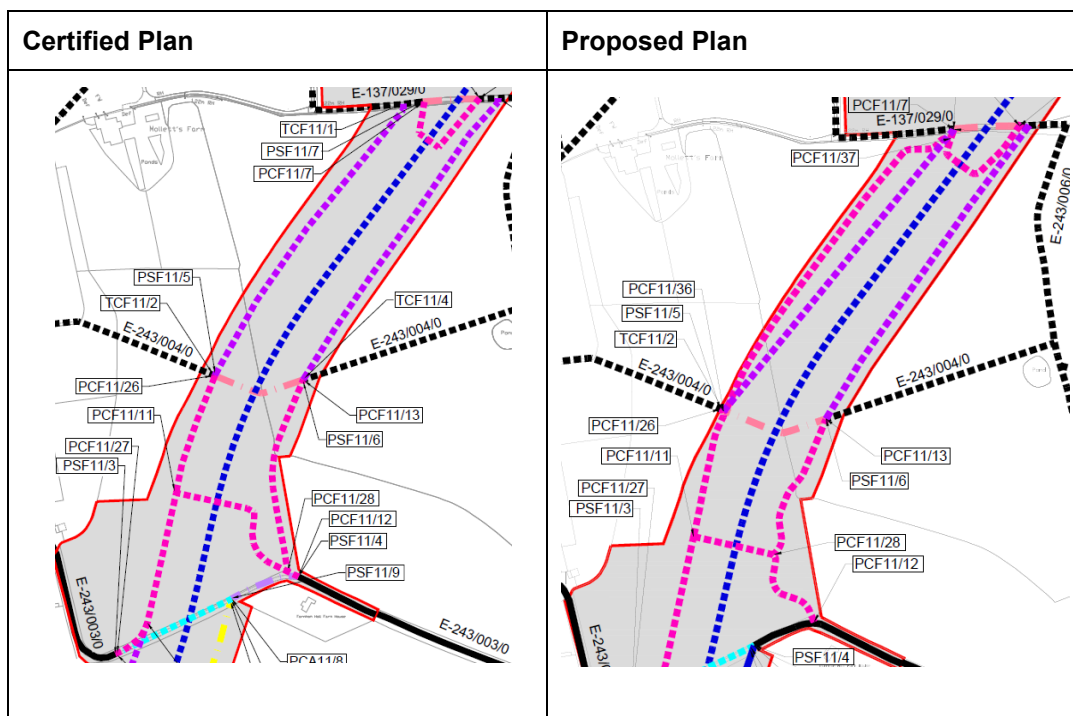


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At the detailed design stage, Sizewell C agreed with Suffolk County Council that an additional PRoW would be provided alongside the carriageway to enhance pedestrian connections. Therefore, a further public right of way on the northern side of carriageway is proposed which would commence with point PCF11/34. This alignment of this public right of way continues on Sheet 18 up to point PCF11/35.

The status of the beige track shown with point PCA11/7 and the yellow track on the certified plan as 'NEW PERMANENT PRIVATE MEANS OF ACCESS' and 'NEW PERMANENT PRIVATE MEANS OF ACCESS' respectively, are both changed to 'NEW PERMANENT HIGHWAY (FOOTPATH) AND PRIVATE MEANS OF ACCESS'. The status of this PRoW has changed following agreement between Sizewell C and Suffolk County that a permanent PRoW would be provided in this location in order to enhance pedestrian connections in this locality.

Table 2.3 Sheet 18 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100337)



The following changes are proposed in this location:

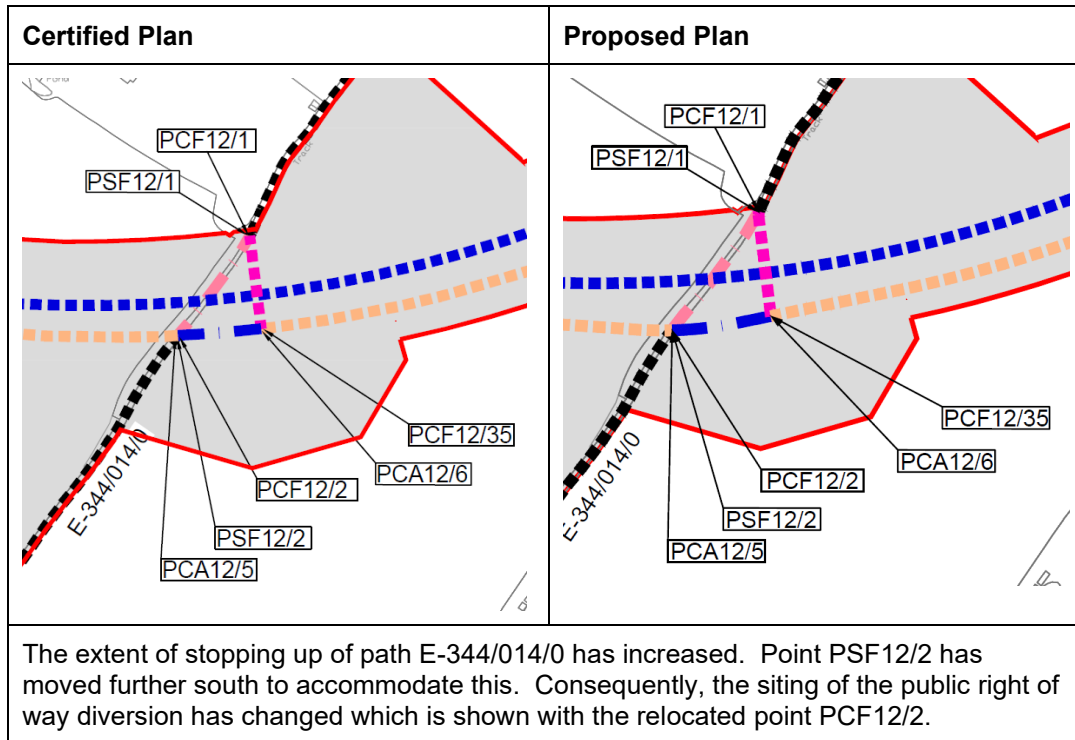
1. The certified drawing shows path E-243/003/0 being partially stopped up in lilac between points PSF11/4 to PSF11/9, however this PRoW will now be retained, so this stopping-up has been removed from the proposed plan.
2. The extent of the stopping up of path E-243/004/0 has been increased, so point PSF11/5 has moved to the west. Consequently, the siting of the commencement point PCF11/26 has also moved further to the west.
3. An additional public right of way is proposed on the western side of the carriageway between points PCF11/36 and PCF11/37. This additional PRoW is proposed following discussions between Sizewell C and Suffolk County Council at the detailed design stage for Two Village Bypass to provide additional pedestrian connections in the locality.

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2.3 Sizewell Link Road

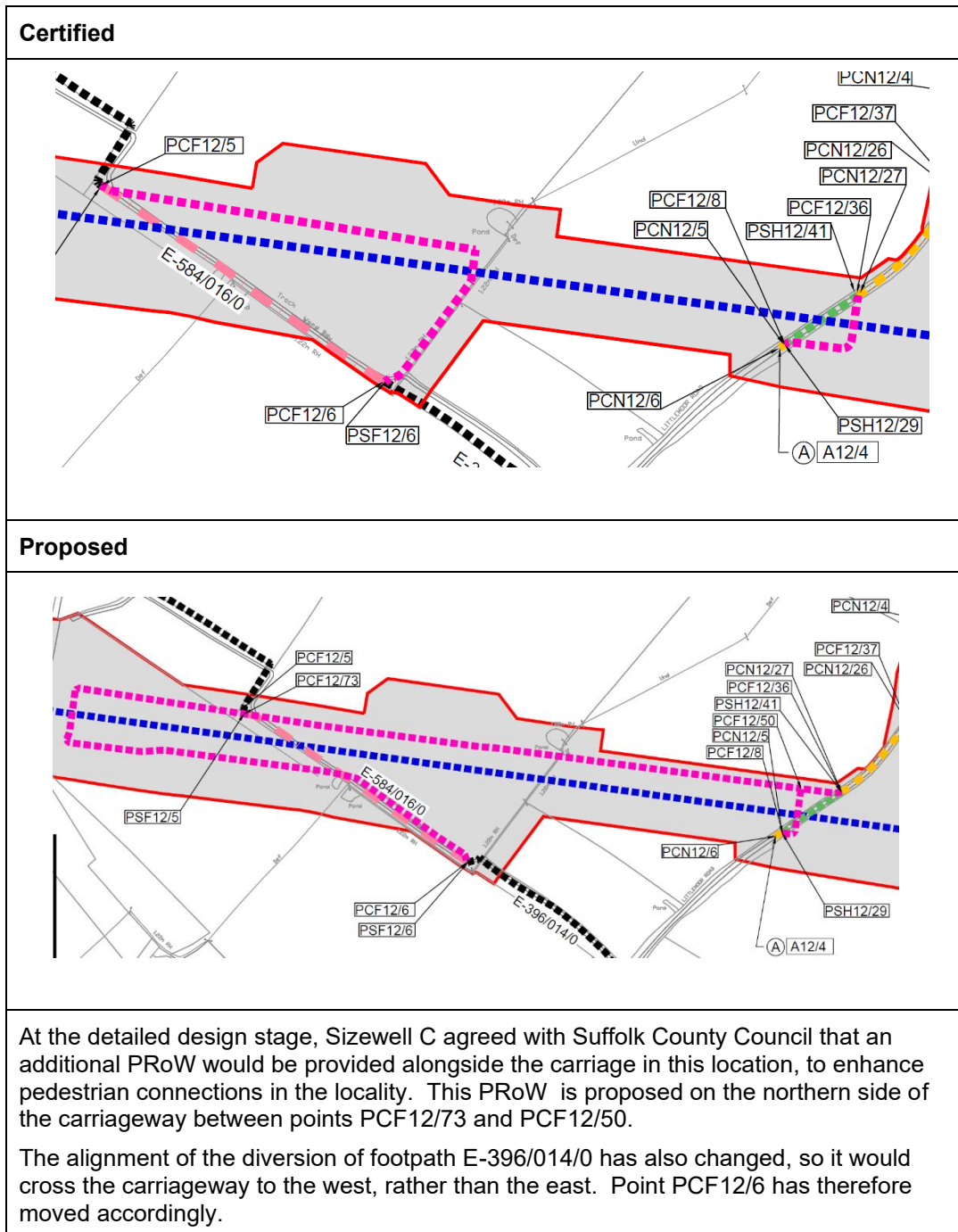
2.3.1 The Order approved a new 6.8km road to connect the A12 with the main Sizewell C development site. The Order approved the stopping-up and diversion of several public rights of way to accommodate this road scheme. Minor amendments to these public rights of way, plus additional public rights of way, are now proposed. These amendments are described below.

Table 2.4 Sheet 19 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100338)



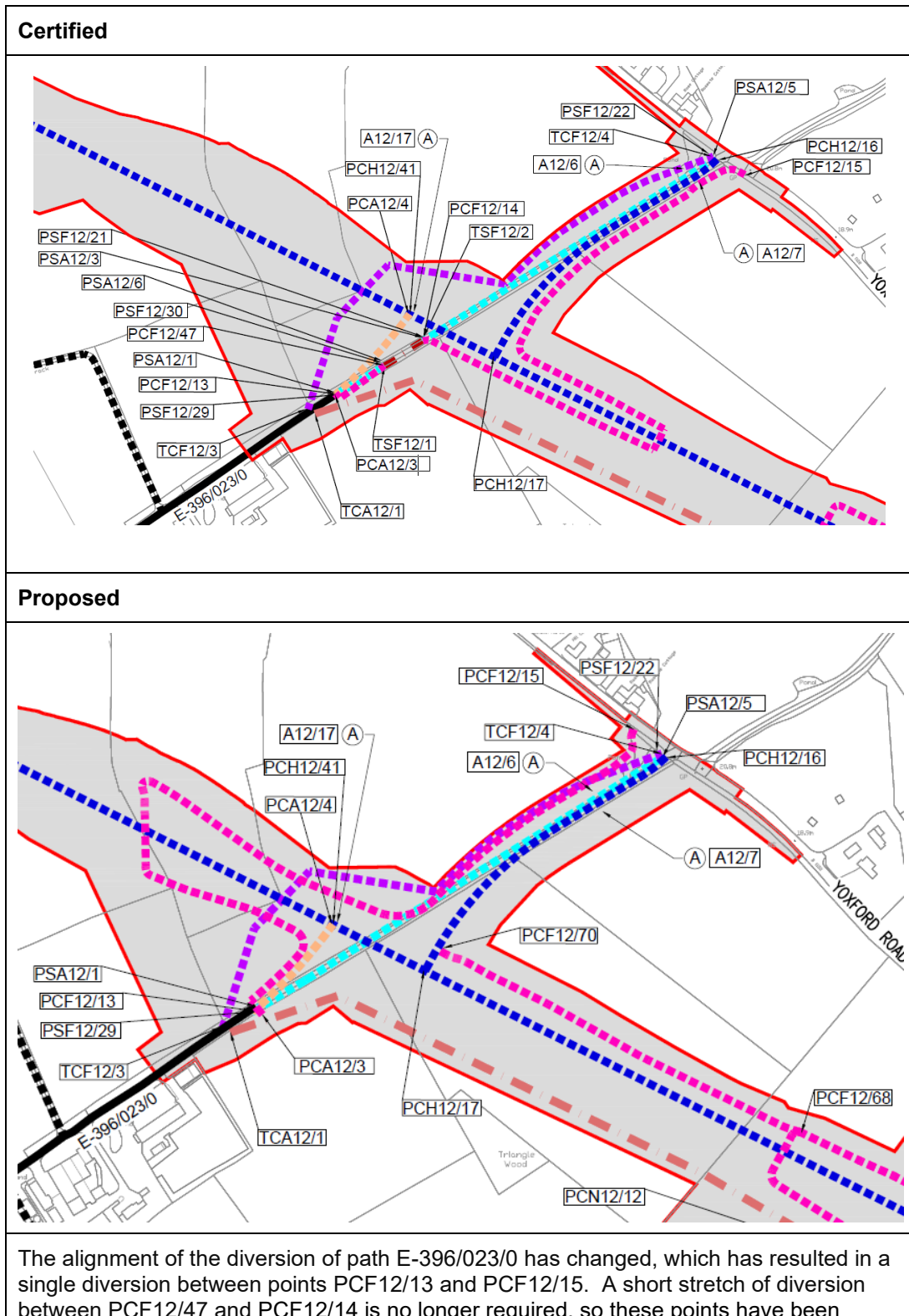
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Table 2.5 Sheet 20 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100339)



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Table 2.6 Sheet 21 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100340)

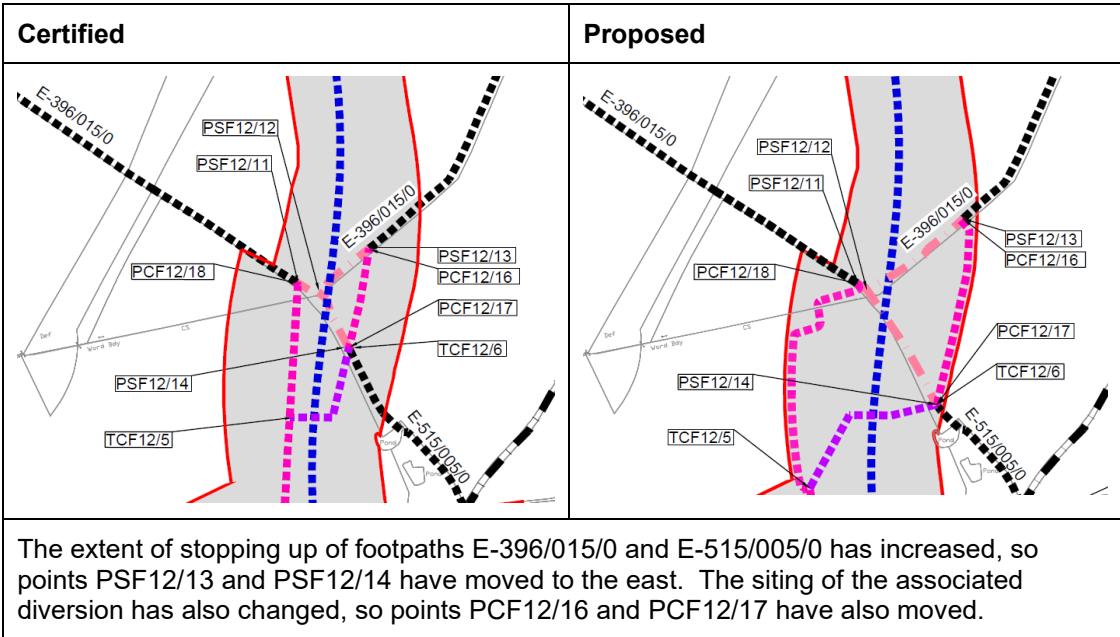


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deleted. TSF12/1 to TSF12/2, and points PSA12/6 and PSA12/3 have also been deleted for this reason.

The location of PCF12/15 has also changed, as the public right of way diversion is now proposed to be located on the opposite side of the carriageway.

At the detailed design stage, Sizewell C agreed with Suffolk County Council that a further PRow would also be provided to the northside of the carriageway in this location to enhance pedestrian connections. This is shown between points PCF12/70 and PCF12/68.



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Table 2.7 Sheet 22 of 28 (Drawing SZC-SZ0204-XX-000-DRW-100341)

