



Our ref: SZC NMC

Your ref: EN010012

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FAO: The Rt Hon Ed Miliband MP, Secretary of State for Energy Security and Net Zero

Response of East Suffolk Council to the consultation received on 12 May 2026 in relation to an application to make a non-material change to The Sizewell C (Nuclear Generating Station) Order 2022 (S.I. 2022/853)

East Suffolk Council ('ESC') welcomes the opportunity to comment on this consultation received from Sizewell C Limited ('the Applicant') on 12 May 2026 in relation to its application to the Secretary of State for Energy Security and Net Zero ('SoS') for a non-material change ('NMC') to The Sizewell C (Nuclear Generating Station) Order 2022 (S.I. 2022/853) ('the Order'), pursuant to section 153 and paragraph 2 of Schedule 6 to the Planning Act 2008 ('the 2008 Act') and Regulation 4 of The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 ('the 2011 Regulations').

ESC has reviewed the submitted application documents and has set out its detailed technical comments, including its views with respect to the materiality of each of the eight proposed changes, in the attached Appendix A, and a summary is provided in Appendix B.

ESC first makes overarching comments, focusing in particular on Change 1 (Use of Part of the Land East of Eastlands Industrial Estate ('LEEIE') as an Integrated Reinforcement Yard) and Change 2 (Simultaneous Use of Rail Facilities at the LEEIE and Temporary Construction Area ('TCA')). These Changes are understood as the primary changes driving the application submission, and the other Changes can broadly be categorised as those ensuring clarity and effectiveness in the operation of the Order, reflecting practical construction stage learning, and procedural amendments.

ESC understands that these changes are being pursued to support the safe, efficient and timely delivery of Sizewell C and provide construction programme resilience. ESC recognises the benefits that the Applicant states will arise out of Changes 1 and 2, namely a reduction in heavy goods vehicle movements, and improved construction programme resilience, and appreciates the Applicant's case that authorising the proposed changes would facilitate timely delivery of this project of national significance.

As stated in the submission, the Applicant considers that none of the proposed changes require

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additional compulsory acquisition of land, 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'), or require a new or updated Environmental Statement or Habitats Regulations Assessment. As such, the Applicant concludes that the proposed changes will not have a sufficient impact on local people or businesses so as to render them material.

However, the decision required to be made by the SoS is not one to be reached through an assessment of planning balance. Instead, if any aspect of the application is considered to constitute a material change to the Order, the application (or at least that aspect of it) cannot be approved as a non-material change. Any application for a change, material or non-material, must be considered fully and carefully. Accordingly, whilst ESC acknowledges the benefits of the proposed changes to the programme and project, its comments are necessarily focused on the materiality of each of the eight changes.

ESC is not currently satisfied, based on the information provided within the application, that Change 1 (Use of Part of the LEEIE as an Integrated Reinforcement Yard) and Change 2 (Simultaneous Use of Rail Facilities at the LEEIE and TCA) are non-material in nature. ESC has concerns regarding the potential for Changes 1 and 2 to introduce new or materially different likely significant environmental effects compared with those set out in the ES (as amended), or have a sufficiently large impact on local people, specifically in relation to noise and vibration impacts. Further detail of ESC's position on each of the eight proposed changes is provided in Appendix A to this letter. A summary of ESC's position on each change is set out in Appendix B.

As such, for Changes 1 and 2, ESC cannot agree with the Applicant's conclusion that 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.

ESC has engaged with the Applicant during pre-application on all the proposed changes and has made clear its concerns about Changes 1 and 2 in particular. For Changes 1 and 2, ESC cannot therefore rule out the necessity of a change to the Order that requires an updated Environment Statement to take account of new, or materially different, likely significant effects on the environment. ESC also cannot rule out Changes 1 and 2 having a significant impact on residents when having regard to the potential impact of the proposed changes on local people.

ESC is also aware of significant concerns in the community about the materiality of Changes 1 and 2 and the potential for new significant effects and impacts on local people. In particular, concerns have been raised regarding the noise impacts of Changes 1 and 2 on receptors close to the LEEIE and along the Saxmundham to Leiston branch line.

ESC remains committed to working constructively and collaboratively with the Applicant, Planning Inspectorate, and all other relevant stakeholders to progress these concerns.

Yours sincerely,

A large black rectangular box redacting the signature of the Head of Energy Planning and Coastal Management.

Head of Energy Planning and Coastal Management
East Suffolk Council

Appendix A – Detailed comments

Introduction

Under the 2008 Act, changes to a Development Consent Order ('DCO') may be material or non-material. The process for considering material changes is different to the process for considering non-material changes. In summary, material changes require greater prior publicity and consultation and consideration following submission. Non-material changes are subject to a simplified and expedited process. The Applicant has applied on the basis that the changes requested are non-material.

ESC is aware of government intention to streamline the change process under provisions stemming from the Planning and Infrastructure Act 2025 by removing the distinction between material and non-material changes, and ESC has considered the application on its current basis in legislation.

There is no statutory definition of what constitutes a 'material' or 'non-material' amendment for the purposes of Schedule 6 to the 2008 Act and Part 1 of the 2011 Regulations. It is accepted that it is not possible to set out precise, comprehensive, or exhaustive guidance on whether a change is material or non-material.

To assist in determining whether a proposed change is material or non-material, guidance has been produced by the Department for Communities and Local Government (now the Ministry of Housing, Communities and Local Government), entitled the "Planning Act 2008: Guidance on Changes to Development Consent Orders" (December 2015) ('the Guidance').¹ The Guidance states that, given the range of infrastructure projects that are consented through the 2008 Act, and the variety of changes that could possibly be proposed for a single project, the Guidance cannot, and does not attempt to, prescribe whether any particular types of change would be material or non-material.

Paragraphs 9-16 of the Guidance provide a starting point for assessing the materiality of a proposed change. Four example characteristics of a proposed change that indicate it is more likely to be treated as material are provided in the Guidance, namely:

- a) it would require an updated Environmental Statement to reflect new or materially different likely significant environmental effects;
- b) it would invoke a need for a Habitats Regulations Assessment or a new/additional licence in respect of European Protected Species;
- c) additional compulsory acquisition powers, or additional interests in or rights over land, are sought; or
- d) there is a sufficiently large impact on local people and businesses.

On a), consideration must be given to whether the proposed changes would give rise to any environmental effects that: i) are new significant effects not identified in the ES for the consented project; or ii) are materially different effects when compared with the environmental effects set out in the ES for the project.

On d) there is no further guidance on what would constitute a sufficiently large impact. ESC has reviewed other applications and decisions and understands that additional impacts that may be relevant to whether a particular change is material will be dependent on the circumstances of a

¹ Department for Communities and Local Government (2015) 'Planning Act 2008: Guidance on Changes to Development Consent Orders'. Available at: https://assets.publishing.service.gov.uk/media/5a8037b4ed915d74e33f9248/Making_changes_guidance_to_Development_Consent_Orders.pdf.

particular case, but examples might include those relating to visual amenity from changes to the size or height of buildings; impacts on the natural or historic environment; and impacts arising from additional traffic. Further, consideration should be given to whether the potential impacts on local people and businesses are greater than those that arise from the Development permitted by the original Order.

It is considered likely that if d) is met, a) would also likely be met.

ESC appreciates from precedent that while the above listed characteristics indicate that a change to a consent is more likely to be treated as a material change, these only form a starting point for assessing the materiality of a change. The above matters are capable of being good indicators of the position on materiality, but each case must depend on thorough consideration of its own circumstances in its individual context.

ESC acknowledges that no additional compulsory acquisition powers or additional interests in or rights over land are sought. With regards to the need for a Habitats Regulations Assessment or a new/additional licence in respect of European Protected Species, ESC defers detailed comments to Natural England and the Environment Agency.

ESC maintains concern regarding the materiality of Changes 1 and 2 and considers that these changes have the potential to introduce new or materially different likely significant environmental effects. ESC also considers it possible for the proposed changes to have a sufficiently large impact on local people and businesses such that the proposals may constitute material changes on the basis of the information provided.

Further detail of ESC's position on each of the eight changes is provided in the subsequent sections of this Appendix A.

ESC also notes that Paragraph 11 of the Guidance states that *'Applicants are strongly advised to discuss with the Planning Inspectorate whether a proposed application for a change to a Development Consent Order is a material change before they undertake any of the procedural requirements set out in the 2011 Regulations'*. ESC is not aware of whether such engagement took place.

Change 1: Use of Part of the Land East of Eastlands Industrial Estate (LEEIE) as an Integrated Reinforcement Yard

Summary of proposals

Under Requirement 13 in Schedule 2 of the Order, construction works carried out as part of the authorised development must be carried out in accordance with the Construction Method Statement ('CMS') and the Main Development Site Construction Parameter Plans ('CPPs'), unless otherwise approved by East Suffolk Council.

ESC received an application from the Applicant (ESC reference DC/25/4267/DRR42) on 3 November 2025 which sought partial discharge of Requirement 13 (Main development site: Temporary construction-related development) of the Order in relation to construction works on the LEEIE that were not in accordance with the approved CMS (Revision 2.0) (approved by ESC via application reference DC/25/1345/DRR42) and the DCO-approved CPPs (Revision 6.0). This application therefore sought approval of a revised CMS and revised CPPs to allow the LEEIE to be used as an Integrated Reinforcement Yard and a Marine Tunnelling Segment Storage Yard.

The application was withdrawn by the Applicant on 16 December 2025, to allow the Applicant further consideration of the proposal and considering making design refinements.

Change 1 of this non-material change application seeks approval of amendments to the Construction Method Statement and Main Development Site Construction Parameter Plans to allow part of the LEEIE to be used as an Integrated Reinforcement Yard whilst remaining in compliance with Requirement 13 of the Order. The Integrated Reinforcement Yard would cut, bend and assemble steel reinforcement meshes and cages for the construction of the power station, and would be removed prior to Sizewell C becoming operational.

A Marine Tunnel Segment Storage Yard in Zone C14 of the LEEIE is also proposed, but does not form part of this NMC application as it falls within the scope of the approved development. Nevertheless, the potential combined effects of using the Marine Tunnel Segment Storage Yard with the Integrated Reinforcement Yard and operation of the LEEIE railhead are considered in the submitted 'Non-Material Change 1: Environmental Compliance Report'.

Change 1 seeks approval of:

- a revised CMS to reflect the proposed use of part of the LEEIE as an Integrated Reinforcement Yard, rather than the previously proposed caravan park, and to provide other minor amendments/corrections;
- revised CPPs to amend Construction Zones C13 and C14 and their exceptional height parameters in order to facilitate use of this part of the LEEIE as an Integrated Reinforcement Yard; and
- the addition of a new sub-paragraph (II) to Work No. 1A in Part 1 of Schedule 1 of the Order, such that the proposed Integrated Reinforcement Yard is expressly referenced on the face of the Order.

There have been some changes to the Integrated Reinforcement Yard proposals compared to the details that were submitted with application DC/25/4267/DRR42. These changes include, but are not limited to:

- the division of the Steel Cut and Bend Facility into three internal acoustic zones (west / central / east), with internal industrial curtain partitions;

- the removal of rooflights from the Steel Cut and Bend Facility to allow for improved roof sound insulation; and
- the relocation of external rebar assembly activities to the TCA, with only storage and circulation space provided externally on the LEEIE for the materials created.

The Change 1 proposals remain generally consistent with those submitted for the LEEIE Integrated Reinforcement Yard element of the discharge of Requirement 13 application (ESC reference DC/25/4267/DRR42) that was withdrawn by the Applicant in December 2025.

Summary of ESC's position

In preparing its comments on Change 1, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Document 10.3 Non-Material Change 1: Construction Method Statement (Revision 3.0) (Clean and Tracked Change versions)
- Document 2.5: Main Development Site Construction Parameter Plans – Plan For Approval (Revision 7.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC is not satisfied, based on the information provided within the application, that Change 1 and the proposed use of part of the LEEIE as an Integrated Reinforcement Yard would not result in new or materially different likely significant effects, compared with those set out in the ES (as amended), specifically in relation to noise impacts.

ESC is also concerned that the proposed Integrated Reinforcement Yard could have a sufficiently large impact on local people such that the change may be considered material. ESC is aware of such concerns in the local community, and the case has been made to ESC that Change 1 should be considered a material change and not be approved under this NMC application. While ESC is not aware of any particular guidance on assessing whether the proposed changes would have a sufficiently large impact on local people and businesses, on the basis of the information submitted in this NMC application, ESC shares these concerns and cannot rule out this test of materiality being met.

Detailed technical comments

The submitted Non-Material Change 1: Environmental Compliance Report uses the following terms, and ESC will therefore use the same terminology in this consultation response:

- “Revised Construction Use”: the Integrated Reinforcement Yard, Marine Tunnel Segment Storage Yard and extended use of the LEEIE railhead;
- “Revised Construction Works”: construction of the Integrated Reinforcement Yard and Marine Tunnel Segment Storage Yard;
- “Revised Construction Activity”: operation of the Revised Construction Use during the construction period of the Sizewell C project; and

- “Previously Anticipated Construction Use”: uses described for Zones C13 and C14 within the unamended Construction Method Statement.

Of the environmental topics that were included within the ES, the Applicant has screened the following topics out from further assessment for Change 1, with justification provided in Section 4.3 of the submitted Non-Material Change 1: Environmental Compliance Report:

- Soils and Agriculture (as the Applicant considers there to be no potential for new or materially different likely significant effects because no new areas of land take would be introduced, and no other assumptions made within the ES would change);
- Geology and Land Quality (as the Applicant does not anticipate any new or materially different likely significant effects because there would be no effect on the general site activities including soil stripping, the creation of level ground, stockpiles and bunds, the construction of hard standing and foundations, and the storage of materials that were included and assessed in the ES);
- Groundwater and Surface Water (as the Applicant considers that Change 1 would not change the conceptual site model (Volume 2, Appendix 18B of the ES) and thus no new or materially different likely significant effects on groundwater and surface water are anticipated. The Applicant also states that Change 1 would not change the conclusions of the ES (as amended) with regards to flood risk, noting that this is mitigated through the Drainage Strategy to be submitted for approval by ESC pursuant to Requirement 5 of the Order);
- Radiological Considerations (as the Applicant considers that Change 1 would not change any assumptions associated with activities involving the handling of radioactive materials); and
- Climate Change (as the Applicant considers that there is no potential for Change 1 to change the conclusion of the In-combination Climate Change Impact Assessment and the Climate Change Risk Assessment, noting that flood risk is mitigated through the Drainage Strategy).

ESC is satisfied that Change 1 would not introduce any new or materially different likely significant effects in relation to the environmental topics listed above. All other environmental topics were ‘screened in’, with further assessment undertaken within Section 4.4 and Appendix A of the Environmental Compliance Report.

Conventional Waste and Material Resources

Section 2 of Appendix A to the Environmental Compliance Report provides an assessment of the effects of the Revised Construction Works and Revised Construction Activity on conventional waste and material resources.

Table 2-1 of Appendix A indicates that the Revised Construction Works and Revised Construction Activity would lead to an increase in the use of concrete, bitumen, steel and gravel during the construction of Sizewell C. The Applicant concludes at Paragraph 2.2.2 that these increases do not equate to a change in the significance level for any of the materials. ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant environmental effects on material resources compared to those reported in the ES (as amended).

Table 2-2 of Appendix A indicates that the Revised Construction Works and Revised Construction Activity would lead to an increase in both the non-hazardous and hazardous waste arisings from the construction of Sizewell C. The Applicant states at Paragraph 2.2.3 that these increases are not large enough to lead to a change in the significance level for waste generation. ESC is satisfied that the

Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant environmental effects on waste generation compared to those reported in the ES (as amended).

Paragraph 2.2.4 of Appendix A states that during removal and reinstatement, the majority of the materials used for the Revised Construction Use would be recovered and diverted from landfill, and since the materials used would be predominantly readily recyclable, the national average recovery rate for non-hazardous construction and demolition waste would be met, as required by the Code of Construction Practice.

In conclusion, ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant effects on conventional waste and material resources to those described in the ES (as amended).

Socio-economics

Section 3 of Appendix A to the Environmental Compliance Report provides an assessment of the effects of the Revised Construction Works and Revised Construction Activity on socio-economics.

Paragraph 3.2.1 of Appendix A notes that the baseline position for the receptors identified has changed since submission of the ES, with an increase in construction jobs, a growth in population, and an increase in Private Rented Sector homes. The original baseline described within the ES (as amended) has been used for the assessment in order to provide a worst-case assumption.

Table 3-1 of Appendix A indicates that it is anticipated that the Revised Construction Works and Revised Construction Activity would result in a 2.12% increase in the Year 3 workforce, a 1.56% increase in the Year 4 workforce, and a 1.28% increase in peak workforce, when compared to the estimated construction workforce considered in the ES (as amended). The Applicant considers these increases to be relatively small, that there would therefore be no change to the significance level of labour market effects, and that the conclusions of the ES (as amended) remain valid. ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant labour market effects compared to those reported in the ES (as amended).

Paragraph 3.2.3 states that the Revised Construction Activity would include fixed, longer-term positions for skilled construction operatives and around eight roles for professional and management workers. The Applicant anticipates that these roles would be likely to be predominantly filled by home-based workers, meaning they would not contribute to accommodation or community facility / public service demands. Table 3-2 indicates that there is estimated to be a 3.05% increase in the number of non-home-based workers in Year 3, a 2.15% increase in Year 4, and no change in the number of peak non-home-based workers. The Applicant states at Paragraph 3.2.5 that the Revised Construction Works and Revised Construction Activity are not anticipated to materially alter assumptions relating to recreational displacement. The Applicant therefore concludes at Paragraph 3.2.6 that there would be no change in the significance of effect on accommodation, community facilities, or public services as a result of the Revised Construction Works or Revised Construction Activity, when compared to those reported in the ES (as amended). ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant effects on accommodation, community facilities, or public services compared to those reported in the ES (as amended).

In conclusion, ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant socio-economic effects to those reported in the ES (as amended).

Air Quality

Section 4 of Appendix A to the submitted Environmental Compliance Report provides an assessment of the effects of the Revised Construction Works and Revised Construction Activity on air quality.

Revised Construction Works

Paragraph 4.2.4 of Appendix A states that earthworks have already been completed within the LEEIE and therefore no further effects of dust from soil movement are anticipated when considering the Revised Construction Works. The Applicant states that the construction of hard standing and the construction and ultimate removal of the temporary facilities, storage areas and hardstanding could generate dust. The measures included in the Dust Monitoring and Management Plan are considered by the Applicant to be appropriate to control the impact of dust at all sensitive receptors and it is therefore concluded that there would be no change to the conclusions of the ES (as amended) with respect to emissions to air.

ESC is satisfied that the Revised Construction Works would not give rise to any new or materially different likely significant air quality effects with respect to emissions to air compared to those reported in the ES (as amended).

Paragraph 4.2.7 of Appendix A states that during the Revised Construction Works, the total volume of road traffic movements would be lower than considered in the ES, and so the potential air quality impacts at receptors on the A12 and B1122 corridors would be no greater than reported in the ES. Paragraph 4.2.5 of Appendix A states that although there are likely to be changes to the two-way 24-hour annual average daily total flows of both light duty vehicles (LDVs) and heavy duty vehicles (HDVs) on Lover's Lane and King George's Avenue, compared to the values used in the ES, the scale of vehicle movements is considered by the Applicant to be so small that the impact of emissions is still likely to be negligible to low at the residential properties on these two roads. This is not considered by the Applicant to represent a material change to the conclusion of the ES with respect to air quality.

Provided that Suffolk County Council ('SCC'), as the Local Highway Authority, raise no objections to the revised traffic figures, ESC is satisfied that the conclusions drawn regarding the impact on air quality are reasonable and that the changes in road traffic movements as a result of the Revised Construction Works would not give rise to any new or materially different likely significant air quality effects compared to those reported in the ES (as amended).

Revised Construction Activity

Paragraph 4.2.6 of Appendix A states that activities during the Revised Construction Activity include cutting and welding that would emit particulate matter to air, but the Applicant states that emissions would be suitably distant from nearby receptors and would not be capable of changing the concentrations of particulate matter experienced at any receptor location. It is therefore stated by the Applicant that there would be no change to the conclusions of the ES (as amended) with respect to air quality. ESC is satisfied that the Revised Construction Activity would not give rise to any new or materially different likely significant air quality effects compared to those reported in the ES (as amended).

Paragraph 4.2.7 of Appendix A states that during the Revised Construction Activity, the total volume of road traffic movements would be lower than considered in the ES, and so the potential air quality impacts at receptors on the A12 and B1122 corridors would be no greater than reported in the ES. Paragraph 4.2.8 states that although there are likely to be changes to the two-way 24-hour annual average daily total flows of both LDVs and HDVs on Lover's Lane and King George's Avenue, compared to the values used in the ES, the scale of vehicle movements is considered by the Applicant to be so small that the impact of emissions is still likely to be negligible at the residential properties on these two roads. This is not considered by the Applicant to represent a material change to the conclusion of the ES with respect to air quality.

Provided that SCC, as the Local Highway Authority, raise no objections to the revised traffic figures, ESC is satisfied that the conclusions drawn regarding the impact on air quality are reasonable and that the changes in road traffic movements as a result of the Revised Construction Activity would not give rise to any new or materially different likely significant air quality effects compared to those reported in the ES (as amended).

In conclusion, ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant air quality effects to those reported in the ES (as amended).

Terrestrial Ecology and Ornithology

Section 5 of Appendix A to the submitted Environmental Compliance Report provides an assessment of the effects of the Revised Construction Use on Terrestrial Ecology and Ornithology. Appendix B reports the findings of the Applicant's review of whether or not Change 1 would alter the conclusions of the Shadow Habitats Regulations Assessment (as amended).

Designated Sites

Table 5-1 of Appendix A provides a review of the impact pathways for designated sites considered within the ES (as amended), in the context of the Revised Construction Use. All impact pathways to designated sites for the Revised Construction Use have been screened out, and the Applicant has concluded that the Revised Construction Use would not introduce any new or materially different likely significant effects on designated sites compared to the ES (as amended). ESC is satisfied with this conclusion.

Ornithology

Paragraph 5.2.4 of Appendix A states that the LEEIE is remote from areas of importance to waterbirds and it is considered by the Applicant that the conclusion of the ES (as amended) on the associated ornithological interest features of designated sites would remain unchanged. ESC is satisfied that the Revised Construction Use would not give rise to any new or materially different likely significant effects on ornithology compared to those reported in the ES (as amended).

Bats

The Applicant states at Paragraph 5.2.5 of Appendix A that the LEEIE was not considered at DCO stage to be an important location for foraging, commuting and roosting bats. Paragraph 5.2.6 states that the Revised Construction Use would comply with the controls in the Lighting Management Plan, and the specific lighting controls required within the Sizewell C Main Development Site Bat Licence, ensuring that light spill onto boundary features would be minimised. The Applicant has also concluded, at Paragraph 5.2.7 of Appendix A, that the Revised Construction Use would not result in potential noise levels exceeding 60 dB at roost locations, or 65 dB in key foraging and commuting

routes. The Applicant therefore concludes that the Revised Construction Use would not influence the modelling undertaken within the ES (as amended) for the important locations for foraging, commuting and roosting bats within and adjacent to the Main Development Site.

ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant effects on bats compared to those reported in the ES (as amended).

Shadow Habitats Regulations Assessment (SHRA)

Table 2-1 of Appendix B provides a review of the relevance of each of the effect pathways considered in the Shadow Habitats Regulations Assessment to Change 1, in order to determine which effect pathways require further consideration. The Applicant considers that only the 'disturbance effects on species populations' effect pathway requires further consideration, and has screened out all other effect pathways.

The 'disturbance effects on species populations' effect pathway is further considered in Section 2.2 of Appendix B. The Applicant concludes that as there are no European sites or functionally linked land within 300m of the LEEIE, the conclusions of the SHRA (as amended) in relation to visual disturbance would remain unchanged. Paragraph 2.2.7 of Appendix B states that Change 1 would comply with controls in the Lighting Management Plan to ensure minimal light spillage at the site's boundaries. As a result, and noting that the closest European sites or functionally linked land are over 500m from the LEEIE, the Applicant concludes that the conclusions in the SHRA (as amended) in relation to artificial lighting would remain unchanged. With regards to noise disturbance, the Applicant states at Paragraph 2.2.8 of Appendix B that there is no potential for changes to the effects described in the SHRA (as amended) due to the localised nature of the changes in the noise environment as a result of Change 1.

ESC is satisfied that Change 1 would not alter the conclusions of the SHRA (as amended). However, ESC notes, as a point of clarification, that the Habitats Regulations Assessment for the Pontins Caravan site extension (ESC application reference DC/25/3078/FUL) has not yet concluded that the proposal will not result in adverse effects on the integrity of any European designated site. This is still a matter of ongoing discussion between the Applicant and ESC as the competent authority, and so the Applicant's assertion in Paragraph 1.1.7 of Appendix B to the Non-Material Change 1: Environmental Compliance Report that '*there would be no adverse effects on integrity of any site*' during the temporary use of the Pontins Caravan site for Sizewell C workers is yet to be confirmed.

Overall, the Applicant concludes at Paragraph 5.3.1 of Appendix A that the Revised Construction Use would not give rise to any new or materially different likely significant terrestrial ecology and ornithology effects to those reported in the ES (as amended). ESC is satisfied with this conclusion.

Amenity and Recreation

Section 6 of Appendix A to the submitted Environmental Compliance Report provides an assessment of the effects of the Revised Construction Works and Revised Construction Activity on amenity and recreation.

Based on the comparison of workforce numbers discussed in the 'Socio-economics' section above and in Section 3.2 of Appendix A, the Applicant concludes that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant effects caused by increases in numbers of people using recreational resources, when compared to those reported in the ES (as amended).

Paragraph 6.2.4 of Appendix A states that, given their location, Receptor Groups 15 (Sizewell Belts), 16 (North of Leiston), 17 (Leiston), and 19 (Aldringham Common and the Walks), and Suffolk Coast Path and Sandlings Walk are relevant to the context of the LEEIE. The Applicant has concluded in Paragraph 6.2.5 of Appendix A that the Revised Construction Use would result in no additional physical changes to amenity and recreation resources to those assessed in the ES (as amended). The Applicant goes on to state that there would be small changes in vehicle numbers, but that this would not influence the findings of the ES (as amended) with respect to amenity and recreation. Section 11 of Appendix A concludes, based on the Noise and Vibration Assessment in Annex B, that the Revised Construction Use would not generate any new or materially different likely significant noise and vibration effects on receptors using rights of way and other recreational assets. As discussed in the 'Air quality' section above, Section 4 of Appendix A concludes that the Revised Construction Use would not change the conclusions of the air quality assessment presented in the ES (as amended). As reported in Section 12 of Appendix A and Annex C (Landscape and Visual Appraisal), the Applicant does not expect the Revised Construction Use to introduce new or materially different likely significant visual effects on visual receptors using rights of way and other recreational assets, nor would it introduce new or materially different likely significant effects in relation to receptors visiting the Dark Sky Discovery Site at Westleton Common. As discussed in the 'Socio-economics' section above, Section 3 of Appendix A concludes that the Revised Construction Use would not result in any new or materially different likely significant effects in relation to recreational displacement or recreational pressure.

Overall, the Applicant concludes that the Revised Construction Use would not result in any new or materially different likely significant amenity and recreation effects compared to those reported in the ES (as amended).

ESC is satisfied that the Revised Construction Use would not give rise to any new or materially different likely significant amenity and recreation effects as a result of physical changes to amenity and recreation resources, changes in vehicle numbers, recreational displacement or recreational pressure, visual effects, or air quality effects, compared to those reported in the ES (as amended). ESC is also satisfied that no new or materially different likely significant effects in relation to receptors visiting the Dark Sky Discovery Site at Westleton Common would be introduced as a result of the Revised Construction Use.

However, as stated below in the 'Noise and Vibration' section of this report, ESC considers that the details given within the application have not demonstrated that the Revised Construction Use would not result in new or materially different likely significant noise and vibration effects, compared with those set out in the ES (as amended). Therefore, ESC is not satisfied that the submitted information demonstrates that there will be no new or materially different likely significant noise and vibration effects on receptors using rights of way and other recreational assets.

Terrestrial Historic Environment

Section 7 of Appendix A to the Environmental Compliance Report provides an assessment of the effects of the Revised Construction Works and Revised Construction Activity on the terrestrial historic environment.

Built Heritage

Table 7-1 of Appendix A provides a review of the assessments of relevant built heritage assets in light of the proposed Revised Construction Works and Revised Construction Activity. For Upper Abbey Farmhouse and the Barn 40m north of Upper Abbey Farmhouse, the group of assets at Leiston Abbey (comprising Leiston Abbey and moated site, and St Mary's Abbey), Retreat House,

Barn at Abbey Farm, the Guesten Hall at Abbey Farm, and The Watch House, the changes to the height parameters within the LEEIE are not considered by the Applicant to be of a sufficient scale to change the conclusions of the ES (as amended).

For the cottage 450m south west of Upper Abbey Farmhouse, the Applicant states in Table 7-1 that the changes to the height parameters within the LEEIE would not be apparent as the viewer approached or left the asset travelling south-east along the B1122 Abbey Road, nor on the immediate private access route, located off Abbey Road, and so there would be no change to the conclusions of the ES (as amended) in relation to this asset.

For Hill Farmhouse, the Applicant states that there may be occasional glimpses of construction associated with the Revised Construction Use as the viewer approaches the asset from the direction of Moat Lane due to the lack of planting at intervals along the road leading to the farmhouse. However, it is stated that its connection with the farm complex, and to other farm groups in the area, would not be impacted. The Applicant concludes that there would be no change to the conclusions of the ES (as amended).

With regards to the Leiston Conservation Area, the Applicant concludes that the changes to the height parameters within the LEEIE are not of a sufficient scale to affect the character, setting or relationships of the Conservation Area, or change the conclusions of the ES (as amended).

Therefore, the Applicant concludes at Paragraph 7.3.1 that the Revised Construction Use would not introduce any new or materially different likely significant effects on built heritage assets, compared to those reported in the ES (as amended). ESC is satisfied with this conclusion.

Buried Remains

Paragraph 7.2.4 of Appendix A states that earthworks and archaeological mitigation are complete across the LEEIE, so the effects described within the ES (as amended) have already been experienced. A new receptor was identified during archaeological mitigation, and the Applicant states at Paragraph 7.2.2 that it was agreed with SCC that this would be preserved in situ. Paragraph 7.2.4 goes on to state that given the depth of the surviving remains, they would be well below the extent of proposed ground-breaking, and any additional surface loading would not cause any material alteration to the water table that might impact the preservation of waterlogged remains. Therefore, the Applicant considers that any impact would be of very low magnitude on this low sensitivity receptor, resulting in a negligible (non-significant) effect which would have also occurred for the Previously Anticipated Construction Use. Therefore, the Applicant considers there to be no new or materially different likely significant effects on buried remains as a result of the Revised Construction Works or Revised Construction Activity.

ESC defers technical consideration of the Applicant's assessment of impacts on buried remains to SCC Archaeological Service as the relevant authority responsible for below ground heritage assets.

In conclusion, subject to SCC Archaeological Service raising no objections to the Applicant's conclusions on buried remains, ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not introduce any new or materially different likely significant effects on the terrestrial historic environment to those reported in the ES (as amended).

Climate Change

Section 8 of Appendix A to the Environmental Compliance Report provides an assessment of the effects of the Revised Construction Use on climate change.

Table 8-1 of Appendix A states that it is estimated that the Revised Construction Works and Revised Construction Use would cause a 0.48% increase in greenhouse gas emissions (reported as tonnes of carbon dioxide equivalent) compared to the forecast greenhouse gas emissions reported in the ES (as amended). Table 8-2 indicates that the emissions produced during the construction phase of Sizewell C, when taking into account the Revised Construction Use, are projected to account for less than 0.26% of the total emissions within any five-year UK carbon budget period in which they occur. Paragraph 8.2.3 of Appendix A states that the additional greenhouse gas emissions associated with the Revised Construction Use would have occurred elsewhere within the UK either as part of a consented and operational facility, or at a new facility. The Revised Construction Use is therefore considered by the Applicant to not give rise to new or materially different likely significant greenhouse gas emissions effects compared to those reported in the ES (as amended). ESC is satisfied with this conclusion.

Health and Wellbeing

Section 9 of Appendix A to the Environmental Compliance Report provides an assessment of the effects of the Revised Construction Use on health and wellbeing.

Paragraph 9.2.2 of Appendix A states that the previous sections of the Environmental Compliance Report have demonstrated that the Revised Construction Use would not change the conclusions of the ES (as amended) with regard to potential health and wellbeing pathways, including changes in emissions to air, additional transport movements, changes in noise exposure, the introduction of a non-home-based construction workforce (including social impacts and effects on healthcare capacity), socio-economic factors (such as direct, indirect and induced employment), and general stress and anxiety impacting upon quality of life and wellbeing. Therefore, the Applicant concludes that the Health and Wellbeing assessment presented in the ES (as amended) would remain unchanged and the Revised Construction Use would not result in new or materially different likely significant health and wellbeing effects to those reported in the ES (as amended).

ESC is satisfied that the Revised Construction Use would not give rise to any new or materially different likely significant health and wellbeing effects as a result of changes in emissions to air, the introduction of a non-home-based workforce, and socio-economic factors, compared to those reported in the ES (as amended). Subject to SCC as Local Highway Authority raising no concerns regarding the Applicant's transport assessment, ESC is also satisfied that the Revised Construction Use would not give rise to any new or materially different likely significant health and wellbeing effects as a result of additional transport movements.

However, as stated below in the 'Noise and Vibration' section of this report, ESC is concerned that the Revised Construction Use could result in new or materially different likely significant noise and vibration effects, compared with those set out in the ES (as amended). Therefore, ESC is not satisfied that the submitted information demonstrates that there will be no new or materially different likely significant health and wellbeing effects as a result of changes in noise exposure and the potential resulting stress and anxiety impacting upon quality of life and wellbeing.

Transport

Section 10 of Appendix A to the Environmental Compliance Report provides a summary of the findings of the Transport Appraisal in Annex A, which assesses the effects of the Revised Construction Works and Revised Construction Activity on transport, compared to those reported in the ES (as amended).

Section 4.2(a)(iv) of the Environmental Compliance Report states that the LEEIE area will be served by a dedicated rail line (Green Rail Route, or 'GRR') which was consented under the Order. Due to payload limitations on the local rail network and train length, it is stated by the Applicant that the estimated maximum amount of steel reinforcement that can be moved onto the site by a single train is 900T, equivalent to removing 35 HGVs off the road per train. If it is decided to deliver steel reinforcement by road, the Applicant states that bundles of steel reinforcement would be transported on 26-ton articulated trailers directly to the Steel Cut and Bend Facility and offloaded using an internal gantry crane. The Applicant goes on to state that setting up a dedicated Steel Cut and Bend Facility on site, rather than relying on the supply chain, would reduce the traffic volume in the area, even if stock steel is transported by road and not by rail, because it requires fewer vehicles to transport straight steel bars than those which have already been cut and bent.

Revised Construction Works

Paragraph 5.1.1 of Annex A (Transport Appraisal) states that the Revised Construction Works would be completed during the 'Early Years' of Sizewell C construction (defined for freight traffic as the construction period up until the Sizewell Link Road and Two Village Bypass are available for use). The Applicant has therefore carried out a comparison of the daily traffic flows between the original estimated flows in the ES (as amended) during the 'Early Years' and those of an updated scenario that includes the Revised Construction Works. Table 5-3 of the Transport Appraisal indicates a net reduction in daily traffic to/from the LEEIE of 440 two-way vehicle movements as a result of the removal of the caravan park. The Applicant has therefore concluded that the transport effects as a result of the Revised Construction Works would remain as reported in the ES (as amended).

Revised Construction Activity

Paragraph 5.2.1 of Annex A (Transport Appraisal) states that the Revised Construction Activity would be during the 'Peak Construction' of Sizewell C, once the Sizewell Link Road and Two Village Bypass are operational. The Applicant has therefore carried out a comparison of the daily traffic flows between the original estimated flows in the ES (as amended) during 'Peak Construction' and those of an updated scenario that includes the operation of the Revised Construction Use. Table 5-6 of the Transport Appraisal indicates a net reduction in daily traffic to/from the LEEIE of 86 two-way vehicle movements as a result of the removal of the caravan park. The table does, however, indicate that there would be an increase of 12 in the number of two-way bus movements from the wider network to/from the LEEIE, an increase of 66 in the number of two-way heavy goods vehicle (HGV) movements per day between the LEEIE and TCA using the Lover's Lane route, and an increase of 36 in the number of two-way Abnormal Indivisible Load (AIL) movements per day between the LEEIE and TCA using the Lover's Lane route.

Paragraphs 5.4.4 and 5.4.5 of Annex A (Transport Appraisal) notes that the Transport Review Group approved a variation to the Construction Traffic Management Plan (CTMP) in October 2025 to permit some HGV and AIL movements associated with the Revised Construction Activity between the LEEIE and TCA outside of the hours previously permitted in the CTMP.

Paragraph 5.6.4 of the Transport Appraisal states that the ES (as amended) identified two sensitive receptors on Lover's Lane between the LEEIE and TCA Secondary Access (Link 3 and Link 75, both classified as 'Medium' in terms of sensitivity to traffic flows). The only significant adverse effect on Lover's Lane reported in the ES (as amended) was for amenity as a result of the increase in HGVs. The Applicant concludes in Paragraph 5.6.5 that the increase in HGVs on Lover's Lane as a result of the Revised Construction Use would not change the conclusions of the ES (as amended).

In conclusion, the Applicant considers that the Revised Construction Use would not introduce any new or materially different likely significant transport effects to those described in the ES (as amended), and the residual effects would remain unchanged.

ESC defers technical consideration of the Applicant's Transport conclusions to SCC as the Local Highway Authority.

Noise and Vibration

Section 11 of Appendix A to the Environmental Compliance Report provides a summary of the findings of Annex B (Noise and Vibration Assessment), which assesses the noise and vibration effects of the Revised Construction Works and Revised Construction Activity and compares these to those reported in the ES (as amended).

Methodology – Revised Construction Works and Revised Construction Activity

The Applicant considers, as stated at Paragraph 3.2.1 of Annex B, that the guidance documents that informed the DCO remain valid for the Noise and Vibration Appraisal, namely:

- Parts 1 and 2 of British Standard 5228: 2009: A1: 2014 'Code of practice for noise and vibration control at open construction sites' ('BS 5228-1' and 'BS 5228-2', respectively);
- British Standard BS 6472-1: 2008 'Guide to evaluation of human exposure to vibration in buildings Part 1: Vibration sources other than blasting' ('BS 6472');
- British Standard BS 7385-2: 1993 'Evaluation and measurement for vibration in buildings – Part 2: Guide to damage levels from groundborne vibration' ('BS 7385');
- Design Manual for Roads and Bridges (DMRB) Document LA111 ('DMRB'); and
- 'Calculation of road traffic noise' ('CRTN').

Tables 3-1 and 3-2 of Annex B provide the noise and vibration assessment criteria, respectively, for the MDS, as set out in the MDS ES, and the duration criteria are set out in Paragraph 3.3.3. The assessment criteria for road traffic noise are provided in Table 3-3, and those for the magnitude of noise impact for new or altered railway lines are provided in Table 3-4.

The Revised Construction Works have been assessed using the same methods as were used when preparing the MDS ES. However, BS 5228-1 has been used for calculations of noise from the Revised Construction Works, rather than the ISO 9613 used in the ES. Section 6.1 justifies this, stating that ISO 9613 was used for construction noise calculations at the Main Development Site due to the large distances between the TCA and some receptors, but in this instance, the receptors considered are close to the LEEIE.

The Revised Construction Activity has been assessed using the calculation method set out in ISO 9613. Paragraph 6.2.3 of Annex B notes that the use of either electric or diesel shunters would depend on day-to-day works programmes and schedules, so calculations are based on either all electric or all diesel shunters, and the worst-case values used. Paragraph 1.2.2 of Annex B provides the Applicant's justification for using the same methodology as was used to assess the Previously Anticipated Construction Use of the LEEIE in the ES (as amended) (i.e. as a construction activity that forms part of a wider construction project), stating that it continues to form part of the wider Sizewell C construction site and has the sole purpose of supporting the construction of the power station.

ESC fundamentally disagrees that the Revised Construction Activity is a 'construction activity' and is therefore not satisfied with the Applicant's proposal to use the DCO Construction Noise and Vibration criteria to control noise and vibration, which are informed by BS5228. Whilst ESC

acknowledges that this approach may be appropriate for the Revised Construction Works, it is clearly evident that the operational site does not meet the definition of a construction site or an 'open site' as defined by BS5228. The changed use amounts to a distinct manufacturing or industrial facility with fixed plant, workshops, storage, and transport activity, meaning that BS4142 is clearly the correct and appropriate standard which should be applied. This point was raised during meetings with SZC and in writing prior to the submission of the application for discharge of Requirement 13 (ESC application reference DC/25/4267/DRR42), and then again prior to submission of this NMC application. However, this has clearly not been taken into consideration, nor even referenced, in any submissions as part of this NMC application, including the Environmental Compliance Report.

Whilst Note 2 of the BS5228 -1 scope accepts that *"...long term construction projects can, in most cases, be treated as open sites"*, ESC does not believe this to be applicable in this instance. The proposed changed use clearly represents a distinct manufacturing and industrial facility with storage and both road and rail transport. It is the view of ESC officers that the size, duration and complexity of Change 1 represents a scale that does not fall within the category of "most cases". As a consequence, this definition would not apply; this activity is not a "construction activity" and it should be assessed as a distinct facility to ensure that environmental impacts can be properly understood and adequately controlled. Conversely, the scope of BS4142 is defined to include sound of an industrial and/or commercial nature, including sound from industrial and manufacturing processes. ESC is strongly of the view that the Integrated Reinforcement Yard is a clear example of an industrial/manufacturing facility and therefore falls within the scope of BS4142, rather than BS5228.

The intention is for the operational site to be controlled by the Main Development Site Noise and Vibration Criteria of the DCO. Whilst the facility's location is within the DCO boundary, this does not automatically mean that the extant DCO controls apply, particularly where more appropriate assessment and controls exist and, in this case, are required. This is especially the case where the proposed use is such a distinct operation in terms of both its purpose and spatially in the area when the proposed use will be the dominant use of the LEEIE as opposed to being attached to the wider construction work of the Main Development Site.

While not wholly relevant in this scenario, it should be noted that if this change of use was submitted under the Town and Country Planning Act 1990, the use change would be from Class A to a B2/B8 use. This would require a full planning application to determine the impacts of the development. Additionally, if this was a standard planning application, ESC would expect a full and detailed submission from the Applicant including a detailed BS5228 for construction, BS4142 assessment for the operational phase, and calculations regarding road traffic noise and train noise.

Paragraph 3.9.11 of Annex B states that the materiality of changes to likely significant effects that were identified in the submitted environmental information is not defined or quantified in the DCO. The approach taken by the Applicant is explained in Section 3.9(b) of Annex B. The Applicant notes that the IEMA Guidelines for Environmental Noise Impact Assessment state that "a change of...3 dB is perceptible under most normal conditions", and that this is supported by Scottish and Welsh planning guidance, and the 1963 Wilson Report. Therefore, the Applicant has taken the approach that where there is a change in effect category, a previously identified likely significant effect will only be considered materially different if the level of impact changes by at least ± 3 dB. Where there is no change in effect category, the Applicant states at Paragraph 3.9.23 of Annex B that the materiality of the noise change is not tied to whether anyone could perceive that change, but to the underlying guidance on the significance of effects. The 'ABC' impact categories set out in BS 5228-1 for construction noise vary by 5 dB, and BS 5228-1 also contains 'the 5 dB(A) change' method of

quantifying construction noise effects, where changes in total noise of 5 dB(A) or more are deemed to be potentially significant. The Applicant has therefore taken the approach that where there is no change in effect category, a previously identified likely significant effect will only be considered materially different if the level of impact changes by ± 5 dB or more.

ESC disagrees with the Applicant's approach as it is not a recognised method of assessing such changes. Instead, a recognised approach to determine impact should have been used, the correct instrument for the assessment of impact being provided by BS4142.

In this context, it should be noted that the Secretary of State's decision in relation to the "West Midlands Interchange", which the Applicant cites in Paragraph 3.9.27 of Annex B as precedent for its failure to adopt the correct approach, is clearly not comparable nor relevant to the proposed change of use now being considered. Whilst rail forms a part of this application there are also a number of other significant activities that make it distinct from the precedent cited.

Revised Construction Works

Paragraph 6.1.2 of Annex B states that the groundworks and ACA railhead track installation would be largely complete before the Revised Construction Works begin, so the Noise and Vibration Appraisal considers the works to create foundations, erect and fit-out the buildings, and create the roadways and parking areas.

Only the receptors closest to the works have been assessed, as the Applicant states at Paragraph 6.1.6 that receptors at a greater distance would experience lower noise levels. Average and worst-case noise levels have been calculated by assuming that the construction plant are at the approximate centre of the works area, and at the part of the works area closest to the receptor under consideration, respectively. This has provided a range of values for the noise levels at each receptor, from the average to the worst-case noise levels. These ranges of construction noise level values are provided in Table 6-1, with Paragraph 6.1.8 stating that it is predicted that the construction noise levels would be below the 60 dB threshold at which a medium impact (leading to significant effect for the medium sensitivity receptors close to the LEEIE) is deemed to occur.

Paragraph 6.1.9 states that the Revised Construction Works would be unlikely to give rise to significant levels of vibration, other than where plant such as vibratory rollers are used. The Applicant goes on to state that vibratory rollers would be at least 75m from a receptor, and at this distance vibration levels of more than 1 mm/s are not predicted to occur for general rolling activities. Therefore, by avoiding starting up or shutting down the rollers within 120m of a receptor, and using appropriately low vibration settings where required, the Applicant considers that significant effects are unlikely to result from construction vibration. It is also stated that if augered piling is required, this is unlikely to result in vibration levels greater than 1 mm/s at a distance of 75m.

Revised Construction Activity

Paragraph 2.2.12 of Annex B states that the reverberant sound levels within the Steel Cut and Bend Facility would be in the region of 95 dB(A) when all of the machinery is in use, based on measurements at a cut and bend facility in Canvey Island, adjusted to account for the dimensions of the Revised Construction Use. Paragraph 2.2.4 states that the eastern end of the Steel Cut and Bend facility would be located at least 110m from the nearest residential receptor, and the western end would be at least 250m from the nearest residential receptor. Paragraph 2.2.3 states that the facility would be steel-framed with external building fabric materials that provide a sound reduction performance of 40 dB R_w for the walls and roof, which is an improvement on the proposals submitted to ESC for the discharge of Requirement 13 (ESC application reference

DC/25/4267/DRR42) as the rooflights (which have a poorer acoustic performance) have been removed.

Paragraphs 2.2.6 and 2.2.7 state that gantry cranes within the facility would lift metal by magnetic means, and the magnet would only be energised when in contact with the metal to eliminate flying, and de-energised when the metal is at rest on its receiving surface to avoid drops. The Applicant states that deliveries to the Steel Cut and Bend facility would be via roller shutter doors at its eastern and western ends, and cut and bent bars will then be moved from the facility on trailers using diesel or electrically-powered shunters from roller shutter doors on the northern and southern sides of the building. The eastern and western doors would be open all day, and closed at night. The northern door would be open for access for electric shunters only, for up to 50% of the time during the day, and will be closed at night. The southern door would be open up to 50% of the time during the day where electric shunters are used, up to all day where diesel shunters are used, and up to all night. The roller shutter doors would provide a sound reduction of 15 dB R_w when closed and 0 dB when open.

An additional change that has been made since the Integrated Reinforcement Yard proposals were submitted (and subsequently withdrawn) to ESC for approval via a discharge of Requirement 13 (ESC application reference DC/25/4267/DRR42) is the inclusion of internal partitioning within the Steel Cut and Bend Facility. Five large, ceiling hung insulated vinyl (or similar) strip curtains are assumed in the assessment to provide a sound reduction of 7 dB R_w . These partitions will 'zone' the Facility, resulting in sound levels of up to 95 dB at the western end, up to 80 dB in the central area, and up to 90 dB at the eastern end.

Paragraph 2.2.18 of Annex B states that the noise assessment assumes 30 two-way forklift movements per hour in the external assembly area during the daytime, and no movements at night.

All works within the Assembly Area would take place within workshops, which would be steel-framed with external building fabric materials that provide a sound reduction performance of 25 dB R_w for the walls and 23 dB R_w for the roofs, which allows for the lower sound reduction performance of rooflights covering up to 15% of roof. Noise-generating activities within the workshops would only take place between 07:00 and 19:00, and it is stated that the workshops would be no closer than 80 m from the western edge of Lover's Lane. The Applicant goes on to state that the roller shutter doors would provide a sound reduction of 15 dB R_w when closed and 0 dB when open, but it is assumed that the doors to each workshop would be open at all times to provide a worst-case assessment. Paragraph 2.2.23 of Annex B states that it is predicted that the reverberant sound levels within the joinery, metal and maintenance workshops would be 80 dB(A), 85 dB(A), and 75 dB(A), respectively. These noise-generating workshops would be located in the western half of the external Assembly Area.

Paragraph 2.3.8 of Annex B states that at the Marine Tunnelling Segment Storage Yard, electrically-powered gantry cranes would be used to move segments from the trains to the storage area, and from the storage area to HGV trailers for movement to the TCA. The Applicant states that the cranes would be fitted with broadband movement alarms for health and safety purposes, but that these alarms are adjustable so that their level can be set according to local circumstances to minimise off-site noise. The Applicant states that the wagon types to be used to move tunnel segments is not yet known, but that there is expected to be no material difference in vibration levels from the tunnel segment trains relative to those assessed in the submitted environmental information. ESC considers that given the wagon types are not yet known, this assessment cannot be relied upon.

Table 6-2 of Annex B provides the estimated noise levels for the Revised Construction Activity, without any contribution from the Marine Tunnel Segment Storage Yard. From this, the Applicant

concludes at Paragraph 6.2.8 that the Revised Construction Activity in isolation would not introduce any new or materially different likely significant noise effects compared to the ES (as amended). Table 6-3 shows the estimated noise levels for the Revised Construction Activity in combination with the Marine Tunnel Segment Storage Yard. From this, the Applicant concludes at Paragraph 6.2.11 that the cumulative noise emissions from the Revised Construction Activity and the Marine Tunnel Segment Storage Yard would not introduce any new or materially different likely significant noise effects compared to the ES (as amended). From measurements at Frank Brazil in Canvey Island, the Applicant concludes at Paragraph 6.2.12 of Annex B that the Revised Construction Activity would not generate significant levels of vibration, and so there would not be any new or materially different likely significant vibration effects introduced by the Revised Construction Activity compared to the ES (as amended).

Road Traffic Noise

As stated in the Transport section above, the Applicant has assessed that the Revised Construction Activity has the potential to increase the number of HGV/AIL movements relative to those assessed in the ES, with up to an additional 102 HGV/AIL movements expected per 24 hour period moving between the LEEIE and the TCA / MCA via Lover's Lane. Of these additional 102 movements, up to 93 would occur between 06:00 and 00:00 (i.e. the daytime road traffic noise assessment period), and 24 may occur between 23:00 and 07:00 (i.e. the night-time road traffic noise assessment period).

The Applicant states at Paragraph 6.3.1 of Annex B that the traffic serving the LEEIE during the Revised Construction Works would remain within the envelope assessed in the ES (as amended), and their potential noise effects would not change. The Applicant therefore considers that the residual road traffic noise effects identified in the ES (as amended) would remain as previously identified, and no new or materially different likely significant road traffic noise effects would occur during the Revised Construction Works.

Table 6-4 provides the potential changes in road traffic noise level along the two Lover's Lane road links that would be used by the Revised Construction Activity HGVs (Link 3 and Link 75). Based on the assessment thresholds in Table 3-3, the Applicant concludes in Paragraph 6.3.5 that the changes in road traffic noise expected to result from the Revised Construction Activity on Link 3 and Link 75 would equate to a low impact, and given the medium sensitivity of the residential properties along Lover's Lane, these would be minor-adverse, non-significant effects. Therefore, the Applicant concludes that the Revised Construction Activity would not introduce any new or materially different likely significant road traffic noise effects compared to the ES (as amended). SCC as Local Highway Authority is responsible for road traffic noise, so ESC defers technical consideration of the Applicant's conclusion on road traffic noise to SCC.

Removal of the Revised Construction Use

The Applicant states at Paragraph 6.5.1 of Annex B that activities that are likely to be the noisiest and potentially generate the most vibration during the Removal of the Revised Construction Use would include the removal of concrete hardstanding, which was considered at the DCO stage and would occur in the same place as originally anticipated without the Revised Construction Use. The Applicant goes on to state that buildings are intended to be lightweight, steel-framed structures that can be demounted in a controlled manner. The Applicant therefore concludes that the removal of the Revised Construction Use would not introduce any new or materially different likely significant noise and vibration effects compared to those reported in the ES (as amended).

Other mitigation and controls

The construction controls to be employed on the Sizewell C project are set out in the Code of Construction Practice ('CoCP'), and the Noise Monitoring and Management Plans ('NMMPs') that sit below the CoCP. The CoCP sets out a number of noise and vibration controls for the works, and requires the submission and approval of NMMPs that set out specific thresholds for individual sites that the Applicant must use best practicable means to adhere to. The NMMPs also set out the process for the creation of Bespoke Mitigation Plans ('BMPs'). The construction noise thresholds, construction vibration thresholds, and BMP trigger levels for the MDS are provided in Table 3-7, Table 3-8, and Paragraph 3.10.7 of Annex B, respectively.

The Applicant states at Paragraph 3.8.3 of Annex B that the eligibility of properties under the Noise Mitigation Scheme ('NMS') will be revisited if the Revised Construction Use is approved, and additional offers of insulation made where appropriate.

Paragraph 7.1.2 of Annex B states that, as it has been concluded by the Applicant that, overall, there would be no new or materially different likely significant effects arising from the Revised Construction Use, no additional mitigation measures are proposed. ESC notes that the Applicant commits in Paragraph 2.6.4 of Annex B to erecting a 5-metre acoustic fence along the northern LEEIE boundary, and to extending Barrier B6 (a 3m high bund in the north-eastern corner of the LEEIE) in both height and length, with a 2m high fence installed on top.

Conclusion

Overall, Section 4.4(d) of the Environmental Compliance Report, and Section 11 of, and Annex B to, Appendix A of the Environmental Compliance Report state that the Applicant considers that the Revised Construction Works, Revised Construction Activity, and removal of the Revised Construction Use would not result in any new or materially different likely significant noise and vibration effects to those reported in the ES (as amended). The Applicant states that the Revised Construction Works and Revised Construction Activity would be carried out in compliance with the CoCP and MDS NMMP.

ESC considers that the proposed variation of use of this area from a caravan site to a 24-hour, 7 day a week manufacturing facility, with storage, a rail head and logistics hub would constitute a new and significantly different use of the site and has the potential to result in new and materially different significant adverse effects from noise and potentially vibration and light. ESC is of the view that the proposed change would be significant and potentially detrimental to surrounding receptors. ESC aims to ensure that observable adverse impacts to residents and other relevant noise sensitive receptors have been identified and can be avoided, mitigated and minimised. ESC is currently not satisfied that this is the case.

ESC considers that the Revised Construction Use represents a distinct manufacturing and industrial facility, albeit serving the project exclusively, rather than a 'construction activity' as asserted by the Applicant. ESC considers that the proposals must therefore be assessed using BS4142, rather than using the same basis of assessment as was undertaken in the ES (as amended).

Furthermore, ESC notes that there has been no options appraisal provided for alternative sites. If there is restricted space within the confines of the existing area covered by the DCO, the Applicant may need to consider utilising a more appropriate site outside of the Order. Whilst it is acknowledged that this site may be preferential for the project in terms of cost, transport, and ease of use, it brings with it the likelihood of significant environmental impacts which have not been correctly assessed. The fact that this process does not need to take place on the Main Development Site and can take place remotely, in the same way as will be the case for the imported precast tunnel

segments, further supports the fact that this is not intrinsically a “construction activity”, but a distinct manufacturing facility that supports but is separate from construction.

As a consequence of the above, ESC is not satisfied that the submitted information is sufficient to demonstrate that Change 1 would not give rise to any new or materially different likely significant noise and vibration effects to those reported in the ES (as amended). ESC considers that such a deviation from the consented use will constitute a new and significantly different use of the site and has the potential to result in significant new and significantly different adverse impacts from noise and potentially vibration.

Landscape and Visual

ESC notes that the amended parameter plans in Document 2.5: Main Development Site Construction Parameter Plans – Plan For Approval (Revision 7.0) propose changes to the spatial arrangement of the construction activities (parameter zones) across this area. The amended parameter plans show variation in the proposed exceptional height parameters when compared to the permitted plans in the DCO. The proposed changes will require new maximum height parameters in C13 under exceptional conditions and a slight reduction in exceptional height parameters in C14.

Section 12 of Appendix A to the Environmental Compliance Report provides a summary of the findings of Annex C to the Compliance Report, which provides a Landscape and Visual Appraisal assessing the effects of the Revised Construction Use on landscape fabric, landscape character, visual receptors, and designated and defined landscapes, compared to those reported in the ES (as amended). ESC notes that the submitted Landscape and Visual Appraisal follows the same format and methodology as the Environmental Statement submitted at DCO stage, which follows recognised industry guidance.

The Applicant states at Paragraph 6.1.1 of Annex C that the extent of theoretical visibility of the maximum height parameters for the Previously Anticipated Construction Use of the LEEIE and the Revised Construction Use are generally identical across the full extent of the Landscape and Visual Impact Assessment (‘LVIA’) study area, and in proximity to the LEEIE. The Applicant therefore considers that no additional landscape or visual receptors would be affected by Change 1.

Paragraph 6.2.1 of Annex C states that Change 1 does not require the removal of any additional established trees or lengths of hedgerow around the perimeter of the LEEIE to those proposed to be removed as part of the Previously Anticipated Construction Use. The Applicant therefore concludes that there would be no new or materially different likely significant effects on the landscape fabric of the site introduced by Change 1 compared to those described within the ES (as amended).

Paragraph 6.2.6 of Annex C states that due to nature of the Change 1, the distance of the LEEIE from other landscape character types (‘LCTs’), and the intervening land uses, landform and vegetation, it is considered that the potential for new or materially different likely significant effects to landscape character would be limited to the Estate Sandlands LCT. Paragraph 6.2.11 notes that whilst the Revised Construction Use is different in nature to the Previously Anticipated Construction Use, the proposed facilities are consistent with the function of the Previously Anticipated Construction Use of supporting the construction of Sizewell C, and any changes to characteristic views within the Estate Sandlands LCT would be similar in nature (i.e. to a construction site) and experienced in the context of consented construction works within the remainder of the LEEIE and other areas within the Main Development Site. Additionally, Paragraph 6.2.10 notes that the area of the 75m AOD maximum height parameter (exceptional condition) has been reduced overall as a result of the

Revised Construction Use, reducing the extent of the LEEIE in which tower cranes would be visible from within the Estate Sandlands LCT. The Applicant therefore concludes at Paragraph 6.2.12 that there would be no new or materially different likely significant effects on the Estate Sandlands LCT from the Revised Construction Use.

Paragraph 6.2.14 of Annex C states that due to the nature of Change 1, the distance between the LEEIE from some visual receptors, and intervening land uses, landform and vegetation cover, it is assessed that the potential for new or materially different likely significant visual effects would be limited to the following visual receptors:

- Visual Receptor Group 15 (Sizewell Belts);
- Visual Receptor Group 16 (North of Leiston);
- Visual Receptor Group 17 (Leiston);
- Visual Receptor Group 19 (Aldringham Common and the Walks); and
- Users of key recreational routes - Suffolk Coast Path, Sandlings Walk and future England Coast Path (including realigned routes during the construction phase).

Section 6.2(d) of Annex C assesses the impacts of the Revised Construction Use on each of these visual receptor groups and on users of key recreational routes. The Applicant again notes that whilst the Revised Construction Use is different in nature to the originally anticipated construction use of the LEEIE, it is consistent with LEEIE's function of supporting the construction of Sizewell C in views from these visual receptor groups and key recreational routes. The Revised Construction Use would result in a reduction in the area within the LEEIE covered by the 75m AOD maximum height parameter (exceptional condition) compared to the Previously Anticipated Construction Use. It is stated that this would reduce the extent of the LEEIE in which tower cranes would be visible from within each of these visual receptor groups and users of key recreational routes. It is however noted that the tower cranes would be marginally closer to some visual receptors. The Applicant concludes that the Revised Construction Use would not give rise to any new or materially different likely significant effects on visual receptors within each of these visual receptor groups or users of key recreational routes compared to those reported in the ES (as amended).

Paragraphs 6.2.32 and 6.2.33 of Annex C states that there would be no new or materially different likely significant effects on the natural beauty indicators and special qualities of the Suffolk and Essex Coast and Heaths National Landscape or on the Suffolk Heritage Coast as a result of Change 1. The Applicant again cites the fact that Change 1 is broadly consistent with the LEEIE's function of supporting the construction of Sizewell C.

Paragraph 6.3.1 of Annex C states that Change 1 would not alter the proposed restoration of the LEEIE, and it is considered that all operational phase effects would remain as reported in the ES (as amended). The Applicant therefore concludes that Change 1 would not give rise to any new or materially different likely significant landscape and visual effects during the operational phase compared to those reported in the ES (as amended).

Section 6.4 of Annex C states that no new or materially different likely significant effects at night are anticipated on the Estate Sandlands LCT, Visual Receptor Group 15 (Sizewell Belts), Visual Receptor Group 19 (Aldringham Common and the Walks), and Suffolk and Essex Coast and Heaths National Landscape as a result of Change 1.

Overall, the Applicant's assessment concludes that there would be no new or materially different significant environmental effects on landscape fabric, landscape character, visual receptors or the Suffolk and Essex Coast and Heaths National Landscape during construction or operation. Variations to only the 'exceptional condition' height parameters are proposed and are required for the use of

tower cranes, which will be a temporary use. Whilst the proposed change will be a deviation from the previously approved height parameters, ESC considers that this deviation is not notably significant and will not give rise to significantly different landscape and visual effects than were identified at DCO stage. ESC is therefore satisfied that Change 1 would not introduce any new or materially different likely significant landscape and visual effects.

Major Accidents and Disasters

Section 13 of Appendix A to the Environmental Compliance Report provides a summary of the findings of Annex D (Major Accidents and Disasters Review). Annex D provides a review of the Major Accidents and Disasters Assessment to consider further if the Revised Construction Works and Revised Construction Activity have the potential to change the likelihood of a risk event considered in the ES (as amended) occurring, or have the potential to introduce a new risk event.

The Applicant concludes in Section 13.3 of Appendix A that the Revised Construction Use would not significantly increase the likelihood of major accidents and disasters, and the risks remain as low as reasonably practicable and within tolerable limits. ESC is satisfied that the Revised Construction Works and Revised Construction Activity would not give rise to any new or materially different likely significant effects in relation to major accidents and disasters, when compared to those reported in the ES (as amended).

Removal of the Previously Anticipated Caravan Park

Section 4.5 of the Environmental Compliance Report provides an assessment of the potential for Change 1 to give rise to new or materially different likely significant environmental effects as a result of the non-delivery of the previously anticipated caravan park at the LEEIE.

Paragraph 4.5.3 notes that the ES recognised the inherent uncertainty in project workforce numbers, location, and accommodation choices, and therefore applied a precautionary plan-monitor-manage approach.

Section 4.5(b) notes that this accommodation provision has been replaced by alternative provision. Specifically, this replacement provision comprises the use of existing chalet bedspaces at Pontins Pakefield, and the use of 340 additional touring caravan pitches as an extension to Pontins Pakefield. The latter was agreed by the Accommodation Working Group, pursuant to Paragraph 4.2 of Schedule 3 of the Deed of Obligation, but the associated planning application (ESC reference DC/25/3078/FUL), submitted in August 2025, remains under consideration by ESC. Fall-back measures are included in the Deed of Obligation through the housing Contingency Fund, and so the Applicant states that approval of this NMC application is not dependent on the delivery of the alternative provision at Pontins Pakefield.

Section 4.5(c) states that the socio-economic mitigation framework is designed to be precautionary, flexible and responsive to ongoing monitoring of workforce scale, location and housing market conditions. Therefore, the Applicant states that variation between assessed assumptions and actual outcomes does not inherently give rise to new or materially different likely significant socio-economic effects, and the removal of the LEEIE caravan park does not reduce the effectiveness of the socio-economic mitigation framework.

Section 4.5(d) states that community safety and public services are managed through project-specific controls, including the Worker Code of Conduct. Resilience funding and the Community Fund are also secured through the Deed of Obligation.

Therefore, the Applicant concludes at Paragraph 4.5.16 that the non-delivery of serviced caravan pitches at the LEEIE would not give rise to any new or materially different likely significant effects to those assessed in the ES (as amended).

Other comments

ESC wishes to highlight that the submitted tracked change version of the Construction Method Statement appears to not identify some changes using the tracked change markup. ESC has identified a number of differences in Table A between Revision 2.0 of the CMS (approved by ESC via application reference DC/25/1345/DRR42) and Revision 3.0 of the CMS (submitted with this NMC application). ESC assumes that the tracked changes in Table A show a comparison between the CMS submitted to ESC for approval through a discharge of Requirement 13 (ESC application reference DC/25/4267/DRR42) and that submitted with this NMC application. For full clarity and transparency, ESC wishes to highlight this to the SoS.

ESC also wishes to highlight to the Secretary of State that the submitted Main Development Site Construction Parameter Plan Key Plan (Drawing No. SZC-SZ0100-XX-000-DRW-100046) (Revision 07) submitted with this NMC application does not identify Zone C13c, nor does it divide Zone C14 into sub-zones C14a, C14b and C14c. These zones are identified in Table 4.4 of the submitted CMS and on the Main Development Site Construction Parameter Plan Sheet 3 of 4 (Drawing No. SZC-SZ0100-XX-000-DRW-100094) (Revision 04). Notwithstanding the concerns raised by ESC in relation to Change 1 in this consultation response, ESC considers that amendments must be made to align the Main Development Site Construction Parameter Plan Key Plan with the CMS and the Main Development Site Construction Parameter Plan Sheet 3 of 4, prior to any approval and certification of this Plan by the Secretary of State under Schedules 6 and 23 of the Order.

Concluding comments on Change 1

ESC is not satisfied that the submitted information is sufficient to demonstrate that Change 1 would not give rise to any new or materially different likely significant noise and vibration effects to those reported in the ES (as amended). ESC considers that the deviation from the consented use will constitute a new and significantly different use of the site and has the potential to result in significant new and significantly different adverse impacts from noise and potentially vibration.

For the reasons set out above, ESC has concerns, based on the information submitted for Change 1, about the noise impacts associated with the proposed change. ESC cannot therefore at present agree with the Applicant's position that the proposed Change 1 is non-material in nature and should be dealt with under the procedures for NMCs. ESC cannot therefore rule out the necessity of a change to the Order that requires an updated Environment Statement to take account of new, or materially different, likely significant effects on the environment.

ESC also cannot rule out Change 1 having a significant impact on residents when having regard to the potential impact of the proposed changes on local people.

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

Summary of proposals

Change 2 seeks approval for the continued use of the LEEIE railhead for the duration of the Sizewell C construction period, such that both the LEEIE and TCA railheads would be operational simultaneously. It was assumed in the ES that use of the LEEIE railhead would not continue beyond the early years of construction, other than during a short transition period and when the rail extension route (also known as the Green Rail Route) was not available.

The Applicant states in Section 5.2 of the Environmental Compliance Report that simultaneous operation of both the LEEIE and TCA railheads would allow the use of rail-based logistics to be optimised, improving resilience in construction sequencing and potentially reducing the number of HGV movements on the local road network. It is stated that the rail movements into the LEEIE would primarily be used for the delivery of precast marine tunnelling segments manufactured off-site, but there is also potential for rail delivery of steel for use within the Integrated Reinforcement Yard.

ESC notes that the Applicant states at Paragraph 5.2.3 of the Environmental Compliance Report that up to two trains per week would use the LEEIE railhead (maximum of one at a time), with loading and unloading activities only occurring between 23:00-07:00. However, it is stated at Paragraph 6.4.2 of Annex B to Appendix A of the Report that *'once the GRR is open...only two to four trains per week [will use] the LEEIE, instead of the two trains per day before the opening of the GRR'*. The Environmental Compliance Report therefore appears to provide conflicting information regarding the maximum number of trains that will run to the LEEIE after the GRR open. Furthermore, these maximum numbers are not secured in the RNMP submitted with this NMC application, with Paragraph 3.7.2 stating that *'there will be no more than two freight trains per day to the LEEIE (four movements)'*. ESC would therefore request that the Applicant clarifies how many train movements per day/week would take place as a maximum, and that this number is secured in the RNMP. This is particularly important given that the passage of vehicles and pedestrians through Leiston Level Crossing will be impacted as a result of freight moving to the LEEIE. This would create new severance effects at times they were not previously anticipated to take place, and an understanding of the frequency and duration of freight trains blocking Leiston Level Crossing is needed for an assessment to be made of whether these constitute new likely significant effects.

It is also stated that operational rail controls set out in the Rail Noise Mitigation Plan would still apply, including hours of operation and noise mitigation, but Change 2 seeks approval of an updated Rail Noise Mitigation Plan (RNMP) to permit the simultaneous use of the LEEIE and TCA railheads.

The Applicant is also proposing to amend Requirement 39 (Rail noise) of the Order such that any future amendments to the RNMP would need to be in accordance with the certified RNMP that is approved by the SoS through approval of this NMC application, rather than the draft RNMP certified under the Order as made in July 2022. Amendments are also proposed to Schedule 23 of the Order so that the Draft RNMP is no longer listed as a certified document, with the RNMP approved by the SoS through approval of this NMC application added to the list of certified documents.

Summary of ESC's position

In preparing its comments on Change 2, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Document 10.9.1: Rail Noise Mitigation Plan (Revision 5.0) (Clean and Tracked Change versions)

- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC agrees that SZC Ltd cannot submit a Rail Noise Mitigation Plan for approval by ESC via a discharge of Requirement 39 that accommodates simultaneous use of the LEEIE and TCA railheads, as the Draft Rail Noise Mitigation Plan which is a certified control document under the Order assumed this would not take place, beyond a short transition period and in periods where the rail extension route was not available. This provision was included in Revision 2.0 of the RNMP submitted to ESC for approval via a discharge of Requirement 39 (ESC application reference DC/24/4508/DRR). Following discussions with ESC and the withdrawal of an application for the discharge of Requirement 13 (ESC reference DC/25/4267/DRR42) in relation to Change 1 in December 2025 which would be facilitated by simultaneous railhead operations, this provision was removed from Revision 4.0 of the RNMP approved by ESC on 18 February 2026.

ESC is supportive, in principle, of the proposed changes to Requirement 39 and Schedule 23 of the Order such that any future amendments to the RNMP approved by ESC would need to be in accordance with the certified RNMP that is approved by the SoS through approval of this NMC application, rather than the draft RNMP certified under the Order. However, ESC considers, based on the information provided within the application, that Change 2 and the continued use of the LEEIE railhead significantly beyond the time period consented in the Order has the potential to introduce new likely significant environmental effects, compared with those set out in the ES (as amended).

ESC is also concerned that Change 2 could have a sufficiently large impact on local people such that the change may be considered material. ESC is aware of such concerns in the local community, and the case has been made to ESC that Change 2 should be considered a material change and not be approved under this NMC application. While ESC is not aware of any particular guidance on assessing whether the proposed changes would have a sufficiently large impact on local people and businesses, on the basis of the information submitted in this NMC application, ESC shares these concerns and cannot rule out this test of materiality being met.

Detailed technical comments

Section 5 of the submitted ‘Non-Material Change 1: Environmental Compliance Report’ provides an assessment to consider whether Change 2 would give rise to any new or materially different likely significant environmental effects. Table 5-1 shows that the majority of environmental topics have been screened out from further assessment:

- Conventional Waste and Material Resources (as the Applicant states that Change 2 would not alter material requirements, waste generation rates, or waste management practices, and so there is no potential for new or materially different likely significant effects);
- Socio-economics (as the Applicant states that Change 2 would not affect workforce numbers, accommodation assumptions, employment effects, or population change, and so there is no potential for new or materially different likely significant effects);
- Transport (as the Applicant states that Change 2 would not result in any increase in road traffic movements, and would instead reduce reliance on road-based transport, but this

would not be of a scale to change the conclusions of the ES so there is no potential for new or materially different likely significant effects);

- Air Quality (as the Applicant states that Change 2 would not introduce new emission sources and would not increase overall traffic or rail movements beyond those assessed. Instead, Change 2 would reduce reliance on road-based transport, but this would not be of a scale to change the conclusions of the ES so there is no potential for new or materially different likely significant effects);
- Landscape and Visual (as the Applicant states that Change 2 would not introduce new built form, lighting or physical works, nor would it alter the scale or appearance of development assessed in the ES, and so there is no potential for new or materially different likely significant effects);
- Terrestrial Ecology and Ornithology (as the Applicant states that Change 2 would not introduce new land take, lighting or physical disturbance, nor would it alter ecological impact pathways assessed in the ES, and so there is no potential for new or materially different likely significant effects);
- Amenity and Recreation (as the Applicant states that Change 2 would not alter access arrangements, public rights of way or recreational resources, and any changes in construction logistics timing would not affect amenity or recreational receptors beyond those already assessed. It is therefore concluded that there is no potential for new or materially different likely significant effects);
- Terrestrial Historic Environment (as the Applicant states that Change 2 would not involve ground disturbance or changes to construction footprints, and would not affect heritage assets or archaeological remains assessed in the ES, and so there is no potential for new or materially different likely significant effects);
- Soils and Agriculture (as the Applicant states that Change 2 would not introduce new land take or changes to soil handling practices, and so there is no potential for new or materially different likely significant effects);
- Geology and Land Quality (as the Applicant states that Change 2 would not alter construction activities relevant to land quality or contamination risk, nor would it change the conceptual site model, and so there is no potential for new or materially different likely significant effects);
- Groundwater and Surface Water (as the Applicant states that Change 2 would not affect drainage, watercourses or flood risk management arrangements, and so there is no potential for new or materially different likely significant effects);
- Radiological Considerations (as the Applicant states that Change 2 would not affect radiological risk or controls associated with the operation of the Sizewell C Project, and so there is no potential for new or materially different likely significant effects);
- Climate Change (Greenhouse Gas) (as the Applicant states that Change 2 would not materially alter construction energy use or emissions assumptions, nor would the proposed use of rail-based transport change the significance of effects, and so there is no potential for new or materially different likely significant effects);
- Climate Change (In combination Climate Change Assessment / Climate Change Risk Assessment) (as the Applicant states that Change 2 would not alter climate resilience, flood risk or in combination climate change conclusions, and so there is no potential for new or materially different likely significant effects); and
- Major Accidents and Disasters (as the Applicant states that Change 2 would not introduce new activities or risk events, and existing controls and emergency arrangements remain applicable. It is therefore concluded that there is no potential for new or materially different likely significant effects).

ESC is satisfied that Change 2 would not introduce any new or materially different likely significant effects in relation to the environmental topics listed above. The only environmental topics that were 'screened in' were Noise and Vibration, and Health and Wellbeing. Further assessment of these topics was undertaken and is presented within Section 5.4 and Appendix A, Annex B (Noise and Vibration Assessment) of the Environmental Compliance Report.

Noise and vibration

The assessment of rail noise and vibration impacts in the ES (as amended) was based on the use of the temporary LEEIE railhead until the Green Rail Route opened, but it is now proposed to be used for an extended period as a result of the Revised Construction Activity. Section 6.4 of Annex B to Appendix A of the Environmental Compliance Report states that as the duration of impacts was not factored into the determination of effects in the ES (as amended), the use of the LEEIE railhead for a longer period would not in itself change the potential for significant effects, and so the effects would be the same as those identified in the ES (as amended), but would occur over a longer period.

Paragraph 6.4.6 of Annex B to Appendix A of the Environmental Compliance Report states that the north-western corner of Leiston, close to where the Green Rail Route diverges from the Saxmundham to Leiston branch line, is the one location where the change in operations may be noticeable, since trains will be using both the GRR and the route through Leiston to the LEEIE. However, the Applicant goes on to state that the night-time prohibition on trains moving through Leiston means that additive effects will be avoided since GRR trains will continue to move to the TCA railhead during the night and any LEEIE-bound trains will wait on the branch line until it is clear to move through Leiston after 07:00 hours.

Section 6.4 of Annex B to Appendix A also notes that the idling of locomotives on the Saxmundham to Leiston branch line would occur for a longer period of time (i.e. beyond the early years of construction) due to the night-time Leiston restrictions. ESC understands that idling locomotives would be a quieter option than shutting them down and restarting them and approved an RNMP in February 2026 which removed the commitment to shut down stationary locomotives. The Applicant states that as its assessment found there to be no likely significant effects as a result of idling locomotives, the absence of an assessment of idling locomotives in the Rail ES does not prevent a conclusion of no new or materially different likely significant effects being reached.

The Applicant states at Paragraph 6.4.14 of Annex B to Appendix A that vibration impacts from rail movements will also be no different to those assessed in the ES (as amended).

Paragraph 2.5.2 of Annex B to Appendix A of the Environmental Compliance Report states that the use of trains for the movement of tunnel segments, and for the Integrated Reinforcement Yard if applicable, would adhere to the operational controls set out in the Rail Noise Mitigation Plan (RNMP), submitted for approval to the Secretary of State as part of this NMC application. The RNMP includes a commitment to not exceed the maximum number of trains set out in Section 3.5 of the RNMP and to maintain the night-time Leiston restrictions for freight trains set out in Section 3.4 of the RNMP.

As noted in the 'Summary of proposals' section above, ESC requests that the Applicant clarifies how many train movements per day/week would take place as a maximum, and that this number is secured in the RNMP, as there appears to be conflicting information provided in the RNMP and Environmental Compliance Report.

ESC fundamentally disagrees with the Applicant's conclusion of 'no new or materially different likely significant noise and vibration effects'. ESC considers the continued use of the LEEIE railhead

significantly beyond the time period consented in the DCO to be a further deviation, simply by the fact that it will continue to exist long past the intended period of use, meaning impacts will be present for a far greater duration where under the current consent they would not. ESC is not satisfied, on the basis of the information provided, that Change 2 would not give rise to new or materially different likely significant noise and vibration effects.

Health and Wellbeing

The Applicant states at Paragraph 5.4.4 of the Environmental Compliance Report that the rail noise and vibration effects remain within the envelope assessed in the ES, with no new receptors affected and no change to the significance of effects. The Applicant goes on to conclude that there would be no new or materially different likely significant health and wellbeing effects arising out of Change 2, as health and wellbeing effects are derived from the assessments of the contributing topics, and no new or materially different likely significant effects are identified for those topics.

As noted in the 'Noise and Vibration' section above, ESC fundamentally disagrees with the Applicant's conclusion of 'no new or materially different likely significant noise and vibration effects'. It follows, therefore, that ESC disagrees with the Applicant's conclusion of 'no new or materially different likely significant health and wellbeing effects' as a result of Change 2, as the LEEIE railhead will continue to exist long past what was previously intended, meaning impacts will be present where under the current consent they would not.

Concluding comments on Change 2

Change 2 is heavily inter-related to Change 1. On the basis of noise impacts, ESC is not satisfied that the submitted information is sufficient to demonstrate that Change 2 would not give rise to any new or materially different likely significant noise and vibration effects to those reported in the ES (as amended). As such, on the basis of the information submitted for Change 2, ESC cannot agree with the Applicant's conclusions on the non-materiality of Change 2. ESC is not satisfied that Change 2 is not material and should be dealt with under the procedures for NMCs.

ESC cannot therefore rule out the necessity of a change to the Order that requires an updated Environment Statement to take account of new, or materially different, likely significant effects on the environment.

ESC also cannot rule out Change 2 having a significant impact on residents when having regard to the potential impact of the proposed changes on local people.

In-combination effects associated with Changes 1 and 2

Paragraph 7.1.2 of the Environmental Compliance Report states that there is the potential for a project wide in-combination effect due to noise from the operation of the Saxmundham to Leiston branch line due to extended use of the LEEIE railhead (Change 2), combined with construction and operation of the LEEIE, including the Integrated Reinforcement Yard proposed through Change 1. Potentially affected receptors are dwellings on Valley Road (north and south) and the eastern end of Carr Avenue. The Applicant has concluded that project-wide noise effects would remain not significant for these combined activities, given that there would only be two daytime trains using the branch line and that the Revised Construction Use at the LEEIE would not result in new or materially different likely significant effects at these receptors. Given that ESC is not satisfied with the Applicant's noise and vibration conclusions for Changes 1 and 2, it necessarily follows that ESC is not satisfied, based on the information provided with the application, that Changes 1 and 2 would not combine to give new or materially different likely significant noise and vibration effects overall.

Furthermore, as a result of ESC's concerns regarding the potential for new or materially different significant in-combination noise and vibration effects, ESC is also not satisfied, based on the information provided, that there would be no new or different likely significant in-combination effects on health and wellbeing.

Change 3: Greater Flexibility in the Precise Siting of the Intermediate Level Waste Store (ILWS) within the Main Development Site (MDS) and Other Corrections to the MDS Operational Parameter Plans

Summary of proposals

Change 3 seeks approval of amendments to the MDS Operational Parameter Plans to accommodate a larger footprint for the Intermediate Level Waste Store ('ILWS') (Work No. 1A(f)) such that it has sufficient capacity to serve the operational lifetime of Sizewell C. Specifically, an expansion of Zone 1A-6 is proposed, in addition to other minor corrections to the MDS Operational Parameter Plans and MDS Operational Siting and Height Parameters document. Schedule 23 (Certified Documents) and Schedule 6 (Parameter Plans) are also proposed to be amended to reference the updated versions of the MDS Operational Parameter Plans.

Summary of ESC's position

In preparing its comments on Change 3, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Document 2.5: Main Development Site Operational Parameter Plans – Plans For Approval (Revision 5.0)
- Document 10.19: Main Development Site – Operational Siting and Height Parameters (Revision 2.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC has no objections to the proposed amendments to the MDS Operational Parameter Plans and the MDS Operational Siting and Height Parameters Document, which expand Zone 1A-6 to accommodate a larger footprint for the ILWS, and correct cross-referencing errors. ESC is satisfied that the proposed changes are non-material, noting that there are no proposed changes to the secured parameter heights.

Detailed technical comments

ESC has identified the following errors in the tables in the revised MDS Operational Siting and Height Parameters Document:

- In Table 2.1:
 - The second row of the 'Parameter Zone 1A-1 (nuclear islands)' section states 'Fuel building hall x2 (Work No.1 1A(a)(iii)' rather than 'Fuel building hall x2 (Work No. 1A(a)(iii)'
 - The heading of the second page of the table is a repeat of the details in the previous row of the table (i.e. 'Filtering debris recovery pit x 1 (Work No. 1A(e)(iv)' and '22'); the heading row should instead state 'Building/structure details' and 'Maximum height (mAOD)' for the first and second columns, respectively.
- In Table 2.5:

- The Work No. for the second row of the 'Parameter Zone 1G (National Grid substation)' (i.e. 'Unspecified amount of associated plant, buildings and infrastructure' should be Work No 1A(o) rather than Work No. 1A(p).
- No definitions of *, ** and ***

Landscape and visual

Change 3 provides greater flexibility in the precise siting of the Intermediate Level Waste Store within the Main Development Site by extending Zone 1A-6 further to the east along the northern boundary of Zone 1A on the certified Main Development Site Operational Parameter Plan.

ESC understands that Change 3 does not:

- change the operational maximum height parameters;
- introduce new uses; or
- alter the scale of development assessed at DCO stage.

Whilst the building will have a larger footprint, there will be no increase in maximum height which is currently set at 27 m AOD. Therefore, the key consideration will be whether the increased lateral spatial extent over and above that which was considered in the landscape and visual impact assessment in the ES has the potential to result in new or materially different likely significant effects on landscape and visual receptors.

Section 6 of the Environmental Compliance Report suggests that construction phase parameters that were considered in the ES do not need any changes in light of the proposed revised lateral spatial extent of the facility. ESC considers this to be a reliable conclusion on the basis that the construction of the additional footprint would have negligible additional effect over and above those arising from the overall construction activity on the Main Construction Area, which will be taking place in the background to this facility and which will be of a much larger scale compared to that required for this aspect of the development.

The Applicant states at Paragraph 6.4.4 of the Environmental Compliance Report that during the operational phase, the ILWS would still be visible from the established publicly accessible viewpoints in the context of the other ancillary structures within the operational parameter Zone 1A with a shared maximum parameter height of 27m. However, it is stated that the main power station structures would remain the dominant elements of the views. ESC considers that the additional footprint of the ILWS would have negligible additional visual impact, especially given that established design principles would remain unaltered and the final details would still be subject to agreement with East Suffolk Council under Requirement 17.

Overall, the Applicant concludes that Change 3 would not result in any new or materially different significant effects on landscape fabric, landscape character, visual receptors, or the natural beauty or special qualities of the National Landscape to those described in Volume 2, Chapter 13 of the ES. Additionally, no new receptors have been identified in addition to those covered within the ES submitted at DCO stage.

Given the limited extent of the proposed change, especially when considered against the scale and extent of the overall development which will take place in close association with this waste storage facility, ESC agrees with these conclusions.

In-combination effects associated with Changes 1 and 3

Paragraph 7.1.3 of the Environmental Compliance Report states that the locations of Changes 1 and 3 are geographically distant and would therefore not be prominent in the same views. Additionally, Change 1 is associated with a change to the construction parameters of LEEIE, whilst Change 3 amends the operational parameters for the Intermediate Level Waste Store. Therefore, ESC agrees with the Applicant's conclusion that there is no potential for new or materially different likely significant in-combination effects on landscape and visual receptors or heritage assets as a result of Changes 1 and 3.

Change 4: Changes to PRow for the Sizewell Link Road, Two Village Bypass and MDS

Summary of proposals

ESC understands that Change 4 of this NMC application seeks approval for amendments to certain sheets of the certified Rights of Way Plans, and 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). This is intended to align PRow stopping-up and diversion extents with detailed highway designs, correct omissions and inaccuracies between certified plans and the Schedules to the Order, and authorise new PRow running alongside the Sizewell Link Road and Two Village Bypass.

Summary of ESC's position

In preparing its comments on Change 4, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Document 2.4: Access and Rights of Way Plans (Revision 9.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC notes that Change 4 was screened out for further environmental consideration as changes to design introduced through Change 4 require minor updates to the Rights of Way Plans, which the Applicant states do not materially alter any of the assumptions made within the ES or the Shadow HRA.

ESC understands that SCC, as the Local Highway Authority with responsibility for PRow, has a number of concerns about the proposals under Change 4. ESC supports these concerns, noting the impact of disruption to PRow on local residents and tourism, but defers technical comments on Change 4 to SCC as the responsible authority.

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

Summary of proposals

Change 5 seeks approval for the addition of a new paragraph 1(2)(c) in Schedule 2 of the Order as follows:

"[Where any requirement--]

(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."

Summary of ESC's position

In preparing its comments on Change 5, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC notes that Change 5 was screened out for further environmental consideration as it is purely a procedural amendment and so does not change any of the assumptions made within the ES or the Shadow HRA.

ESC understands that this drafting change does not alter the scope of power afforded to discharging authorities to approve departures from the certified control documents, nor does it widen the potential scope of approved activities. Instead, the proposals seek to clarify that where deviations are approved under requirements 2, 4, 8 and 13, this approval can be provided by way of approving an updated version of the control document itself, and any references to that document in the Order relate to the updated version of that document. ESC therefore has no objections to the proposal to add a new paragraph 1(2)(c) in Schedule 2 of the Order, as per Section 3.6(b) of the Non-Material Change 1: Application Report, and is satisfied that the proposed change is non-material.

Change 6: Refinement of the Traffic Regulation Order Power

Summary of proposals

Change 6 seeks to amend Article 24(2)(a) of the Order to remove the qualifier that an existing Traffic Regulation Order ('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"*.

It is intended that this would alleviate the administrative burden on the local traffic authority to make amendments itself to existing TROs and would instead allow SZC Ltd to resource the carrying out of this function. ESC understands that consent would still need to be received from the traffic authority.

Summary of ESC's position

In preparing its comments on Change 6, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC notes that Change 6 was screened out for further environmental consideration as it is purely a procedural amendment and so does not change any of the assumptions made within the ES or the Shadow HRA. Additionally, use of the power under Article 24(2) of the Order would be subject to consideration of impacts at the stage where consent is sought from the traffic authority.

ESC defers technical comments on Change 6 to SCC as the traffic authority responsible under Article 24(2)(a) of the Order for determining applications from the undertaker to revoke, amend or suspend existing Traffic Regulation Orders. ESC notes that the Applicant has stated in Paragraph 3.7.8 of the Non-Material Change 1: Application Report that SCC is supportive of this proposed change.

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

Summary of proposals

Change 7 seeks approval for amendments to Schedule 1 of the Order to remove cross-reference to the Works Plans for Work Nos. 2A-2P, thus allowing the precise location of marine works to be changed through a variation of the DML being approved by the Marine Management Organisation, without requiring SZC Ltd to apply to the Secretary of State for changes to the Works Plans. The wording of Article 50 of the Order would also need to be amended so that the marine works specified in Article 50(1) are not tied to the Works Plans.

Summary of ESC's position

In preparing its comments on Change 7, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC notes that Change 7 was screened out for further environmental consideration as it is purely a procedural amendment and so does not change any of the assumptions made within the ES or the Shadow HRA.

ESC has no objections to remove the line after the work description of Work No. 2P, as set out in Section 3.8(b) of the Non-Material Change 1: Application Report. ESC is satisfied that the proposed change is non-material.

Detailed technical comments

Coastal management

ESC is keen to ensure that decoupling any DML variations from a parallel DCO change would not result in any less opportunity for ESC to be consulted on future changes to the development of marine/coastal works below Mean High Water, including receiving any updated works plans, method statements, and locational information. ESC notes that SZC and the Marine Management Organisation (MMO) have communicated with ESC in a transparent manner to date, and ESC trusts that this working relationship will continue, irrespective of statutory obligations and ESC's jurisdiction.

ESC also wishes to note its concern that Paragraph 3.8.1 in the submitted Non-Material Change 1: Application Report (Revision 1.0) fails to recognise that ESC's jurisdiction extends to Mean Low Water, and therefore an overlap of consent applies to infrastructure that crosses the intertidal zone (albeit sub-surface), and hence ESC should have co-regulatory responsibility with the MMO.

Paragraph 3.8.1 currently states:

'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.'

The final sentence is incorrect; the infrastructure referenced extends from the main site, under the foreshore, and exits at sea, so is within ESC's jurisdiction. ESC wishes to highlight this to the Secretary of State, although does not consider that this error has any material impact on how Change 7 would work in practice, nor does ESC consider that it would affect the materiality of Change 7.

ESC has shared these comments with the Applicant for their information prior to submission of its NMC consultation response. At the time of submission of this response, the Applicant has not provided a response to ESC raising this.

Notwithstanding the above, ESC is satisfied that Change 7 is non-material, would not introduce any new or materially different likely significant effects, and is purely a procedural amendment.

Change 8: Drafting Corrections to the Order

Summary of proposals

Change 8 seeks approval of amendments to the Order to correct minor drafting errors and omissions, ensuring a clear and effective operation of the Order. These changes are detailed in full in the Schedule of Proposed Changes to the Order which was submitted with this NMC application.

Summary of ESC's position

In preparing its comments on Change 8, ESC has reviewed the following application documents:

- Non-Material Change 1: Application Report (Revision 1.0)
- Non-Material Change 1: Environmental Compliance Report (Revision 1.0)
- Non-Material Change 1: Draft of the Sizewell C (Nuclear Generating Station) (Amendment) Order 2026 (Revision 1.0)
- Non-Material Change 1: Schedule of Proposed Changes to the DCO – Tracked Changes (Revision 1.0)
- Non-Material Change 1: The Sizewell C (Nuclear Generating Station) Order 2022 – Tracked Changes (Revision 1.0)

ESC notes that Change 8 was screened out for further environmental consideration as it only relates to the wording of the Order and so does not change any of the assumptions made within the ES or the Shadow HRA.

ESC agrees that all drafting corrections to the Order made under Change 8 are minor and non-material.



Appendix B – Summary of ESC’s position on the materiality of each of the eight proposed changes

	Characteristics that indicate a change to a consent is more likely to be treated as material			
Change	a) Environmental Statement – a change to a DCO requires an updated Environment Statement to take account of new, or materially different, likely significant effects on the environment	b) Habitats and Protected Species – a change to a DCO would invoke a need for a Habitats Regulations Assessment or the need for a new or additional licence in respect of European Protected Species	c) Compulsory Acquisition – a change that would authorise the compulsory acquisition of any land, or an interest in or rights over land, that was not authorised through the original DCO	d) Impact on Businesses and Residents – the potential impact of the proposed changes on local people
Change 1: Use of part of the LEEIE as an Integrated Reinforcement Yard	Concerns – on the basis of the submitted information	No concerns	No concerns	Concerns – on the basis of the submitted information
Change 2: Simultaneous use of rail facilities at the LEEIE and TCA	Concerns – on the basis of the submitted information	No concerns	No concerns	Concerns – on the basis of the submitted information
Change 3: Greater flexibility in the precise siting of the Intermediate Level Waste Store within the MDS and corrections to plans	No concerns	No concerns	No concerns	No concerns

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Change 4: Public Rights of Way – Sizewell Link Road, Two Village Bypass and Main Development Site	ESC defers to SCC as the Local Highway Authority with responsibility for PRow.	ESC defers to SCC as the Local Highway Authority with responsibility for PRow.	ESC defers to SCC as the Local Highway Authority with responsibility for PRow.	ESC defers to SCC as the Local Highway Authority with responsibility for PRow.
Change 5: Clarification of process for approved departures from certified control documents	No concerns	No concerns	No concerns	No concerns
Change 6: Refinement of the Traffic Regulation Order power	ESC defers to SCC as the traffic authority responsible under Article 24(2)(a) of the Order for determining applications from the undertaker to revoke, amend or suspend existing Traffic Regulation Orders	ESC defers to SCC as the traffic authority responsible under Article 24(2)(a) of the Order for determining applications from the undertaker to revoke, amend or suspend existing Traffic Regulation Orders	ESC defers to SCC as the traffic authority responsible under Article 24(2)(a) of the Order for determining applications from the undertaker to revoke, amend or suspend existing Traffic Regulation Orders	ESC defers to SCC as the traffic authority responsible under Article 24(2)(a) of the Order for determining applications from the undertaker to revoke, amend or suspend existing Traffic Regulation Orders
Change 7: Ensuring that variations to the Deemed Marine Licence have effect without a parallel change to the Order	No concerns	No concerns	No concerns	No concerns
Change 8: Drafting corrections to the Order	No concerns	No concerns	No concerns	No concerns